

# CODE OF ETHICS FOR SUPPLIERS

AerolíneasArgentinas 





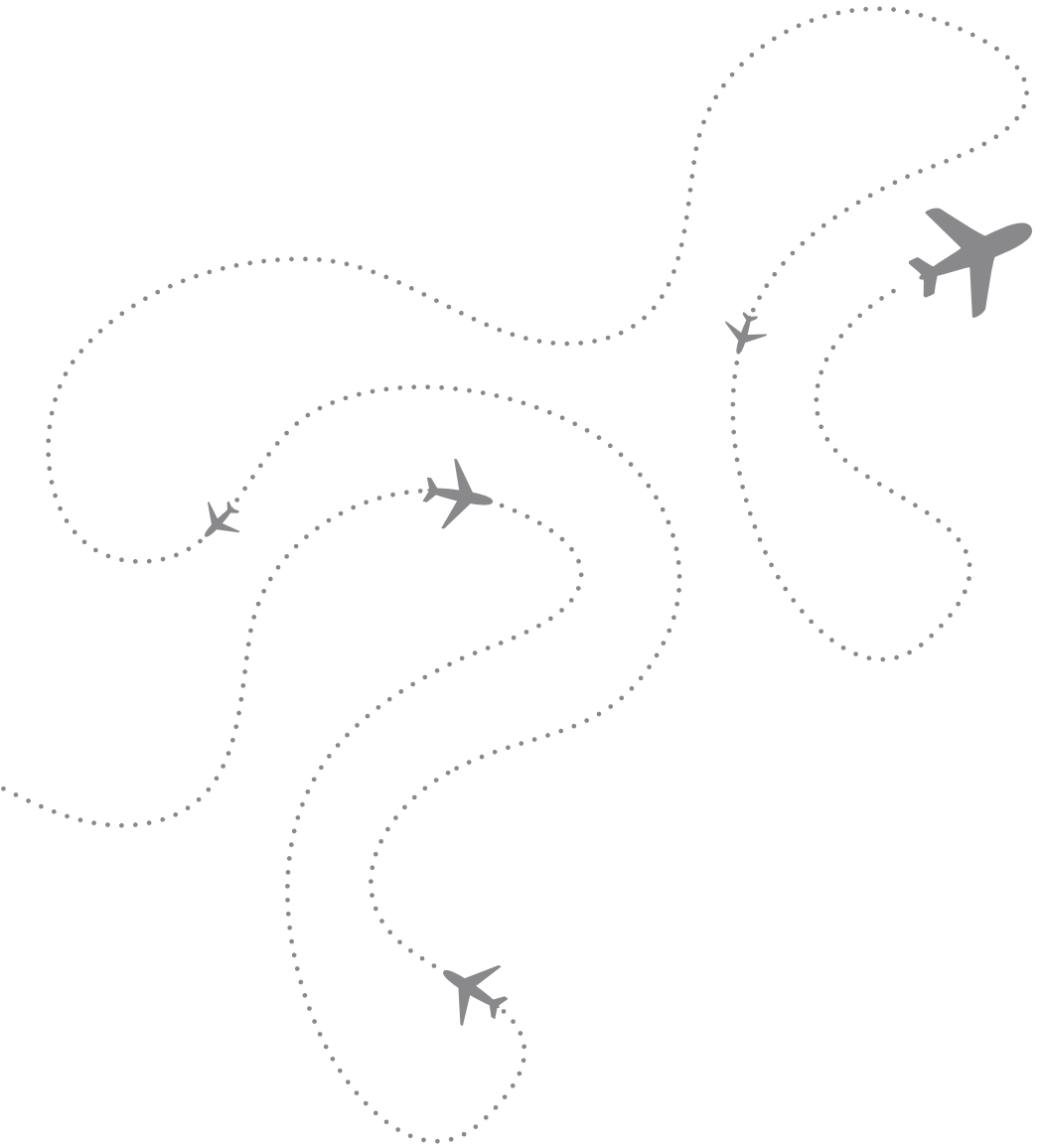
Dear Suppliers,

**Grupo Aerolíneas is committed to complying with the highest standards of ethics, integrity and legality.** These values are reflected in the Code of Ethics of the Company, the objective of which is to inspire and guide the actions of all employees in adherence to them.

