



Code of  
**Conduct**

Version 8.0  
May 2, 2024

 **GRUPO  
AEROMEXICO.**

# THE REASON BEHIND A CODE OF CONDUCT

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It is very important that all of us who work at the Grupo Aeromexico Companies share the same vision with respect to the Company's objectives and goals, and that we make sure that the way we conduct ourselves is always aligned to ethical principles and standards.

This Code establishes the vision, the values that guide our behavior and the commitments that we accept by being part of this Company, as well as the third parties that act in representation of Grupo Aeromexico, with the purpose of creating a framework of trust, honesty, transparency and lawfulness.

We must remember that this Code applies to all Collaborators of all the Companies of Grupo Aeromexico:

- **Aerovías de México S.A. de C.V.,**
- **Aerolitoral S.A. de C.V.**
- **Sistemas Integrados de Soporte Terrestre en México S.A. de C.V.**
- **Aerovías Empresa de Cargo S.A. de C.V.,**
- **AM Formación Interna S.A. de C.V.**
- **Integración y Supervisión de Recursos Corporativos S.A. de C.V.**
- **PLM Premier, S.A.P.I. de C.V.**

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# A message from Andrés Conesa:

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**B**eing part of Grupo Aeromexico implies living with unwavering integrity, acting with discipline and responsibility at all times, according to our behaviors and values.

As Aeromexico ambassadors, we must take responsibility for the impact of our decisions, respect our Customers and co-workers, as well as promote diversity and inclusion to build an environment where we feel free to be who we really are

Thus, knowing and guaranteeing compliance with our Code of Conduct becomes essential. Since it is there where the commitments that we adopt as part of Grupo Aeromexico are established, which, by living them every day, allow us to comply with the highest standards of ethics, corporate integrity and excellence.

As part of our continuous evolution, we have adapted the behaviors that make up the DNA of our company, through which we define our actions to continue bringing the best of Mexico to the whole world.

I invite you to carefully read this Code, reflect on its scope and importance, and apply it without exceptions, in order to become an ambassador of our values and, consequently, provide our colleagues and Customers with the best experience.

If you have any question, you can approach your direct manager, the Legal Compliance Area or your HRBP. Should you want to report any ethical fault or any situation that goes against this Code, remember that the Aeromexico Ethics Line is available, where you can report it confidentially.

Complying with our behaviors and values is essential to continue being the #1 option of our Customers and Collaborators.

**I count on you!**



**Andrés Conesa**  
Chief Executive Officer of Grupo Aeromexico

**Live with  
unshakeable  
integrity**





## Our purpose

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Elevate the journey to an extraordinary experience, taking care of ourselves and our world.



## Our vision

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To be the #1 choice for delivering the best personalized flying experience with a spirit of warmth and service.

# OUR VALUES

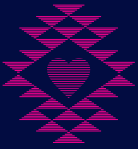


## Security

This is our main value. All of us at Aeromexico have a firm commitment to putting safety first, guaranteeing at all times the well-being of our customers and collaborators, complying with the highest safety, quality and hygiene standards in the industry.

## Consistency

Consistency over time builds trust. Consistency for Aeromexico is based on meeting expectations.



## Mexican Warmth

We are proud of our Mexican roots. Our country is a reference for service worldwide. The responsibility is even greater because we carry Mexico in our name. It is up to us to bring the best of our country to the world through our closeness, kindness and empathy.

## Integrity

All of us who are part of Grupo Aeromexico have a firm commitment to live with unshakable integrity, acting with responsibility and discipline, complying with the highest standards of ethics and excellence towards our customers, colleagues, partners and third parties in line with our values and behaviors.



## Innovation

Human-empowering technologies and processes. We use technology and processes as tools to improve the experience of:

- Our customers to make flying a personalized experience.
- Our people to make Aeromexico an agile and efficient company.

# OUR BEHAVIORS



Showing a genuine interest in the care and well-being of people; and following to the letter the rules, protocols and safety processes.



Acting with discipline and responsibility at all times according to our values and Code Conduct.



Creating extraordinary moments for our customers through warm, consistent and reliable service.



Being empathetic and authentic, fostering diversity and inclusion, and inspiring others to reach their full potential.



Collaborating as a single team, adapting quickly and creating efficiencies that help us reinvest in our people and business.



Having fun, taking control of your career and development, and celebrating our successes.

# My responsibility before the Code of Conduct

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The greatest responsibility of all of us working at or for Grupo Aeromexico is to do the right thing at all times, by complying with Laws, Rules, Regulations, Policies and Procedures established by the Company, in order to have a framework of trust, honesty, transparency and legality.

**Therefore, each of one of us is responsible for:**

- Always acting with unbreakable integrity, taking responsibility for your decisions, promoting free respectful expression to our customers, colleagues and workplace.
  - Creating a culture of compliance; understanding our responsibilities and following the rules at all times, even when no one is watching.
  - Becoming familiar with the Laws, Regulations and Rules that apply to our specific job.
  - With the elements provided by the company to meet our customers' expectations, anticipate their needs, take ownership of the situation by offering solutions and personalize our treatment.
  - Promoting compliance with health and safety regulations, the comprehensive well-being of your team, reporting irregularities that imply a risk and being reliable by complying on time, exceeding expectations.
  - Working in an agile way, avoiding unnecessary processes and focusing on projects that generate benefits for the business, encouraging innovation and quick and adaptable methodologies, creating efficiencies with fewer resources and synergies between the people on your team and other areas.
- Including, recognizing and listening to the contributions of people with different perspectives, avoiding assumptions and prejudices.
  - Taking control of your career and development by getting involved in activities that motivate you personally and professionally. Celebrating your successes, those of the company and those of others.
  - Reading, understanding, complying and participating in the trainings of the Code of Conduct, and other Company's policies. You can query the Code and other policies in the internal portal [miaeromexico.com](http://miaeromexico.com) or at [www.aeromexico.com](http://www.aeromexico.com).
  - Confirming in the means provided by the Company that you have read, understood and accepted your responsibilities according to the Code of Conduct (see Annex A).
  - Reporting any violation of the Code of Conduct and applicable policies through the Aeromexico Ethics Line and cooperating in the investigations carried out as a result thereof.

Send your complaints by telephone to 800 112 0585 from Mexico or to 1 800 921 2240 from the United States or for any other place dialing the prefix (00), or by e-mail to: [lineaeticaaeromexico@resguarda.com](mailto:lineaeticaaeromexico@resguarda.com), authorized channels governed by the principles of non-retaliation, confidentiality and anonymity.

In case of doubt, or if you are not sure if some of your actions or omissions can be misunderstood, **DO NOT DO IT!** Consult your Manager, your HRBP or the Aeromexico Ethics Line before acting.



# KEY QUESTIONS

## **To whom does this Code apply?**

To all Collaborators, whether national or international, regardless of their hierarchy level, including all the Companies that comprise Grupo Aeromexico.

Likewise, it also applies, when suitable, to our Suppliers, Partners, Clients and third parties that act on behalf of the Companies of Grupo Aeromexico.

## **Does this Code incorporate all our obligations?**

No, it is only a general guideline of the values, ethical principles and behavior that could be inappropriate, without limitation, that does not breach or contravene the provisions of collective bargaining agreements, labor rules and it is a supplement to valid National and International Laws, Rules and Regulations.

## **What should I do if I require more information?**

You have several options:

- Talk to your Manager
- Talk to your HRBP
- Call the Aeromexico Ethics Line
- Talk to the Legal and Compliance Corporate Division.

Send your complaints through our Ethics Line: [lineaeticaaeromexico@resguarda.com](mailto:lineaeticaaeromexico@resguarda.com) or call 800 112 0585 from Mexico, and 1 800 921 2240 for the United States or for any other place dialing the prefix (00).

Remember that our complaint hotline is managed by an independent third-party with experience in managing the report of unethical or illegal acts at Companies.

If you are ever in doubt if something is appropriate or not, or if it is not specified, ask yourself:

- Does this act comply with the Code of Conduct and our policies and/or with their spirit?
- What effect could my action have?
- Could it damage the reputation of the Company or my professional reputation?
- Would I feel comfortable if the decision or my participation therein become public?

If after asking yourself the previous questions you are still in doubt, we recommend you not to make any decisions and to consult it through the channels mentioned above.

## **Who supervises cases of breaches to this Code?**

Legal Compliance, Internal Audit, Labor Relations, and Human Resources, as well as the Ethics and Compliance Committee, are accountable for the surveillance of compliance with this Code, according to its areas of competence, to promote and adopt the proper corrective action to promote compliance therewith.

