



Sabon®

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A message from Kurt Ekert, President and CEO



At Sabre, we're committed to taking on the biggest opportunities and solving the most complex challenges in travel; all with a promise to uphold the highest ethical standards in everything we do. From forging partner relationships to closing key business transactions to simply interacting with fellow team members, each of us has an important responsibility to do the right thing, always.

The principles outlined in our Sabre Code of Conduct define the Company's philosophies for doing business every day. They detail our commitment to follow the law, make ethical decisions and maintain the highest Sabre values. As a trusted technology partner to travel companies across the globe, these are more than guidelines – they're expectations.

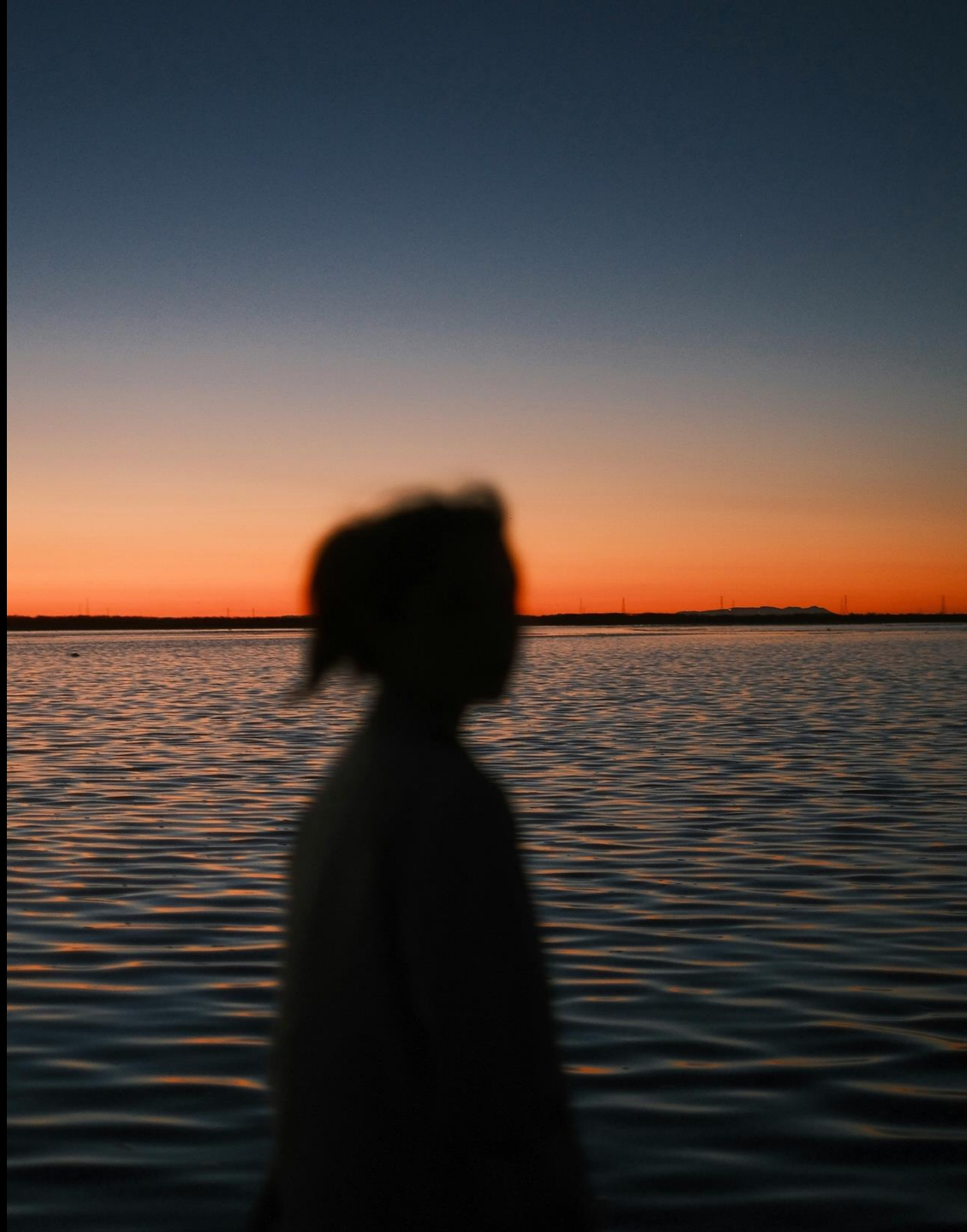
Beyond abiding by the policies set forth, each of us is empowered to report any concern that is not consistent with our fundamentals. We pledge to take any such issue seriously and protect every individual who raises a concern in good faith.

