



Code of Ethics & Business Conduct

Information
Membership
Environment
Protection
Values
Commitment
Antitrust
Safeguards
Integrity
Principles
Respect
Security
Workplace
Compliance
Rules
Principles
Law
Confidentiality



Dear Colleagues,

The mission of IATA is to represent, lead and serve the airline industry. With this unique privilege comes enormous responsibility. Our members have high expectations for how we will conduct ourselves in pursuing our mission.

The IATA Code of Ethics & Business Conduct (Code) exists to support us, ensuring that the behaviours and activities we undertake when working with our IATA colleagues, our member airlines and external stakeholders, live up to the promise and obligations of our mission.

The IATA Values are embedded in the Code:

- ONE IATA – we collaborate across teams;
- TRUSTED – we do the right thing;
- INCLUSIVE – we embrace diverse perspectives;
- INNOVATIVE – we make tomorrow better.

Embracing these values in how we approach our daily activities will guide us in conducting ourselves in an honest, professional, and inclusive manner.

I strongly urge you to familiarize yourself with the Code. It applies to all employees of IATA and its subsidiaries worldwide. It is not intended to be all-inclusive, but it does provide important information about IATA's established way of doing business.

We should all be proud of the vital work we do on behalf of this industry, and of the trust our membership have placed on our shoulders. Thank you for doing your part to create and maintain an ethical work environment as we carry out this mission.

Foreword	1
Definition & Applicability	3
Vision, Mission & Values	4
Compliance & Reporting Violations	6
Our Standards	7
Policies & Procedures	
Nondiscrimination, Diversity & Inclusion	
Harassment-Free Workplace	
Health, Safety & Security	
Fraud Prevention	
Conflicts of Interest	
Acceptance of Gifts	
Protection of Assets	
Financial Statements	
Political & Charitable Activities	
Employment Outside of IATA	
Regulatory Compliance	
Antitrust / Competition	
Anti-corruption / Bribery	
Economic Sanctions	
Industry Activities vs. Products & Services	
Resources for Assistance	15

Definition & Applicability

Definition & Applicability

To run our business effectively, IATA has a mission and vision statement.

Our Values define what we are as a company, the expectations of key stakeholders, and the behaviours needed to deliver on the promise of IATA's mission and vision.

Our Behaviours include specific ways in which we act or conduct ourselves, especially with others.

Our Code provides a standard, which acts as a guardrail to drive our behaviours based on a given situation.

This Code defines IATA's expectations and guiding principles for appropriate workplace behaviour and has been designed with consideration for our Values. It acts as a standing guide for handling business situations in an honest and professional manner. The Code helps us to make key business decisions, and promotes:

- Accountability for compliance with its standards of conduct and prompt internal reporting of any violations;
- Commitment to maintaining a respectful and safe working environment that is free of all forms of unlawful harassment and discrimination, and that protects employees and their personal information;
- Conduct that is honest and ethical, including the avoidance of actual or apparent conflicts of interest and appropriate rules governing the acceptance of business-related gifts;
- Confidentiality with respect to corporate and personal information;
- Protection and proper use of corporate assets and opportunities;
- Full, accurate, and timely financial reporting and disclosures;
- Compliance with applicable governmental laws and regulations;
- Fair dealings with our members, customers, suppliers and competitors.

This Code applies to all employees of IATA and its subsidiaries worldwide. It also applies to agents, consultants, contractors, and suppliers when they are representing or acting on behalf of IATA. The Code is not intended to be all-inclusive, but it does provide important information about IATA's established way of doing business.

The standards in this Code should be a part of your daily working practices. National laws and customs may sometimes require us to modify the practices that have been outlined here. If you need further guidance in applying them to your specific situation, or if you have any questions or concerns about the proper course of action, discuss the situation with your supervisor and/or colleagues in Legal Services, Internal Audit or PPD.

IATA has also partnered with EthicsPoint to offer our staff the ability to file a confidential, anonymous report of potential violations.

Please keep in mind that failure to conduct business in compliance with these guidelines may result in disciplinary action.

Our understanding of these standards will help to ensure that all of us conduct our business with uncompromising integrity and professionalism.

