

CODE OF ETHICS

*Aerolíneas*AerolíneasArgentina 



Dear Employees,

We, the members of Grupo Aerolíneas, regardless of our location or responsibilities, build the image of our Company on a daily basis.

This constitutes an enormous responsibility for each one of us, since **our behavior with colleagues, customers, suppliers, society and the environment is building our own identity.**

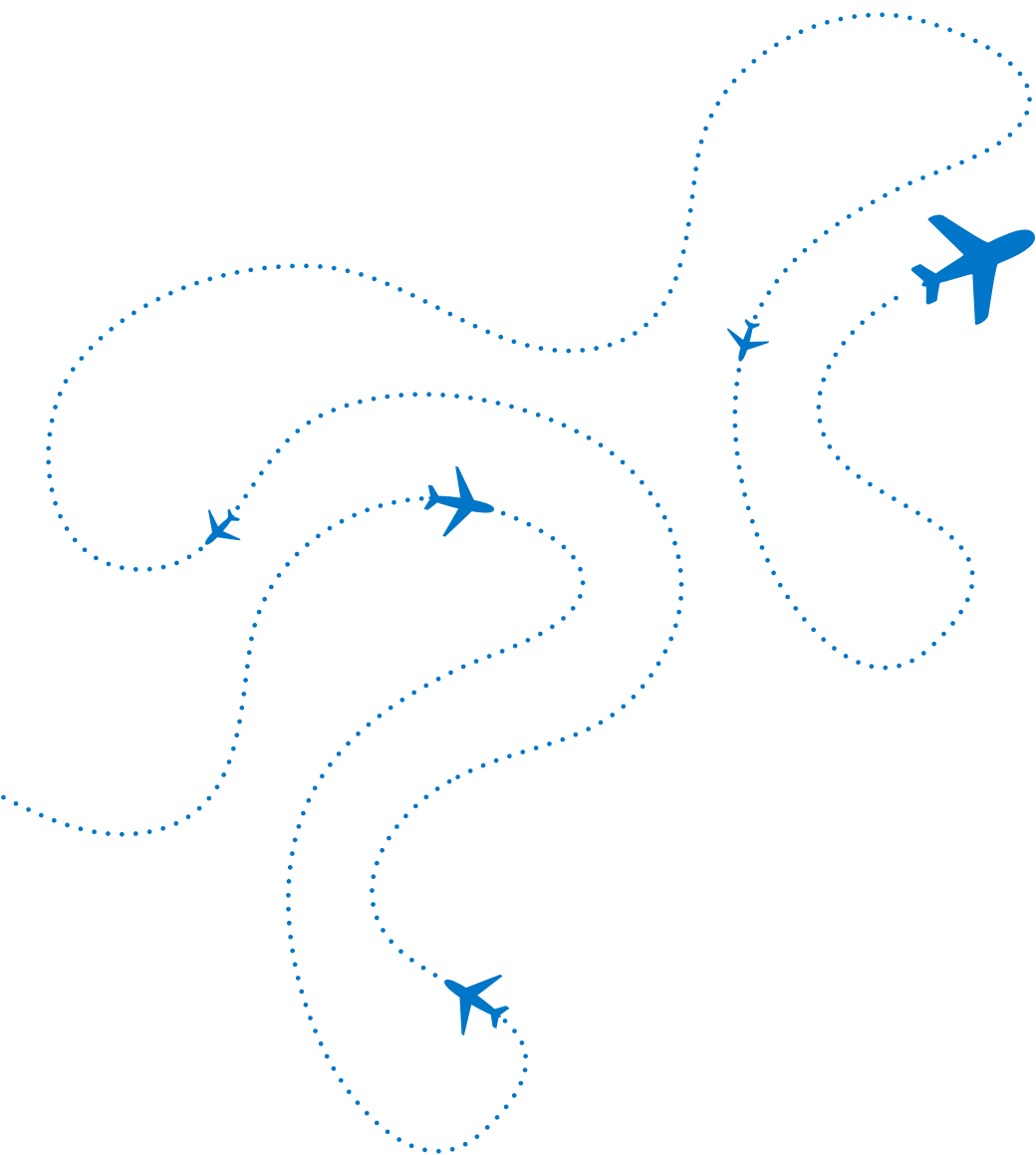
The challenges are enormous and to overcome them successfully, we must act and make decisions according to the mission, vision and values that guide us.

Through the updating of our Code of Ethics, **we want to reinforce and transmit the commitment we have with our values, which we invite you to adopt and use as a guide in each of our actions.** Doing business in accordance with these principles shall be fundamental to our success and constitutes our foundation for a sustainable future.

We invite you, knowing the great commitment, pride and passion that it generates in us to work in Grupo Aerolíneas, **to trust in the enormous potential of this Company and to work to further strengthen our reputation to continue growing with integrity and excellence.**

As employees of the Company, we are likely to face unforeseen situations and we trust that, when the moment arrives, we will always adhere to the spirit of this Code and, **if necessary, seek advice from our direct supervisor or the Internal Audit - Compliance Department.**

Board of Directors - Grupo Aerolíneas



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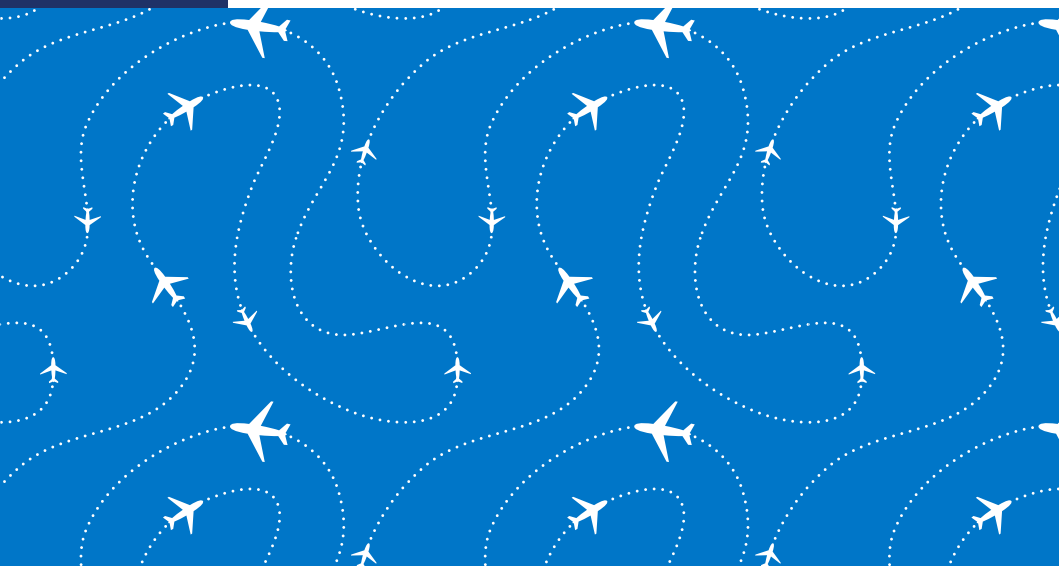
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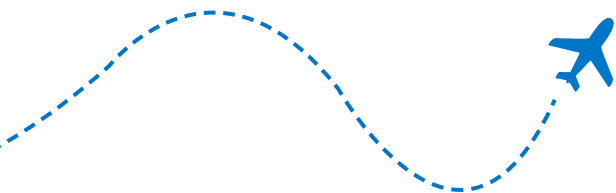