Through a collective commitment to abide by the Sabre Code of Conduct and embody our shared values, we will all move the business forward with honesty, credibility and integrity.

Kurt Ekert
President/CEO

01

We Understand the Code





About the code

Team members at Sabre Corporation and its subsidiaries (“Sabre” or the “Company”) are expected to maintain high ethical standards, conduct Sabre business responsibly, and follow Sabre policies and the law.

The Sabre Code of Conduct helps us put our commitment to winning together into action every day. By making sure every team member knows and follows the code, we can ensure we’re doing business according to high ethical and legal standards. When we all adhere to it, we contribute to Sabre’s success together.

Sabre may update the Code as needed to meet our business needs, address changes in the law or for other reasons. We also have additional policies that supplement the Code, which are referred to within it.

If you have any questions or concerns, please reach out to the Compliance & Ethics Office.

What if?

- Q.** What if there is a conflict between what is in the Code and the laws in the country I work. Which should I follow?
- A.** We are all required to adhere to both the letter and the spirit of the law at all times, regardless of where we live or work. If you have questions about this, please reach out to the Compliance & Ethics Office.

Need to report a concern?

Contact: Your manager or any Sabre leader, the Legal Department or the Compliance Office

Or access: SabreHotline.com
For your convenience, the hotline is available 24 hours a day, seven days a week, no matter where you are. Reports can also be made anonymously, where allowed by law.



See something, say something

You have a right and responsibility to report concerns and get help when you are uncertain about what action to take. **DON'T BE SILENT.** If you see something that needs to be reported, say something.

Sometimes, it may seem easier to stay quiet or look the other way, yet doing nothing about a known or suspected issue can have serious consequences for you, fellow Sabre team members and Sabre.

We are all responsible and accountable for preventing, detecting and reporting instances of noncompliance with the Code, Sabre policies and the law. We must also report any activity that could damage Sabre's reputation.

Any concerns or issues you raise will be treated seriously, fairly and promptly. Sabre will handle concerns or issues discreetly and make every effort to maintain, within the limits allowed by law, the confidentiality of anyone requesting guidance or reporting a possible violation. You have our guarantee that your comments will be heard.

Your personal data and your report will be treated in accordance with applicable Sabre policies and applicable law.

Remaining anonymous

Where allowed by law, you may also report your concerns anonymously using the following website and phone options located in the sidebar that are managed by our independent hotline provider, NavexGlobal.

For your convenience, the Sabre Ethics Hotline is available 24 hours a day, seven days a week, no matter where you are.

If you elect to remain anonymous, please provide as much information as possible so a reasonable investigation can be conducted.

Hotline info

SabreHotline.com

For your convenience, it is available 24 hours a day, seven days a week, no matter where you are.





What if?

When reporting concerns, be sure to include the following information. The more information you can give us, the better.

Who - Who is involved in this concern? This can also include people you have reported the concern to already, or people who may serve as witnesses or provide more information if needed.

What - What happened? Tell us the details of your concern, being as specific as possible.

When – When did this occur? Additionally, tell us if this is an ongoing issue or a one-time occurrence. If this is a pattern of behavior, a documented timeline of specific events will be helpful.

How - If you would like to provide us an alternative way of contacting you for further information, please be sure to include those details.

Where – If relevant, it could be helpful to let us know if the concern was related to an in-person or virtual meeting, or if it was on a phone call.

Attachments - If there are any attachments to support your concerns, like emails or screenshots, be sure to include those for our review as well.

The more thorough you are in your report, the quicker we will be able to review and start addressing your concerns.

No retaliation

Sabre does not tolerate retaliation against any employee, contractor or consultant who makes a good faith report; cooperates with an investigation or audit; or refuses to participate in activities that violate applicable laws, regulations, Company policies, or the Code. Any employee who engages in retaliation will be subject to disciplinary action, up to and including termination of employment.



Making good decisions

Making good decisions is imperative. Acting with integrity means doing the right thing, no matter what. If you're unsure about your decision, think through these questions:

1 →

Does my decision follow the Code and Sabre policies?

2 →

Does my decision support Sabre's goals?

3 →

Is my decision good for the company?

4 →

Does my decision follow all applicable laws?

5

Would I feel comfortable if others knew about my decision?

If you answer **NO** to any of these questions, do not proceed. Instead, stop and consult the [resources](#) at the end of this document for guidance on how to move forward.



Responsibility & accountability

All Sabre team members have a responsibility to:

Exemplify Sabre values and use good judgment;

- Follow the Code and Sabre policies;
- Obey the law; and
- Speak up.