Vision Mission & Values

Our Vision, Mission & Values

Our Vision

To be the force for value creation and innovation driving a safe, secure and profitable air transport industry that sustainably connects and enriches our world.

Our Mission

IATA's mission is to represent, lead, and serve the airline industry.

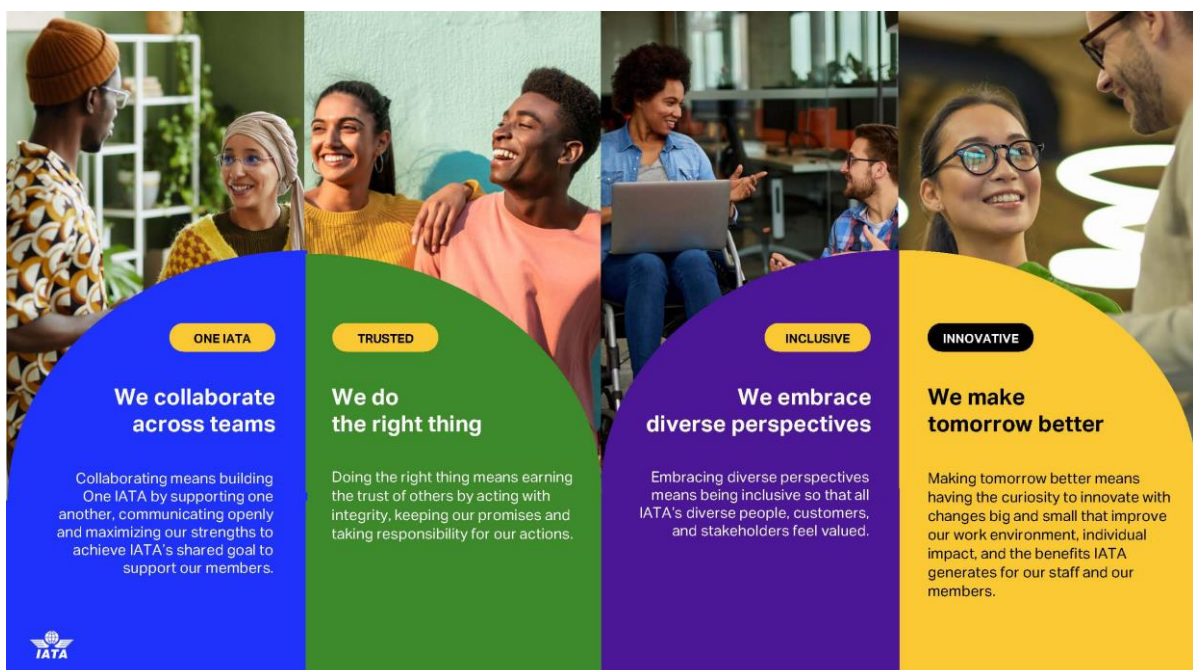
Represent the airline industry – We improve understanding of the air transport industry among decision makers and increase awareness of the benefits that aviation brings to national and global economies. Advocating for the interests of airlines across the globe, we challenge unreasonable rules and charges, hold regulators and governments to account, and strive for sensible regulation.

Lead the airline industry – We develop global commercial standards upon which the air transport industry is built. Our aim is to assist airlines by simplifying processes and increasing passenger convenience, while reducing costs and improving efficiency.

Serve the airline industry – We help airlines to operate safely, securely, efficiently, and economically under clearly defined rules. Professional support is provided to all industry stakeholders with a wide range of products and expert services.

Our Values

IATA's values are both a definition of what we value, what our key stakeholders expect of us, and how we must behave to deliver the IATA mission and vision. We come from many different backgrounds and cultures, and have different personalities, styles, and areas of expertise. We celebrate these differences. By embracing IATA's values, we will ensure that IATA is recognized and respected for the integrity that consistently characterizes the way in which its people act and behave.




ONE IATA
INNOVATIVE
INCLUSIVE
TRUSTED

BEHAVIOURS

We maximise our strengths

Do you...

- Engage each other's abilities—helping when you can and asking for help when you need it?
- Align individual efforts with the bigger picture of team and IATA objectives?
- Make it easy for others to help by setting realistic goals and simple structures/processes?
- Share information, ideas and learnings (including from mistakes) that could benefit others?