1

THE COMPANY





MISSION



To ensure the connectivity of Argentine men and women, within our country and with the rest of the world, promoting economic, social and cultural development.

VISION



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

VALUES



Safety

We comply with the highest safety standards.

Quality service

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

Connectivity

We provide a fast and comfortable public service that ensures transportation within the country and connection with the world.

Transparency

We apply clear and public access procedures, promoting a broad participation in each contract.

Efficiency and profitability

We work to be sustainable, optimize resources and boost productivity.

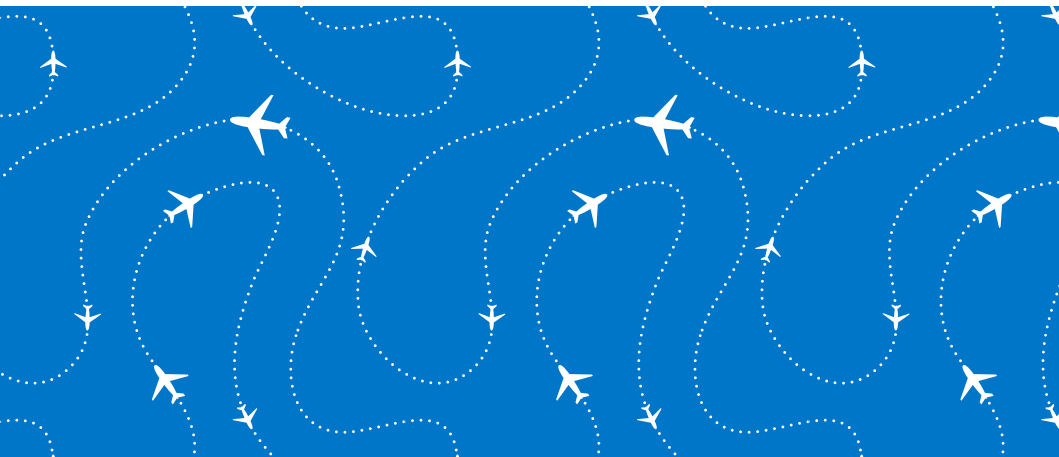
Inclusion

We promote an organizational culture that fosters respect for diversity by means of inclusive environments.

Sustainability

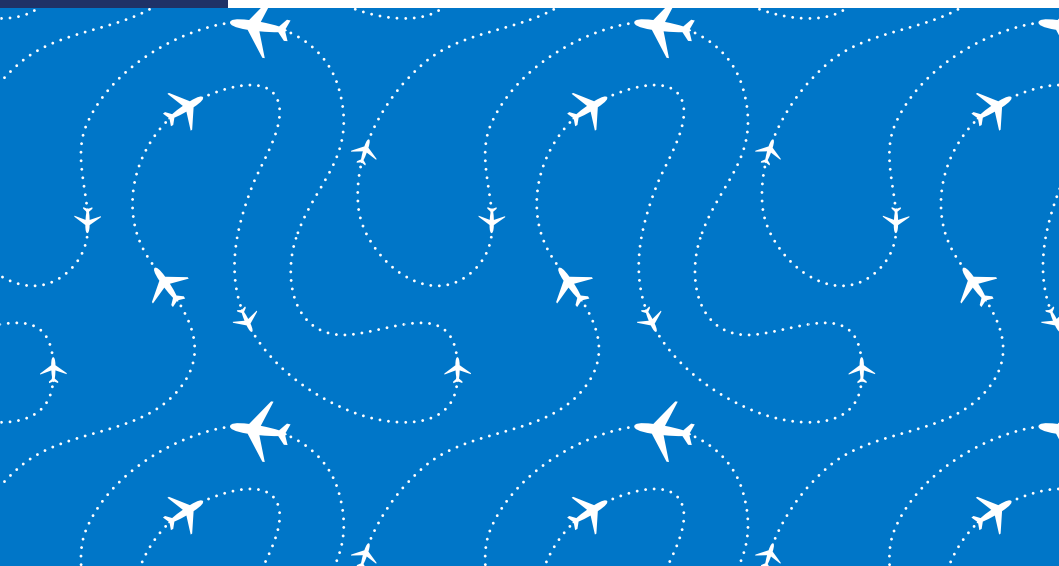
We are committed to reducing the impact of our activities on the environment.

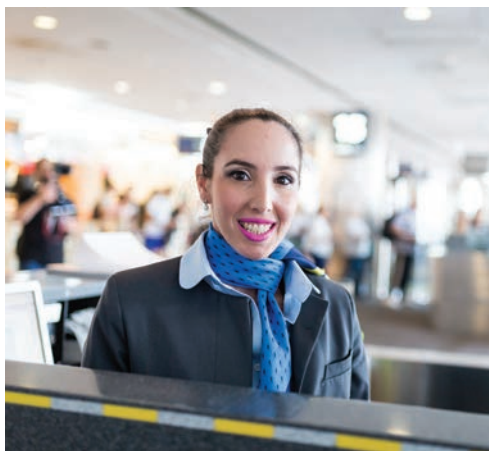




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PURPOSE





The mission, vision and values of Grupo Aerolíneas constitute its foundations, define its personality and should be the guide in the development of its activities, allowing the Company to boost confidence in its actions and consolidating its image and prestige.