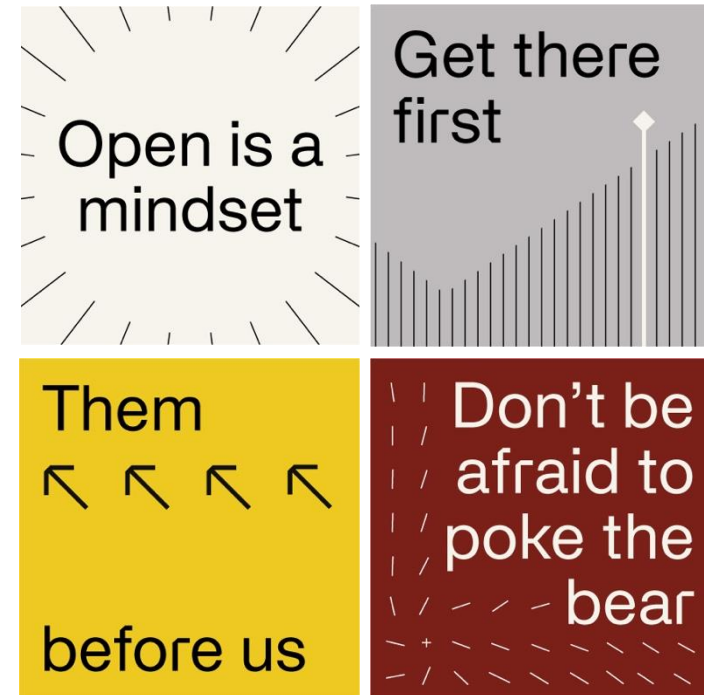
People leaders have an even greater level of responsibility:

- Lead by example;
- Take immediate action if concerns are reported to you; and
- Never retaliate against someone reporting a concern in good faith or cooperating in an investigation.

The Sabre Code of Conduct is an important part of your relationship with Sabre. We take this commitment to ethical principles very seriously and so should you. Violations of the Code and our policies may result in disciplinary action, up to and including termination.

Sabre values

We enable and empower our people to grow, embrace challenges and drive performance. We are committed to winning together.



02

We Are Global Citizens

As a global company, Sabre acknowledges and respects diverse cultures, customs and business practices.





Community and political activities

You may become involved in community and political affairs; however, do not bring these activities to work. These activities must be restricted to your personal time, resources and facilities.

You should excuse yourself from being involved in any decisions that might create or appear to create a conflict of interest and disclose your involvement via our annual Conflicts of Interest Questionnaire.

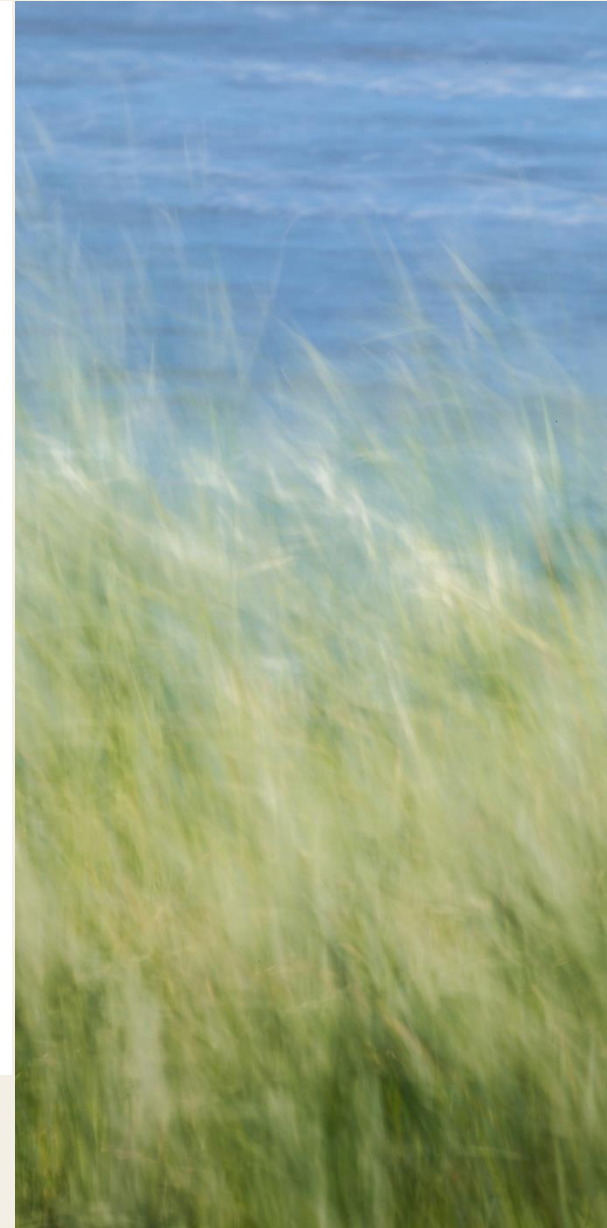
Sabre may, at times, also donate to charitable organizations. For charitable donations and contributions to community activities made on behalf of Sabre, be sure to complete the Charitable Donation Request form and obtain prior written approval before proceeding. Contact the Compliance & Ethics Office with any questions.