ONE IATA
INNOVATIVE
INCLUSIVE
TRUSTED

BEHAVIOURS

We are curious

Do you...

- Keep pace with how global changes impact your role, IATA, and aviation?
- Develop yourself by being open change, upskilling, and learning from mistakes?
- Experiment and take measured risks in pursuit of improvement?

ONE IATA
INNOVATIVE
INCLUSIVE
TRUSTED

BEHAVIOURS

We learn from one another

Do you...

- Seek diverse perspectives to challenge assumptions and make well-informed decisions?

ONE IATA
INNOVATIVE
INCLUSIVE
TRUSTED

BEHAVIOURS

We act with integrity

Do you..

- Show respect, dignity and consideration to all, including colleagues and stakeholders?
- Abide by our rules and protect sensitive information in line with IATA policies?
- Make ethical decisions in line with the IATA Code of Conduct?
- Speak truthfully and hold others accountable when necessary?


ONE IATA
INNOVATIVE
INCLUSIVE
TRUSTED

BEHAVIOURS

We communicate openly & honestly

Do you...

- Express ideas clearly and listen actively?
- Resolve conflicts promptly and harmoniously?
- Give and receive feedback with facts, empathy, and tact?
- Praise good achievements and behaviours



ONE IATA
INNOVATIVE
INCLUSIVE
TRUSTED

BEHAVIOURS

We continuously improve

Do you..

- Review your work, keeping what is working and changing what is not?
- Listen to colleagues and stakeholders to identify pain points and make changes?
- Focus on simplification and remove complexities to improve output and satisfaction?

ONE IATA
INNOVATIVE
INCLUSIVE
TRUSTED

BEHAVIOURS

We make everyone feel valued

Do you...

- Consider the impact of your words and actions on others?
- Keep processes and decisions free of bias and discrimination?
- Treat everyone as you would want to be treated?

ONE IATA
INNOVATIVE
INCLUSIVE
TRUSTED

BEHAVIOURS

We take responsibility

Do you..

- Keep your promises?
- Align actions with your words even when no one is watching?
- Own your mistakes, recognize their consequences, and learn from them?

Compliance & Reporting Violations

Compliance & Reporting Violations

All employees must comply with this Code. We all have a responsibility to ourselves, our colleagues, our members and our Association to conduct business ethically, legally, and in accordance with our Values and standards of professional conduct.

IATA will take appropriate disciplinary action, up to and including dismissal, in response to any violation of this Code. Individuals who violate the Code may also expose themselves to possible civil damages or criminal penalties.

In order to ensure that employees are aware and abide by the Code, an Employee Declaration shall be completed by each new employee upon joining IATA. Any employee may be required to complete and sign a Declaration at the request of IATA. Employees are also encouraged to participate in all available training opportunities to better understand the Code.

If an employee observes or suspects any violation of the Code, he or she should first inform his or her supervisor. If this is not appropriate for any reason, then he or she should contact colleagues in Legal Services, Internal Audit or PPD.

In addition, an [Ethics Hotline](#) has been established for the benefit of IATA and its employees. In some situations, individuals may prefer to use this hotline (independently hosted by EthicsPoint) which provides the option to file a confidential, anonymous report via telephone or the Internet.

EthicsPoint does not generate or maintain any internal connection logs with IP addresses, so no information linking your PC to EthicsPoint is available. Furthermore, calls to the hotline are answered by trained specialists at EthicsPoint. IATA reviews all reports and investigates matters when necessary. Depending on the nature of the report, the matter may be referred to Legal Services, Internal Audit, or PPD for further investigation.

When you file a report at the EthicsPoint website or through the EthicsPoint call center, you receive a unique username and are asked to choose a password. You can return to the EthicsPoint system again either by Internet or telephone and access the original report to add more detail, or answer questions posed by an IATA representative and add further information that will help resolve open issues.

Employees may raise their concerns regarding violations of the Code or other illegal or unethical conduct, without fear that they will be disciplined or terminated. IATA will not permit retaliation of any kind against an employee for reporting information in good faith, which means telling the truth, as the employee knows it to be, to a supervisor or a colleague within Legal Services, Internal Audit, or PPD.

For more information, tips and best practices on the Ethics Hotline visit the [IATA Intranet](#).