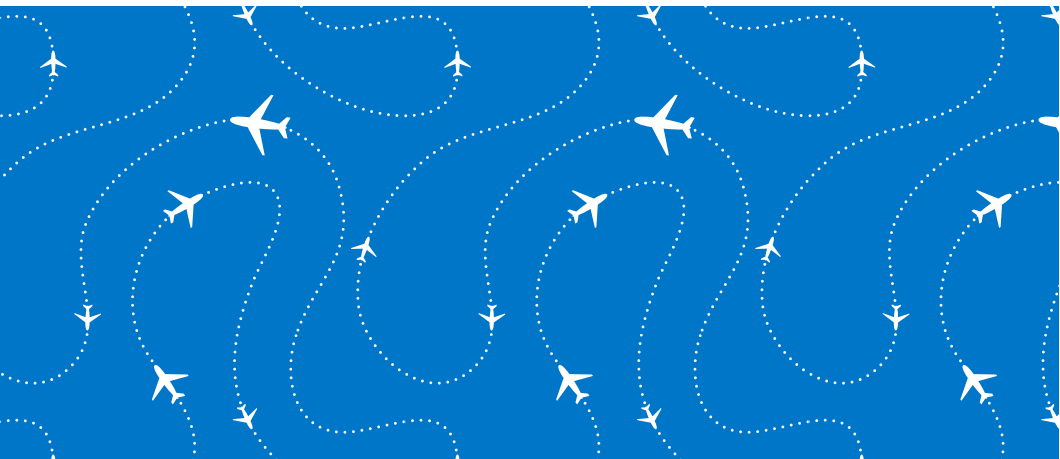
Compliance with the guidelines included in this Code shall allow to maintain a transparent, respectful and responsible attitude both among co-workers and with customers, suppliers and any other individual or legal entity with whom the Company interacts.

This Code is not intended to cover all possible situations that may arise in the professional environment, but to establish minimum standards of conduct that guide the Employees in their way of acting during the development of their activity in the Company and also in any related environment or activity, adopting a uniform criterion regardless of the function they occupy or the location of their place of work.



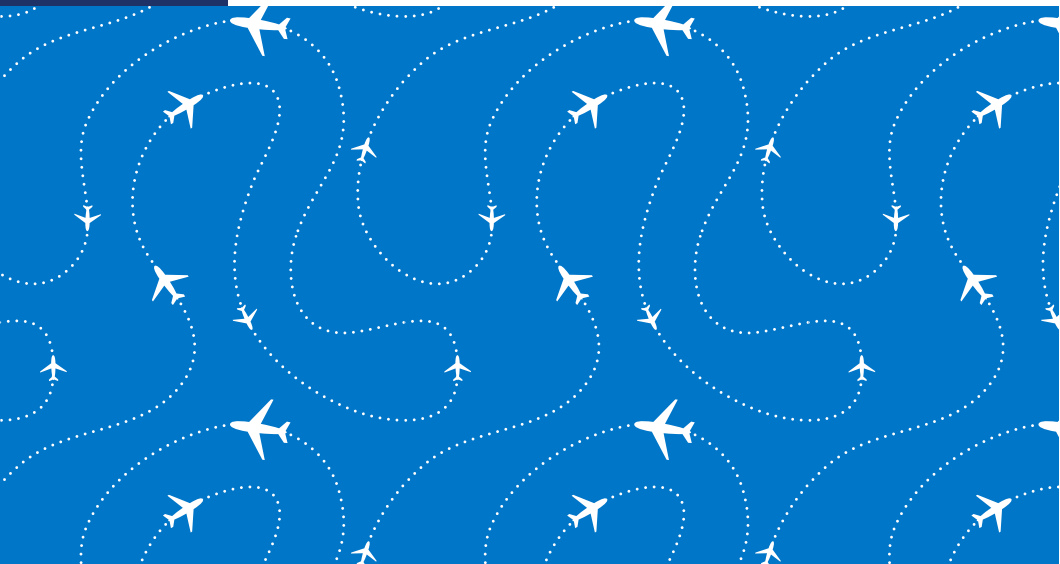
Should any doubt arise, due to the complexity or sensitivity of the situation, the Employees may consult with their immediate superior or the Internal Audit - Compliance Department.





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SCOPE

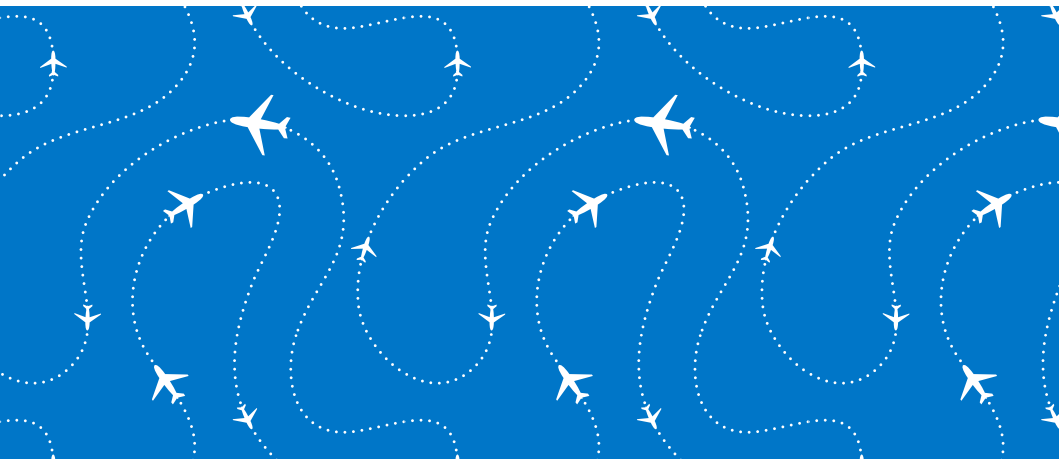


This Code is applicable to all employees and authorities of Grupo Aerolíneas (*hereinafter collectively referred to as “Employees”*) whether they are permanent or transient, regardless of their function or hierarchy.

Grupo Aerolíneas includes 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. Hereinafter collectively referred to as the “Company”.