Support sustainability

Sabre is committed to integrating sustainability principles into the foundation of our business to better serve all of our stakeholders — from our people to our partners, from our customers to travelers around the world. As a leader in the travel technology space, we recognize the opportunities and responsibilities we have to advance global sustainability efforts.

As we look to the future, we are focused on decarbonization efforts within the travel industry and are committed to acting responsibly and intentionally to better enrich our communities.

Our suppliers are asked to comply with our requirements for social and environmental sustainability. To support these efforts and demonstrate our commitment to environmental sustainability, you are expected to adhere to these policies and perform your work in a way that is conducive to sustainability.





Human rights

Sabre is committed to fair employment practices and upholding human rights everywhere we operate. We are dedicated to combating slavery and human trafficking in our supply chain or any part of our business.

We are committed to the principles established under the United Nations Universal Declaration of Human Rights and do not knowingly conduct business with any individual or company that participates in the exploitation of children (including child labor), physical punishment, forced or prison labor (including wage slavery as defined by the UK Modern Slavery Act of 2015), or human trafficking.

We value our corporate responsibility and are committed to minimizing the impact of our global business operations. Sabre expects its suppliers to respect the human rights of their employees and others and to comply with relevant legislation.

Diversity, inclusion & engagement

At Sabre, we embrace the talents of every team member across the globe, enabling an inclusive and energizing environment for all. No matter where you are in the world, or what team you're on, we're confident you will find a community of colleagues who welcome diverse perspectives and unique life experiences.

Together, we enrich Sabre with diversity of thought, perspective and experience.

For more information on Sabre's I&D efforts, visit: [Inclusion and Engagement at Sabre](#).

ASPIRE

Asian Pacific Islander Representation and Empowerment in Tech

Ascenders

Professional Growth and Development

BGOLD

Black Generations of Leadership and Development

IDEAS

Individuals with Disabilities Empowered At Sabre

Pride

LGBTQ+

LIT

Latinos In Travel Technology

Veterans

Global Veterans

WCN

Women's Career Network

WIT

Women In Tech

03

We Promote a Safe and Ethical Workplace

It is expected that all Sabre employees treat everyone with dignity and respect. This includes coworkers, customers, suppliers, consultants and contractors.





Anti-Harassment and discrimination

Sabre encourages a creative, culturally diverse and collaborative work environment. We are committed to providing a workplace free of discrimination and sexual harassment, as well as harassment or discrimination based on race, color, creed, religion, sex, national origin, marital status, age, sexual orientation, gender identity characteristics or expression, genetic information, physical or mental disability, pregnancy, medical condition, or any other basis protected by law.

We will not tolerate discrimination or harassment of employees or non-employees with whom we have a business, service or professional relationship.

This applies to interactions with employees, customers, suppliers, and applicants for employment and any other interactions where you represent Sabre.

Accessibility

Sabre values the contributions of team members and strives to create working environments that are open and inclusive to all people, including those with disabilities.

Sabre will review requests for a work adjustment or reasonable accommodation to enhance workplace productivity and provide equal conditions and opportunities to prospective and current team members with disabilities. Please reach out to the People Team for any inquiries regarding accessibility or accommodation requests.

Health & safety

The health and safety of our employees is paramount at Sabre. Accordingly, employees must follow – and cooperate with officials who enforce – health and safety rules and practices.

This includes attending required safety training and immediately reporting all injuries and unsafe practices or conditions to management, the Global Safety & Security team, or to the Sabre Ethics Hotline.

Need to report a concern?

If you have been harassed or discriminated against – or have witnessed this behavior – report the incident immediately via the **Sabre Ethics Hotline**.



Workplace violence

Sabre will not tolerate any workplace violence, including physical violence, threats, intimidation, defacing Sabre property and causing physical damage to Sabre property or facilities. Threats also include domestic violence, intimate partner threats and personal threats of self-harm.

Please report any incidents immediately to the Global Safety & Security team. If there is an emergency, please contact the appropriate authorities first.

Alcohol use and drug-free workplace

While at work, you may never use, possess or be under the influence of any illegal or unauthorized controlled substance. You also may not have excessive amounts of otherwise lawful, controlled substances in your system – such as alcohol and over-the-counter medications – that impair your ability to work or make you appear to be “under the influence.”

Important

Nothing in our Code or policies prevents the appropriate use of legally prescribed medication.