Our Standards

Policies & Procedures
Nondiscrimination, Diversity & Inclusion
Harassment-Free Workplace
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Fraud Prevention
Conflicts of Interest
Acceptance of Gifts
Protection of Assets
Financial Statements
Political & Charitable Activities
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Antitrust / Competition
Anti-corruption / Bribery
Economic Sanctions
Industry Activities vs. Products & Services

Our Standards

Policies & Procedures

Collectively, IATA's employees commit to maintaining a respectful and safe working environment. Respecting one another and our differences is a core value of our working culture. IATA employees are expected to maintain high standards of conduct, comply with IATA's policies and procedures, and conduct assigned duties to the best of their abilities.

The IATA Policy Guide brings together in one place the corporate policies that provide the standards of financial, operational and administrative practices for the entire organization. All employees must familiarize themselves with its content.

The purpose of these policies is to ensure that decision-making and actions are consistent with the missions and goals of the organization. IATA relies on the good judgment of all employees to ensure that both the spirit and letter of all policies are respected.

IATA policies are classified according to five categories: (i) Audit, Legal & Risk Management; (ii) Finance, Administration, Procurement, Planning & Projects; (iii) People, Performance & Development; (iv) Information Technology; (v) Communication & Marketing.

Deviations or non-compliance, including attempts to circumvent policies or procedures, may result in disciplinary actions, up to and including dismissal.

For more information consult the [IATA Policy Guide](#).

Nondiscrimination, Diversity & Inclusion

IATA respects, values and promotes diversity and inclusion in our workforce, as well as in our customers, our suppliers and the global marketplace. IATA's policy is to comply with all applicable laws and to provide equal employment opportunity for all applicants and employees without regard to non-job related factors such as race, color, religion, gender, national origin, ancestry, age, disability, marital status or sexual orientation. This policy applies to all areas of employment, including recruitment, hiring, training, promotion, compensation, benefits, transfer, and social and recreational programs.

For more information consult the [IATA Employee Guide](#).

Harassment-Free Workplace

IATA is committed to providing a workplace free of all types of harassment. IATA does not tolerate the harassment of employees by supervisors or co-workers and is committed to providing a work environment that protects employees from harassment in the workplace.

Harassment includes any conduct that creates an intimidating, offensive or hostile working environment or that interferes with work performance. Examples include racial slurs; ethnic or sexual jokes; intimidation tactics; distribution of inappropriate adult oriented material or offensive language on email or any other IATA computer or networks; or other similar conduct. Sexual harassment includes behaviours such as unwelcome sexual advances, or other verbal, visual or physical conduct of a sexual nature.

For more information consult the [IATA Employee Guide](#).

Health, Safety & Security

IATA is committed to providing a healthy and productive work environment and promoting safe and productive work practices throughout its operations.

IATA is committed to complying with all occupational health and safety laws, regulations and rules applicable to its business and operations. Employees thus have a responsibility to promote health and safety in the workplace and must report or correct dangerous conditions immediately so that workplace accidents are minimized.

The use of drugs and other controlled substances in the workplace for other than prescribed medical reasons interferes with a safe, healthy and productive work environment and is prohibited. IATA has a zero-tolerance policy for violence or threatening violence in the workplace. It is everyone's duty to prevent violence in the workplace. Employees can help by reporting promptly any workplace incident related to the health, safety and security of co-workers.

Fraud Prevention

IATA recognizes that it must guard itself against the possibility of fraud. To this end it has devised systems and will take specific measures that reduce its risk, including the investigation of suspected acts of misappropriation (e.g. theft of assets) or other similar irregularities such as corruption (e.g. conflicts of interest, bribery) and financial statement fraud.

All levels of IATA management are responsible for establishing and maintaining proper internal controls to ensure security and accountability for the resources entrusted to them.

IATA also recognizes that its employees can make a significant contribution to the prevention of fraud. Supervisors and employees should be familiar with the fraud risks and exposures inherent in their areas of responsibility, and be alert for any indications of improper activities, misappropriation, or dishonest acts.

Any employee who has knowledge of an occurrence of irregular conduct, or has reason to suspect that a fraud has occurred shall immediately notify their supervisor and/or a colleague in Legal Services, Internal Audit or PPD.