## **Are there any penalties for those who do not comply with this Code, as well as the Policies, Procedures and other standards of Grupo Aeromexico?**

Yes, we are all subject to the application of the disciplinary actions set forth in the Internal Labor Regulations and/or the Collective Bargaining Agreements, as well as those in applicable law, which may lead to termination of employment.

It is important to note that cases reported must be investigated, according to the established protocols, before taking any disciplinary action, which shall depend on the seriousness of the misconduct or the recurrence of the Collaborator.

## **Could there be any kind of retaliation when reporting any violation to this Code of Conduct?**

No, retaliation is prohibited against any Collaborator reporting any legitimate concerns or doubts about ethics or discrimination issues, or possible violations to the Code of Conduct.

However, all of us, Collaborators that belong to Grupo Aeromexico, must protect its assets and guarantee an efficient use; therefore, we must use responsibly the Company's hotlines (Aeromexico Ethics Line and Gam E-Report).

**Grupo Aeromexico** trusts that you will always use your good judgment, freedom of decision and common sense, with the highest levels of ethics and responsibility, in order to comply with all the provisions of this Code of Conduct, as well as with the policies, procedures, and general standards and to prevent – even seemingly – an improper behavior.

## 1.

### BE AN INCLUSIVE COMPANY IN COMPLIANCE WITH SOCIAL STANDARDS

#### 1.1 Equal Opportunities and Equity

In Grupo Aeromexico, the growth of our Collaborators depends on their performance, capacity, responsibility, and positive and service attitude towards work. Such factors determine the direction of the work life of each Collaborator and, therefore, any act of favoritism is completely prohibited.

The issues to be considered during recruitment, promotion, upgrade, and recognition processes should be transparent and equitable, taking always into account the profile required for each position.

A key element is active and constant training—regardless of the position or hierarchy level—that enables you to achieve an outstanding performance, while allowing you to be assessed as a competitive candidate to achieve professional growth.

#### 1.2 No Discrimination

Everyone at Grupo Aeromexico must encourage a working environment governed by respect, cordiality and tolerance, in which all the decisions and actions related to employment and service are made regardless of national origin, gender identity, age, disability, religion, economic or health status, opinions, sexual orientation, marital status, physical appearance or any other condition that undermines human dignity and, by itself, does not explain or has nothing to do with a strictly labor environment, and which is aimed at disturbing or voiding equality regarding the treatment of every Collaborator.

When, for traveling reasons, you must perform some of your job duties in the Company's offices or facilities abroad, you should try to get familiarized with local rules, traditions and practices, which may be different from those of your place of origin, and adapt your behavior in order to prevent any misunderstanding, always in compliance with the provisions of this Code.

We should all participate actively in the promotion and conservation of a respectful and inclusive working environment. In case of doubt, consult the internal standard applicable to diversity and no discrimination of Grupo Aeromexico.

#### 1.3 Harassment

Grupo Aeromexico has zero tolerance to any circumstance involving harassment, bullying, other irregular behavior, abusive treatment or any other act of violence. We define these concepts as follows:

- Harassment: any action, practice or behavior, considered inappropriate, humiliating, disparaging, intimidating or hostile, towards any person, which can be physical, written or verbal aggressions, up to and including those that may be considered as sexual harassment.
- Bullying from anybody hierarchically superior: the exercise of power in a relationship of real subordination of the victim to the aggressor in the workplace, which is expressed in verbal, physical behavior or both.
- Abusive Treatment: those acts consisting of insults, mockery, humiliation or ridicule of the worker, whether or not carried out in a continuous and persistent manner.

In case of submitting a complaint, through the Aeromexico Ethics Line, any other formal channel, or in case of being aware of any situation that violates this Code, Aeromexico shall carry out an investigation as quickly and discreetly as possible. In Aeromexico, there is no tolerance for such types of actions, and therefore, the application of disciplinary measures can lead to the termination of employment.

# 1. BE AN INCLUSIVE COMPANY IN COMPLIANCE WITH SOCIAL STANDARDS

## 1.4 Safety and Health, and Hygiene

We are all responsible for creating and preserving a safe and healthy working environment at all times, always complying with safety and hygiene rules. In Grupo Aeromexico, there are no business goals or results that justify risking the physical integrity of Collaborators, Customers or third parties.

For Grupo Aeromexico, safety is non-negotiable; therefore, it is your obligation to know and respect the special rules that govern your job activities, and to follow the measures determined by the Company to ensure compliance with applicable regulations, especially if you are a Collaborator subject to special regulations, such as pilots, flight attendants and technicians, among others.

At Grupo Aeromexico, we take care of the integrity of our Passengers, employees, colleagues, luggage and merchandise that we transport. For this reason, it is forbidden to smoke, eat or drink in all work areas, such as: Customer service counters, operational maneuvering areas, inspection points, warehouses or areas for the safekeeping of merchandise, luggage or supplies, vaults of securities, cold chambers, document archives and inside motor vehicles when you are transporting passengers, merchandise or luggage. Except for the exception for crews in the performance of

their duties, when the operation during the flight so allows.

In Grupo Aeromexico, health and hygiene are very important, for this reason, we created the "Health and Sanitization Management System" (HSMS), which is a system through which measures and procedures developed by the Company are managed, with the purpose of complying with the new obligations on health matters that must be observed at the national and international level, as well as the initiatives that have been created in the Company to safeguard physical integrity and improve the experience of Collaborators, Customers and third parties.

If you are aware of any act of violence against the property of the Company, its Collaborators or Customers, as well as threats or vandalism and the presence of weapons, or forbidden substances inside the Company's premises, or any other situation that you consider that may jeopardize the safety of Grupo Aeromexico, it is important that you report such issues to the security area through GAM e-Report.



# 2.

## LIVE WITH UNSHAKEABLE INTEGRITY AND BE RESPONSIBLE

### 2.1 My Work Performance

In Grupo Aeromexico, we strive to always have the best people in the best job positions, according to their skills, competences and attitude, in order to achieve an outstanding performance of their duties, always considering and respecting the business decisions and needs required by the Company.

Therefore, we are strongly committed to providing the necessary tools and resources, in order to develop and improve the talent, skills and knowledge of our Collaborators, according to our standards, policies and result-measuring systems in the search for agility and efficiency in our day to day.

It is the responsibility of each Collaborator to know the objectives, indicators and goals that correspond to their position, ask for guidance from their manager and to be accountable for their own results. In performance evaluations, education or training, besides considering the results, Collaborator's conduct is also of great importance, based on our values, behaviors and competences, this Code and the applicable policies.

This in order to ensure that each Collaborator is enjoying their work at Aeromexico, is developing comprehensively and taking into account objective factors for their job growth within Grupo Aeromexico, which is why we provide them with the tools and constant training to enhance their talent. If such development is not being achieved, actions such as professional growth plans or even job termination may be carried out.

### 2.2 Use of Assets and Benefits

At Aeromexico, we promote a healthy work environment and that all of us as collaborators can enjoy our daily activities to achieve our best experience. In this context, it is important to be careful and always think like an owner when using the assets and benefits provided to you by the Company, if applicable, for performing your duties, such as materials, tools, telephone and transport services, computer and technology equipment, facilities, office supplies, vehicles, as well as information about Customers, Suppliers, or distributors, among others. You should only use them to perform your activities within the Company and not for your benefit.

We are all accountable for safeguarding the tangible and intangible goods of the Company, including those from Customers and Suppliers that are under our control. The illegal appropriation and use of assets for purposes other than those established by Grupo Aeromexico constitutes a violation of the obligations contained in this Code, and can even constitute breach of trust or theft.

### 2.3 Use of Travel Benefits

It is strictly prohibited for Collaborators to, directly or indirectly, alter or manipulate without any authorization, the Company's systems or those belonging to third-parties, for their own or other people's benefit, especially those related to issuance and use of discount tickets, bookings, procedures at the airport, cabin and class changes, and attendance records, among others.

Likewise, the abuse or commercialization of labor or commercial benefits granted by Grupo Aeromexico (for instance, passes, discounts and premier points), on your own, or through third-parties, is strictly prohibited.

You are not authorized, for any reason, to use the Company's systems in a way that may result harmful to the Company. Any unnecessary, excessive or unauthorized use threatens the Company and may risk the continuity of such benefit for you, as a Collaborator, during your term of employment with the Company.