04

We Follow the Law & Act with Integrity

The Company will comply with the laws and regulations that govern our operations, wherever we do business.





Anti-bribery and Anti-corruption

We win business by competing fairly. We never promise, offer, or receive bribes or kickbacks.

We comply with anti-corruption laws in all places we do business and expect the same commitment from our third parties. We:

- Never offer or accept anything of value to influence a business decision or to secure an improper advantage
- Follow all policies on gifts and entertainment, and understand the limits in all places we do business
- Take extra care when interacting with public officials, including employees of state-owned enterprises
- Follow all policies on vetting and oversight of third parties working on our behalf
- Keep accurate and complete books and records

Contact the Compliance and Ethics team or Legal with any questions or concerns

No Sabre employee or representative of Sabre will suffer adverse consequences for refusing to pay or accept a bribe or kickback, even if it results in a loss of business.

We also prohibit employees from making any “facilitating payments,” even if such payments may be legal under applicable law.

Insider trading

Never buy or sell stock if you are aware of information that has not been publicly announced and could have a material effect on the value of the stock. This applies to decisions to buy and sell Sabre and/or third-party stock, such as the stock of a Sabre supplier or vendor.

It is also against Sabre policy and may be illegal to give others, such as friends and family, tips on when to buy or sell stock if you have material, non-public information concerning that stock.

In addition, whether or not you have material, non-public information about Sabre, you cannot invest in Sabre stock derivatives, including hedging transactions, as well as transactions that involve options, warrants, puts, or calls or similar instruments related to shares of Sabre stock.

If you have questions about this policy, contact the [Legal Department](#).



Fair competition

Sabre complies with the applicable laws and regulations that promote healthy competition. Antitrust and fair competition laws generally prohibit contracts or activities that restrain trade or abuse a dominant position, or are deemed unfair competition with competitors or consumers. We conduct our business in compliance with these laws.

Please contact the Legal Department for specific guidance about the laws in your country if you need additional guidance on the types of contracts or activities that may implicate antitrust or fair competition laws generally.

Books, records and accounts

Sabre must maintain books, records and accounts that, in reasonable detail, accurately and fairly reflect the business transactions of the Company.

Our recorded information is used to make daily decisions, advise investors on our financial results and make required legal filings.

False or misleading entries are prohibited. No fund, asset, account or entity of Sabre may be established or acquired for any purpose unless the fund, asset, account or entity is accurately reflected in Sabre's books and records.

Employees who have accounting and finance responsibilities, and others who keep Sabre's official records, have added professional and legal responsibility. Employees must maintain books, records, accounts and financial statements in a manner that is both accurate and auditable.

It is against Company policy to make entries in Sabre's books and records that are intentionally inaccurate or conceal or disguise the true nature of any transaction.



Global trade compliance

We are committed to complying with applicable economic sanctions and trade controls.

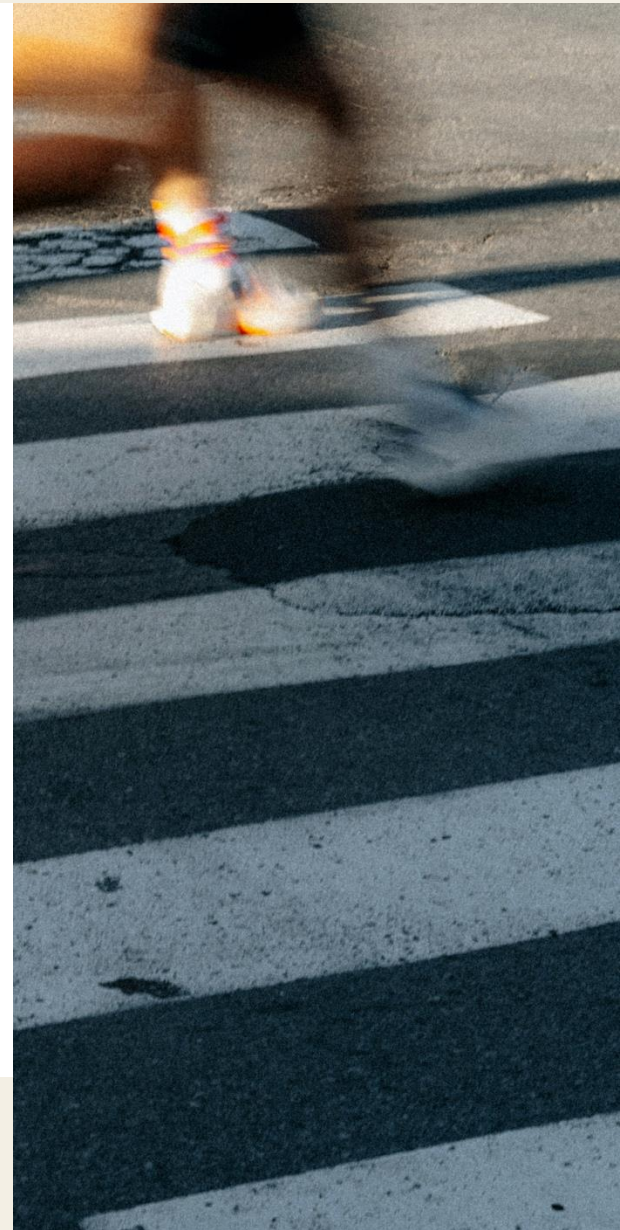
Economic sanctions and export controls may restrict or prohibit business dealings with specified individuals, entities or countries. Laws may also cover travel to or from a sanctioned country, imports or exports, new investments or business, and other related topics. Certain laws also prohibit approval, support, or facilitation of boycotted activities. Sabre complies with all applicable laws, no matter what.