Conflicts of Interest

IATA employees should avoid any activity that is or has the appearance of creating a conflict of interest (i.e., being hostile, adverse or competitive with IATA) or that interferes with the proper performance of the employee's duties at IATA.

Employees have a contractual obligation and a duty to IATA. A conflict of interest occurs when an individual's private interest interferes or appears to interfere with the interests of IATA. In particular, employees must never use or attempt to use their position to obtain any improper personal benefit for themselves, for their families, or for any other person.

While it is not IATA's policy to prohibit the employment of, or doing business with, employees' family members or friends, employees are prohibited from participating, formally or informally, in any recruitment or procurement in which a family member or personal friend is competing.

Accordingly, employees must avoid direct or indirect conflicts of interest and all situations where their personal interests may conflict, or may be perceived to conflict, with their duties to IATA.

An employee's best course of action when uncertain whether circumstances may create a prohibited conflict of interest is to review the specific situation with his/her supervisor. If the

employee's supervisor concludes that there is or may be a perceived conflict of interest, he or she must consult with colleagues in Legal Services, Internal Audit or PPD.

If a conflict exists, it will be necessary for the employee to remedy the situation (through divestiture, formal walling-off from participation, or other prescribed measures) as a condition of continued employment.

Acceptance of Gifts

In many countries, gifts play an important role in business protocols and customs. However, when given inappropriately, gifts may violate one or more laws. The acceptance of a gift or other benefit by an employee can prejudice IATA's interests by affecting the employee's judgment or by creating an unfavorable impression. In a worst case scenario a gift, depending on the circumstances, may constitute bribery.

Employees shall use prudence in relations with customers and suppliers and ensure that their independent judgment will not be influenced or impaired in any way by the acceptance of any gift or benefit. Above all, employees must exercise care and good judgment.

Accepting gifts of a nominal or moderate value is acceptable in situations where business-related gift giving is legal, reasonable, and transparent and in accordance with local business practice, and the gifts involved are appropriate for the occasion. Nominal or moderate value is considered to be the equivalent of one hundred US dollars or less.

Employees must not, however, accept gifts of any kind in circumstances that could be perceived as inducing or influencing the recipient to give business opportunities to, or make business decisions in favor of, IATA. Since only gifts of nominal value may be personally accepted, if an item's value is unclear, the item should be returned. If it cannot be returned, it must be turned over to IATA.

The following items must never be accepted as gifts under any circumstances, regardless of value:

- Cash or other monetary instruments;
- Drugs or other controlled substances;
- Products, services or discounts not available to all employees;
- Personal use of accommodation or transportation;
- Payments or loans to be used toward the purchase of property (other than borrowing on commercial terms from entities that are in the business of lending).

When unsure about proper conduct, an employee should describe the situation to his or her supervisor, or colleagues in Legal Services, Internal Audit or PPD.

Protection of Assets

IATA's assets include physical assets, such as equipment and buildings, as well as our funds, intellectual property, and confidential information. Every IATA employee is responsible for understanding IATA's obligations for protecting these assets, including assets that have been entrusted to it by members, customers or suppliers. Employees also have an obligation to safeguard any IATA assets within their care and possession, whether physical or electronic.

To ensure the proper protection of its assets, IATA regulates their possession and movement, subject to the limitations imposed by local law. The sale, lending, donation, or modification of IATA's assets in any manner is prohibited without prior authorization.

In carrying out IATA's business, employees often acquire confidential or proprietary information about IATA, its members, customers, suppliers or other business partners. Employees must

maintain the confidentiality of all information so entrusted to them, except when disclosure is authorized or legally mandated.

Confidential or proprietary information of IATA, and of other companies, includes any nonpublic information the disclosure of which would be contrary to the interests of the company from which the information was obtained. All information that has been developed or acquired by IATA, including technical, financial and business information, and not generally disclosed is the property of, and confidential to IATA and must be protected against theft, loss or misuse.

Employees must not disclose confidential information to other employees without authorization from their supervisor unless it is reasonably required by them to perform their jobs. Employees must not reveal confidential information to third parties (other than approved auditors, lawyers, other professional advisors or financial institutions) without authorization by the Legal Services department. Such disclosure should be limited only to those who “need-to-know” and be made pursuant to a confidentiality agreement restricting the recipient from disclosing or using the information in an unauthorized manner.

