



Sabre[®]

Code of Business Ethics



At Sabre, integrity matters. It's how we commit to do business, treat others, make decisions, and hire and manage people.

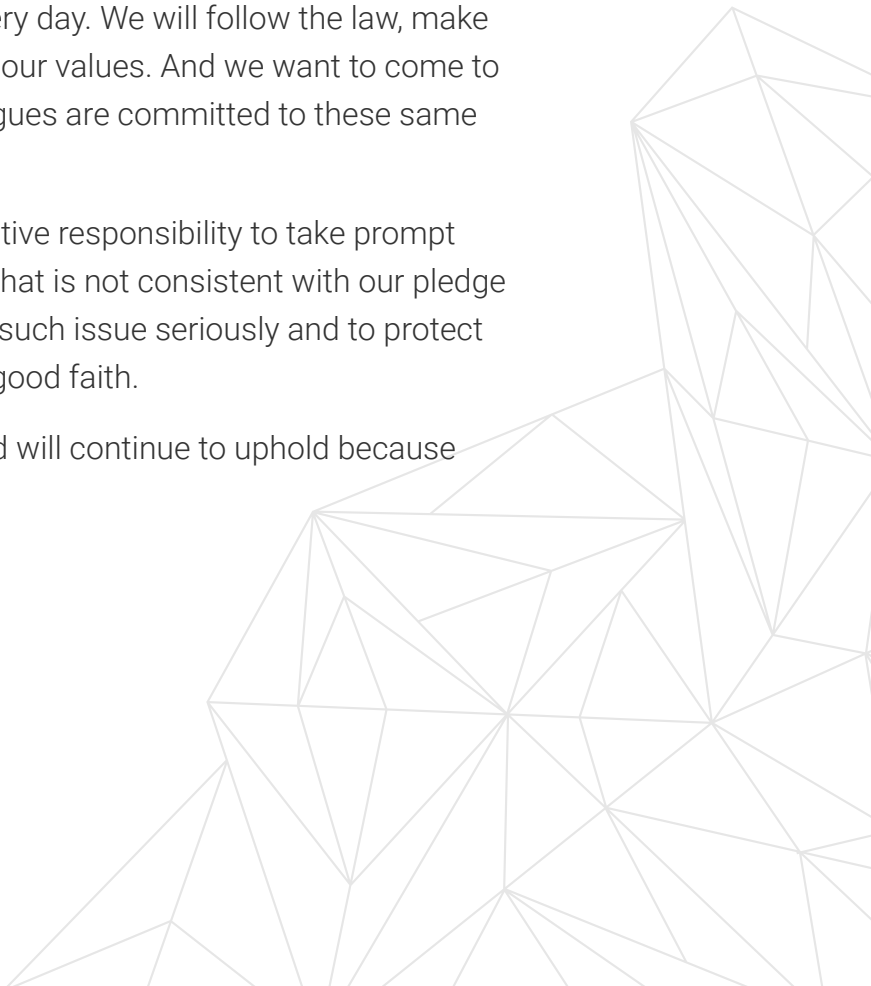
Integrity matters because it's an extension of our brand as we strive to meet the needs of our customers, deliver on our promises and maintain the highest ethical standards. As a trusted technology partner to companies around the world, we do not take this commitment lightly. We work to put our personal and corporate integrity front and center in our business relationships and in the value we deliver to the market.