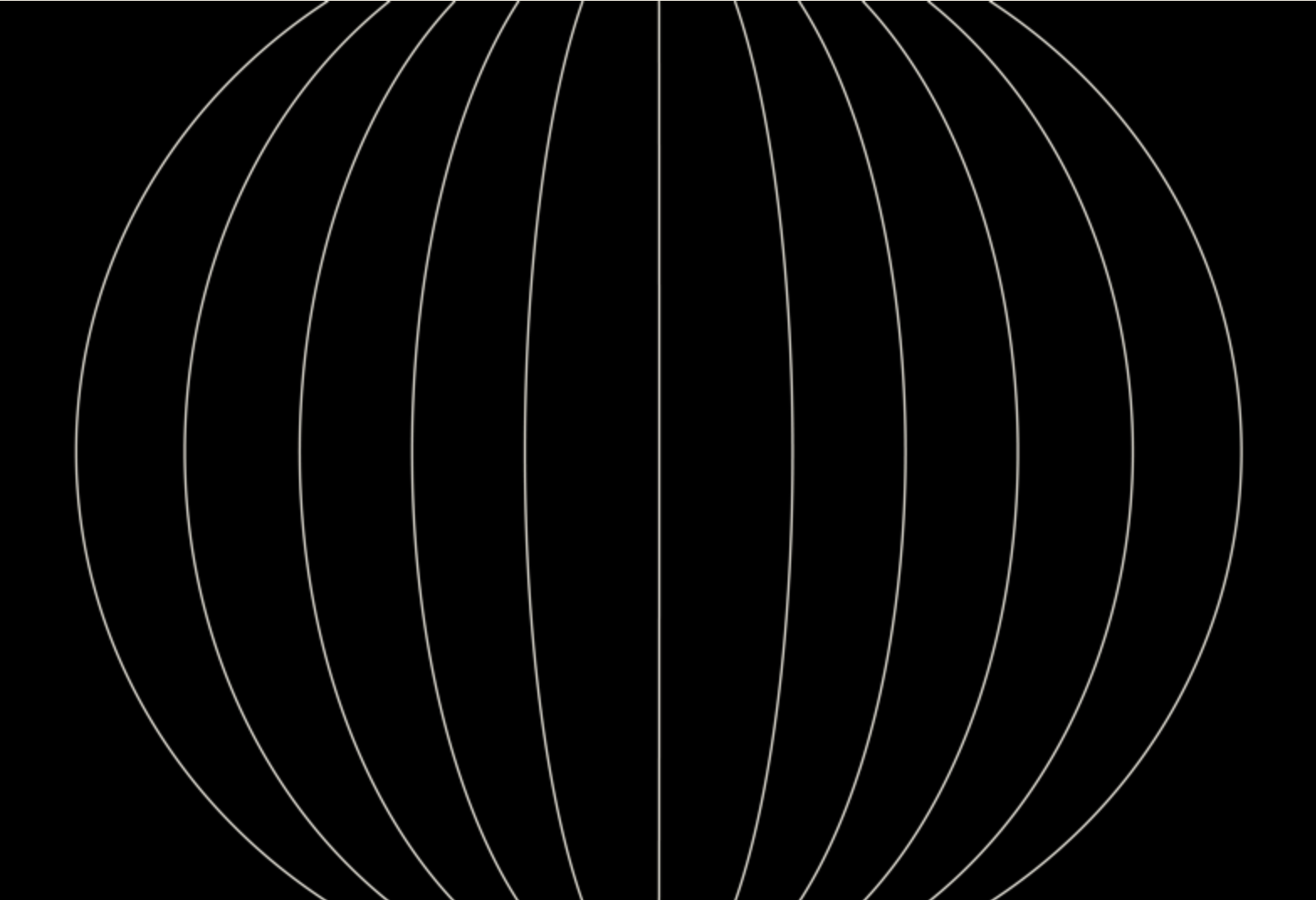
Sabre maintains policies and processes to help ensure none of our businesses or employees engage in a prohibited transaction.

