ANTI-CORRUPTION POLICY

AIR NOSTRUM LÍNEAS AÉREAS DEL MEDITERRÁNEO, S.A.U.

AIR NOSTRUM ENGINEERING AND MAINTENANCE OPERATIONS, S.L.U.

AIR INVESTMENT VALENCIA, S.L.

Responsible officer	COMPLIANCE BODY COMPLIANCE OFFICER
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Version	Date of approval	Effective from	Changes
1	21-MAY-2024	22-MAY-2024	Original version.
2	15-JUL-2025	01-AUG-2025	See the changes detailed in the following line
-p. 1. Updated dates and version number. -p. 2. “Changes” column added. -p. 3. Format changes in the “Contents” index. -p. 4. Applies to AN Companies. -pp. 5-7. “Scope” added. -pp. 7-8. Additional definitions: “Conflict of Interest” and “Members of the Organisation”. -p. 13, last part. Paragraph on upcoming Procedure and related Records added. -p. 15. Reference to internal policies and rules of application under “Supplier Selection”. Reference to authorisation under “Donations” deleted because it will be regulated in the relevant Procedure. -p. 16. “Policy update” section deleted. Reference and content added in the last section “Approval, validity, monitoring and dissemination”. -p. 17. Updated text in the last section to align the wording and content with the rest of CCMS policies.			
3	22-SEP-2026	01-OCT-2026	See the changes detailed in the following line
General • The Policy has been updated to reflect the significant organizational changes resulting from the recent corporate restructuring. • The Policy has been reviewed to determine whether any amendments were required to align with **UNE 19601:2025** requirements. **1. Introduction** • Reference to the **Corporate Compliance Management System** and its structure has been added, together with a statement regarding compliance with the requirements of the applicable certification standards.			

3. Scope

- **Section 3.2** has been updated to align the affected activities with the current corporate scope.

8. Communication and Reporting

- Updated to align with the Corporate Compliance Policy.

9. Control, Monitoring and Oversight / 10. Approval, Validity and Communication

- Former Section 9 has been split into two separate sections, now Sections 9 and 10.

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1. Introduction

AIR NOSTRUM LÍNEAS AÉREAS DEL MEDITERRÁNEO, S.A.U., AIR NOSTRUM ENGINEERING AND MAINTENANCE OPERATIONS, S.L.U., and AIR INVESTMENT VALENCIA, S.L, as a majority shareholder in the aforementioned companies and their parent company (hereinafter referred to interchangeably as “AIR NOSTRUM”, “AIR NOSTRUM Companies”, “the Organisation” or “the Company”) operate in full accordance with the law under the principles of business ethics.

AIR NOSTRUM abides by the principles of accountability and good governance, which translates into the implementation of policies and procedures that ensure the control of all its areas and departments so that its operation is fully transparent, verifiable, and auditable.

The entry into force of Organic Law 5/2010, of 22 June, gave rise to the amendment of the Spanish Criminal Code, introducing corporate criminal liability of legal persons for offences committed by their employees, officers and directors within their organisation and for their benefit. In addition, Law No. 1/2015, of 30 March, which amended the Criminal Code once again, established a series of incentives for companies to implement effective crime prevention measures within their organisations when conducting their business.

Furthermore, in line with the provisions of key international regulations, such as the US Foreign Corrupt Practices Act (FCPA) or the UK Bribery Act among others, AIR NOSTRUM must ensure that certain behaviours that would undermine business integrity are not allowed within its scope. These include offering or accepting gifts, invitations or other forms of incentives that may reward or influence a business decision, or engaging in potential conflicts of interest that could put personal priorities before common ones; thus encouraging all persons involved in its activities to behave with integrity, without seeking any illegitimate benefit for AIR NOSTRUM, their own or third-parties by abusing their position or contacts under any circumstances.

In this regulatory context, AIR NOSTRUM has decided to approve this Anti-Corruption Policy (hereinafter, the “Policy”), which forms part of the Corporate Compliance Management System (“SGCC”) of the AIR NOSTRUM Companies, currently comprising the criminal compliance management system and the tax compliance management system. The Policy seeks to ensure the strict observance of all actions inherent to the various activities carried out by the AIR NOSTRUM Companies, specifically those set out in the following section.