In order to reinforce and transmit this commitment to those who interact with Grupo Aerolíneas, the Company has developed this Code of Ethics for Suppliers. **It regulates the minimum standards of conduct that adhere to said values and aims to guide its suppliers in the way they should act during the development of their commercial activity with Grupo Aerolíneas.**

Should any doubt arise as to the use of the guidelines included in this Code, we invite you to contact your assigned representative in the Supply Chain and Logistics Department of the Company.

***Board of Directors***  
**Grupo Aerolíneas**



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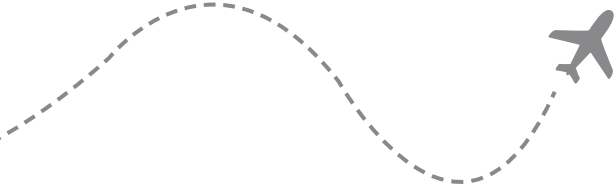




# 1

## THE COMPANY





## MISSION



As the flag airline, our mission is to guarantee the connectivity within Argentina and with the world; with the objective of being an essential tool for the economic, social and cultural development of our country.

## VISION



To be the leading airline within Argentina and the one chosen by those who visit our country from abroad.

## OBJETIVOS



To connect, integrate and develop.  
To be productive and efficient.  
To be sustainable.

## VALUES



### **Safety:**

We comply with the highest safety standards.

### **Connectivity:**

We provide a fast and comfortable public service, which guarantees the mobility within the country and connectivity with foreign countries.

### **Quality service:**

We prioritize the service and assistance that we provide in each stage of the travel experience.

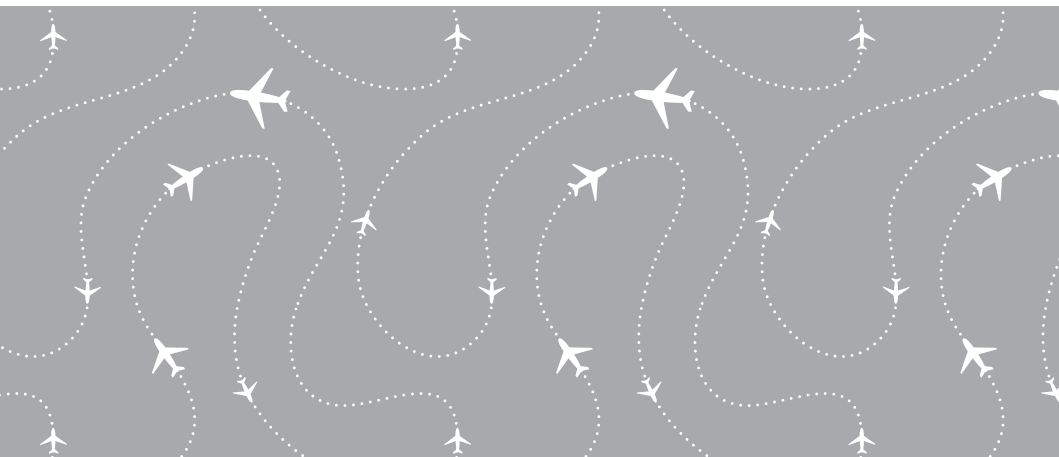
### **Transparency:**

We apply visible public-access procedures, fostering broad participation in each contracting process. We work to be sustainable, optimize resources and increase productivity.

### **Inclusion:**

We encourage an organizational culture that promotes respect for diversity through inclusive environments.





# 2

## SCOPE





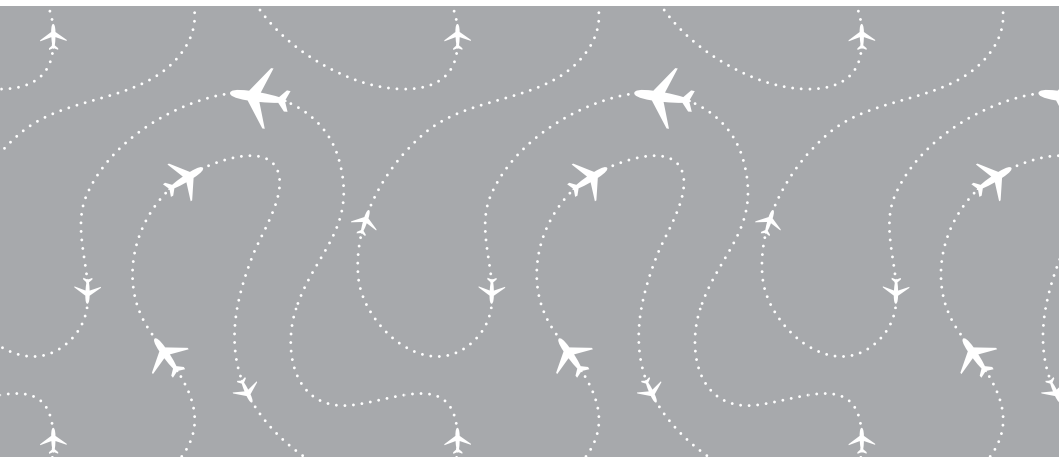
This Code is applicable to all the Suppliers of Grupo Aerolíneas<sup>1</sup> (*hereinafter also referred to as the “Company”*).