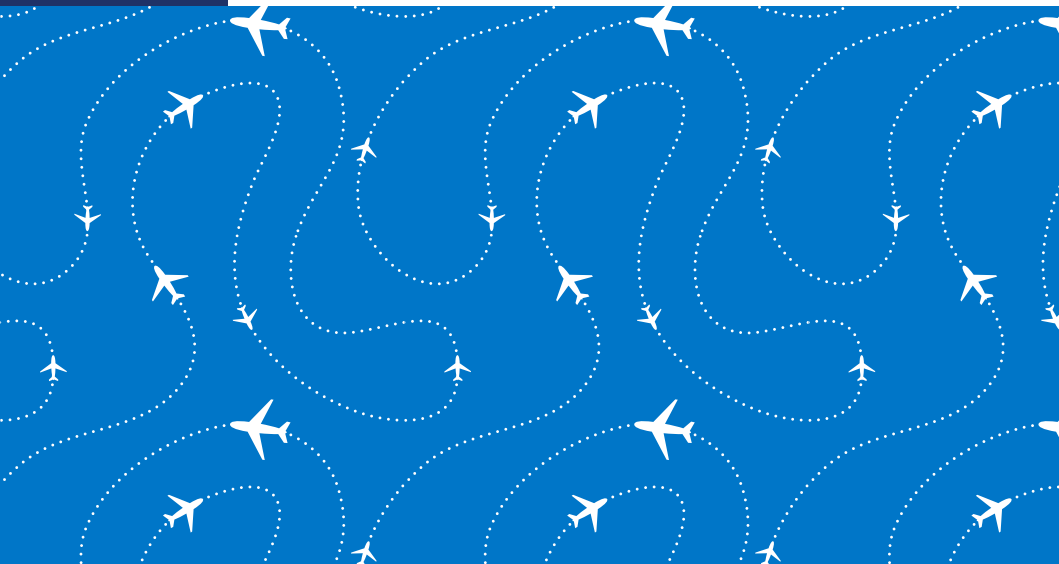






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RESPONSABILITIES



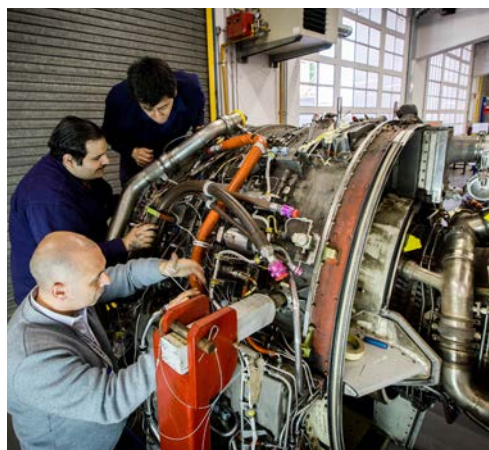


All Employees must act in accordance with the guidelines described in this Code, being the acceptance of its fulfillment, a condition so as to continue working in the Company.

Each Employee is responsible for complying with the provisions of the Code and it could not be argued that the Code was breached due to

ignorance or obedience to instructions from a higher hierarchical level. The guidelines of the Code are above the orders that any level of authority can give to its subordinates.

Any person in charge of staff shall also have the responsibility to make this document known to his employees and assist them in its compliance.





Failure to comply with this Code shall not be tolerated by Grupo Aerolíneas. If a situation contrary to the provisions of this Code is suspected or detected by an Employee, it must be reported immediately through the channels stated in Article 5 herein. Moreover, Employees must collaborate on any internal investigation carried out by the Company, when they are requested to do so and to the extent that their participation is necessary.

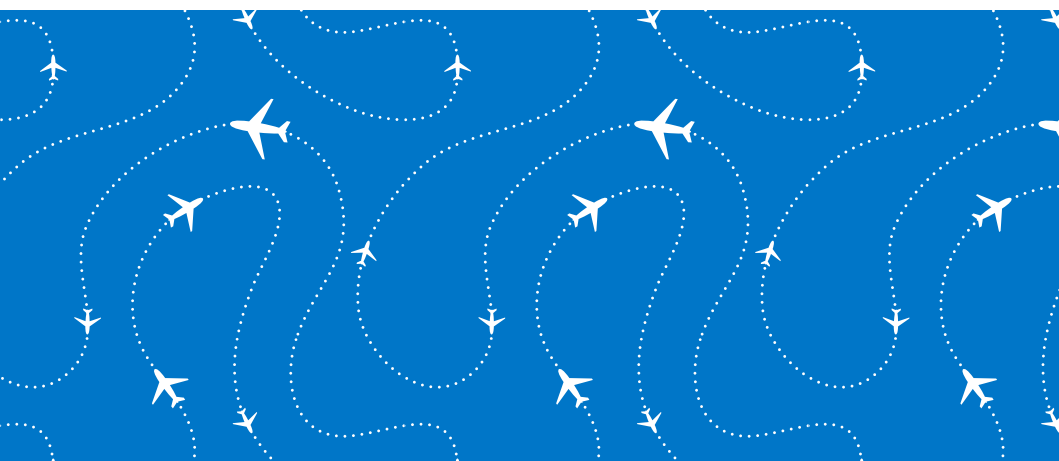


If a breach of the guidelines of the Code of Ethics is verified, the Company shall apply the corresponding penalties depending on the severity of the breach.

The Internal Audit Department, together with the Human Resources Department, shall take the necessary measures to ensure that Employees are aware of the provisions of this Code.

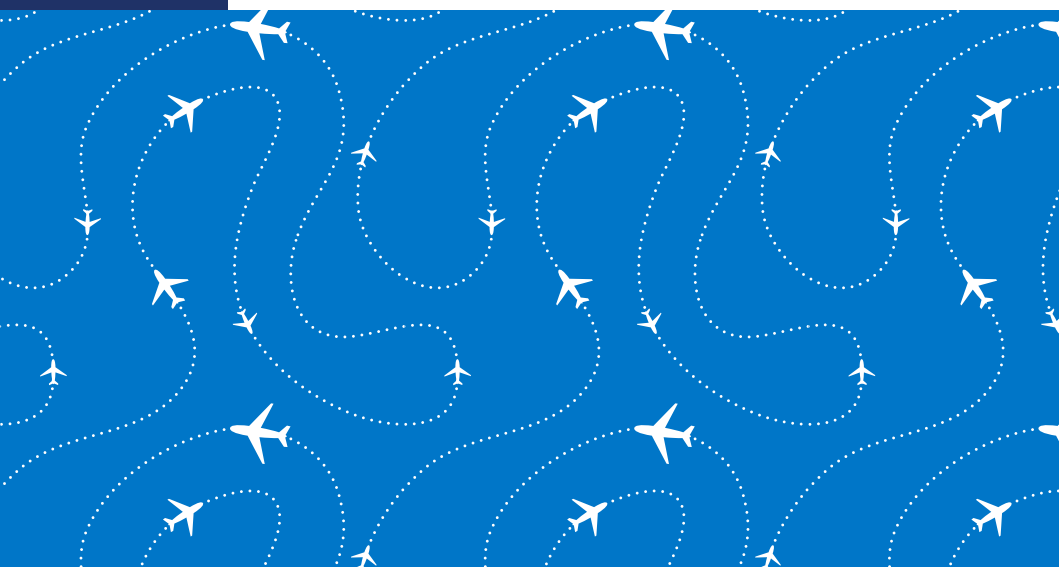






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NON-COMPLIANCE REPORT



Grupo Aerolíneas makes the Ethics Line available to anyone who suspects or detects a situation contrary to the Code of Ethics.