This Policy is aligned with AIR NOSTRUM’s corporate culture and business ethics and takes into consideration both the Company's interests and the expectations of its stakeholders and society as a whole. It is also aligned with the requirements established in UNE 19601, Criminal Compliance Management Systems, and UNE 19602, Tax Compliance Management Systems. Likewise, it may be adapted to the requirements of any other UNE, ISO or certifiable compliance standards that the organization may decide to implement in the future, in order to ensure its adequacy to the applicable compliance framework and to best practices in the field.

2. Purpose

The purpose of this Policy is twofold: on the one hand, it seeks to set conduct guidelines on accepting or offering gifts or invitations, prohibiting bribery in all its forms; on the other hand, it outlines the expected behaviour of AIR NOSTRUM's staff when engaging with authorities, public officials and members of the Public Administrations in general, whether they are elected or not, as well as with third parties outside the companies (suppliers, customers, competitors, contractors, etc.).

3. Scope

This Policy applies to AIR NOSTRUM LÍNEAS AÉREAS DEL MEDITERRÁNEO, S.A.U., AIR NOSTRUM ENGINEERING AND MAINTENANCE OPERATIONS, S.L.U., and AIR INVESTMENT VALENCIA, S.L. as a majority shareholder in the aforementioned companies and their parent company (all of them hereinafter referred to as "AIR NOSTRUM", "AIR NOSTRUM Companies", "the Organisation" or "the Company").

3.1 Concerned companies and individuals

This Policy is mandatory and globally applicable to all AIR NOSTRUM Companies. All members of the Organisation must comply with its provisions, irrespective of the position they hold or the activity they carry out and their location, without prejudice to the application of the relevant current legislation in each specific case.
While this Policy applies to members of AIR NOSTRUM, it will also concern, in whole or in part, those natural or legal persons with whom AIR NOSTRUM engages, provided that the specific circumstances of the case so require it, for the purpose of complying with internal processes and thus ensure regulatory compliance in this regard.

3.2 Concerned activities

The activities subject to this Policy are all those conducted by AIR NOSTRUM Companies. Specifically, and in short:

- AIR NOSTRUM LÍNEAS AÉREAS DEL MEDITERRÁNEO, S.A.U.
  a) The operation and management of all types of scheduled and charter air transport services for passengers, cargo of all kinds and mail; b) The operation and sale of services associated with passenger air transport, particularly onboard sales and commercial advertising; c) The management, administration and provision of advisory services in all areas, including legal, administrative, labour, financial, strategic, commercial and technological matters, as well as the management of the acquisition and procurement of material resources and, where applicable, human resources, for the provision of investment services related to air transport activities; d) The purchase, sale and leasing of all types of aircraft, as well as materials and spare parts related to the construction and operation thereof; e) The maintenance, modification and technical adaptation of all types of aircraft, engines and auxiliary equipment, or any part thereof, on its own behalf or on behalf of third parties; f) The handling of baggage and other

items at airports and general civil aviation facilities; g) The management and handling of food and catering services associated with passenger air transport operations; h) The provision of aviation training and instruction services; i) The provision of aviation consultancy and audit services; j) The marketing of all types of wet lease and charter services for passengers, cargo of all kinds and mail, as well as the sale of services associated with air transport; k) The provision of ancillary and complementary services related to the marketing of air transport activities, acting as agents and/or commission agents, carrying out customs formalities, marketing, communications and advertising activities, as well as the analysis, planning and scheduling of commercial routes for scheduled, charter and wet lease services; l) The preparation of schedules and crew planning, including the assessment of associated staffing requirements and the provision of crew support services (travel arrangements, accommodation and allowances). The provision of technical assistance and the management of resources and services related to air transport, including flight crew personnel.

- AIR NOSTRUM ENGINEERING AND MAINTENANCE OPERATIONS, S.L.U.
  The provision of maintenance services and the modification and technical adaptation of all types of aircraft, engines and auxiliary equipment, on its own behalf or on behalf of third parties, as well as the purchase, sale and leasing of all types of materials and spare parts related to their construction and operation.

