

# Compliance Pocket

## Tone At The Top

### Members of the Board

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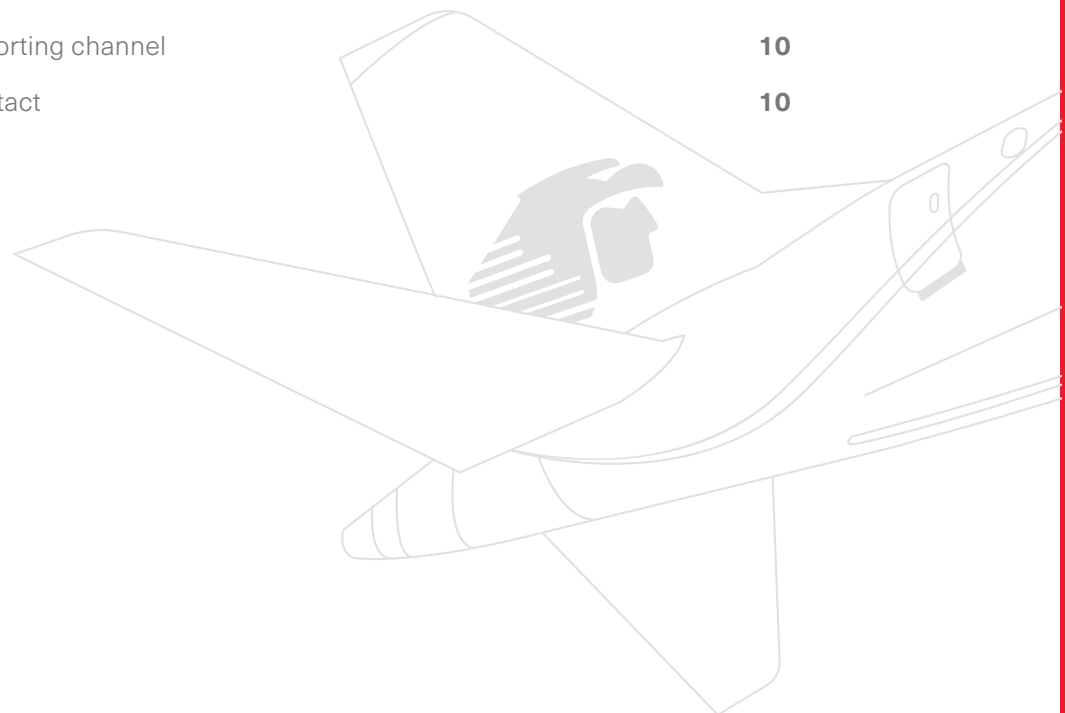


# Introduction

This document is a quick guide intended to train and disseminate Grupo Aeromexico's Compliance Program among the Members of the Board, as well as to recognize their commitment thereof.

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## What is Compliance?

To live with unshakeable integrity is everyone's commitment.

Procedures and tools aimed mainly at complying with, inter alia, legal, accounting, financial, operational, safety and security provisions, as well as at preventing crimes such as acts of corruption and applying sanctions in organizations.

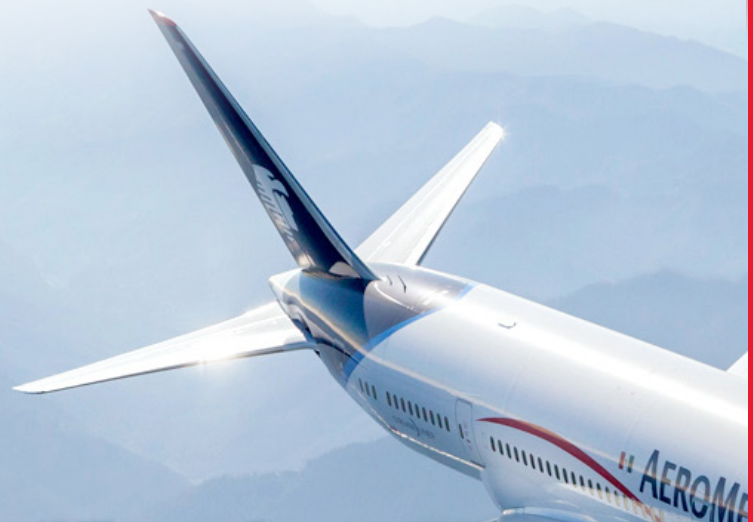
The Compliance Program, as we know it today, was created in 2019 in **alignment with Grupo Aeromexico's vision and values**, and primarily promotes behaviors aimed at **Living with Unshakeable Integrity and Putting Safety First**.