Employees who gain access to information related to IATA or our business that is not known to the general public (“insider information”) are prohibited from using such information for any unauthorized purpose. Insider information may not be disclosed to anyone outside IATA, except for the purpose of conducting IATA business.

Personal information refers to information relating to an identified or identifiable individual. Employees who collect personal information from other employees or third parties on behalf of IATA must do so in a lawful, ethical and non-intrusive manner in full compliance with applicable laws and regulations.

Employees must take appropriate steps to ensure that all personal information collected by them is accurate and is retained for no longer than necessary or permitted by law. Employees are required to maintain the confidentiality of all personal information held by IATA.

Employees must not disclose such personal information to other employees unless it is required in the performance of their assigned responsibilities. Employees must not disclose such personal information to third parties unless required by applicable law or regulation (and then only to the extent required) or unless the informed consent of the individual in question has been obtained.

Financial Statements

All financial and other transactions involving or affecting IATA must be properly authorized and approved and fully and accurately recorded in the financial books and records of IATA in accordance with applicable laws and regulations, internal controls and procedures, generally accepted accounting principles and the highest standards of integrity.

The Director General & CEO and the Chief Financial Officer have the direct and primary responsibility to ensure full, fair, accurate, timely and understandable disclosure in IATA’s annual financial statements and any public disclosures. Disclosure Controls and Procedures refer to the policies and procedures which provide a reasonable assurance that all material information that could impact IATA’s consolidated financial statements is made known to the Director General & CEO and the Chief Financial Officer.

Since accurate records play a vital role in assuring the maintenance of high ethical standards, employees have a responsibility to record transactions accurately, completely and in a timely manner. Employees should never make false or artificial entries in any IATA records. They should never understate or overstate reports of sales or expenses, or alter any documents used to support those reports.

All of IATA's books and records are subject to review and audit. When employees are asked to respond to requests by internal auditors, legal staff and independent accountants, responses must be complete and truthful. Employees must include all relevant information, even if the request is not specific as to what information is required. If you know something that could be relevant, it must be disclosed.

Political & Charitable Activities

IATA is impartial with respect to domestic or international politics and political disagreements. Employees may participate in political activities as long as they do not do so on company time and do not use IATA resources.

Consistent with the demands of their positions at IATA, employees are encouraged as private citizens to volunteer for participation in local political or charitable activities. In doing so, however, employees are prohibited from representing, or creating the impression that they are representing, either IATA or its member airlines.

Employment Outside of IATA

All employees of IATA are prohibited from maintaining other employment outside IATA, whether compensated or not, without the express authorization of the Director General. This rule includes, among other forms of outside employment, membership on corporate boards of directors or advisors, and government boards, commissions, and councils.

Regulatory Compliance

IATA seeks to have open, honest and constructive relationships with all governments, regulatory and other similar bodies having jurisdiction or authority over IATA and its operations. All information provided by employees to governmental authorities must be full, fair and accurate.

IATA is determined to comply with the letter and spirit of all applicable laws and regulations. Accordingly, it is the personal responsibility of each employee to understand and adhere to the standards and restrictions imposed by those laws and regulations. Employees are therefore required to acquaint themselves with the legal and regulatory requirements applicable to their business responsibilities and to fulfill their duties accordingly.

Ignorance does not excuse a failure to comply. Questions concerning the applicability of any law or regulation should be directed to colleagues in Legal Services, Internal Audit or PPD. Specific compliance programs have been developed by IATA to ensure compliance with applicable laws and regulations.

Competition/ Antitrust

Competition and antitrust laws protect and promote free and fair competition in the marketplace for the benefit of consumers. Such laws exist in most of the countries where IATA conducts business.

Antitrust laws reflect the view that competitive markets provide consumers with the highest quality goods and services at the lowest prices. To further this, antitrust laws prohibit conduct that reduces competition by unfair means.

Competition laws also regulate how competitors may conduct joint activities. Many of IATA's activities involve the participation and co-operation of airlines that compete with one another, therefore familiarity with competition laws is essential for employees.