“Supplier” means any employee, representative, director, proxy holder, partner, shareholder or subcontractor of the supplier related to the provision of services or goods to the Company.

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**(1)** Aerolíneas Argentinas S.A., Austral Líneas Aéreas - Cielos del Sur S.A., Aerohandling S.A., Jet Paq S.A., OPTAR Operador Mayorista de Servicios Turísticos S.A. and any other company that in the future may integrate “Grupo Aerolíneas”.





# 3

## OBLIGATIONS



*Suppliers must act in adherence to the guidelines included in this Code. In addition, they are expected to apply these guidelines in their supply chain.*

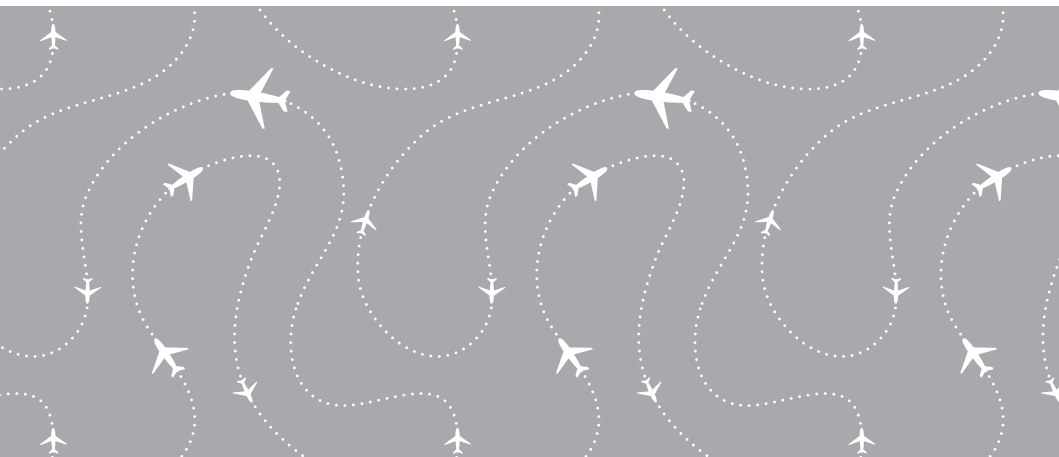
Transgressions of the Code shall not be tolerated by the Company and it could not be argued that the Code was breached due to ignorance or obedience to instructions received.

The acknowledgement of and compliance with this document constitutes a fundamental factor for the Company when it comes to selecting, hiring, evaluating and retaining Suppliers.

If facts or situations contrary to the Code of Ethics for Suppliers are verified, the Company shall apply the corresponding sanctions depending on the severity of the breach.







# 4

# NON-COMPLIANCE REPORT



If a situation contrary to the provisions of this Code is suspected or detected by the Supplier, it must be reported to the Ethics Line of Grupo Aerolíneas.

It is a confidential channel, managed by an independent third party, available 24 hours a day, 365 days a year through the following contact channels:



Argentina: 0800-999-4636 / 0800-122-7374

Other countries: check available lines in [www.resguarda.com/grupoaerolineas](http://www.resguarda.com/grupoaerolineas)



[www.resguarda.com/grupoaerolineas](http://www.resguarda.com/grupoaerolineas)



[lineaetica.grupoar@resguarda.com](mailto:lineaetica.grupoar@resguarda.com)

The Internal Audit Department is the only one authorized and is obliged to investigate all potential acts contrary to the Code of Ethics for Suppliers. The reporting person should not attempt to personally conduct investigations or interviews related to reported situations.