## Benefits



Through the provisions and procedures established in our Compliance Program, we seek to acquire the following utilities and benefits:

- 1** To prevent legal, operational, financial, and reputational risks.
- 2** To verify compliance with national and international regulations.
- 3** To contribute to establishing a culture of legality and regulatory compliance, with ethical values in accordance with international best practices.
- 4** To protect the company from sanctions.
- 5** To make the group's companies' operations more efficient and agile to get to know our associates, partners, clients, and suppliers better.
- 6** To strengthen our Environmental, Social and Governance (ESG) commitment.

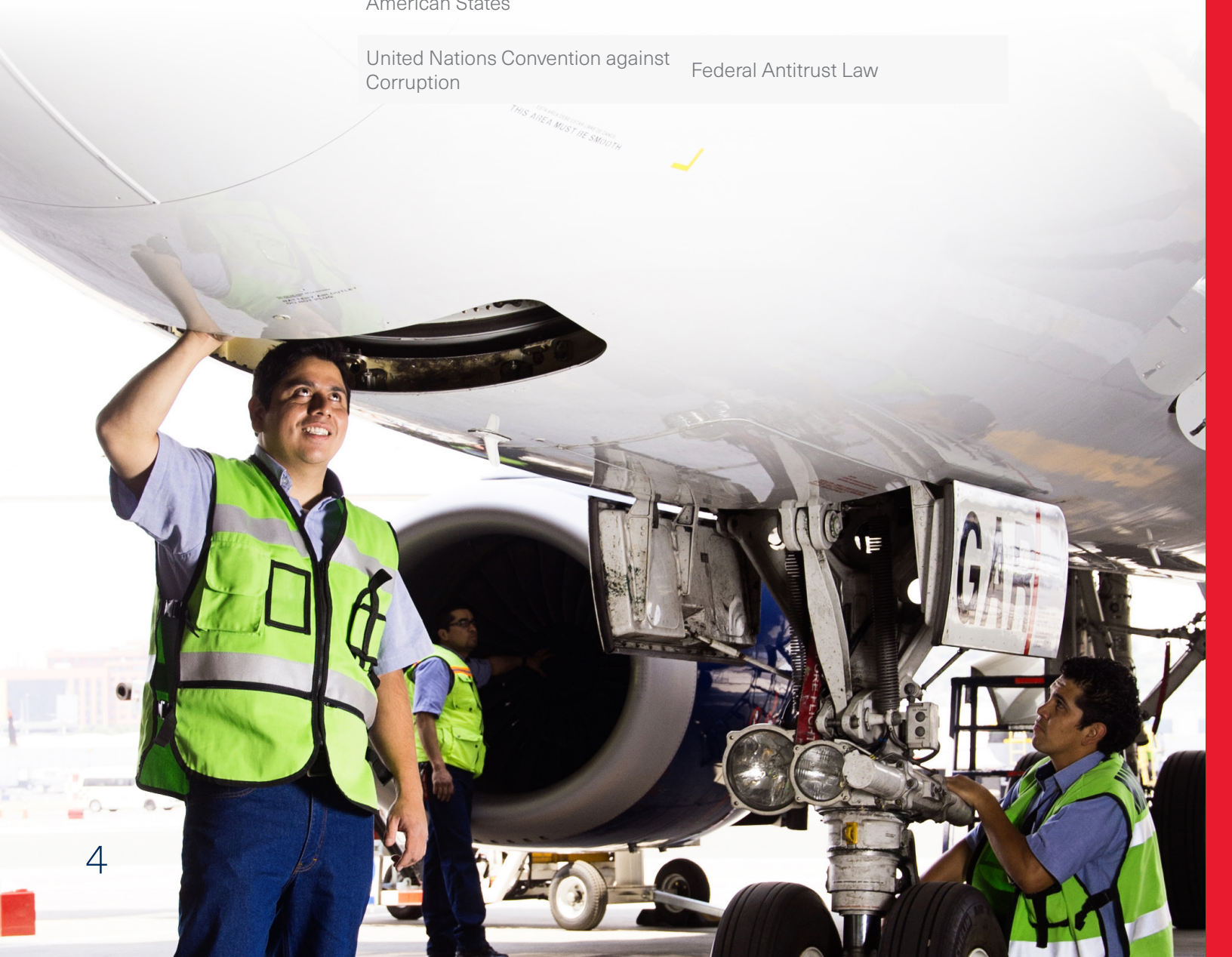


# Regulatory Compliance



Based on Aeromexico's operations and investors, it is necessary to comply with various domestic and international regulations, among which are the following:

International	Domestic
Foreign Corrupt Practices Act (FCPA)	General Law of the National Anti-Corruption System
United Nations Global Compact	General Law on Administrative Responsibilities
Inter-American Convention against Corruption of the Organization of American States	National Code of Criminal Procedure
United Nations Convention against Corruption	Federal Antitrust Law



## Benefits of Promoting the Compliance Program



To convey an image of integrity, reliability, and competitiveness

To show Grupo Aeromexico's commitment to good practices on Compliance at a national and international level.



To strengthen our image on compliance

Our Compliance Program is a great asset for the company, it allows us to show zero tolerance towards irregular or unlawful behavior, the above-mentioned will increase investor's and customer's trust in our organization.



To create an instrument of corporate social responsibility

Through the Compliance Program, we create an instrument to achieve competitiveness, efficiency, and improvement of reputation, which is even helpful in attracting investors and shareholders in line with ESG best practices. Today, there is a tangible trend among investors to value sustained and sustainable growth standards within a company.



To create a unique culture of compliance

To strengthen a culture of compliance across the enterprise through a variety of means that allow us to communicate our core values, policies, and internal regulations, as well as the reporting channels available to us so that we are all aware of what unites us through Compliance.