If you have questions about Sabre's commitment to Global Trade Compliance, you can refer to our Sanctions Compliance policy, or reach out to the Compliance & Ethics Office.

If your work involves the sale or transmission of products, technologies, technical information or data, or services across international borders, check with the Legal Department to ensure you and Sabre comply with any laws or restrictions that may apply.

If you are supporting business in certain countries that have a higher risk of trade controls, be sure to check with the Compliance & Ethics Office before proceeding. You can find a list of those countries in the Sanctions Compliance policy, or on the Compliance & Ethics Office website.





Antiboycott laws

Several countries have introduced laws that forbid their nationals and businesses from being involved in or supporting trade embargoes or sanctions initiated by other nations.

In the U.S., for instance, antiboycott laws impose penalties on U.S. companies, like Sabre, if they or their subsidiaries or affiliates take part in or back international boycotts not recognized by the U.S. government.

Moreover, these laws mandate that companies report any instances where they are asked to participate in such boycotts. Employees who receive such requests should immediately report them to the Compliance & Ethics Office.

05

We Protect the Company





Your role

You are responsible for protecting and safeguarding assets and confidential information you have been given charge over for Sabre and/or our customers.

Examples of assets to be safeguarded include:

- Cash
- Supplies
- Software
- Equipment
- Company records

Sabre's confidential information may include:

- Trade secrets,
- Products,
- Intellectual property,
- Customers,
- Employees,
- Finances,
- Business prospects, and Methods of doing business.

Use and maintain these assets with care and respect, and guard against waste and abuse.

Privacy and protecting personal data and information/electronic resources

Sabre products and services often involve the processing of personal data. Personal data must be processed in accordance with data protection laws and regulations. Additionally, we agree to certain data protection and data privacy terms in our customer agreements.

These legal requirements address obligations related to data protection and other processing considerations, including requirements around the appropriate use and handling of personal data as well as the rights of data subjects.

You must follow all corporate privacy policies, security policies, and supporting standards and procedures when you engage in any business or practice or when you use applications or systems that involve the processing, use, storage or transmission of data and personal information.

Our policies and standards are consistent with applicable global data protection and privacy laws and the Code. This reflects our commitment and obligations that are associated with the data entrusted to us by our customers, suppliers and employees. If you have questions pertaining to data privacy, reach out to **Sabre's Data Privacy team**.



Confidential and proprietary information

You have legal and ethical obligations to protect Sabre's confidential and proprietary information and trade secrets (collectively referred to as Confidential Information), as well as the Confidential Information entrusted to us by our customers, suppliers and other business partners.

You must hold any and all Confidential Information in strict confidence and take reasonable precautions to protect such Confidential Information from unauthorized disclosure.

Confidential Information must only be used or disclosed on a need-to-know basis to conduct Sabre business. Depending on your role, you may be subject to additional obligations to safeguard Confidential Information in accordance with applicable non-disclosure agreements and/or in compliance with applicable laws.

You cannot use or disclose this type of information for personal advantage or for non-Sabre business use. Further, you must maintain the confidentiality of this information even after your employment relationship ends with Sabre.

Intellectual property

Sabre complies with applicable laws and regulations that govern the rights to, and the protection of, the intellectual property that belongs to Sabre and others.

This includes copyrights, trademarks, patents and trade secrets, intangible legal rights or interests evidenced by or embodied in any idea, design, concept, algorithm, technology, technique, invention, or other know-how, whether registered or unregistered and regardless of patentability or location, and all derivatives of any of the foregoing.

You must not use, copy or distribute a third party's intellectual property (whether from a prior employer, found online or in other publications, or otherwise) without proper authorization. You must not use, copy or distribute any Sabre intellectual property except as necessary for Sabre's own business purposes and subject to appropriate restrictions on further use, copying, or distribution.

Consult your manager or Sabre Legal if you are uncertain about whether any use, copying or distribution of intellectual property is permissible.



Guidelines for confidential information

When reporting concerns, be sure to include the following information. The more information you can give us, the better.

Never share - Confidential Information with friends, family members, and former colleagues or employees. There may be instances where certain information cannot even be shared with your co-workers.

Never discuss - Confidential Information in places where you may be overheard, including hallways, lobbies, airports and cafeterias.

Never work on documents - containing Confidential Information in public or where others can see them.

Only discuss - Confidential Information with your colleagues on a need-to-know basis.

Always restrict access - to Confidential Information posted on the intranet, other shared worksites and/or when you leave your desk.