Since IATA's membership is comprised of companies who are in competition with each other, awareness of competition law requirements is an essential obligation of every employee. IATA makes formal training available to all employees. Every employee is responsible for becoming familiar with competition law requirements applicable to his or her activities. Questions relating to specific fact situations should be addressed to the Legal Services.

For more information consult the [IATA Policy Guide](#).

Anti-Corruption/Bribery

IATA is committed to doing business with integrity and the highest anti-corruption standards. Corruption violates the public's trust, threatens economic and social development, and hurts fair trade. To combat corruption, most countries have enacted anti-corruption/anti-bribery laws and regulations. These laws make it a crime to give, pay or promise 'anything of value' to influence an act or a decision to obtain, retain and/or direct business, or secure an improper advantage of any kind. In many jurisdictions it is also a crime to accept 'anything of value' in these circumstances.

Anything of value is defined as any form of benefit, which includes, but is not limited to:

- Cash or cash equivalents, loans, gifts or prizes;
- Employment offers or promises of future employment to an individual or his/her relatives;
- Favorable terms on a product or service or product discounts;
- Entertainment/hospitality (payment of travel, hotel, meals, living expenses, etc.);
- Use of vehicles or vacation homes;
- Discounted or free tickets to events;
- Services, personal favors, or home improvements;
- Political or charitable donations;
- Opportunity to purchase shares in a company with a connection to IATA.

A bribe is defined as 'anything of value' given to someone with the intent of obtaining favorable treatment from the recipient (e.g. obtaining or retaining business, to win a business advantage, or to influence a decision such as obtaining licenses or regulatory approvals, preventing negative government actions, reducing taxes, avoiding duties or custom fees, or blocking a competitor from bidding on business).

IATA seeks to have open, honest and constructive relationships with all governments, regulatory and other similar bodies having jurisdiction or authority over IATA and its operations. IATA is impartial with respect to domestic or international politics and political disagreements. Employees may participate in political activities as long as they do not do so on company time and do not use the financial or other resources of IATA.

All information provided by employees to governmental authorities must be full, fair and accurate. Care should be taken to avoid giving gifts that are intended to be innocent but may be construed as a bribe, especially with respect to gifts to government officials for which strict rules apply.

Government officials include any officer or employee (regardless of rank) of: (i) any national, provincial, regional or local government agency or department; (ii) any government owned/controlled company or commercial entity; (iii) any public (quasi-governmental) international organization; (iv) any political candidate, party or any officer or employee of a political party; (v) any private person acting in an official capacity for or on behalf of any government or public international organization.

IATA employees may not accept or offer a bribe directly or through a third party, regardless of nationality or local custom. When unsure about proper conduct, an employee should describe the situation to his or her supervisor, or colleagues in Legal Services, Internal Audit or PPD.

Economic Sanctions

Sanctions are punitive actions taken by countries against others for political reasons, either unilaterally or multilaterally. There are several types of international sanctions, including political, economic, etc.

Economic sanctions are typically punitive restrictions on doing business with sanctioned entities that governments apply to their own nationals or to activities within their territory. The sanctions are generally administered and enforced by domestic regulatory authorities.

These regulatory authorities also publish lists of specially designated nationals, which include individuals and companies owned or controlled by, or acting for or on behalf of, targeted countries and persons.

Economic sanctions vary from country to country (and may not include lists of specially designated nations), but generally when nations are targeted, domestic persons that hold or manage assets of a specially designated national may be barred from trading or effecting financial transactions. Furthermore, if a sanctioned individual majority-owns or controls an entity, sanctions may also apply to the business with that entity.

Canadian sanctions are of particular relevance to IATA employees around the globe. Canadian economic sanctions apply to all persons (which is broadly defined to include people and organizations) in Canada and all Canadian persons wherever situated, including corporations formed under the laws of Canada. Compliance with Canadian sanctions must be addressed in the context of every economic undertaking made by IATA; anywhere we operate in the world.

Because economic sanctions frequently affect IATA's ability to do business in certain countries and with certain individuals, and because such sanctions can change rapidly with geopolitical developments, IATA monitors such developments closely. IATA makes formal training available to all employees in order to ensure that they are sufficiently aware of the impact on their individual activities of economic sanctions and are able to identify potential violations before they happen. Every employee is responsible for taking this training and becoming familiar with economic sanctions law as applicable to his or her activities. Questions relating to specific fact situations should be addressed to Internal Audit or the Legal Services department.