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



www.resguarda.com/grupoaerolineas



lineaetica.grupoar@resguarda.com

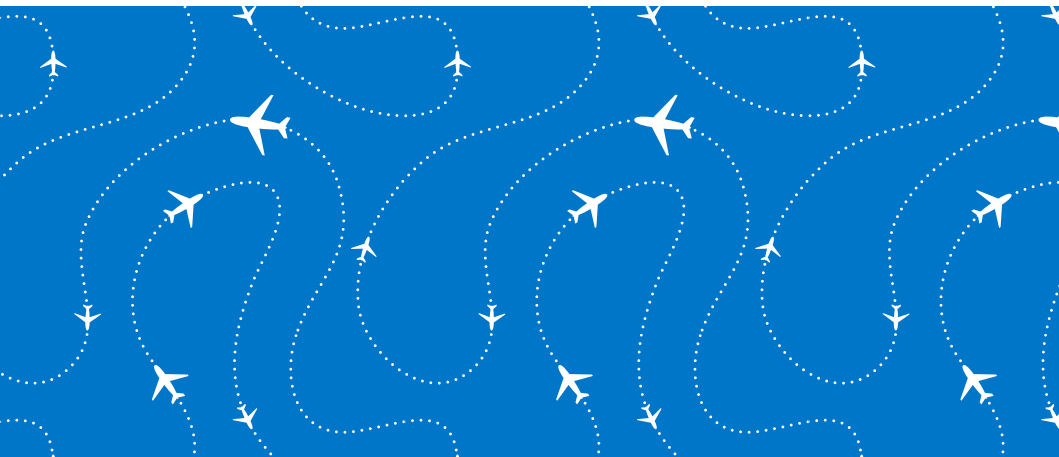
The Internal Audit Department is the only one authorized and is obliged to investigate all potential acts contrary to the Code of Ethics. For that purpose, they can freely and without restrictions access all records and facilities of the Company, examine and / or copy all or part of the contents of files, computers, desks, cabinets, etc. according to the applicable legislation of each country.

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, the Company 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.

The reporting person should not attempt to personally conduct investigations or interviews related to reported situations.

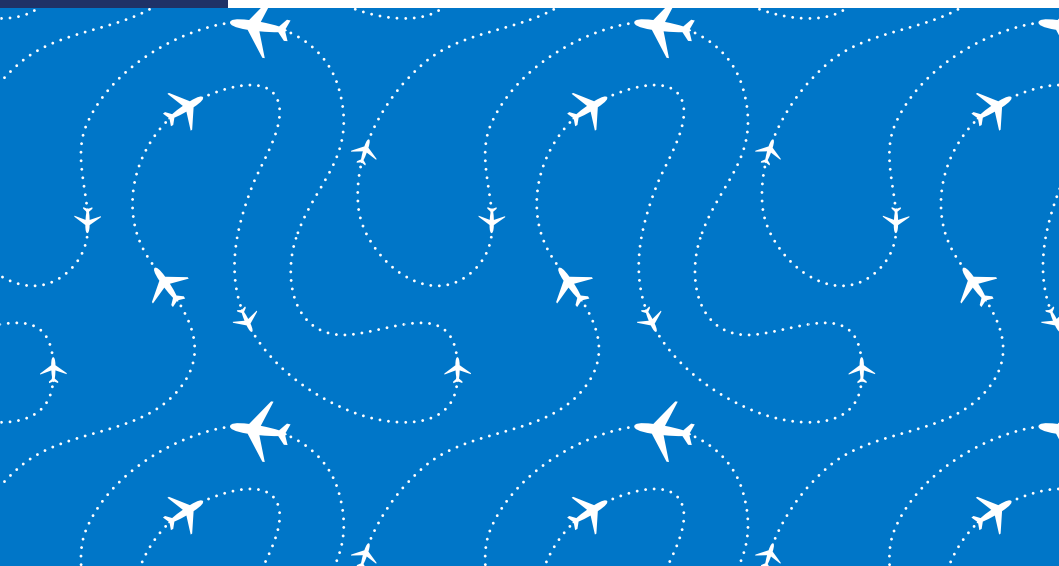






6

ETHICAL GUIDELINES





6.01 COMPLIANCE WITH LAWS AND REGULATIONS

All Employees must perform their duties in accordance with the applicable legislation in each country where Grupo Aerolíneas operates. Moreover, they must comply with the provisions of this Code and any 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 and the internal regulations of the Company even when they are habitual and accepted in certain places, shall not be accepted.

6.02 OPERATIONAL SAFETY

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 through the “Safety Reports” implemented for such purposes.



6.03 DEFENSE OF FREE COMPETITION

Employees must comply with the legislation that regulates free competition in each of the countries where the Company operates.

For that reason, necessary precautions must be taken so as not to break these rules when they make agreements, contract, request and / or share information with other airlines, whether they belong or not to the same alliance as Grupo Aerolíneas. Compliance must also be observed, among others, when designing projects or products and when participating and / or organizing meetings with the personnel of any airline.

Moreover, it is forbidden to carry out unfair competition actions in order to undermine free competition or to abuse of a dominant position in the market. Nor should actions be taken that undermine or discredit the products and services of the competing companies.

Under no circumstances is it allowed to obtain information about the competition in an undue or fraudulent way. Only information that has been obtained in a lawful manner may be considered in the decision-making process.

Should any questions arise regarding the application of free competition laws, you should consult the Legal and Regulatory Affairs Department.



Grupo Aerolíneas rejects and condemns all acts of fraud or corruption.



Fraud means any intentional attempt, omission or action taken to harm Grupo Aerolíneas in order to obtain an undue benefit or advantage, avoid compliance with an obligation and / or induce a third party to act to the detriment of the Company. Likewise, it is understood that said concept includes the misappropriation or misuse of the assets or resources of the Company, as well as the improper handling and / or falsification of their information.