To maintain a high level of compliance perception

This action, aimed at employees and stakeholders, will boost the long-term growth of the company and its borderless expansion.



## Benefits of Promoting the Compliance Program



**To achieve competitive advantage that will be reflected in the company's bottom line**

The Compliance Program assures customers, suppliers, and even competitors in the industry, that the company is committed to fulfill its obligations under any circumstances and in any country, and that it will meet its legal and contractual commitments wherever it does business.



**To prevent legal, financial, operational and reputation risks**

Promoting a savings culture and adding value of interest for our partners and future investors will be achieved through preventive and corrective actions that will help us avoid potential fines due to non-compliance events.



**To implement preventive mitigation measures**

As a company with an international operating network, we are exposed to regulations and compliance standards that vary from country to country; therefore, the Compliance Program encourages all areas to identify risks and implement mitigation measures.



**Decisive factor for our business profitability**

Through the Compliance Program, Company's departments are influenced to obtain a better understanding of their business processes, avoid duplication of processes and functions, as well as early detection of serious inefficiencies or defects in operational processes and potential internal conflicts.

## Benefits of Promoting the Compliance Program



**To ensure comfort for our consumers, for the society, and for authorities**

Counting on the Members of the Board support to our Compliance Program, we convey a clear message that our company is fully committed to good practices and to compliance.



**Consistency of the Compliance Program**

The commitment of the Members of the Board to the Compliance Program is necessary, since the compliance culture is an asset that must be reflected in all spheres of the organization.



**It is everyone's responsibility to be compliant**

All of us who collaborate for Grupo Aeromexico have the same compliance duty in alignment with the company's commitments and values. That is why, in your capacity as a Member of the Board, we recommend you to participate in the training sessions that are offered within the company.