- AIR INVESTMENT VALENCIA, S.L.
  The direct or indirect provision and management of resources, services and investments related to air transport activities; the management, administration, assistance and provision of advisory services in legal, administrative, labour and any other areas that may be required for the conduct of business activities, as well as the management of the acquisition and procurement of material resources and, where applicable, human resources, for the provision of investment services related to air transport activities; and the incorporation of, or participation in, other companies and entities engaged in activities related to those described in the preceding sections.

Any other future activity that AIR NOSTRUM may undertake in its business development shall be bound by this Policy.

Therefore, this policy applies to all the actions and functions carried out by (i) the governing body and the senior management of AIR NOSTRUM Companies; (ii) any employees on the payroll of AIR NOSTRUM Companies; (iii) anyone acting on behalf of and representing the Company or providing services on behalf of AIR NOSTRUM Companies.

Accordingly, all departments and divisions involved in performing such activities, whether there are defined specific policies that concern or regulate their specific function or not, will be bound by this policy, and they must be aware of it and comply with its contents.

4. Definitions

For the purposes of this Policy and other internal procedures:

- **Authority** means any person who individually or as a member of a corporation, court or collegiate body has authority or exercises their own jurisdiction. In any case, this includes but is not limited to members of the Congress of Deputies, the Senate, the Legislative Assemblies of the Autonomous Communities and Local Authorities, if any, and the European Parliament. Civil servants of the Public Prosecutor's Office and the Judiciary shall also be deemed authority.

- **Public official** includes public authorities and civil servants; it may also refer to employees or agents of an international organisation such as the UN or the World Bank.
- **Conflict of interest** is understood as any situation in which external, financial, family, political or personal interests could interfere with the judgement of members of the organisation when performing their duties in AIR NOSTRUM Companies.

- **Family members** are those who have a family relationship up to the fourth degree of consanguinity or affinity (parents, in-laws, children, son/daughter-in-law, grandparents, siblings, siblings-in-law, grandchildren, great-grandparents, uncles/aunts, nephews/nieces, great-grandchildren and cousins) as well as their spouses or partners, i.e., any person with an equivalent de facto relationship. Siblings can be related through blood or by adoption.

- **Civil servant** means anyone who, by law or by election or appointment by a competent authority, acts in an official capacity. Also referred to as "public servant" for the purposes of this Policy.

- **Members of the organisation** are members of the governing body, managers, employees, temporary workers or anyone under a collaboration agreement, and volunteers of an organisation, as well as any person reporting to any of the foregoing.

- **Facilitation payments** refer to handing out any item of value to a public official or to a person who oversees processing or equivalent certification functions to ensure or expedite a process, procedure, specific business, necessary or routine action to which the payer is entitled without the need to make such payment. Also referred to as "facilitating payments" or "grease payments".

- **Close persons** are those natural persons with a known close friendship, or any natural person who holds ownership or control of a legal entity or instrument jointly, or with whom another type of close business relationship exists, or who holds ownership or control of a legal entity or instrument that is known to have been set up for their benefit.

- **Legal entity with public capital** means a legal entity that is partly funded by a Public Administration or in which the Public Administration has undertaken its management and/or administration.

- **Related persons** are those persons who a family relationship up to the fourth degree of consanguinity or affinity with the civil servant, authority or public official (parents, in-laws, children, son/daughter-in-law, grandparents, siblings, siblings-in-law, grandchildren, great-grandparents, uncles/aunts, nephews/nieces, great-grandchildren and cousins) as well as their spouses or partners, i.e., any person with an equivalent de facto relationship. Siblings can be related through blood or by adoption.

- **Promise** refers to a declaration for future action for the benefit of the person to whom it is directed, subject to a previous action for the benefit of whosoever promises or a third party.
- **Gift, invitation and item of value:**

  Gift means an offering that is made voluntarily or customarily.

  Invitation refers to the communication by which a natural or legal person is asked to attend a specific social function, event, party, or any kind of celebration.