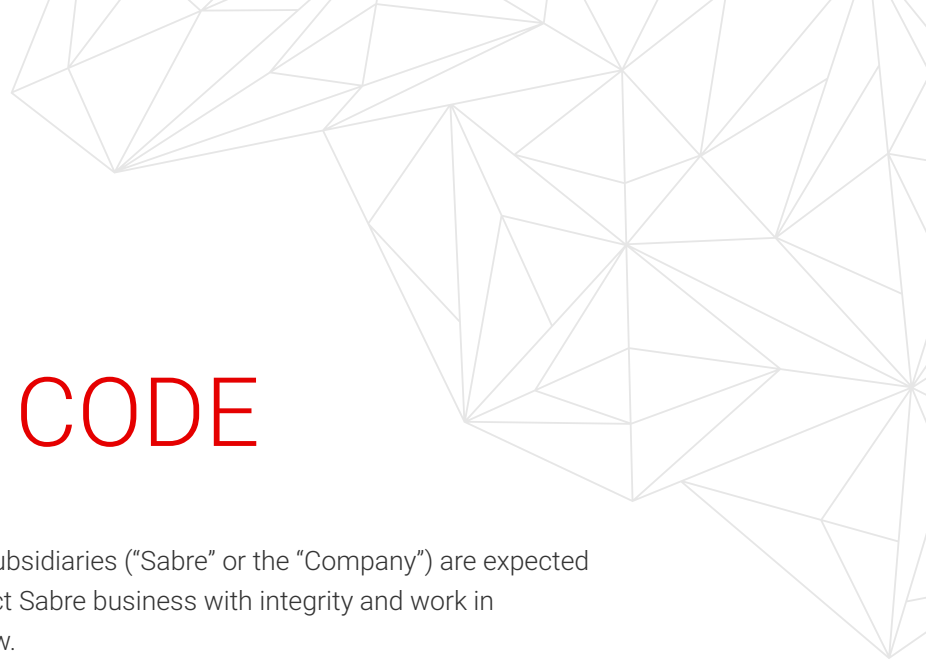
The principles in our Sabre Code of Business Ethics outline the way we conduct business around the world every day. We will follow the law, make ethical decisions, and not compromise our values. And we want to come to work each day knowing that our colleagues are committed to these same ideals.

In operating by the Code, it is our collective responsibility to take prompt action to resolve any issue or concern that is not consistent with our pledge to integrity. We also pledge to take any such issue seriously and to protect any individual who raises a concern in good faith.

This is the foundation we have built and will continue to uphold because integrity matters.

Kurt Ekert
President and CEO, Sabre





KNOW THE CODE

Employees of Sabre Corporation and its subsidiaries (“Sabre” or the “Company”) are expected to maintain high ethical standards, conduct Sabre business with integrity and work in compliance with Sabre policies and the law.

The Sabre Code of Business Ethics is one way we put our highest Sabre Value – integrity – into practice every day. Because we do business according to the highest ethical and legal standards, we expect all of our directors, officers, employees, contractors, and consultants to know and follow the Code. The Code is our guide to acting with integrity. When we follow it, we all contribute to the success of Sabre.

As Sabre employees and representatives, we have a personal responsibility to incorporate the principles of the Code into our work and encourage others to do the same. All Sabre leaders – from supervisors to senior executives – should ensure their teams follow the Code.

When needed, Sabre may amend the Code to better meet the needs of our business, address changes in the law, or for other reasons. Sabre also supplements the Code with policies, such as those referred to in this Code. To the extent the Code contradicts or is inconsistent with applicable law, the applicable law will apply.

If you have any questions or concerns, please contact our [Legal Department](#) or the [Compliance Office](#).



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01. REPORT CONCERNS

NEED TO REPORT A CONCERN?

CONTACT:

Your manager or any Sabre leader, the [Legal Department](#) or the [Compliance Office](#)

ACCESS:

[SabreHotline.com](#)

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

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.

Sometimes it may seem easier to stay quiet or look the other way, but doing nothing about a known or suspected issue can have serious consequences for you, your co-workers and the Company. You are responsible and accountable for preventing, detecting and reporting instances of non-compliance with the Code, Company policies, and the law.

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.

You can report your concerns or instances of non-compliance to Sabre management, [Legal Department](#), the [Compliance Office](#), or by accessing the [Sabre Hotline](#), hosted by NAVEX EthicsPoint, a third-party vendor. Anonymous reports are allowed but we encourage you to provide your contact details if you are willing to do so in an effort to investigate the matter more efficiently. We will process your personal data in accordance with Sabre's Privacy Notices. Your report will be treated confidentially in accordance with Sabre's policies.