Did you know?

The use of Artificial Intelligence (AI) is rapidly expanding.

As such it's important to remember to use AI responsibly, transparently, and always be sure to follow our policies and procedures. **If you're not sure, ASK.**





Avoid conflicts

A Conflict of Interest is any activity that is inconsistent with or opposed to Sabre's best interests or that gives the appearance of divided loyalty. Sabre team members must avoid any situation that creates a real or perceived Conflict of Interest.

Team members should promptly disclose any potential or real conflicts to the Compliance & Ethics Office.

To help protect the Company, as well as your interests, always disclose any of your relationships, associations or activities that create or could create actual, potential or perceived conflicts of interest. Sabre will then determine if there is a conflict or an appearance of a conflict, and how to mitigate those conflicts, if possible.

Refer to the Conflicts of Interest Policy for more information.

Types of conflicts of interest

- Board Participation
- Advisory Board Service
- Outside Employment/Activities
- Government Participation
- Outside Investment
- Close Relative/Family Member Employment (either at Sabre or a competitor/supplier)

Important

Actual, potential or perceived Conflicts of Interest should be disclosed by using the Conflicts of Interest Disclosure platform available through **Sabre's Compliance Hub**.

Please visit the **Compliance page** for more details if needed.



Gifts & Hospitality

You must never solicit gifts, hospitality, travel or favors of any value from persons or entities with which Sabre does business – currently or prospectively. You should also avoid acting in a manner that would place any suppliers or partners in a position where they feel obligated to make a gift, provide hospitality or provide personal favors to do or continue to do business with Sabre.

Refer to the Gifts & Entertainment Policy or contact the Compliance & Ethics Office for more information.

Customer events hosted by Sabre or attended by Sabre often involve gift giving and hospitality and therefore must comply with this principle.

Here are some factors to keep in mind when offering or accepting gifts and entertainment:

Value: Gifts and entertainment should be of modest value like Sabre-branded items, refreshments or a business lunch. We should never offer or accept anything that does not have a business purpose or that could be considered extravagant.

Frequency: The exchange of gifts and entertainment should be infrequent. Offering or accepting gifts, entertainment, meals or business travel too often could make it appear that the business relationship is not completely impartial.

Timing: We must consider the timing of contract renewals and other significant decisions when offering or accepting gifts and entertainment to ensure that our business dealings are not biased. We must avoid the appearance that any business courtesy is an attempt to influence a business decision.

Cash and equivalents: In general, it is against Sabre's policy to offer or accept cash or cash equivalents (including gift cards or vouchers).

Legal and compliant: The exchange of gifts and entertainment must be legal and must comply with the giver and receiver's policies. Remember that laws vary across countries, and activity involving government officials and employees may be subject to strict limits and require pre-approval from the Compliance & Ethics Office.

Open and transparent: Gifts and entertainment must be given openly and must be properly recorded in Sabre's books and records. Items given or received using personal funds or through family members and third parties are prohibited.

Closing Thoughts from Rochelle Boas, Chief Legal Officer



We believe our people are the heartbeat of Sabre technology. That's why our shared commitment to the Code of Conduct outlined above is crucial. By embracing compliance in our daily actions, we set a positive example – both internally and externally – that Sabre is a strong, trustworthy organization.

It takes the vigilance and proactive approach of each and every one of us to maintain our high standards. Whether you're interacting with clients, working hands-on with our innovative technologies or contributing to the business in an essential supporting role, we all play a part in ensuring we adhere to laws, regulations and our own internal policies. Observing the code not only strengthens the company today, it also fortifies our path toward the Sabre of tomorrow.

Thank you for your dedication to this critical aspect of our business and for being an essential part of making travel happen.

Rochelle Boas
Chief Legal Officer



Helpful resources

Use this Sabre Code of Conduct as your first source for information about ethics and standards of conduct.

If you're ever unsure or have a question, concern or disclosure related to Sabre's Code of Conduct, you can always contact the Compliance & Ethics Office or make a report through the Sabre Hotline.

Resources:

[Sabre's Corporate Policies](#)

[Sabre Legal Department](#)

[Sabre Compliance & Ethics Office](#)

[Sabre Ethics Hotline](#)

Contacts:

General Legal inquiries

Sabre.Legal@sabre.com

Privacy inquiries

Privacy@sabre.com

Compliance & Ethics inquiries

Compliance.Office@sabre.com

Investor inquiries

Sabre.InvestorRelations@sabre.com

Global Safety & Security

Global.Security@sabre.com

Insider Trading inquiries

SECComplianceOffice@sabre.com

Media inquiries

SabreNews@sabre.com

IT Security inquiries

Help.sabre.com



sabre®



Thank
you