Acts of corruption occur when an Employee of the Company and / or a third party representing it (*such as legal advisors, consultants, suppliers, agents, representatives, etc.*) promises, offers, delivers, requests and / or receives - whether directly or indirectly - any valuable asset¹ 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.

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.

Relationships with suppliers must take place under the integrity standards of this Code. Moreover, they must comply with the applicable legislation in commercial matters, labor relations, health and safety, environment, ethics and transparency and any other applicable regulations.

The selection and hiring of suppliers must always be based on technical, professional, ethical criteria and the needs of the Company, following predetermined guidelines, such as competition or price quotation, that guarantee the transparency of the process and the best cost-benefit analysis.



(1) 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.

There is a conflict of interest when the personal interests of an Employee can or could unduly influence on the performance of his duties and responsibilities within the Company to the detriment of the latter.

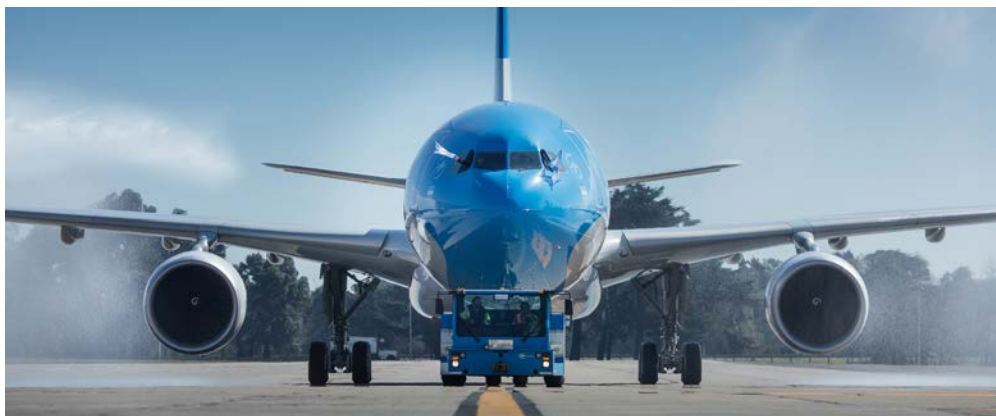
Employees must put the Company's interests ahead of any situation that could represent a real or potential benefit for themselves, their family members, relatives or third parties. In this context, "family members" means any family relationship with an employee by consanguinity (blood relationship) or affinity to the fourth degree.



It is understood that the Employee has a relationship that might create a conflict of interest when the situation involves:

i) commercial interests in any entity that does business with the Company or with interests opposed to the Company's; **ii)** family, kinship or business relationships in the workplace, **iii)** business links with other Employees; and **iv)** offering or receiving gifts or business courtesies in the course or as a result of the performance of their duties.

Employees must communicate any potential conflict of interest according to the requirements of the internal policies or procedures of the Company or when it is considered necessary by the Company.





6.07 ANTI-NEPOTISM

It is not allowed to hire personnel, regardless of the area of the Company or the type of employment used, which has kinship relationships with members of the Board of Directors, the Chief Executive Officer and / or Directors. In this context, “kinship” means any family relationship by consanguinity (*blood relationship*) to the second degree, including spouses and domestic partners.

The following are excepted from this provision:

i) Employees who comply with the abovementioned requirements but have taken over their positions prior to the entry into force of this Code of Ethics; and ii) Employees who, in the future, may comply with the abovementioned requirements but have taken over their positions prior to the commencement of the kinship relationship.

Any other exception to these provisions must be submitted for the approval of the Audit Committee.

6.08 GIFTS AND BUSINESS COURTESIES

As a general rule, Employees must not offer, give or receive gifts or business courtesies whatsoever, including the free assignment of rights to use them, 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”).



Employees may offer, deliver or receive gifts and business courtesies with insignificant or symbolic economic value, as defined by the Company, and as a sign of hospitality or courtesy provided they are kept within the usual parameters for the industry and they are not intended to incite Improper Conduct. Invitations, whether extended or received, to participate in business presentations, conferences, academic activities or technical courses, promotional tours (*for example, Fam Tours*) that involve costs, whether in charge of the person extending the invitation or not, must be authorized by the corresponding superior, at least a manager, taking

into account the interests of the Company, ensuring that the costs and characteristics involved are reasonable in agreement with the nature of the object and in accordance with best practices. In addition, its acceptance must not give rise to a real or potential conflict of interest, be incompatible with the job duties or be prohibited by applicable law. Once the invitation is approved, the decision must be communicated to the Director of the area involved.

The gifts and business courtesies offered, delivered or received by the relatives of an Employee shall be considered as gifts and business courtesies offered, delivered or received by the Employee.

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 or client, are banned from delivering or receiving gifts or business courtesies from them.

The Human Resources Department will keep a Record of the gifts or business courtesies delivered and received, as well as any other situation required by the specific policy

Employees must ensure the proper use of the Company's property and technological resources, for the purposes and by the persons expressly authorized.



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 an Employee of Grupo Aerolíneas in the exercise of his duties*). 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.

The Company's property and technological resources must not be used for personal purposes, since they provoke distractions in the performance of duties and responsibilities.

All Employees are responsible for their safekeeping and their misappropriation, neglect or wastefulness shall be considered as a violation of the guidelines contained in this Code.

It is strictly forbidden to use software or intellectual property rights of third parties without the corresponding license or authorization from its owner.

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

Confidential information includes all non-public data, the disclosure of which could cause damage to the Company, customers, suppliers or any other person interacting with 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 that could affect the normal development of the activities of the Company. Should any doubt arise, all information must be presumed confidential.

As a general rule, confidential information can only be exchanged - even within the Company - when necessary, depending on the activity of those who participate in the exchange and, if applicable, when there is express authorization from the owner of the information.

Personnel must be alert and report any situation that may cause loss, misuse or theft of information owned by the Company.

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





6.11 INFORMATION SECURITY AND RELIABILITY

Only duly authorized persons, 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.

