



Code of Ethics and Business Conduct

1 April 2022



MESSAGE BY PRESIDENT & CEO KERRY MOK

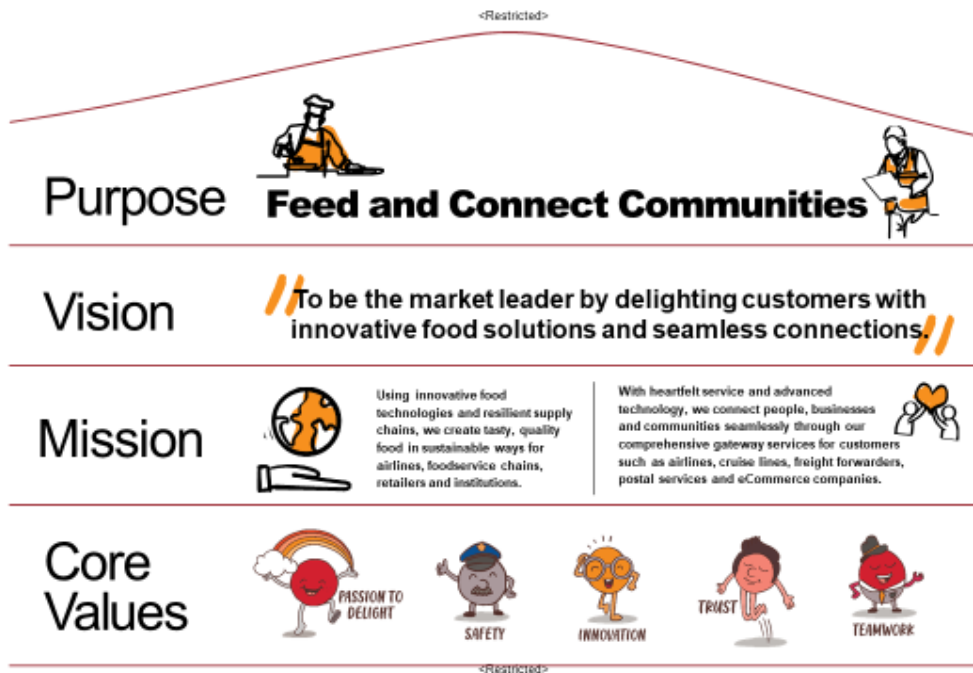
At SATS, we believe how we do our work is as important as what we do. We have embodied this in our Code of Ethics and Business Conduct ("**Code of Ethics**"), to set out the expectations clearly on how we deal with our stakeholders, customers, business partners, colleagues, suppliers and each other. We are committed to upholding the highest standards of integrity and business conduct. We believe that while we carry out our purpose to feed and connect communities, we must do so ethically - that is the boundary within which we operate. We recognise that ethical business is good business for the long term.

Wherever we operate, we comply with all local laws and regulations, company policies and operating procedures. We want SATS to continue to deliver on its purpose and promise to the community and stakeholders in an honest, ethical and lawful manner. We are committed to our five core values which guide us as we go above and beyond to deliver quality food solutions to our customers and customised gateway services to some of the best airports in the world such as Changi Airport and beyond aviation.



This Code of Ethics defines our commitment and applies to all our SATS subsidiaries worldwide.



I firmly believe if we all live our Code of Ethics, we will make SATS a great place to work and a great company to do business with.

PURPOSE, VISION & MISSION



We do what we say. We live by our core values.

	Understanding the needs of customers from our hearts to meet or even exceed their expectations
	Meeting all our safety standards
	Keeping an open mind to drive the growth of our communities, businesses and individuals

	<p>Having empathy, taking responsibility and keeping our promises</p>
	<p>Working together to achieve our common goals</p>

Key Highlights

Our Code of Ethics provides guidance to our staff on the ethical behaviour that is expected in carrying out their roles and responsibilities and when they deal with our various stakeholders.

Our staff are also required to comply with the SATS Code of Conduct which sets out the standards of behaviour according to which we deal with our customers, business partners, colleagues, suppliers and one another.

1. No Bribes

SATS is fully committed to conducting business with integrity, consistent with the highest ethical standards, and in compliance with all applicable laws and regulatory requirements for the prevention of corruption and bribery. We do not tolerate bribery or corruption in any form (be it the offering of bribes, receipt of bribes, undue payments, kickbacks, personal financial advantage, or any other benefit, whether in cash or kind).

SATS employees may offer and accept reasonable legitimate hospitality given in the normal course of business. However, in all cases they must ensure that the gift or benefit is offered as an expression of goodwill and not in expectation of a return favour and must be in compliance with the Gifts & Entertainment Guidance paper.

2. Fair Competition and Commitment to Customers

We compete fairly and honestly, observing all applicable anti-trust and competition laws. We are truthful and do not make misleading statements about offerings of our food and services. We aim to offer food and services that are safe, hygienic, innovative

and relevant to customers' needs. We take customer feedback seriously and aim to resolve any concerns in a quick, friendly and professional way.