Depending on your position in the Company, you should read more on the applicable regulations, or the collective bargaining agreement, on passes, discounts and service commission.

## **2.4 Use of Drugs and Alcohol**

For your own safety, and that of your peers and for those who depend on you, in Grupo Aeromexico it is strictly prohibited to come to work under the influence of alcohol or drugs, as well as the sale, possession or distribution thereof within and outside the facilities of the Company.

You must always display a proper attitude when participating in off-hours activities, such as breakfasts, lunches, or dinners with Customers or Suppliers, as well as internal events or celebrations, conventions, international fairs and service commissions, among others, organized by the Company or which you attend in representation of the Company.

If you require medical treatment that includes the prescription of drugs, consult with your physician the implication that this medication will have on your job or on your skills, and make sure to provide such prescription to your manager or HRBP.

In the case of pilots, flight attendants, technicians, and operation officers, both for dispatch and on platform, that hold a license to perform their job, make sure to inform the relevant authorities, and determine together with them if you can perform your duties while you are under such treatment. In Grupo Aeromexico, we are committed to the well-being of our Collaborators, that is why, if you require support, Grupo Aeromexico will jointly look for the adequate means to help its Collaborators.

For more information, read the internal policies applicable to psychoactive substance and alcoholic beverages, and flight crew member "fitness for duty".

In the event of non-compliance, such conduct may be considered as cause for employment termination.

## **2.5 Conflict of Interest**

Conflict of Interest occurs when the Collaborator's judgment and ability for making decisions is influenced by a personal, family or friendship interest, different than those of the Company, or when the Collaborator receives a benefit that can compromise his/her way of acting in the decisions concerning the business.

For further information, please consult the applicable regulations on conflict of interest matters.

### **2.5.1 With Investors**

Although Grupo Aeromexico will always respect your freedom to perform financial investments, you must not make any personal investment, through relatives or third-parties, in organizations of Suppliers, Collaborators, public or private Companies, Strategic Partners, Customers and/or competitors of Grupo Aeromexico, with relevant financial interests, that could harm, or seem to harm, your capacity for making impartial decisions regarding the businesses of Grupo Aeromexico.

"Relevant financial interests" is understood as the shareholding ownership of more than 1% of the value of a company. The investments made by mutual funds or portfolios managed by third-parties, where you cannot interfere in the decision of the destination of your funds, are not included in this rule.

If you made an investment before starting to work for Grupo Aeromexico, or if your position changes in such manner that it may create a conflict of interest, consult your manager and report such situation using the Statement of Personal, Business, Work or Professional Relations format, included in Appendix "B", which will be assessed by the Legal & Compliance Corporate Division for approval.

The members of the Board of Directors and of the Audit and Corporate Practice Committee, as well as the CEO, the Vice-presidents and executives must fill in said declaration, either they have personal investments considered within this assumption, or not.

Avoid carrying out actions or transactions on your behalf, or performed by family members or third-parties, which may be questioned because they involve purchasing decisions, recommendations or sale of shares, hiring or any other, on behalf of Grupo Aeromexico, from direct relatives or close friends, when they can generate a conflict of interest with your responsibilities or if they compromise the Company's interest.

Company's assets must be used for the sole benefit of the Company. Personal use of Company's assets can only be authorized, in an incidental manner, for activities related to the Company and/or through a consideration to be paid by the director, officer or Collaborator concerned, under arm's length terms.



## 2. LIVE WITH UNSHAKEABLE INTEGRITY AND BE RESPONSIBLE

All directors, officers and Collaborators have the obligation to protect the assets of the Company and monitor their efficient use. Company's assets must only be used for legitimate purposes. Personal use, relocation or destruction of property, equipment or materials of the Company without due authorization is strictly prohibited.

If you become a shareholder, you are an employee of another Company, or you have another job while you are a Collaborator of Grupo Aeromexico, this must not influence or create conflict with the duties that you must perform, or with the interests of the Company.

For further information, please consult the Conflict of Interest Policy.

### 2.5.2 With Working Relations

Family members or people, who have a close relationship, are allowed to work at the same time at Grupo Aeromexico. However, in order to avoid possible conflict of interest, it is not allowed to hire any relative of an executive (L10 or higher, according to Aeromexico taxonomy), regardless of the area where he/she works. Also, depending on your work area and duties, no Collaborator is allowed to supervise a family member that also works for the Company, or a person with whom the Collaborator has a functional daily relation that may give rise to a conflict of interest.

For the purposes of this Code and Aeromexico internal regulations, it is understood as "relative", the spouse, parents, children and siblings, as well as kinship up to the fourth degree by blood or in-laws, as well as the persons related by a concubine, partner in fact, or similar relationship.

You should inform your HRBP, or otherwise your manager, in case you realize that a potential hiring, promotion, transfer or similar process can result in a possible conflict of interest according to anything mentioned above.

For further information, please consult the Conflict of Interest Policy.

### 2.5.3 Due to Political and Social Activities

In Grupo Aeromexico, we understand the importance of the political and social activities that we perform in our daily life and the right to perform them freely. However, we also understand our responsibility within the Company to avoid any type of conflict of interest that such activities can entail. For this reason, all activities with political or social purposes shall be performed outside working hours, personally and without involving Grupo Aeromexico, or its affiliates, facilities, and/or resources for such purposes

It is strictly prohibited to perform political activities and donations to political institutions on behalf of Grupo Aeromexico, directly or through third parties.



# 3.

## BE AN AMBASSADOR OF AEROMEXICO

### 3.1 With Our Customers

Our Customers are our reason for being; therefore, we have a great sense of commitment in always providing a respectful and cordial treatment to each one of them. When you share with them the space of our airplanes as a Passenger, crew member, or as a Collaborator in commission, the way to act should always be exemplary, regardless of their diversity. In Grupo Aeromexico, it is strictly forbidden to discriminate Customers based on their national origin, gender identity, age, disability, religion, economic or health status, opinions, sexual orientation, marital status, physical appearance, or any other condition which is demeaning to human dignity.

Likewise, theft, abuse or misappropriation of any of our Customers' belongings is strictly prohibited. We are committed to them; that is why in Grupo Aeromexico we have zero tolerance to those actions, which can lead to the termination of employment.

Appealing to your honesty, and in compliance with our corporate principles, if you find any belongings from third-parties or Customers in any of our locations, please promptly notify or contact Security, through the **GAM e-Report application**.

In case of detecting any kind of conduct similar to these ones, please notify your manager promptly and the Legal and Compliance Corporate Division, or anonymously through the Aeromexico Ethics Line to the e-mail address: [lineaeticaaeromexico@resguarda.com](mailto:lineaeticaaeromexico@resguarda.com) or by calling 800 112 0585 from Mexico, and 1 800 921 2240 from the United States or for any other place dialing the prefix (00).

### 3.2 To The Assets We Transport

As you know, in addition to passenger transport, at Aeromexico, we also carry out freight transport on board our planes. Our Clients rely on the speed, safety, and strict adherence to processes to deliver essential assets for commerce, the food industry, and human health. All merchandise that boards our planes has been carefully inspected for the benefit of the safety of our Collaborators and Passengers. Aeromexico is committed to the care and dignified treatment of animals; therefore, we promote that their transportation and handling be carried out in the best possible conditions. The unlawful removal, theft or mistreatment of merchandise transported on board our aircraft is strictly prohibited.

Regarding the transport of pharmaceutical products—in addition to taking care of the physical integrity of shipments—, we must take care of temperature control; therefore, we must ensure that the operational processes in these assets are expeditious and prevent them from being exposed to extreme temperature conditions or in spaces with inadequate cleaning.

In case of deviations in the handling of the merchandise or if you notice something strange in their handling, notify your manager immediately and report it through GAM e-Report.

Refer to the Policies and Procedures related to transportation and management in the Intranet at: <https://intranet.portal-aeromexico.com>

### 3.3 With Our Providers and Institutions

Any relationship that Grupo Aeromexico establishes with any public or private entity, whether as a Customer or Supplier, should always be developed within a legal and ethical framework.

Grupo Aeromexico grants the highest value to fair competition in all its assessment processes for selecting the best suppliers. For this reason, we must be committed to building lasting, durable, equitable and fair business relations with no discrimination or impositions.

All tenders for selecting service providers and purchasing goods must be performed according to the Acquisition or Lease of Materials, Goods

& Services Policy, through the Procurement Management area. Before starting a Supplier hiring process, refer to the aforementioned policy.