  Item of value means any item of tangible or intangible value, broadly defined, in any form, including but not limited to cash, cash equivalents (such as gift cards or product discounts), loans, gifts, invitations, goods, services, job positions for family members, trips, lodging, training, meals, expense reimbursement , favours, business or employment opportunities, fulfilment of the request for handing out something of value to a third party, contributions to charitable or non-profit organisations, and promotional sponsorships.

- **Public Sector** is the set of institutions, activities and services in which the Public Administration and the central government play an essential role.

- **Private Sector** is the sector of the economy of a country consisting of private enterprises, families and non-profit institutions.

- **Business partner** refers to third parties acting by or on behalf of AIR NOSTRUM or any entity owned or controlled by AIR NOSTRUM that may engage with external parties, especially if they are public officials or public employees.

For the purposes of this Policy, the definitions of Authority, Public Servant and Public Official are broadened to include anyone who no longer holds the position as such because they are disengaged, retired or separated from the public service. The definition also encompasses their relatives and related persons.

5. Gifts and invitations

5.1. Standard prohibitions

- Giving, offering, promising, accepting or requesting an authority, civil servant, public official, related or close person, whatever their location, to (directly or indirectly) hand out an item of value contravening the provisions of the applicable regulations, as an incentive or reward for acting or refraining from acting in connection with the performance of their duties (these actions also include failing to act or delaying the required action) is not allowed.

- Facilitation payments are expressly prohibited, even in cases where they are not prohibited by the legislation of the country or territory concerned.

- Directors, managers, employees or business partners of AIR NOSTRUM must not give, offer, promise, accept or request, through them or through an intermediary, an item of value or an unjustified benefit or advantage of any nature, with the aim of improperly influencing the procurement of services or business relations.

- In any event, the offering, promising or granting of cash regardless of the amount is prohibited.

Contravening this Policy does not require that the exchange actually takes place—an offer or a promise is sufficient for this purpose.

5.2. Acceptable practices

Gifts and business invitations must never be offered or accepted for unlawful purposes and must always be:

- in accordance with the laws and regulations, both of the country of the person who extends the invitation as well as of the country of the person receiving it;

- given or accepted without the expectation of reciprocity. The intent pursued by the gift or invitation must be simply to build the business relationship within normal standards of courtesy, and not to influence the person in charge of making a particular business decision;

- consistent with the interests of AIR NOSTRUM's business, as well as with the sector's usual practices;

- occasional and not excessive, according to local or industry standards;

- accurately and appropriately documented with reasonable detail:

    - If the gift, hospitality, guest, occasion, or event has a value of **up to one hundred and fifty euros (€150),** it will not be necessary to report it to the Compliance Officer, nor to account for it in AIR NOSTRUM's Gifts and Hospitality Register, and it may be accepted or offered without the direct supervisor's approval.

    - If the value **exceeds one hundred and fifty euros (€150)** per gift, hospitality, guest, occasion, or event, it must be reported to the Compliance Officer so that it can be accounted for and documented in AIR NOSTRUM's Gifts and Hospitality Register, and the corresponding approval from the direct supervisor must also be obtained.

  The financial control of gifts and hospitality will be carried out in line with the internal management and processing procedure set for the payment of Company's expenses, without the logging and accounting indicated in this section releasing the person responsible for the expense from due diligence at an economic and financial level with respect to the systems and procedures previously established at AIR NOSTRUM.

- **Courtesy tickets**. Air NOSTRUM may consider it appropriate to make complimentary tickets available to third parties. These tickets or airline seats will always be granted "subject to space availability", i.e., subject to availability of seats on the flight in question.

The following table describes the CORPORATE HOSPITALITY and ENTERTAINMENT TEST consisting of six (6) key tests that all corporate hospitality events and all business courtesies must pass:

TEST	DESCRIPTION
1. Reasonableness and proportionality	Reasonable and proportionate promotional entertainment and expenses, when intended to improve the image of the Company or the advertising of its products or services, or to foster cordial relationships are recognised as an intrinsic part of the development of business activity.
2. Legitimate professional purposes	The professional aspect of events is relevant and should make up a significant part of the time spent in the company of third parties.