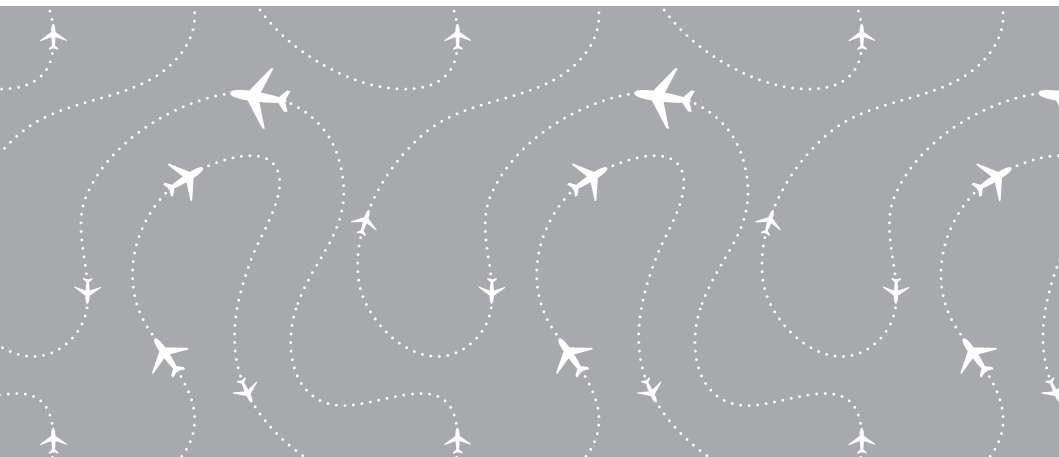
*The Company will take measures to ensure the confidentiality of the information received and to protect all those who report in good faith.*



In this context, it encourages to report any attempt to restrict the right to report or expose any conduct contrary to this Code in order to take immediate measures against those who carry out such actions.







# 5

# ETHICAL GUIDELINES



*Suppliers must guarantee compliance with the applicable legislation in each country where they carry out their activities for Grupo Aerolíneas. Moreover, they must comply with the provisions of this Code and any applicable internal policy and procedure on the basis of commitment, honesty and loyalty to the Company.*



Any behavior contrary to the laws, the Code of Ethics for Suppliers and the internal regulations of the Company even when they are habitual and accepted in certain places, shall not be accepted.

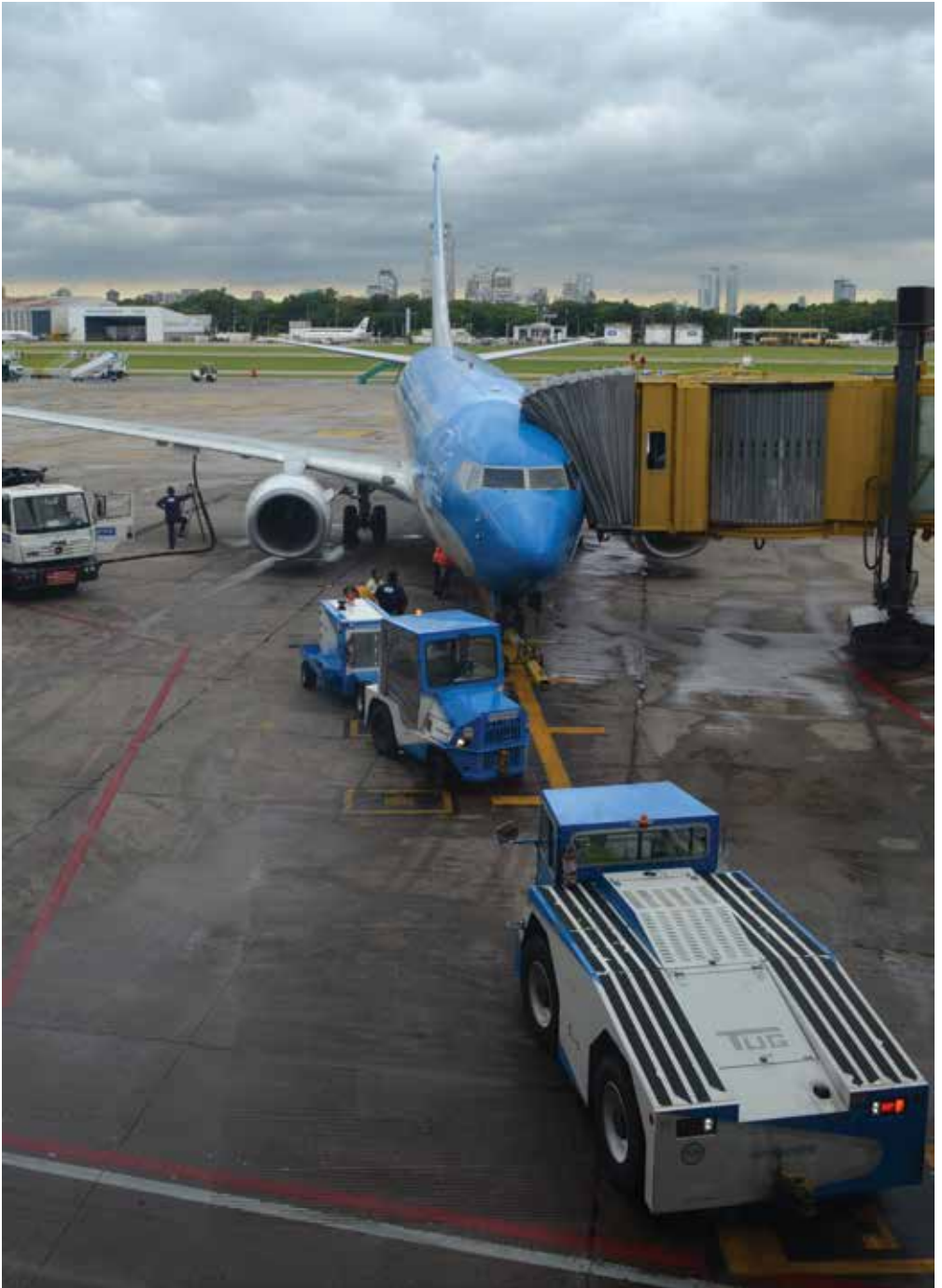
Suppliers must keep records evidencing that they have complied with all provisions regarding employer contributions, social security and medicare contributions, payments to the labor risk insurance companies and any legal authorization necessary to provide goods or render services. The Company may periodically request proof of payments or transactions and the validity of the aforementioned documents.