For contracts or agreements with Suppliers or service providers, in which due to their purpose, amount, risk, relevance or responsibility level, may materially affect the Company in the long run, before signing any commitment, a Due Diligence procedure must be followed on anti-corruption matters, to assess the background and rating of the counterpart, in accordance with applicable policies. In case of doubt, or comments related to this procedure, you can contact the Legal Compliance Area, to the e-mail address: [amcumplimiento@aeromexico.com](mailto:amcumplimiento@aeromexico.com)

### 3. BE AN AMBASSADOR OF AEROMEXICO

#### 3.4 With Our Competitors

Free competition means that all the transactions in the commercial activity are performed without any type of absolute or relative monopolistic practices, which main purpose is that a Company obtains an illegal benefit over the competition.

Due to the complexity of the Antitrust laws, before developing action plans related to competitors, Customers or Suppliers, you should always consult the Legal and Compliance Corporate Division.

Under no circumstances, should Collaborators be allowed to obtain information from competitors in any fraudulent or prohibited way. If you are offered or obtain information regarding competitors, you should never accept it, and least of all distribute it.

- Some of the issues that must be consulted in advance include agreements with competitors; agreements with exclusivity clauses and joint purchases.
- Some of the agreements that must never be executed, neither expressly or implicitly, are: agreements to set prices, commissions, or additional service rates; agreements to divide Customers or markets, and agreements to exchange information between competitors for any of these purposes.
- Always consult with the Legal and Compliance Corporate Division on the types of agreements that are authorized by the antitrust authorities.

In order to continue growing and being successful, we need to understand our competition. Therefore, you can manage information regarding competitors and consider it during a decision-making process, provided that it is obtained in a licit way and from public sources, it is used with caution in specific contexts, and it does not expose Grupo Aeromexico to fines or penalties.







Generally, comparative marketing and advertising are acceptable. However, each of us who are part of Grupo Aeromexico should avoid discrediting the services or products of competing Companies.

If a competitor or Customer tries to argue with you issues that raise concerns about the possibility of anti-competitive behavior, you must refuse to do so, and ask such person to stop immediately. If necessary, it is recommended that you leave the meeting, end the conversation, and notify your manager and/or the Legal Compliance Area about such affair.

All of us must always comply with applicable laws in terms of economic competition (antitrust) of the country in which we operate and/or work. For more information, please refer to the Federal Law of Economic Competition, and request the online course from the Legal Compliance Area, if you need it according to your duties.

#### **3.5 With Our Investors, Shareholders and Directors**

In order to be the best aviation Company at an international level, we must always be committed to our investors, shareholders and directors, while developing our actions and work in a way that always contribute to the growth of our Company.

The Collaborators of Grupo Aeromexico have the obligation to perform efficiently and manage information in an accurate, precise and timely manner, in order to enable decision-making and strengthen the trust in our Company.

It is strictly forbidden to alter information or manipulate the accounting records of the Company. There is no justification for inaccurate or false recording of transactions performed by the Company, whether to increase or decrease profits, hide losses or the real purpose of the payments made.

# 4.

## RESPECT LAWS, REGULATIONS, AND STANDARDS

### 4.1 Corruption and Bribery Prevention

Grupo Aeromexico is committed to compete fairly and to show an ethical behavior with full adherence to the relevant legal provisions in the countries where it operates, mainly those related to our dealings with government officials and the prevention of corruption and bribery acts to such officials and private parties; foremost among which are: Mexico's General Law of Administrative Responsibilities (3-of-3 Law), the US Foreign Corrupt Practices Act (FCPA) and UK Bribery Act (UK Bribery).

Due to the foregoing, Grupo Aeromexico prohibits its Collaborators, officers, Members of the Board of Directors, or authorized third-parties (agents, consultants, representatives, services providers and commercial partners) to act on its behalf in offering or delivering money or anything valuable, directly or indirectly, to government officials, government employees, or any person acting in an official capacity), with the purpose of obtaining or maintaining business, facilitating the completion of procedures, obtaining favorable resolutions, permits and licenses, among others.

For clarity purposes, it is strictly prohibited to offer, promise or provide, directly or indirectly, any present, gift or benefit in goods or services to any government official or public servant, whether for their own use or that of their spouse, biological or in-law family members, or for third parties with whom professional, labor or business relations are maintained, or for Partners or Companies for which the Government Officials or the aforementioned persons work.

In the case of benefits such as free flights, reduced fees or upgrades to the Premier Cabin, these can be provided to government officials and public servants, and Collaborators, if they are entitled to the rights as any Passenger of Aeromexico or as a Club Premier program member or of any other loyalty program which the Company is part of.

The prohibition of offering or giving money or anything valuable, also applies to individuals and private Companies, if it is performed with the purpose of obtaining or influencing any negotiation, decision, opinion or report related to Grupo Aeromexico.

All payments to authorized third parties that were completely or partially transferred to a government official or an individual, for an ultimate purpose other than the one acknowledged or suspected by Grupo Aeromexico, may be considered as a corrupt conduct.

Anti-corruption and anti-bribery laws require maintaining adequate books and records that reflect the economical results and transactions. There is no justification for inaccurate or false recording of transactions performed by the Company, whether to decrease profits, or to hide the real purpose of the payments made.

Non-compliance with such provisions can have civil and criminal consequences, both for you and the Company.

For further information on this topic, refer to **the Anti-corruption policies of Grupo Aeromexico.**

#### 4.1.1 Accepting Gifts

Receiving tips and gifts of any type from Passengers to all operating personnel in the performance of their functions and/or at the workplace is prohibited.

In case of doubt, please contact the Legal and Compliance Corporate Division by email at: [AMCumplimiento@aeromexico.com](mailto:AMCumplimiento@aeromexico.com)

Also, for further information on this topic, refer to the Anti-corruption policies of Grupo Aeromexico.

## 4. RESPECT LAWS, REGULATIONS, AND STANDARDS

### 4.1.2 Accepting Invitations to Events

Occasional business meals or events may be accepted from a Partner, Customer, or Supplier, provided that the value is reasonable, it adheres to good customs, and their acceptance does not represent an actual or apparent or future conflict of interest.

In case of receiving an invitation to an event considered major or "Premium", such as a Golf Tournament, the FIFA World Cup, the Olympic Games and similar events, the acceptance thereof must relate to a compelling business reason, and it must always have the authorization of your manager, as well as the approval of the Legal Compliance Area. In such case, Grupo Aeromexico shall pay for your expenses related to the attendance to such event.

Collaborators in the procurement area, and other areas negotiating or reviewing a contract with a Supplier are forbidden from accepting any meals or entertainment.

### 4.1.3 Offering and Accepting Gifts, Meals, Entertainment and Benefits

Offering gifts, meals, entertainment and benefits, to Suppliers, such as upgrades to premier class or any other change that implies a cost for the Company, must be previously approved by the head of the responsible area, and comply with the requirements established in the internal regulations applicable to such matters and in the valid policy on anti-corruption of Grupo Aeromexico.

It is prohibited to accept money or gifts with a value higher than the one approved by the Aeromexico Anti-Corruption Policy, hospitality in excess, loans or any special treatment, or benefits from a supplier, customer or competitor.

If you have any questions regarding if it is appropriate or not to receive or offer a gift, invitation, entertainment or benefit, you should ask your immediate boss first, or Aeromexico Ethical Line, or if necessary the Legal and Compliance Corporate Division.

### 4.1.4 Former Public Officials

It is strictly forbidden to hire former government officials who had access to privileged information during the previous year, due to their position or commission in the public service, if such information allows the employer to benefit in the market or to have an advantageous position regarding its competitors.

In case it is required to hire a former government official, you should have authorization from the Legal Compliance Area and deliver it to the Human Resource area, prior to hiring.

## 4.2 Anti-Money Laundering

All of us working in or for GAM companies at domestic or international level, regardless of the hierarchical level, share the commitment to avoid incurring in situations that might be illegal and affect our reputation and the operational and financial integrity of the company, which includes knowing the subject and management of basic tool to prevent and identify transactions with resources of illicit origin or money laundering.

That is why we have an **Anti-Money Laundering Policy**, which purpose is to identify activities susceptible to money laundering in GAM companies, identify customers or users, integrate their unique identification file, and, where appropriate, file notices to the competent authority. Remember that as a collaborator, according to your field of competence and functions, you have an obligation to know general concepts on the matter if they affect your daily activities, which is why you must take the training courses scheduled by the company so that you can identify warning signs to prevent money laundering, thus reinforcing compliance with anti-money laundering regulations.

