



Compliance Pocket Tone At The Top

L10+

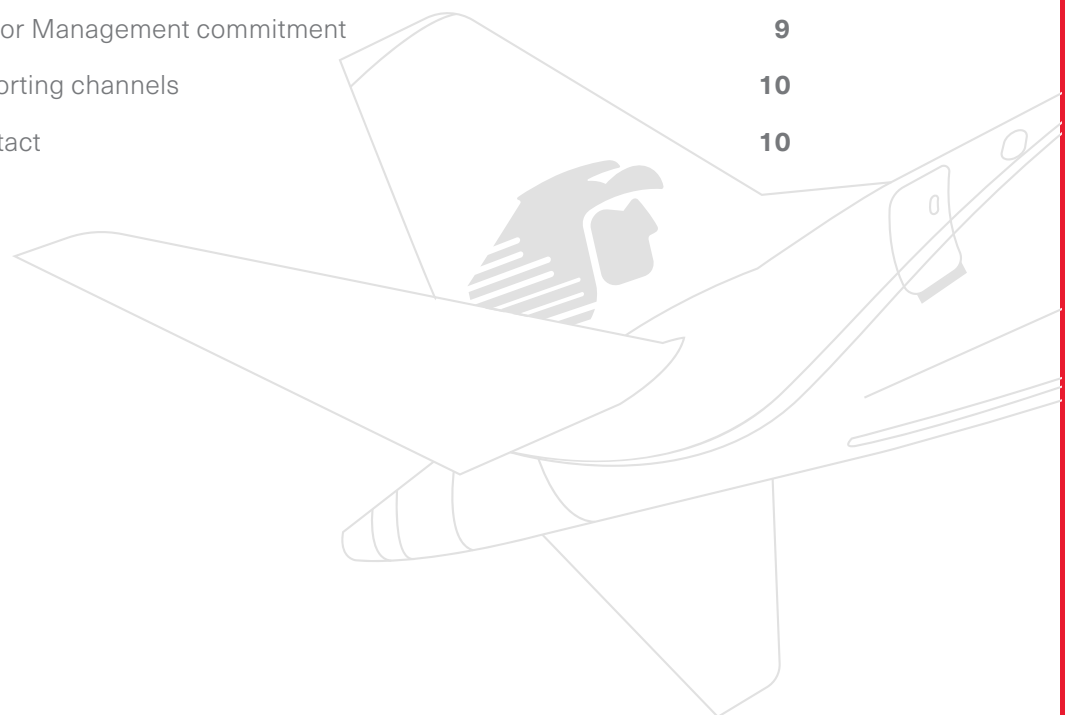


Introduction

This document is a quick guide intended to train and disseminate Grupo Aeromexico's Compliance Program among the Senior Management, 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.
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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

Your role as promoter of the Compliance Program

Together we promote a Compliance culture.

Promotion and Followup

The efficacy of the Compliance Program depends on its promotion and dissemination by Senior Management (L10+); therefore, it is essential to comply with the following actions:

- Carry out the certification of the Code of Conduct once every year
- Complete the Anti-Corruption, Conflict of Interest and other courses which are required depending on your role
- Endorse and promote the different training sessions with the personnel under your charge
- Generate messages both inside and outside of the company through authorized media on the culture of compliance and the existence of a Compliance Program in Grupo Aeromexico



IMPORTANT: Senior Management support of the Compliance Program should be visible inside and outside the company; therefore, it is essential to give such acts the formality they require so that in case of a revision from the authorities, they are fully verifiable.

Benefits of Promoting the Compliance Program



To convey an image of integrity, reliability, and competitiveness

To show Grupo Aeromexico's firm 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 Senior Management 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 support of Senior Management will allow a more consistent diffusion of the Compliance Program throughout the company, including offices abroad, providing natural continuity to the compliance culture that is already implemented nation-wide.



It is everyone's responsibility to be compliant

By being part of Grupo Aeromexico, we all have the same compliance duty in alignment with the company's commitments and values. That is why, it is of critical importance that Senior Management participates in the training courses.



To be an ethically responsible company

Strengthening our Compliance Program through the support of the Senior Management 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 servants is prohibited, which is set forth as a guideline in our Anti-Corruption Policy.



Senior Management Commitment

It is everyone's responsibility to be compliant.



Senior Management

As Leader, by being part of Grupo Aeromexico, you assume to promote and comply with the following commitments when it comes to the Compliance Program:

- 1** To act with unshakeable integrity. Remember that you are one of Aeromexico's ambassadors.
- 2** To promote the Compliance Program and provide the tone for your team.
- 3** To read, understand, and comply with the Code of Conduct and with other company's policies.
- 4** To report any violations to the Code of Conduct through the Aeromexico Ethics Line.
- 5** To comply with and observe all internal policies and procedures applicable to your role.
- 6** To carry out the training courses promoted by the Compliance area.
- 7** To collaborate in the sustainability activities with a focus on economic growth, in line with environmental, social and governance standards. ✓
- 8** To foster a healthy work environment so that all associates can enjoy our daily activities and gain more experience.




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

 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

 www.resguarda.com/aeromexico
miaeromexico.com/compliance



Emotional attention to psychosocial risk factors.

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Contact

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

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