Operational Safety is a strategic priority for Grupo Aerolíneas.

In this context, the Company has developed internal policies and procedures to minimize the risk in operations and allow a safe development of the airline activity, as well as the compliance with the industry standards and the requirements of the enforcing authorities.

*If hazards, deficiencies or events that could put operational safety at risk are detected, they must be immediately reported by email to [reporte\\_ar@aerolineas.com.ar](mailto:reporte_ar@aerolineas.com.ar) (in the case of Aerolíneas Argentinas S.A.) or [reporte\\_au@aerolineas.com.ar](mailto:reporte_au@aerolineas.com.ar) (if it corresponds to Austral Líneas Aéreas - Cielos del Sur S.A.).*







### 5.03

## PROHIBITION OF FRAUDULENT AND CORRUPTION PRACTICES

*Grupo Aerolíneas rejects and condemns all fraudulent acts or corrupt practices and, therefore, expects the same commitment from its Suppliers.*



As regards the development of their commercial activity with the Company, they must not promise, offer, deliver, request and / or receive - whether directly or indirectly - any valuable asset<sup>2</sup> in exchange for influencing a negotiation or decision, obtaining preferential treatment or an improper advantage, or the performance or omission of any act by a public officer and / or any private person or entity.

Neither should they offer employees of Grupo Aerolíneas, nor their family members or friends, incentives of any kind in order to obtain or keep a business.

Suppliers must not tolerate the misappropriation or misuse of the assets or resources of the Company, nor the improper handling and / or falsification of its information.

Any irregularity that is detected or suspected in this context must be reported immediately, even if there is any doubt about the veracity of the facts.

(2) **Valuable asset:** means cash and cash equivalents (e.g. discounts, gift cards, miles, etc.), meals, invitations, trips, entertainments, loans, tangible goods, services or any other type of advantage or benefit with economic value.



#### 5.04 RELATIONSHIP WITH THE COMPANY

*Suppliers must favor fair competition and avoid any type of cartelization or monopoly when conducting their businesses.*



Moreover, they must perform their tasks showing commitment to the assigned functions and responsibilities, complying with the required safety measures, working towards results and, if applicable, with a service-oriented attitude.

#### 5.05 CONFLICT DE INTEREST

*Suppliers must not maintain financial or other relationships with employees of Grupo Aerolíneas that may give rise to a real or potential conflict with regard to the interests of the Company.*



A conflict of interest occurs when there is kinship, affinity or other type of relationship between an employee of Grupo Aerolíneas and a Supplier that may or might improperly influence on the operations with the Company. Kinship means any family relationship with an employee by consanguinity (blood relationship) or affinity to the fourth degree.