## 4. RESPECT LAWS, REGULATIONS, AND STANDARDS

### 4.3 Compliance with Sanctions and Export Control

Grupo Aeromexico, as a company incorporated under Mexican law, has the commitment and obligation to comply with the laws and regulations applicable in the jurisdictions in which it operates, including laws and decrees regarding economic sanctions and export controls due to the commercial relations that it has with individuals and legal entities from other countries, in order to avoid breaching the commercial and contractual restrictions to which it may be directly subjected and that it does not contribute or facilitate the performance of prohibited activities.

In this sense, a policy is in place to reinforce compliance in this subject that can be consulted by our collaborators in the Intranet: <https://intranet.portal-aeromexico.com> and by the general public in the Compliance section of the [am.com](http://am.com) website.

### 4.4 Confidential information

During the term of your employment with Grupo Aeromexico, and after finishing your employment relationship, you must protect the confidentiality of all the non-public information that you obtain or generate regarding your activities.

Confidential information includes, without limitation: financial statements, information on Collaborators, Customers, or Suppliers, operations, business or marketing plans, project and initiative designs, including those governed by the Federal Law for the Protection of Personal Data in Possession of Private Parties, or the Federal Law for the Prevention and Identification of Transactions from Illegal Proceeds.

Special care should be taken not to talk about confidential matters of any kind, or deal with sensitive topics at public places, such as elevators, hallways, restrooms, as well as through electronic devices such as the Internet, social media and mobile phones.

We all are accountable for maintaining professional secrecy, and safeguarding in a confidential way, all the information that we generate, know and use during and after the daily performance of our activities and functions. It is strictly prohibited to share it with other Collaborators who have no relation with your functions, and much less with people outside the Company, including your relatives.

Non-compliance with this principle will be subject to the provisions of our internal policies

and the laws of the countries where they are enforceable. For further information, refer to the Information Security Policy.

### 4.5 Public Information

Only authorized Collaborators can make public statements on behalf of the Company. For this reason, if any media asks your opinion with respect to the activities of the Company, you should refer such company to the Institutional Relations or Investor Relations Divisions.

One of the most important assets of Grupo Aeromexico is its brand; therefore, you are not allowed to use its name or corporate image in presentations, documents, e-mails or similar means outside the organization without the necessary authorization. Likewise, it is forbidden to transform or alter in any way the logo of Grupo Aeromexico, its business units or any of its components. In case of doubt, please refer to the updated policy. No one is exempt from criticism in the communication and digital media. If you detect any type of negative conversation against or about Grupo Aeromexico, and you are not an official spokesperson, do not answer. Remember that only the official spokespersons are authorized to provide statements in case of any request, or to contact reporters in order to release information about Grupo Aeromexico. Only the staff authorized by Grupo Aeromexico can contact celebrities, public figures or opinion leaders on behalf of the Company. Any comment that you obtain from such people about Grupo Aeromexico should be addressed to the Institutional Relations Division, so they can provide a proper answer.





### 4.6 Insider Information

Insider Information is any information that may influence the quotation of securities issued by the Company, as well as the one that an investor would consider important for a sales, purchase or withholding decision of securities that is not public.

This Insider Information may imply any plan, report, data, facts, background, negotiations, restructuring, litigations, or any similar information referring to Grupo Aeromexico, its affiliates or one or several securities issued thereby, not disclosed to the market, and which knowledge, due to its nature, can influence the trading price of the securities issued by the Company.

The law, as well as the policies of Grupo Aeromexico, prohibit transactions with securities (including shares, convertible securities, options, bonds, or any stock market index contained in the securities) of any Organization, while in possession of non-public material information concerning the Company.

For further information about this topic, refer to the Transactions with Shares Policy of Grupo Aeromexico.

### 4.7 Use of Social Media

Social Media is a very important tool that is strongly influencing the way in which we work, offering us a new model to get to know and to contact Customers, and the community in general. We must be aware of the importance of participating in these environments and ensure that our comments do not harm the image of Grupo Aeromexico.

The Company is committed to have our culture reflected on interactions within social media, not only on our part as Collaborators, but also by our commercial partners, agencies and Suppliers, among others.

There is a great difference between speaking on behalf of the Company and speaking about the Company, for this reason you must think before mixing aspects and relations of Grupo Aeromexico with your personal life, relatives and friends. Remember that you are an ambassador of Grupo Aeromexico.

The latter also applies to any comment delivered personally, to your family and friends. In the end, you are the one representing Grupo Aeromexico.

- Take responsibility for your actions. Remember that what you post is your responsibility and that any inappropriate comment you make may be used to damage the Company's image. Always think before you post! Remember that you must never post information about the Company, including confidential and privileged information, as well as taking positions other than the interest of the Company, and always make sure that you do not infringe the confidentiality policies when commenting on or publishing something.
- Remember that the Internet is permanent, once the information is posted on line, it stays there. Even if you erase it, someone could have saved it and use it against the interests of Grupo Aeromexico. Therefore, if necessary, we would encourage you to make a publication with the corresponding clarification.

For more information, see the Guide for the use of social media that is available in the Corporate Portal.

Grupo Aeromexico reserves the right to supervise the use of digital or printed social media, and to take the appropriate measures to protect itself from misuse that could be harmful to the reputation, safety or interests of the Company.

### 4.8 Intellectual and Industrial Property

Designs, products, brands, domains and any work in general protected by law, which has been created, envisioned or produced by you or any other Collaborator of Grupo Aeromexico, in exercising their functions, are the property of the Company. Accordingly, they can only be used for the interests of the Company and within the work context. Therefore, Grupo Aeromexico expects from all of us who work in this Company the following:

- Always identify and protect the industrial and intellectual property of Grupo Aeromexico.
- In case that the Company assigns you an electronic or communications device (laptops, tablets and cellular telephones, among others), never install or use software without the corresponding license, never save pictures, music, movies or any file in a digital format protected by copyright, when the relevant permits for the use thereof have not been obtained.

## 4. RESPECT LAWS, REGULATIONS, AND STANDARDS

- Respect the intellectual and industrial property of third parties. For example: do not make yours or reproduce without proper authorization, documents with copyright, such as reports and handbooks; do not show any type of new product, design, motto, etc., without verifying if it has been registered by a third party.
- If your employment relation with Grupo Aeromexico ends, all the property rights and the information generated or obtained as part of your employment relation will continue to be the exclusive property of Grupo Aeromexico.

It is prohibited to use, sell or distribute information, software or other forms of intellectual property that is a violation to the license agreements.

Consult the relevant internal regulations on intellectual and industrial property (brands and copyright).

### 4.9 Care and Use of Information Technologies

In Grupo Aeromexico, we are aware that the use of electronic media represents a high risk of disclosing confidential or business information in an accidental or not authorized way, and there is a need to protect and manage information in an effective and efficient manner. Information security involves the protection of systems, communication devices, servers and computer networks from information abuse and theft. Due to the foregoing, the use of computer equipment and the access to networks and servers provided by the Company must be limited to the purposes of the operation of your job position.

Your user name and passwords for accessing the computer systems of the Company are personal and non-transferable; therefore, under no circumstances should you provide them to third parties.

Collaborators of Grupo Aeromexico and authorized third parties that have access to information and electronic devices should follow the policies and procedures defined for the protection of the information contained in such media.

Technological resources such as computers, tablets, internet and intranet, wireless networks, e-mail, phone, instant message platforms, corporate teams, etc., are for the exclusive performance of your activities; therefore, it

is strictly prohibited to use such devices in a way that generates abuse and distraction from the performance of our functions and responsibilities.

It is also forbidden to use the work and communication tools provided to download things such as movies, videos and information that is not related to your work (in the specific case of crew members, they must abide by the applicable rules and responsive letter). Likewise, you may not generate communications with offensive or defamatory messages against the reputation of our colleagues, Customers, Suppliers, shareholders, competitors and people or Companies with which we interact.

The Company has the right to monitor, inspect, review, copy and access or deliver to the relevant authorities, the communications developed using its equipment, systems and services, either in inside or outside its offices. Be careful when you send e-mails; make sure that you are sending the information only to whoever is authorized to receive it.

Authorization for usage of personal mobile devices in such networks will be subject to the result of a need analysis and authorization of Technological Development Corporate Division, and to compliance with the specifications required, defined from time to time, being this a privilege and not an obligation.

It is also strictly prohibited to extract or make copies of the information, except for those duly authorized for audit, legal and/or financial purposes.