Remaining anonymous

If you are uncomfortable in reaching out to Sabre directly, or want to remain anonymous when reporting, you can use the following website and phone options that are managed by The Network/Navex, an independent third-party company.

For your convenience, they are available 24 hours a day, seven days a week no matter where you are. However, if you remain anonymous, please provide as much information as possible so a reasonable investigation can be conducted.

NO RETALIATION FOR RAISING GOOD FAITH CONCERNS

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.



02. OBEY LAWS

As a global company, Sabre acknowledges and respects diverse cultures, customs and business practices. The Company will comply with the laws and regulations that govern our operations, wherever we do business.

Fair competition

Sabre complies with the laws and regulations that promote healthy competition. Anti-trust and fair competition laws generally prohibit activities that restrain trade and restrict competition. 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 anti-competitive activities.

Anti-bribery and anti-corruption

Sabre prohibits the payment of bribes and kickbacks of any kind, whether in dealing with government or foreign officials or those in the private sector.

We comply with the applicable anti-bribery, anti-corruption and anti-money-laundering laws of all the countries where we operate. We also require our third-party agents to comply with these laws when acting on our behalf.

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.



OBEY LAWS

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 and transactions that involve options, warrants, puts, or calls or similar instruments related to shares of Sabre stock.

Trade restrictions and export controls

Many countries periodically impose restrictions on exports and other dealings with certain countries, persons or groups. Export laws may control trading of commodities or technologies that are considered to be strategically important because they have the potential to be used for military purposes. Laws may cover travel to or from a sanctioned country, imports or exports, new investments, and other related topics. Certain laws also prohibit support of boycotted activities. Sabre complies with all these laws.

NOTE:

If your work involves the sale or shipment of products, technologies, or services across international borders, check with the [Legal Department](#) to ensure you and Sabre comply with any laws or restrictions that apply.

 **AVOIDING BRIBERY AND CORRUPTION IN THE GLOBAL WORKPLACE**



03. RESPECT OTHERS

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.

NOTE:

If you have been harassed or discriminated against or have witnessed such behavior, report the incident to Sabre management, the [Legal Department](#), the [Compliance Office](#) or access the [Sabre Hotline](#).

Health and 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 or to Human Resources.



RESPECT OTHERS

Workplace violence

Sabre will not tolerate any workplace violence, including physical violence, threats, intimidation, defacing Sabre property and causing physical damage to Sabre facilities.

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.”

NOTE:

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



04. PROTECT ASSETS

You are responsible for protecting and safeguarding any assets you have been given charge over for Sabre and/or our customers. Examples of assets to be safeguarded include cash, supplies, software, equipment and Company records.

Sabre's confidential information, which may include information about its trade secrets, products, intellectual property, customers, employees, finances, business prospects and methods of doing business, is also an example of an asset to be safeguarded. Use and maintain these assets with care and respect, and guard against waste and abuse.

Privacy and protecting personal data and information/electronic resources

Some data may be considered sensitive and require special care. 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 use, store or transmit data and personal information.

Sabre is committed to being a responsible steward of the data and personal information of its customers, suppliers and employees. This helps create an environment of integrity and trust with our customers and the business community, and ensures that Sabre complies with applicable global data protection and privacy laws.

Our policies and standards are consistent with applicable 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.



PROTECT ASSETS

Confidential and proprietary information

You have legal and ethical obligations to protect Company confidential and proprietary information and trade secrets ("Confidential Information"), as well as the Confidential Information of our customers, suppliers and other business partners entrusted to us. Confidential Information must only be used or disclosed, as necessary, to conduct Sabre business. 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 the 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.

GUIDELINES FOR CONFIDENTIAL INFORMATION



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.



05. AVOID CONFLICTS

TAKING ACTION:

Actual, potential or perceived conflicts of interest should be disclosed by emailing the Compliance Office at:

Compliance.Office@Sabre.com

The email should contain as much information as possible to help complete a review and provide a timely response.

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. Avoid any situation that creates a real or perceived conflict of interest.