Suppliers must inform the existence or nonexistence of such circumstances in writing through the forms provided by the Company for these purposes.



## 5.06 GIFTS AND BUSINESS COURTESIES

*Suppliers must not offer or give gifts or business courtesies<sup>3</sup> whatsoever, including the free assignment of rights to use goods or services, to employees of Grupo Aerolíneas in the course or as a result of the performance of their duties and when they would not have been offered if the recipient had not held the position that he held, or when their purpose could reasonably be interpreted as that of obtaining or influencing on the conduct of the recipient of such gifts or business courtesies (“Improper Conduct”).*



As an exception to this rule, Suppliers may offer or deliver gifts and business courtesies with insignificant or symbolic economic value<sup>4</sup> and as a sign of hospitality or courtesy, provided they are kept within the usual parameters for the industry, they are not

frequent or expensive and they are not intended to incite Improper Conduct. Under no circumstances may it be cash or cash equivalents (*such as vouchers or gift cards*) or other items that could be easily converted into cash.

Invitations to participate in business presentations, conferences, academic activities or technical courses, or other activities that involve costs, whether in charge of the person extending the invitation or not, must be expressly authorized by the Company.

In particular, employees of the Supply Chain and Logistics Department, whatever their role, and those who work in other departments that are negotiating or reviewing a contract with a Supplier, are banned from accepting gifts or business courtesies from Suppliers regardless of the value thereof.

(3) **Gifts or Business Courtesies:** any kind of gift, invitation to events, meals, entertainments, benefits or other courtesy goods or services.

(4) **Insignificant or symbolic economic value:** when the value of the gift(s) or business courtesies received from the same source does not exceed, separately or jointly, USD 150 (one hundred and fifty US dollars) per year.



## 5.07 PROPERTY AND TECHNOLOGICAL RESOURCES

*Suppliers that, in the fulfillment of their obligations, need to use property or technological resources of the Company must ensure that said property or resources shall be used properly by the persons and for the purposes expressly authorized. In addition, they must comply with the existing restrictions and agreements regarding the authorization to use them.*



For the purpose of this Code, “property” means both tangible property (*facilities, vehicles, tools, furniture, office supplies, among others*) and intangible property (*brands, patents, designs, Internet domains and, in general, any intellectual property right or work protected by law that has been created, devised or*

*produced by Grupo Aerolíneas*). Moreover, technological resources of the Company such as servers, computers, software, Internet, Intranet, wireless networks, communication and storage devices, cell phones, emails, etc. must also be protected.

Suppliers may only use the trademark, logo or any other type of intellectual property of the Company if they have been expressly authorized by Grupo Aerolíneas.

The Company reserves the right to monitor the use of property and technological resources in accordance with the governing law of each country.



## 5.08 CONFIDENTIAL INFORMATION

*Confidential information includes all nonpublic data, generated by or in the custody of the Company, the disclosure of which could cause damage to Grupo Aerolíneas.*



It includes, without limitation, business plans, negotiations in progress, contracts, patrimonial or financial information, personal data of employees, clients and / or suppliers, changes in key positions, relevant litigation or any information to which the

Supplier could have access by means of its commercial relationship with the Company and that could affect the normal development of its activity. Should any doubt arise, all information must be presumed confidential.

The obligation to keep information confidential continues even after finishing the commercial relationship with the Company for the time established by the governing law of each country.

## 5.09 INFORMATION SECURITY

*Only duly authorized Suppliers, subject to the restrictions imposed by the governing legislation, shall have access to the internal information of the Company - whether it is in physical, magnetic, electronic, optical or any other means that serves such purposes - and may only be used for the purposes and during the periods specified in the authorization. Information security involves its protection against abuse and theft.*



In this context, the passwords to access the computer systems of the Company are essential, they must be protected and, under no circumstances, must they be shared or communicated to another person.

When applicable, they must ensure that the Company's records reflect the transactions and operations carried out in a faithful, timely and complete manner. For the purpose of this Code, "records" means all information generated by or in the custody of Grupo Aerolíneas.