3. Personal Conflicts of Interest

In the course of work, our employees will have many dealings with third parties, which may in some instances give rise to situations where the employee's personal interest conflicts with SATS' interest. Employees must avoid all conflicts of interest with SATS interests. "Personal interest" includes those of the employee's family members, i.e. spouse, children, siblings, parents and parents-in-law.

Employees are required to immediately notify in writing all actual or potential conflicts of interest to their immediate reporting officer and the Human Capital Team.

4. Workplace Safety & Health

Workplace safety is of paramount importance to our business. We ensure that all employees and contractors are adequately trained to perform their tasks competently and we insist on strict adherence to standard operating procedures and safety rules.

5. Workplace Harassment and Fair Treatment

At SATS, every employee will be treated with fairness, respect and dignity purely on merit, performance and achievements and without personal favouritism. No employee shall be subject to abuse or harassment in any form whether physical, psychological, verbal, sexual, discriminatory or aggressive behaviour. SATS has zero-tolerance for workplace harassment and any act of workplace harassment will result in serious disciplinary action.

6. Business Partners

SATS works with a broad range of business partners including customers, agents, representatives, consultants, subcontractors, and suppliers. SATS is committed to the principles of fairness and excellence in our dealings with all of them and expect the same commitment in return. Our selection of such partners is based on their professional expertise, quality, performance, value-add and/or competitiveness.

7. Speaking Up & Whistle Blowing

We want to make sure SATS continues to be a safe and fair place to work. All employees and stakeholders are encouraged to speak up and report any violations of our Code of Ethics or any fraudulent or unethical behaviour by our employees.

If you see or suspect something wrong, you may report it through: -

- (a) your reporting officer/immediate supervisor/superior;

- (b) the managers in your business unit;
- (c) functional heads at SATS such as Human Capital, Ethics & Compliance, Internal Audit or Legal; or
- (d) SATS Whistleblowing Service at the Email Address: tipoffs@sats.com.sg or via the other contact channels as detailed in our website - [Whistle-blowing \(sats.com.sg\)](https://www.sats.com.sg/Whistle-blowing).

At SATS, we do not tolerate retaliation or retribution. Employees who raise a genuine concern will not be at risk of being terminated or suffer retribution or harassment. We will not penalise employees who report concerns **in good faith** even if on closer investigation these turn out to be unfounded. However, the Company will not condone any frivolous, mischievous or malicious allegations. Employees making such allegations will face disciplinary action in accordance with the Company's disciplinary procedures.

8. Sustainability

Our sustainability framework supports our core purpose to feed and connect communities, and outlines how our contribution to global sustainability challenges will drive the future success of SATS as a business. As a company, we integrate our sustainability goals into our business goals, making sustainability a vital facet of our business strategy.

Our refreshed sustainability framework has three focus areas – i.e., to reduce and process food and packaging waste sustainably, to build smart infrastructure to reduce our environmental impact, and to develop skills for the future.

9. Charitable Donations and Political Neutrality

As part of our corporate social responsibility, our goal is to touch four million lives by 2030 through social and community investments that impart our expertise and empower people to fulfil their fullest potential. SATS and its employees donate time and money to meet this goal. We apply the same standards of professionalism in our charitable donations as we do with our business partnerships. We only provide donations to organisations that serve a legitimate purpose and are themselves subject to high standards of transparency and accountability.

Our contributions will always be transparent and properly documented. All charitable donations are approved by the SATS Foundation Steering Committee chaired by the President & CEO of SATS.

SATS does not make donations to political parties nor to any cause that might bring disrepute to the Group.

10. Public Communication

We want to engage with the public in an honest, open and consistent manner. All media inquiries are to be directed to our Public Affairs team. If you are representing SATS at an external event, please ensure Public Affairs is engaged to review your materials/statements.

11. Personal Data Protection

SATS is committed to acting responsibly with regards to the personal data it holds within its various systems. Such personal data contains important, personal information on our staff and customers and we have developed appropriate policies to prevent abuse. Employees who handle personal data must comply with the obligations in the Personal Data Protection Act 2012 and SATS policies.

12. Compliance with Laws and Regulations Wherever We Operate.

SATS complies with both the letter and the spirit of all local and international laws and regulations in the different locations where we operate. We each have a personal responsibility to understand and comply with all applicable laws, rules, regulations and company policies as we perform our daily responsibilities.

Violation of our Code of Ethics

We believe that it is only by strict compliance with our Code of Ethics that we can achieve the desired ethical conduct at SATS. Therefore, any non-compliance may be subject to disciplinary action up to and including dismissal, and/or possibly legal penalties.

As you would have gathered, if we fail to live up to this Code of Ethics, we cannot uphold our reputation as an honest, ethical, fair and lawful organisation and employer.