For more information consult the [IATA Policy Guide](#).

Industry Activities vs. Products & Services

IATA's activities can be classified into Industry (i.e. trade association activities and industry services) and Products & Services.

Trade Association Activities: These core activities include standard setting, advocacy and external cost reduction campaigns, safety, security, operations, slots, passenger, cargo, ground-handling, environment, StB programs and distribution. Demand for these services and their prioritization is driven by the members' needs, which are established through the IATA governance process and the industry-wide interactions of IATA management with members.

Industry Services: These are the IATA services established to support and serve specific business processes for member airlines; examples include services such as the ISS (BSP & CASS), the IATA Clearing House, the Simplified Interline Settlement, the IOSA and ISAGO programs, and the MITA and Codes management services. As with the Trade Association Services, demand for these services and their prioritization is driven by the members' needs.

Products & Services: These include the Publishing, Business Intelligence, Training, Consulting, Strategic Partnership, Events and Payment Services that are operated by IATA in a competitive

environment, on a user-pays basis. Demand for these services and their prioritization are driven by market needs assessed by IATA. They must align with IATA's purpose and strategy. User Groups are established where they can be effective in driving market insight and service improvements. Service fees and prices are determined by IATA based on the value created by the service concerned and competitive market forces. The efficiency of Products & Services (P&S) is measured through their service quality, growth and financial performance.

IATA's Industry activities are supported and enabled by the organization's increasingly vital presence as a vendor of commercial Products & Services. What this means in practice is that IATA's airline members are also its customers. IATA's Strategic Partners are also frequently its competitors. Insufficient clarity about the need to keep its two essential roles separate, therefore, presents both legal and reputational risks, threatening the success of IATA's performance in both areas.

In pursuing its commercial activities in competition with for-profit providers, for example, IATA is prohibited by competition law from attempting to leverage its status as an airline trade association into an unfair competitive advantage. IATA must compete with other providers solely on the basis of the quality of its product or service, not on IATA's status as the world's premier association of airlines. IATA is a standard setter for airlines, but that does not mean that its commercial products and services are themselves "standards."

In negotiating commercial agreements with governmental or intergovernmental authorities, including ICAO, there should be clarity about the importance to our trade association role of maintaining the most effective relationships with such authorities in the interest of advocating our members' interests.

When developing new commercial products and/or services in the interest of enhancing IATA's revenue, IATA must be cognizant of the potential reaction of our members to such initiatives. For example, where a fee or tax imposed by a government is fundamentally objectionable to airlines serving that market, should IATA seek an agreement from the offending government in question to collect the fee or tax?

Such issues are not easily addressed through simple rules. They are typically complex and require the application of our best judgment. Accordingly, IATA's employees must be cognizant of the risks inherent in our association's dual roles. Whenever a question arises regarding a possible conflict between IATA's trade association status and its role as a provider of products and services, it should be elevated immediately to the appropriate MC member, who will then seek a prompt resolution from the MC and/or Director General.

Resources for Assistance

Questions about	Contact
Code of Ethics & Business Conduct	Chief Auditor, General Counsel or VP, PPD
Reporting violations	Legal Services; Internal Audit; PPD Departments; Ethics Hotline (iata.ethicspoint.com)
Conditions of employment, diversity, harassment, discrimination, personal information	PPD Department
Health, Safety, Security	PPD Department; CAP Department; ITS Department
Conflicts of Interest, Acceptance of Gifts, Corruption/ Bribery	Chief Auditor, General Counsel or VP, PPD
Antitrust Compliance	General Counsel
Anti-Money Laundering or Economic Sanctions Compliance	Director Sanctions, AML & CTF Compliance
Legal Policy, Confidential Information	General Counsel
Audit Policy, Fraud Prevention, Risk Management Policy	Chief Auditor
Corporate Finance Policy, Financial Books & Records	Director, Finance
Administration, Procurement Policy	Director, CAP
Planning, Project Policy	Director, CPS
Information Technology Policy	Chief Information & Data Officer
People, Performance & Development Policy	VP, PPD
Communication Policy	VP, Corporate Communications
Version 01.25 Approved by	January 2025 Management Committee