Sabre cannot anticipate every possible conflict of interest situation you may face. Instead, Sabre relies upon your good judgment to uphold our principles. This means being aware of potential conflicts of interest where your personal life (activities, relationships or financial affairs) could or appears to inappropriately influence your judgment in performing your role and responsibilities at Sabre. All employees are expected to avoid activities, interests or relationships that would create a conflict of interest or the appearance that a conflict of interest might exist.

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. The Company will then determine if there is a conflict or an appearance of a conflict.

Interest in a competitor/supplier

You should never have direct or indirect interest in or involvement with any Sabre competitor or supplier if it might interfere with, influence or appear to influence your ability to perform your duties in Sabre’s best interest.

Diversion of business opportunity

If there is a business or financial opportunity that you know of or anticipate that Sabre would be interested in pursuing, do not keep it for yourself or divert it to anyone else.



CONFLICTS OF INTEREST



AVOID CONFLICTS

Gifts and hospitality

When conducting Sabre business, you must use good judgment, discretion and moderation when giving or accepting gifts or hospitality. Gift giving and hospitality practices may vary in different countries. However, any gifts or hospitality given or received must comply with the law, not violate Sabre policies or those of the giver or recipient, and be consistent with local custom and practice.

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 felt obligated to make a gift, provide hospitality or provide personal favors to do or continue to do business with Sabre.

NOTE:

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

GUIDELINES FOR GIFTS AND HOSPITALITY

BE REASONABLE

The item must be of nominal or reasonable value.

CUSTOMARY

The item is a customary business gift and would not embarrass Sabre if publicly disclosed.

NO FAVORED TREATMENT

The gift will not interfere with the exercise of independent judgment in the best interests of Sabre.

LEGAL

Giving or accepting the gift is legal in the location and under the circumstances where given.+

LOCAL CUSTOM OR PRACTICE

The gift is consistent with local custom and practice.

POLICY

The gift will not violate the giver's or receiver's policies on the matter.

+Money or cash equivalents as a gift is prohibited without specific written approval from the Compliance Office.

SOME GIFTS OR ACTIVITIES ARE ALWAYS PROHIBITED

- ✗ A bribe, kickback or anything with corrupt intent
- ✗ Anything of value that might otherwise create the appearance of impropriety or result in embarrassment
- ✗ Use of personal funds to accomplish what is otherwise prohibited by law or policy
- ✗ Gifts in violation of local law



06. BE RESPONSIBLE

We exercise good stewardship over Sabre's financial assets and spend the Company's funds in a responsible manner.

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 or account of Sabre may be established or acquired for any purpose unless the fund, asset or account 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 that are intentionally inaccurate or conceal or disguise the true nature of any transaction.

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.

Support sustainability

We are committed to reducing the environmental impact of our global business operations through best practice initiatives in our facilities, data centers and procurement practices. Our global facilities model best practices to help ensure we are reducing our energy, carbon waste and water usage.

Our suppliers are asked to comply with our requirements for social and environmental sustainability. To support our 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.