Refer to the Policies and Procedures related to Information Security in the Intranet at: <http://intranet.aeromexico.com.mx/>

## 4. RESPECT LAWS, REGULATIONS, AND STANDARDS

### 4.10 Personal Data Protection

At Grupo Aeromexico, we are committed to the protection of all personal data that we obtain from our Collaborators, Customers and Suppliers. Therefore, those who collect, treat or use such data must look after it and promote due protection and prevent it from being disclosed or transferred to third parties without the data owners consent.

Personal data collected by the Companies of Grupo Aeromexico comprises information from individuals, including electronic files, printed documents, databases, audios and videos.

It is prohibited to share or comment personal, sensitive, asset, financial or labor data outside Grupo Aeromexico, except when there is express written consent from the Collaborator, or when the rules, regulations and laws require it through an order issued by an authority.

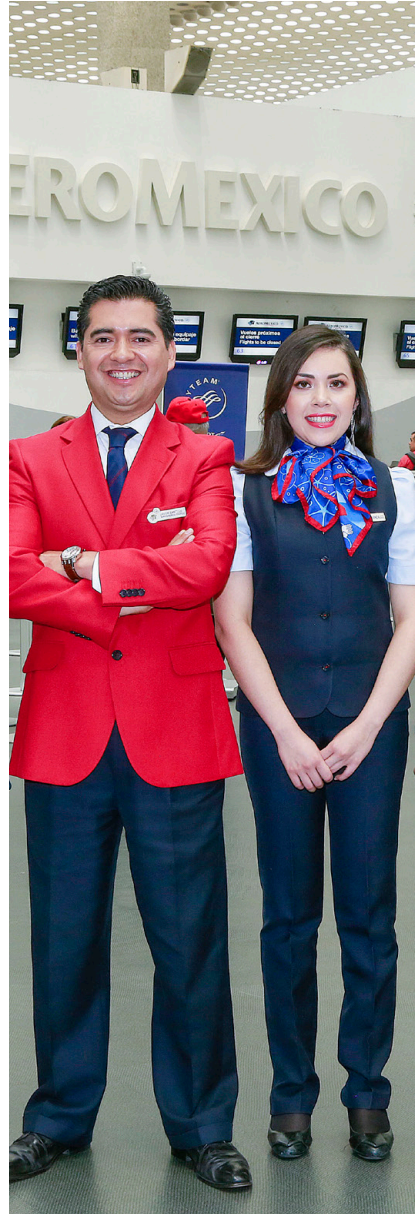
In any case, access requests to such data by any person outside Grupo Aeromexico need the approval of the Corporate Privacy Officer or the Privacy Official at each of the Companies of the group.

See the policies and procedures related to the protection of personal data in the virtual intranet library: <http://intranet.aeromexico.com.mx/> and according to your functions, request from the Legal Compliance Area your registration to the online course.

### 4.11 Participating with the Authorities

In Grupo Aeromexico, we are committed to cooperate with any investigation performed by competent authorities, within the framework of the rights and duties established by Law.

In case of being subject to an investigation by any authority, due to your position, responsibilities or performance of your functions as a Collaborator of Grupo Aeromexico, it is required that you notify the Legal Administrative and Legal and Compliance Corporate Division.





# 5.

## BE A SUSTAINABLE COMPANY (OUR ESG COMMITMENT)

### 5.1 Sustainable Company

Sustainability is one of the most important values for Grupo Aeromexico, and it is reflected in our business strategy, we seek economic growth, without neglecting social and environmental resources, and on the contrary, helping to preserve them to ensure our future and that of society

All our activities must show the responsibility we assume with regard to environmental, social and governance standards.

### 5.2 Collaborate as one Team

Implement all the things contained in this Code in order to create a friendly, collaborative, motivating and nurturing environment among all the people that work at Grupo Aeromexico.

In addition to the correct performance of your daily activities, we must all show a personal leadership commitment, results-oriented, outstanding Customer service, effective communication skills and teamwork.

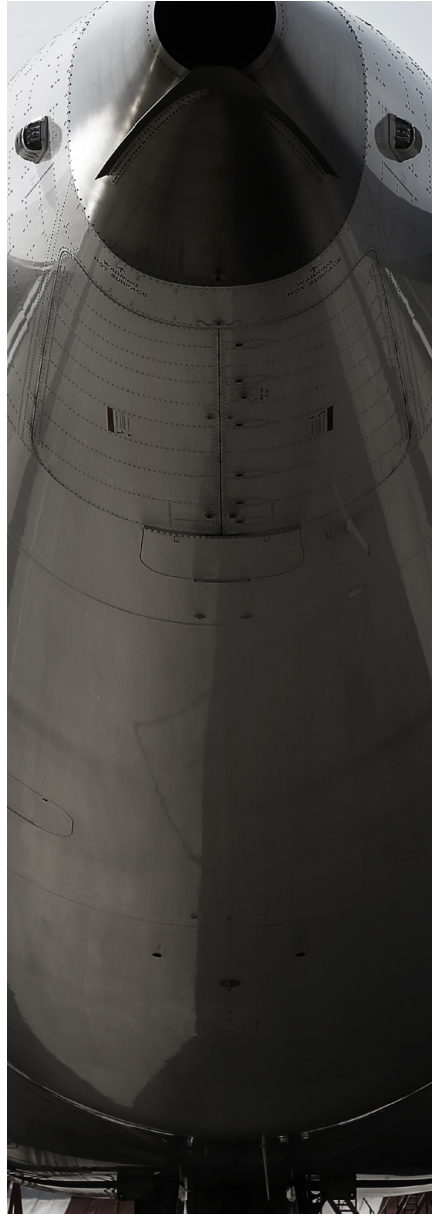
If at any time, you notice an infringement to this item of our Code of Conduct, please notify us through the communication channels mentioned throughout this document.

### 5.3 Environmental Care

All good citizens are responsible for respecting and caring for the environment. This is also essential for the development for our business. For this reason, we should all be concerned about complying with environmental laws, rules, commitments and standards, applicable to the tasks that we perform in our position.

It is an expected behavior to encourage the implementation and compliance with environmental standards, not only national but also international, it is an expected behavior among our Collaborators and external stakeholders. This requires that we promote environmental education and awareness within the Company and with third-parties.

In each country in which we do business, there are different laws, treaties, policies, standards, and regulations –or any other denomination– related to the care of the environment and recycling. Participate in their compliance by doing what is in your hands. Report any behavior or situation that may damage the environment. Energy resources used in our operation, such as fuel, electricity and natural resources, such as water, have to be used diligently. Avoid wasting them. Help recycling most of these materials.



## 5. BE A SUSTAINABLE COMPANY (OUR ESG COMMITMENT)

Comply with the procedures defined with regard to the handling of scrap and industrial waste.

### 5.4 Social Responsibility

Through donations, joint programs and support in case of disasters, we foster and promote our commitment to the sustainable development of the communities where our Collaborators, Customers and Suppliers live and work.

In the case of donations to charities and civil organizations, we must make sure that the donation or contribution effectively meets a social need and, that in no way, it indirectly benefits a government official or person related thereto, and that such donation or contribution is not given in exchange for a purchase, hiring, or any decision that affects the interests of Grupo Aeromexico.

In case of charitable donations made to governmental or state-owned entities, prior approval must be obtained from Aeromexico's Fiscal, Legal Compliance Area and from the Executive Committee.

We have established a support commitment with several non-profit and non-governmental organizations, respecting each and every legal and ethical precept of this Code.

For this reason, at Grupo Aeromexico, we encourage volunteer work, training programs and altruism through our Collaborators. If you want to learn more about the activities that our Company performs, we invite you to be part of the Sustainability activities that take place throughout the year.



## 5. BE A SUSTAINABLE COMPANY (OUR ESG COMMITMENT)

### 5.5. Equality, diversity, inclusion, respect for labor rights, no child labor, freedom of expression and association fight against human trafficking and smuggling.

Aeromexico is an organization that conducts its operations with integrity and respect for human rights recognized internationally in the Universal Declaration of Human Rights, the Declaration of the International Labor Organization and the United Nations Global Compact, among others.

We offer our services and products without discriminating for reasons of race or immigration status, gender, age, disability, social status, health conditions, religion, opinions, sexual preferences, gender identity, marital status, physical appearance or any other that violates human dignity.

Likewise, we provide our collaborators with dignified and safe conditions where we promote an environment based on respect, gender equity, free of harassment, abuse and discrimination.