3. Timing management	It is essential to consider whether commercial negotiations are taking place with the entities or persons concerned.
4. Comparison with similar companies	The planning of any event must be carried out according to the usual practices of the sector and without aiming at obtaining illicit advantages by involving an excessive cost, scale or scope.
5. Transparency	Gifts over one hundred and fifty euros (€150) must be recorded.
6. Context	The number and frequency of events to which individuals or organisations are invited should be taken into account.

5.3. Additional considerations

- Extending an invitation to spouses or partners will make it harder to pass the above Test 2 “Legitimate Professional Purposes”, so it is recommended to avoid it.

- It should be noted that, if the invited person is unable to attend the event, other people from the organisation may do so if they so wish. This will avoid the claim that AIR NOSTRUM was intentionally targeting decision-makers.

- It is not acceptable to change guests without leaving a record and without following the established procedure.

- Declining an invitation shall not entail commercial consequences of any kind.

- In certain exceptional circumstances, AIR NOSTRUM may consider it appropriate to invite a public official (public authority or civil servant). In such cases, it is essential that the above Test 2 “Legitimate Professional Purposes” is perfectly clear, properly documented, submitted to the prior approval of the relevant manager and made known to the Compliance Officer, unless the exceptions or conditions provided for in this Policy are clearly applicable.

  If a public official is lawfully involved in any activity for a certain period of time at the behest of the organisation (for example, if the Mayor of Madrid participates in a joint promotion of the city on a business trip abroad), it is expected that the scope of participation of the public official in the activity in question is clearly and verifiably documented, and the expenses that are considered excluded or included in connection with such participation are listed.

The granting of **courtesy tickets** to public officials concerning events related to the Company's activities such as inaugural routes, tourist promotions, etc. will be accepted and considered exceptional circumstances.

AIR NOSTRUM will adopt a CORPORATE GIFTS, HOSPITALITY and ENTERTAINMENT PROCEDURE and will implement the RECORDS and FORMS necessary to develop the conduct guidelines set out in this Policy.

6. Conflict of interest

6.1. How to engage with public officials or authorities

AIR NOSTRUM and all its staff undertake to comply with a series of conduct rules when engaging with public officials or authorities, to ensure that the relationship with public officials, whether they are elected or not, always develops within AIR NOSTRUM's standards of legality, integrity, transparency, and ethics. These rules are set out below:

- Any relationship, whether regular or for a specific project, with a public official or authority, whether of a national, regional or local nature, or even if it is established with a public official or a member belonging to an international body, shall be evidenced in writing and based on a lawful and real cause and purpose.

- It is prohibited to sign a contractual relationship, by or on behalf of AIR NOSTRUM, when a person is related through a family or personal relationship with the public official or authority involved in the contractual relationship to be entered.

  Once AIR NOSTRUM employees become aware of the existence of such a link, they must refrain from entering the contractual transaction and must be replaced by another person who does not have such links. It is also prohibited for said person to participate in the preparation or presentation of an offer and/or participation in public tenders in which it is known that a member of the Public Administration with whom they have a family or personal relationship is involved in any way.

- It is also prohibited to make use of a third-party intermediary, regardless of the relationship maintained with them, to obtain any kind of benefit from a public official or authority for AIR NOSTRUM.

- Public officials must be treated respectfully while performing one's professional activity.

- No donations or contributions can be made for the benefit of public officials or authorities.

6.2. How to engage with third parties

AIR NOSTRUM's managers and employees, in particular those persons whose functions and responsibilities empower them to select and hire third-party suppliers, shall apply the following rules while performing their duties, as appropriate:

- **Supplier selection** by AIR NOSTRUM for the acquisition of goods or the provision of services will be carried out according to objective criteria only (mainly, offer characteristics, supplier's economic and technical standing, and price offered by the supplier). Regarding these tenders, at least three different offers shall be requested from potential suppliers, as long as the market allows for it, taking into account the provisions of the rest of applicable policies and internal rules.

  Any documents relating to the supplier selection process will be kept physically or electronically.

- The **purchase of goods and contracting of services** will be carried out by the persons authorised for it, in line with the rest of the policies adopted by AIR NOSTRUM.