07. BE AWARE

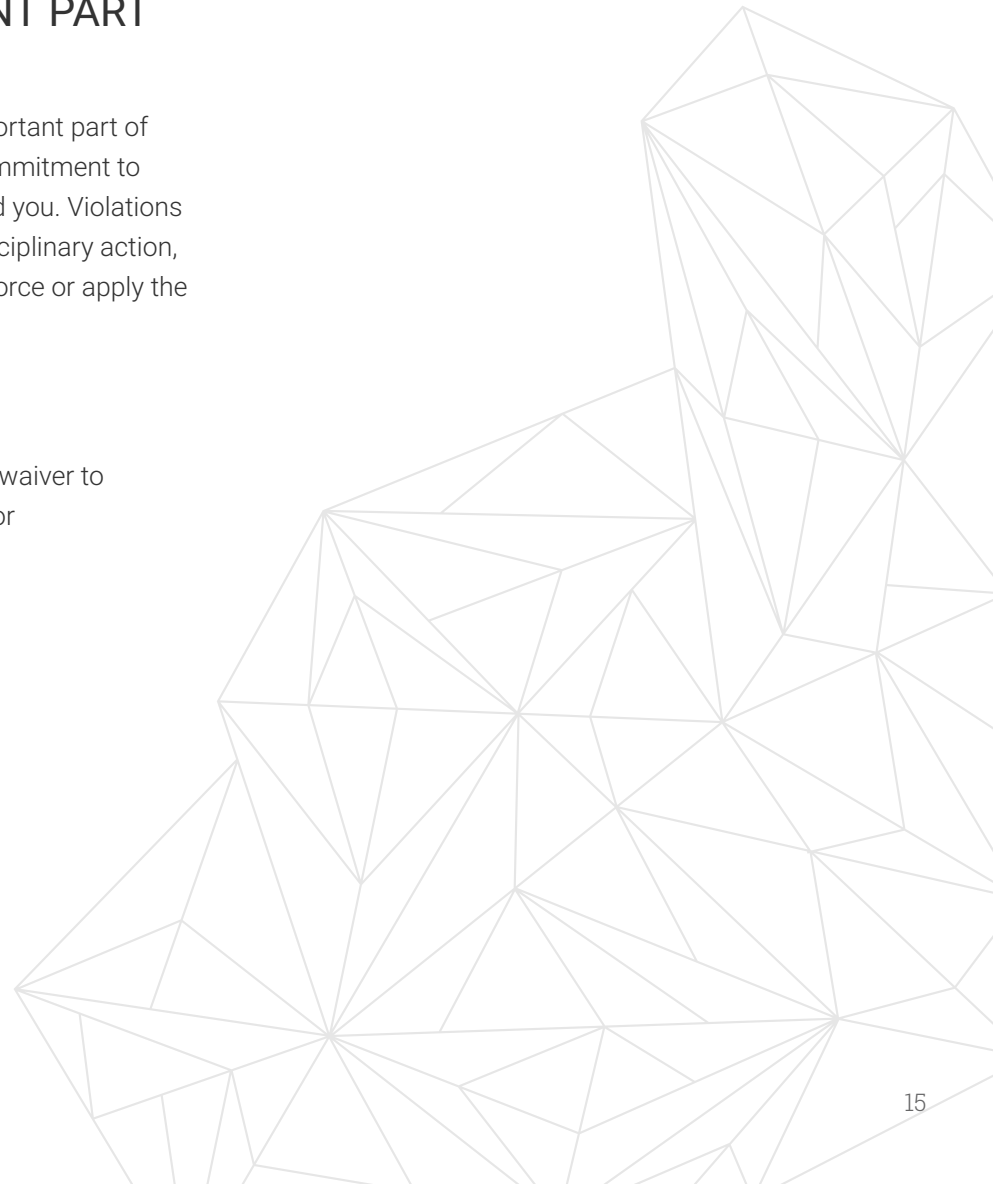


THE CODE IS AN IMPORTANT PART OF YOUR EMPLOYMENT

The Sabre Code of Business Ethics 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. We don't enforce or apply the Code in a way that violates the law.

Questions and waivers

Please direct any questions or requests for a waiver to any Code provision to the [Legal Department](#) or [Compliance Office](#).





08. CONTACTS & RESOURCES

Use this Sabre Code of Business Ethics as your first source for information about ethics and standards of conduct. For the most up-to-date version of the Code, please visit the Sabre compliance page.

Ways you can report or seek help

If you're ever unsure or have a question, concern, or disclosure related to Sabre's Code of Business Ethics or any policies contained therein, you can always contact the [Compliance Office](#), the [Legal Department](#) or make a report through the [Sabre Hotline](#).

Resources:

[SABRE ONLINE RESOURCES CORPORATE POLICY PAGE](#)

Contacts:

Legal inquiries

Sabre.Legal@sabre.com

Media inquiries

SabreNews@sabre.com

Privacy inquiries

Privacy@sabre.com

Investor inquiries

Sabre.InvestorRelations@sabre.com

Insider Trading inquiries

SECComplianceOffice@sabre.com

IT Security inquiries

help.sabre.com