We reject child or forced labor, one of our greatest commitments being the fight against human trafficking, generating courses and training so that this crime is detected and reported by our collaborators.

GAM is committed to the prevention and fight against human trafficking and smuggling, by identifying this type of risk in our operations, with the training of our collaborators, including administrative and operational personnel and crews, which allows us to implement and continuously monitor of controls in these matters, as is the case of the initiative of the "Card for the prevention and detection of possible cases of trafficking in persons," which purpose is to detect and enable the reporting of this type of criminal acts during our operation.

We respect the labor and social security rights of our employees in accordance with the applicable laws.

Employees have the full right to freedom of expression, considering that special care must be taken not to discuss confidential matters of any kind, and abide by what is established in the policies related to the processing of information.

If you detect any non-compliance related to these matters, you can make use of the Aeromexico Ethics Line as anonymous reporting mechanism.



# GLOSSARY

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**Customer:**

Any individual or any public or private entity that acquires any type of service provided by Grupo Aeromexico.

**Collaborator:**

Someone who works under an employment agreement, who provides services to the Company and, who also, through a number of skills and attitudes, teamwork and an everyday upstanding contribution, looks forward to creating value within the Organization

**Company, Business or Organization:**

All the entities that are part of Grupo Aeromexico or that may be part of it in the future.

**ESG:**

Environmental, Social and Governance.

**Grupo Aeromexico/GAM.**

The consortium made up by Grupo Aeromexico, S.A.B. de C.V. and its subsidiary and affiliate Companies.

**HRBP:**

Human Resource Business Partner, that acts as a contact between any area of the Company and Human Resources. It is responsible for coordinating and addressing the needs, enquiries and projects that involve the Human Capital of the Company.

**Passenger:**

An individual who travels through the air transport service. He/she will have this capacity from the moment in which the contract with the concessionaire is executed and until compliance with the purpose thereof.

**Supplier:**

Any person that supplies a product or provides a service to the Company for a specific purpose.

**Labor Relations:**

This is the area that supervises the correct and fair implementation of the legal frame within the working life of our Collaborators, in order to generate an environment of cooperation and trust between the leader and the Collaborator, which will allow us to have a better performance within the Organization.

**Partner:**

Any person who acquires an obligation to the Company proportional to the amount of participation provided or agreed.

**Strategic Partner:**

Any public or private entity that, through a contractual obligation, works together with the Company in key activities of our business model in order to achieve a common goal aligned with the interests of both parties.

# ANNEX A

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## Confirmation of knowledge and adherence to the Code of Conduct of the Aeromexico companies (Employees and Collaborators)

Those of us who collaborate at the Aeromexico companies (Grupo Aeromexico or GAM), are convinced that the relations between employees, and customers, partners, suppliers, stakeholders and society in general (third parties), must be performed within a strict framework of ethical principles and corporate integrity, and in compliance with the law.

**Grupo Aeromexico** expresses its absolute rejection of corruption and confirms that acting in adherence to its Code of Conduct, applicable internal regulations, and domestic and foreign provisions on the matter, is a basic element in helping our companies to have integrity, and to be reliable and competitive in their commercial, labor and investment relations.

**GAM** has a Code of Conduct that establishes the vision of the objectives and goals of the company, and promotes a behavior in adherence to principles, ethical standards, and corporate integrity.

In accordance with the above, **GAM** expects its collaborators to comply with these standards of ethics, corporate integrity and excellence, within which the following can be highlighted:

1. Being an inclusive company and attached to social standards that promotes the following principles and values:
  - Same opportunities and equity.
  - No discrimination.
  - Intolerance to harassment.
  - Compliance with safety, health and hygiene standards.
2. Live with unwavering integrity and be accountable.
  - Avoid the use of drugs and alcohol in working hours and facilities.
  - Refrain from carrying out transactions, commitments and activities that conflict with the interests of GAM or that may involve a conflict between its personal interests and those of the GAM, as well as from engaging in activities that may generate personal gain and are contrary to the interests of GAM, in any case, it is appropriate to report in a timely manner any situation of conflict of real, potential, prohibited or apparent interest in which it may be involved.
3. Give and receive respectful, responsible, legal and ethical treatment to customers, suppliers and institutions, competitors, investors, shareholders and directors with whom you interact.

4. Comply with laws, regulations and standards, as well as control procedures in place to:
- Prevent acts of corruption, bribery and money laundering in terms of national and international law.
  - Promote compliance in terms of economic sanctions and export control.
  - Protect confidential information and proprietary information you have from third parties.
  - Do not make public statements that are not previously authorized and in writing, on behalf of Grupo Aeromexico or its companies.
  - Protect GAM's industrial and intellectual property.
  - Responsible care and use of the IT systems you use from your suppliers or third parties.
  - Protect with the level of care established in applicable laws, the handling of Personal Data of collaborators, customers and suppliers.
  - Cooperate with any investigation performed by competent authorities, within the framework of the rights and duties established by law.
5. Be a sustainable company (our ESG commitment).

In view of the foregoing, as Collaborator, I declare that I know and accept the aforementioned Code of Conduct, which is available for consultation on the Aeromexico.com website at <https://compliance.aeromexico.com>, as well as in the internal portal "My Aeromexico", in the "My AM experience" tab, Compliance section, and in case of doubts or comments, I can consult its scope and application with the Legal & Compliance Department.

Likewise, I agree to carry out the e-learning course of the Code of Conduct with the frequency that is defined.

Finally, by signing this document, I acknowledge and assume compliance with the Code of Conduct of Grupo Aeromexico, and acknowledge that non-compliance with said Code will be considered a breach of it and I will be subject to the appropriate disciplinary action.

Name: \_\_\_\_\_

Position: \_\_\_\_\_

Employee No.: \_\_\_\_\_

Area: \_\_\_\_\_

Place: \_\_\_\_\_

# ANNEX B

## Statement of Personal, Business, Labor and Professional Relations for Members of the Board of Directors, Audit Committee and L10 Executives and higher

Statement of Personal, Business, Labor and Professional Relations for Members of the Board of Directors, Audit Committee and Corporate Directors and Executives of Grupo Aeromexico (GAM).

With the purpose of verifying that you comply with the requirements established in the Code of Conduct and the relevant Corporate Manuals of GAM, and that you do not have any of the impediments, please fill in the following statement:

**Position in Grupo Aeromexico:**

Director

Member of the Audit Committee

Corporate Director

Executive Director

Other (specify: \_\_\_\_\_)

Date: \_\_\_\_\_

Name: \_\_\_\_\_

Employee No. (if applicable)

\_\_\_\_\_

Statement:

1	Do you know if your spouse, concubine, concubinary, or any of your relatives by blood, affinity or civil up to the third degree is an employee of any of the GAM companies? Does he/she have a position elected by popular vote, or is he/she a member of the leadership of a political party, or did he/she hold such position in the three years before this date?	YES <input type="checkbox"/> NO <input type="checkbox"/>	If you answered yes, state the position and, if applicable, the exact date when he/she left office:
2	Are you currently a public servant of any of the powers of the Union, Autonomous Bodies created by Law, of States, Municipalities or the Federal District, or were you one during the three years before this date?	YES <input type="checkbox"/> NO <input type="checkbox"/>	If you answered yes, specify the position and, if applicable, the exact date when you left office:

3	Do you have or have you had during the last five years before this date any hierarchic relation, ascending or descending, within or outside the institution, with any of the members of the Board of Directors?	YES <input type="checkbox"/> NO <input type="checkbox"/>	If you answered yes, state the name and position of the person with whom you had the relation, the type of hierarchic relation, and if it is ongoing and, if applicable, state the time that has elapsed since the relation ended.
4	State if you are an officer, employee, director or member of the Ministry of Communications and Transport, or a similar body of the States, that regulates or supervises airline activities, or if you have served as such in the last two years before this date.	YES <input type="checkbox"/> NO <input type="checkbox"/>	If you answered yes, specify the body, position, duties and, if applicable, the exact date when you left office:
5	State if you are or have been a GAM officer or employee.	YES <input type="checkbox"/> NO <input type="checkbox"/>	If you answered yes, state the position you have or had:
6	State if you have been a supplier or a partner or executive, or if you have interest in any legal entity that has been or is a supplier of goods and/or services of any of the GAM companies in the last five years.	YES <input type="checkbox"/> NO <input type="checkbox"/>	If you answered yes, describe the nature of the purveyance. If you stopped providing goods and/or services, state the time that has elapsed since the settlement of the last agreement up to date:
7	In case you have been a supplier of goods and/or services, was there a termination of an agreement due to causes attributable to you?	YES <input type="checkbox"/> NO <input type="checkbox"/>	If applicable, describe the reasons for such termination:
8	State if you participate or have participated in the last five years in any company or organization, as employee, executive, director, or member of government or consultation bodies, in which any member of the GAM Board of Directors also participates or has participated as an employee or in any other capacity. In case this happened more than five years ago, please state it.	YES <input type="checkbox"/> NO <input type="checkbox"/>	If you answered yes, state the name of the persons with whom you have or had any of the relations described, your role or position, and of the persons mentioned, and the names of the companies or organizations in reference.