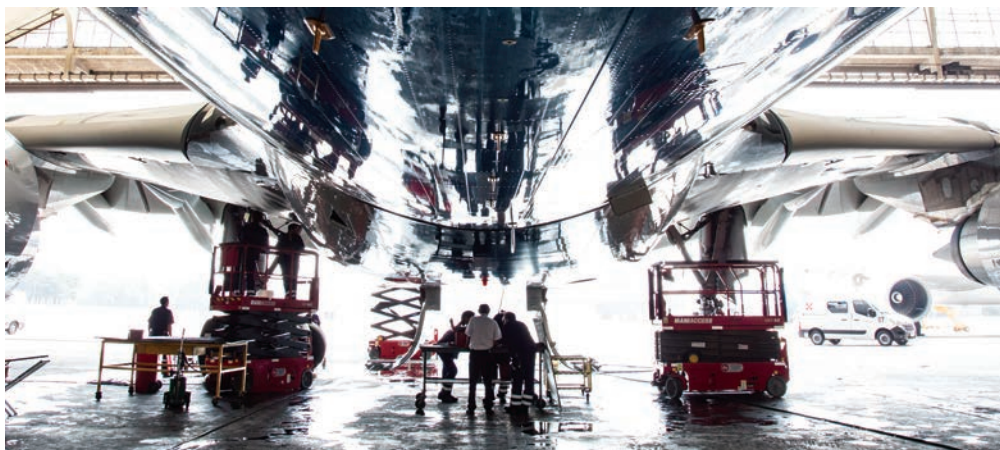
In this context, the passwords to access the computer systems of the Company are essential, they must be protected and, under no circumstances, must they be shared or communicated to another person.

Employees 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. It is strictly forbidden to falsify or manipulate any information or record of the Company.

Each Employee is responsible for taking the necessary precautions to: i) protect the information of the Company under his responsibility against any falsification, manipulation, damages and losses; ii) protect his personal passwords; and iii) ensure the custody of the information under his responsibility for the time established by the laws and internal regulations.





6.12 INTERNAL MANAGEMENT AND CONTROL

Employees must make decisions and act based on accurate information that reflects reality, considering the risks involved and favoring Grupo Aerolíneas' interests. In addition, they must verify that the required approvals have been obtained and duly document the process carried out.

Internal control is a process designed to provide a reasonable degree of security in terms of achieving the objectives of the Company in relation to the effectiveness and efficiency of operations, reliability of financial information and compliance with applicable laws, regulations and rules. All Employees are responsible for adhering to the established controls, maintaining a proactive attitude through the identification and notification of any weakness or failure in their operation.

6.13 COMMITMENT TO FULFILL TASKS

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

Although Employees may have access to an additional job for which they obtain an economic benefit, it will be an indispensable condition that such employment does not imply a competition - direct or indirect - against the Company, affect the performance of their tasks and job commitment, imply the use of the computer equipment owned by Grupo Aerolíneas and / or affect the license or certification necessary for the normal development of their tasks.



6.14 PERSONNEL SELECTION AND DEVELOPMENT

Grupo Aerolíneas shall prefer to fill a vacancy through internal movements and promotions of the Employees. The internal recruitment process shall be the first alternative for the Company although external hiring can be used if considered necessary.

The Company guarantees transparency in the recruitment and selection processes. If there are applications from family members of Employees to enter the Company, and provided they are not excluded by the provisions of Article 6.7, the same equitable treatment shall be ensured for all applicants. In addition, it shall not be feasible to choose someone for a position in which a relative can supervise or control his tasks, have some degree of decision or influence on his salary conditions, place of work, benefits, incentives and career development.

Grupo Aerolíneas encourages the development of its employees based on their performance, capacity, responsibility, results and attitude towards work. Therefore, any case of favoritism is forbidden.

A key factor in the professional development of Employees is constant training, regardless of their position or hierarchical level.

Grupo Aerolíneas adheres to the ethical principles of non-discrimination, respect and tolerance; and commits its best efforts to ensure that all Employees are treated and treat each other fairly, respectfully and with dignity.

The Company shall neither accept discrimination based on race, religious belief, political ideas, nationality, sex, sexual preference, marital status, age, disability, illness or any other 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.

Grupo Aerolíneas must offer fair labor practices, in compliance with the applicable law of each country, including the prohibition of forced labor, child labor and, in general, any type of mistreatment.

The Company will provide a workplace free of health and safety hazards and will permanently inspect the facilities, so that all the members of each area can be safe in their place of work.



This includes keeping the environment free of tobacco, alcohol and / or drugs. The Company prohibits any Employee from working under the influence of alcohol or drugs.

The Company will implement actions for the use of personal protective equipment and clothing appropriate for the tasks performed, in order to ensure the physical integrity of the Employees. Moreover, the Company shall raise awareness about the im-

portance of using these elements properly and the negative consequences of not using them or not using them properly, through training and communication. That is, Employees are obliged to know and respect the specific safety measures established for the assigned job position (*such as pilots, crew members and mechanics, among others*) and any other measure that the Company determines to ensure the safety of the activity, prevent work-related accidents or occupational diseases.

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 "Safety Reports" implemented for these purposes.



Staff Tickets may be used by the Employees and any of their beneficiaries for recreational purposes and may not be used for commercial purposes. Under no circumstances should an irresponsible or abusive use be made or any economic benefit be obtained through their use. Moreover, the tickets obtained through this benefit cannot be sold, donated, negotiated or exchanged for goods or services.

By using this benefit, Grupo Aerolíneas is being represented and a space is shared with passengers. For this reason, respect, tolerance and patience must be fundamental qualifications of the people who use this benefit. It is essential to collaborate with the co-workers at the airport and with the crew before, during and after the flight, complying with the instructions received from them and not causing conflicts. For example: to give priority to passengers during the boarding process, to use the assigned seat instead of requesting a change, to leave the plane if requested, etc. Finally, they cannot interfere with the tasks of their colleagues, for example, assisting them when they are performing the services on board or during an emergency procedure.

It is important to take care of clothing, personal appearance and behavior at all times. If Employees decide to consume alcoholic beverages during the flight, they should do it in a moderate and responsible manner. Employees who wear the uniform that represents the Company during the flight are not allowed to consume alcoholic beverages.

It is important to make an adequate plan when making a leisure trip as non-revenue standby passengers, since, in those cases, absences shall not be justified.

It is important to remember that during a leave of absence, Employees are not allowed to use staff tickets unless expressly authorized by the Central Medical Service.



Employees are not allowed to change or manipulate without authorization, whether directly or indirectly, the systems of Grupo Aerolíneas or third parties, for their own benefit or for someone else's benefit, especially those that have to do with non-revenue ticket issuance and use, reservations, procedures at the airport, upgrades, class changes and attendance records, to name a few.