**To be an ethically responsible company**

Strengthening our Compliance Program through the support of our Members of the Board becomes a necessity, considering the patterns marked by today's society and the ethically upright business development environment at a global level.



**To maintain trust in the business**

It is a primary goal in the process of growing and transforming the company, as ethics is an inherent value and part of the way in which we do business. This is inevitably linked to making efforts to strengthening our image, as well as the Compliance Program.

# Anti-Corruption Statement



All of us who collaborate in Grupo Aeromexico strengthen our commitment to live with unshakeable integrity through our Anti-Corruption Statement, found on the website, in which we express our absolute rejection of any act or situation of corruption within and outside the company.

This statement serves as a guide to compliance with internal rules and domestic and foreign provisions applicable to this subject matter.

## Anti-Corruption Policy

Created in 2011, and updated in 2021, promotes practices that minimize risks from acts of corruption.

## Online training

Courses and workshops to reinforce the knowledge on this topic and to ensure that all of us who collaborate for Grupo Aeromexico act accordingly.



### DID YOU KNOW...?

In Mexico, the United States, and most of our destinations, giving gifts to public officials is prohibited, which is set forth as a guideline in our Anti-Corruption Policy.





## Members of the Board commitment

It is everyone's responsibility to be compliant.



### Members of the Board

The following commitments involve the "Tone at the Top" that you, as a Member of the Board of Grupo Aeromexico, assume to promote and comply with when it comes to the Compliance Program:

- 1** To act with unshakeable integrity. Remember that you are one of Aeromexico's ambassadors.
- 2** To encourage best practices in corporate governance and in alignment with the company's values, principles, and vision.
- 3** To oversee and promote transparency, efficiency, diversity, inclusion and legality within and outside the Board.
- 4** To read, understand, and comply with the Code of Conduct and with other company's policies.
- 5** To report any violations to the Code of Conduct through the Aeromexico Ethics Line.
- 6** To be a facilitator of the Compliance Program by promoting it, taking training on it, and monitoring its development.
- 7** To continue fostering sustainability as an important value in the business strategy in the interest of the economic growth and in line with environmental, social and governance standards.



## Reporting channels

As associates of Grupo Aeromexico, we are all committed to reporting situations that put our safety and integrity at stake. Thus, we offer you the following reporting channels:



As an associate or a third party involved with Aeromexico, you may report potential risks or safety omissions.


 Go to [miaeromexico.com/seguridad](http://miaeromexico.com/seguridad)

 **Or download the app to your mobile device**



Any associate or third party may report situations that are contrary to our Code of Conduct and internal policies.

 **MEX 800 112 0585**

 **USA and rest of the world (00) 1 800 921 2240**

 **[lineaeticaaeromexico@resguarda.com](mailto:lineaeticaaeromexico@resguarda.com)**

 **[www.resguarda.com/aeromexico](http://www.resguarda.com/aeromexico)  
[miaeromexico.com/compliance](http://miaeromexico.com/compliance)**



Emotional attention to psychosocial risk factors.

 Corporate staff:  
**[amservmedfactorhumano3@aeromexico.com](mailto:amservmedfactorhumano3@aeromexico.com)**

 Crew members:  
**[amservmedfactorhumano1@aeromexico.com](mailto:amservmedfactorhumano1@aeromexico.com)**

## Contact

If you require assistance or further information on our Compliance Program, contact the Legal Compliance Office of Grupo Aeromexico:

**Enrique Román Chávez**

Chief Legal Compliance Officer

 [enroman@aeromexico.com](mailto:enroman@aeromexico.com)

**María Gema Valenzuela Galdeano**

Jr. Manager Legal Compliance Office

 [mvalenzuelag@aeromexico.com](mailto:mvalenzuelag@aeromexico.com)

**María Fernanda Granados Fuentes**

Jr. Manager Legal Compliance Office

 [mgranados@aeromexico.com](mailto:mgranados@aeromexico.com)