9	State if you have a company together with, or if you have business relations with a member of the Board of Directors or an employee of GAM.	YES <input type="checkbox"/> NO <input type="checkbox"/>	If applicable, state the name of the person with whom you have the relation, your position/role and of the persons with whom you have the relation and the name of the company or organization of this relation.
10	State if you are a Director, executive or employee of a company that is a creditor of ten per cent or more of the GAM liabilities.	YES <input type="checkbox"/> NO <input type="checkbox"/>	If you answered yes, state the name of the institution, the position or role you have therein and the amount of the credit.
11	State if you are a Director, executive or employee of a company, entity or organization of any type that is a GAM competitor.	YES <input type="checkbox"/> NO <input type="checkbox"/>	If you answered yes, state the name of the organization, the activities it performs and your position or role therein. Attach a certified copy of the bylaws and of the documents you deem relevant.
12	State if you are a relative by blood, affinity or civil up to the fourth degree of any member of the Board of Directors, an executive or employee of GAM.	YES <input type="checkbox"/> NO <input type="checkbox"/>	If you answered yes, state the name of the person, your relation and under which assumption is this person.
13	State if you have been removed from a company.	YES <input type="checkbox"/> NO <input type="checkbox"/>	If you answered yes, state the institution, and describe the causes for the removal.
14	State if you have any family, labor, professional or business relation, or of any other kind, direct or indirect, that may generate conflict of interest with GAM, or that prevents you from acting selflessly and free of pressure, regarding the matters thereof.	YES <input type="checkbox"/> NO <input type="checkbox"/>	If you answered yes, state the type of relation and why you identify a conflict of interest.
15	State if you belong to a corporate government body of another institution or company.	YES <input type="checkbox"/> NO <input type="checkbox"/>	If you answered yes, state the name of the institution or company and the role you perform therein.

16	State if you are a member of the Board of Directors of another institution or company, where an executive or Member of the Board of Directors is a member of the Board.	YES <input type="checkbox"/> NO <input type="checkbox"/>	If you answered yes state the name of the institution or company, the name of the executive, Director, and the role that he/she performs therein.
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Through this document, I inform that I am aware of GAM's Policies for Relations and Transactions with Related Parties and that, in compliance with said policies, I understand the need to make a statement that confirms or eliminates the possible existence of a conflict of interest.

I also acknowledge that any omission or failure to reveal relations or operations with related parties (third parties) leads to sanctions as provided in applicable regulations.

I assume the commitment that if there is any change to the situations mentioned in this statement, I shall immediately inform GAM and its Subsidiaries about them.

To the best of my knowledge, in accordance with ethical principles and honesty, honorability, independence and objectivity values, based on the facts I know, I make this statement under affirmation, on \_\_\_\_\_, 20\_\_.

## PRIVACY NOTICE

(Members of the Board of Directors, Audit Committee and Corporate Officers and Executives)

Date of the most recent update: June 15, 2022

In compliance with the Federal Law on Protection of Personal Data in Held by Individuals, we make this privacy notice available to you, and in this regard we inform you of the following:

1. Responsible of the protection of personal data.

Aerovías de México S.A. de C.V., with address to hear and receive service of process at Paseo de la Reforma 243, Piso 25, Colonia Cuauhtémoc, Delegación Cuauhtémoc, C.P. 06500 in Mexico City, is responsible for the processing and protection of your personal data.

2. Information about our privacy officer and how to contact him.

Our privacy officer is the person within Aeromexico who, in compliance with Article 30 of the Federal Law on Protection of Personal Data Held by Individuals, has been formally designated to:

- Address the requests of the holders to exercise their rights.
- Encourage and ensure the protection of personal data we have in our possession.

For everything related to the processing and protection of your personal data, you may contact our Privacy Officer by sending an e-mail to: [amdatospersonales@aeromexico.com](mailto:amdatospersonales@aeromexico.com).

### 3. Personal information that we collect from you.

In order to fulfill the purposes indicated in number four (4) of this privacy notice, we will collect the following categories of personal data: (i) Identification; (ii) contact information; (iii) professional data; and (iv) employment data.

#### 3.1. Sensitive personal data.

We do not collect sensitive personal data.

#### 3.2. Personal data from third parties.

For any Personal Data of third parties that you provide us, you must previously have the consent of the holder of said data, and inform him/her that he/she can get the corresponding privacy notice by contacting our privacy officer via email.

### 4. Purposes of the processing of the personal data collected.

Your personal information will be used for the following primary purposes, which are necessary for the legal relationship between you and Aeromexico:

- Identifying and contacting you.
- Verifying that it meets the requirements established in the Code of Conduct and relevant corporate manuals of Grupo Aeromexico, and that you do not meet any of the impediments to exercise the position.
- Validating the information you provided.
- Fulfilling your functions.

Your personal information will not be used for secondary purposes.

### 5. Transfer of your personal data.

For the fulfillment of the primary purposes stated in number 4 (four) of this privacy notice, your personal data may be transferred to the following individuals or legal entities, without your consent being legally required under Article 37 of the Federal Law on Protection of Personal Data in Held by Individuals:

- Companies that are part of Grupo Aeromexico, which operate under our same processes and internal policies.- For the purpose of complying with our internal regulations. These companies will establish the administrative, technical and physical security measures that allow us to protect your personal data against damage, loss, alteration, destruction or use other than that indicated in this privacy notice.

Any transfers requiring your consent, or any additional transfers, will not be made.

### 6. ARCO Rights.

Under the terms of the applicable regulations, you have the right to know what personal data we have about you, what we use them for and the conditions of use we give them (Access). Likewise, it is your right to request the correction of your personal information in case it is outdated, inaccurate or incomplete (Rectification); that we remove it from our records or databases when you consider that it is not being used properly (Cancellation); as well as oppose the use of your personal data for specific purposes (Opposition). These rights are known as ARCO rights.

In order to exercise any of the ARCO rights, you must submit the respective request through an email addressed to our privacy officer, who will inform you about the procedure and requirements for the exercise of those rights, response times, the form in which we will make effective your right, and he will address any doubt, complaint or comment that you might have about it.

#### 7. Mechanisms and procedure to revoke your consent.

Under the terms of the applicable regulations, you can revoke the consent that you may have given us. However, it is important that you keep in mind that your request may not be applicable in all cases or that we may not cancel the use immediately, since it is possible that due to some legal obligation we need to continue processing your personal data.

In order to revoke your consent, you must submit the request through an email addressed to our privacy officer, who will inform you about the procedure and requirements for the exercise of this right, response times, the form in which we will make effective your right, and he will address any doubt, complaint or comment that you might have about it.

#### 8. Options available to the holder to limit the use or disclosure of his/her Personal Data.

In addition to the procedure and exercise of the rights contemplated in numbers 6 (six) and 7 (seven) of this privacy notice, you may limit the use or disclosure of your personal data in the following ways:

- For marketing and advertising purposes, you can express your refusal by checking the box "I do not wish to receive emails," located at the bottom of the emails that we send you.
- You can also send an email to our Privacy Officer requesting your registration to the "Advertising Exclusion List of Aeromexico," to make sure that we shall not use your personal information for promotional, advertising or marketing purposes.

#### 9. Amendments to this Privacy Notice.

We reserve the right to amend or update this privacy notice at any time, informing you directly or personally about any amendment or update.

#### 10. Undue processing of your personal data.

If you consider that your right to the protection of your personal data has been infringed by any conduct or omission on our part, or you presume any violation of the provisions of the Federal Law on Protection of Personal Data Held by Individuals, its Regulations and other applicable ordinances, you may file your disagreement or complaint with the National Institute of Access to Information and Data Protection (INAI). For more information, we suggest you visit their official website [www.inai.org.mx](http://www.inai.org.mx).

#### 11. Consent

I give my consent for my personal data to be processed in accordance with the terms of this privacy notice.

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Full name and signature of holder.