Failure to comply with the guidelines of this Code and the internal regulations regarding staff tickets and systems, shall entitle the Company to withdraw or temporarily suspend the benefit, partially or totally, or take any other measure deemed appropriate.

Any other benefit that Employees may have as a consequence of being part of the Company, such as discounts in hotels, car rentals, excursions, etc. must adhere to these same principles.

The Company has internal communication procedures, so, as a consequence of that, only authorized personnel may make public statements on behalf of Grupo Aerolíneas. When media asks an Employee for an opinion on a matter related to the activities of the Company, said Employee must channel said request through the Corporate Affairs and Communications Department. Under no circumstances should an Employee answer on behalf of Grupo Aerolíneas without being authorized.

Moreover, Employees are forbidden to be publicly exposed on media or social networks in outrageous attitudes and / or publicly supporting or participat-

ing in religious, ethnic and / or political activities or conflicts involving Grupo Aerolíneas, its assets and technological resources for such purposes.

Nor should they make statements (*presentations, documents, emails or any other means*) on behalf of the Company or using its image, uniform or any other identifying object without being duly authorized.

The use of social networks by Employees of Grupo Aerolíneas must be performed in a responsible manner, ensuring respect and safeguarding the information, resources and image of the Company.



Passengers and customers of Grupo Aerolíneas must receive, at all times and in all places, the best possible treatment from the Employees with whom they interact. Employees must provide services in a polite and efficient manner, 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.



As part of the respect they deserve, they should be given priority before, during and after the trip and Employees must pay attention to their needs should they require attention.



6.20

SOCIAL RESPONSIBILITY AND THE ENVIRONMENT

Grupo Aerolíneas seeks to promote the production of social value by developing activities with an impact on the communities in which it operates. These actions are carried out taking advantage of the installed capacity or available resources such as:

The donation of tickets in the event of a medical emergency and available space in the cargo compartment so as to send cargo shipments in case of weather emergencies.

“Animate a Volar” Program: intended for people who are afraid of flying.

Technical Visits Program: intended for universities and technical schools with specialization.

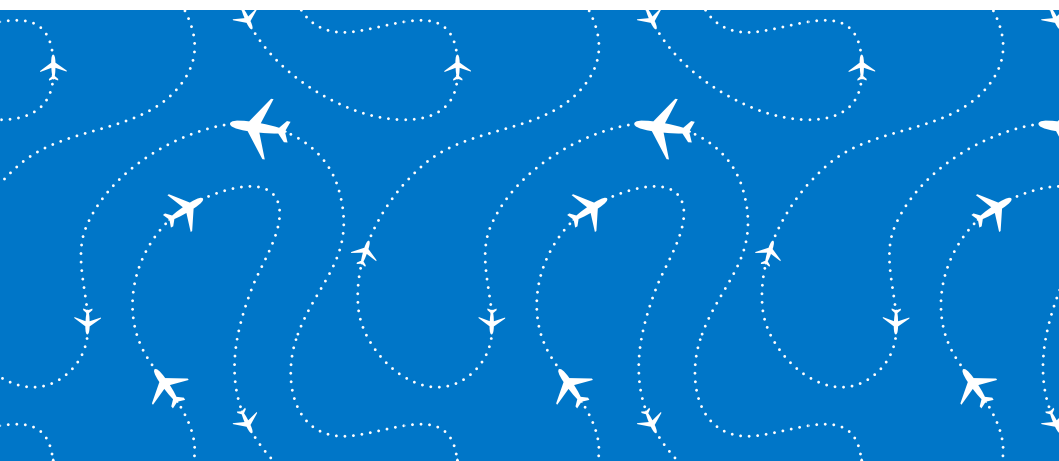
The donation of materials and clothing due to renovation; obsolete equipment for operations and recyclable materials.



In addition, different actions are organized with foundations, non-governmental organizations, associations and official agencies to provide benefits to the community.

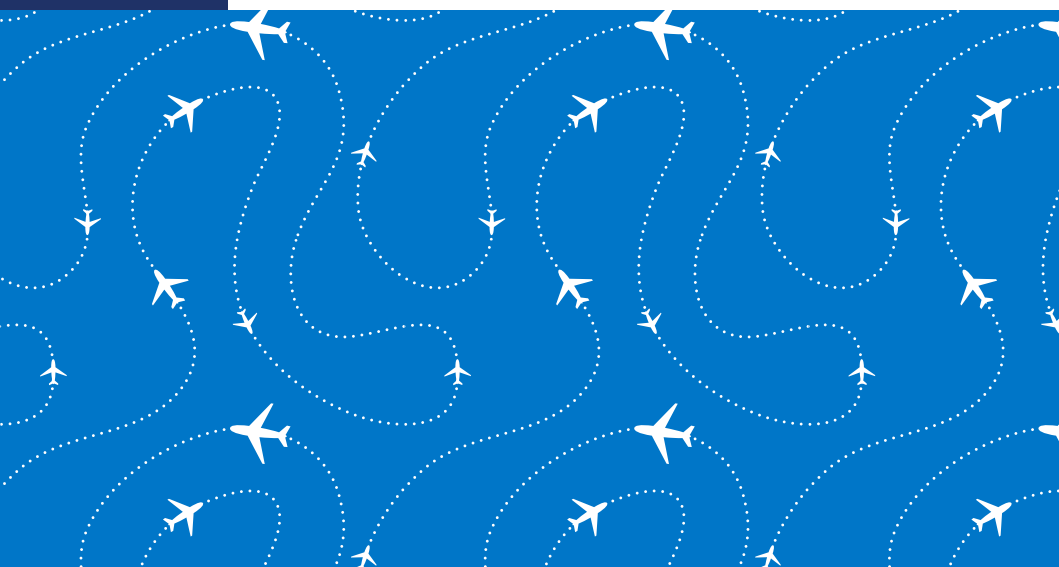
Environmental protection plays an essential role in the Company's commitment to conduct business. Employees must comply with environmental laws and regulations applicable to the tasks they are responsible for, as well as try to achieve an efficient use of available resources. In this context, the Company has developed an Internal Environmental Policy and conducts training and awareness campaigns to ensure compliance with the objectives set in this context, such as reduction of carbon dioxide emissions (CO₂), rationalization of fuel consumption, reduction of noise pollution and treatment and reduction of hazardous waste.





7

VALIDITY AND UPDATE





The revised version of this Code of Ethics was approved on May 9, 2018.

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