- **Payments to suppliers** will always be made through bank transactions, except for smaller cash payments, and the corresponding receipt is needed as proof of payment.

- It is prohibited to offer or request from suppliers (directly or through intermediaries) **benefits or commissions** of any kind for AIR NOSTRUM managers, employees, or directors, or for third parties, with the aim of unduly influencing the contracting of services, or in any kind of commercial relationship.

- While conducting a **contract negotiation** with a customer, AIR NOSTRUM must refrain from offering or granting payments or other benefits (directly or indirectly) in order to gain an illicit advantage or to influence the final decision of the client regarding the contract.

- **Donations and other contributions** that AIR NOSTRUM makes on behalf of third parties must be duly justified and documented.

The above rules shall also apply in cases where AIR NOSTRUM is not contracting suppliers directly, but it does advise or recommend the client or a third party to hire a specific supplier.

7. Financial control

AIR NOSTRUM's managers and employees, and in particular the persons who, due to their functions and responsibilities, have a direct impact on the accounting and financial activity of the company, shall comply with the following rules in their scope of action, as appropriate:

- AIR NOSTRUM's financial statements, books, records and accounts must be kept in detail in such a way that they can accurately and objectively reflect the deals, transactions and provisions concerning assets, in accordance with the Anti-Money Laundering Policy and other AIR NOSTRUM policies.

- It is prohibited to record any entry into the accounting books and records of AIR NOSTRUM that is false, misleading, incomplete, inaccurate or fabricated.

8. Communication and reporting

The Compliance Body must be informed of any potential breach of this Policy or of applicable legislation in order to address the matter promptly and effectively and to prevent or mitigate its impact.

Any member of the organization, business partner, or third party with a direct relationship and a legitimate commercial or professional interest who becomes aware of a breach of this Policy, or who has doubts as to whether an observed practice may constitute unlawful conduct, is required to report it through the channels made available by the organization for this purpose, preferably through the Internal Information System available on the Company's website at the following link:

https://channel.globalsuitesolutions.com/airnostrum

The information submitted through the Internal Information System, as well as the identity of whistleblowers, shall be treated as confidential. In any event, the System allows reports to be made anonymously, in accordance with the applicable regulations and the procedure established for this purpose. The Company values the cooperation of whistleblowers and guarantees that they will not be subjected to any detrimental treatment, including retaliation.

In addition, the Compliance Body may, on its own initiative, investigate any indication of non-compliance with this Policy.

The Internal Information System Manager shall verify whether the reported breach has occurred and shall document the findings in a written report, which shall be securely retained in its records. The written conclusions of the report shall be communicated to the affected Department so that it may adopt the appropriate decision in light of its content and the specific circumstances of the contractual relationship, always in accordance with the procedure established in the Internal Information System Policy.

9. Control, Monitoring and Oversight

The Compliance Body shall oversee the continuous monitoring of compliance with this Policy and shall ensure that it is kept up to date, in line with AIR NOSTRUM's commitment to the continuous improvement of its Corporate Compliance Management System.

The Compliance Body shall be responsible for assessing any proposed amendments to this Policy, while the Governing Body shall be responsible for approving any modifications. Where the changes are minor in nature, such as the correction of typographical errors, the Compliance Body shall be authorized to make such amendments, provided that they are duly recorded in the Documented Information Control Register (RG SGCC 01-01).

This Policy shall be reviewed whenever: (i) significant changes occur in AIR NOSTRUM's organization, structure, or activities that make such review advisable; (ii) legal amendments occur that make such review advisable; or (iii) significant breaches are identified that make such review advisable.

10. Approval, validity and Communication

Version 3 of the Anti-Corruption Policy was approved by the organisation's governing body on 2 September 2026 and is applicable from 1 October 2026.

The Compliance Body shall promote actions aimed at ensuring the effective communication and understanding of this Policy, with a view to fostering an ethical culture, respect for human rights, sustainability, and regulatory compliance among AIR NOSTRUM personnel and other stakeholders.

The Policy shall be communicated to all employees, managers, and directors by email and shall also be made available on the intranets of the AIR NOSTRUM Companies. In addition, for the purposes of external communication to interested parties, it shall be published on the corporate websites.