## 5.10 RELIABILITY OF RECORDS

*Suppliers must have records that reflect in a complete, accurate and timely manner, the transactions and operations linked to their relationship with the Company. In addition, they must ensure the availability of all documentation that supports such registrations. It is forbidden to falsify or manipulate any information or record related to the operations and transactions of the Company.*

Under no circumstances should they obstruct, delay, hinder or make it difficult in any manner whatsoever, for the Company to access the documentation.

Failure to comply with these provisions shall be considered a serious fault.

## 5.11 NON-DISCRIMINATION AND NON-HARASSMENT

*Grupo Aerolíneas adheres to the ethical principles of non-discrimination, respect and tolerance; and commits its best efforts so that those who interact with the Company are treated and treat each other fairly, respectfully and with dignity.*

reason that threatens the dignity of a person, nor allow any damage to someone's reputation through preconceptions, false testimony, unsubstantiated information or other means.

Nor shall any type of harassment be tolerated. For the purpose of this Code, "harassment" means any action, practice or conduct considered inopportune, humiliating, denigrating, intimidating or hostile, which includes physical, written or spoken aggressions that may even constitute sexual harassment.

In this context, the Company shall neither accept discrimination based on race, religious belief, political ideas, nationality, sex, sexual preferences, marital status, age, disability, illness or any other



*Suppliers must promote a safe and healthy work environment in order to avoid accidents and damages to the environment and health that may occur while performing work activities. In addition, they must offer fair labor practices, in compliance with the applicable law, including the prohibition of forced labor, child labor and, in general, any type of mistreatment.*



Grupo Aerolíneas keeps the environment free of tobacco, alcohol and / or drugs. In the same way, Suppliers are also expected to have the same behavior in compliance with their commercial obligations with the Company.

If acts or situations that put health and safety measures established by the Company at risk are detected, they must be reported immediately through the channels stated in Article 4.

*Passengers and customers of Grupo Aerolíneas must receive, at all times and in all places, the attention they require, as well as the best possible treatment from the representatives of the Company with whom they interact, whether they work for the Company or the Supplier.*



Suppliers that are responsible for providing service to passengers and customers must give courteous and efficient attention, offering clear, accurate and transparent information. Passengers and customers must get answers, even if they are negative, to their requests, but in an appropriate and respectful way, as soon as possible.

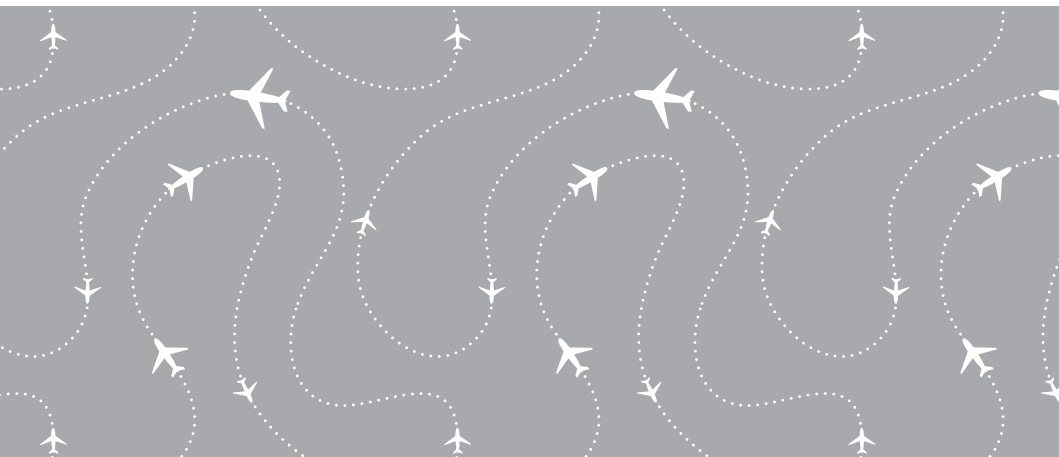
It is strictly forbidden to carry out discrimination of any kind, mistreatment, theft or misappropriation of belongings of any of the passengers or customers.

*Environmental protection plays an essential role in the Company's commitment to conduct business and it is requested that Suppliers have similar behavior.*



In this context, they must comply with environmental laws and regulations applicable to the tasks that Suppliers are accountable for and try to achieve an efficient use of available resources.





# 6

## VALIDITY AND UPDATE





This Code of Ethics for Suppliers was approved on July 26, 2018.

The Company may review, amend and interpret its content, disseminating an eventual amendment, when it deems it appropriate.









*Aerohandling JetPaq Optar Austral AerolíneasArgentinas *