CORPORATE COMPLIANCE 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
Date of approval	22 SEPTEMBER 2026
Approved by	GOVERNING BODY
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Version	1

Version control

Version	Date of approval	Effective from	Changes
1	22-SEP-2026	01-OCT-2026	Initial version

General

- As this is Version 1 of an internal standard, no changes would normally need to be highlighted in this Version Control section. However, as this document consolidates the Criminal Compliance Policy and the Tax Compliance Policy into a single document, both of which are repealed upon the approval of this Version 1 of the Corporate Compliance Policy, the following notes have been included to facilitate a better understanding of the document.
- The functions and responsibilities of the Compliance Body, the Governing Body and Senior Management have been transferred to PR SGCC 03 Leadership.
- The scope of the Policy has been adapted to reflect significant changes within the organisation resulting from the recent corporate restructuring.
- The text of the Policy has been reviewed and aligned with the requirements of UNE 19601:2025, Section 5.2, and UNE 19602:2019, Section 5.2.

1. Purpose

- Changes have been made to reflect the current composition of Senior Management.
- A reference to the Corporate Compliance Management System and its components has been added, together with a reference to compliance with the requirements of the applicable certification standards.

2. Scope of Application: **2.2:** The activities covered have been updated to reflect the organisation's current corporate scope.

3. Organisational Measures. 3.1 and 3.2: References to PR SGCC 03 Leadership have been included. **3.1:** The possibility of obtaining external advice has been added.

4. Awareness and Declaration of Compliance. A clarification has been added regarding the validity of the declarations of awareness, understanding and acceptance signed prior to the entry into force of this Policy, particularly those relating to the Criminal Compliance Policy and the Tax Compliance Policy.

5. Reporting of Non-Compliance. The wording has been updated to align with UNE 19601:2025, Section 5.2, incorporating references to anonymity and detrimental conduct.

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1. PURPOSE

AIR NOSTRUM LÍNEAS AÉREAS DEL MEDITERRÁNEO, S.A.U., AIR NOSTRUM ENGINEERING AND MAINTENANCE OPERATIONS, S.L.U., and their majority shareholder and controlling company AIR INVESTMENT VALENCIA, S.L. - the latter being the sole shareholder of the former two companies- (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.

This policy sets forth AIR NOSTRUM’s steadfast commitment to operating in line with the highest ethical standards and in compliance with current legislation. To achieve this, it builds on the provisions of the Organisation’s Code of Ethics, aligning to its ethical principles. It also reaffirms the Company’s determination to expressly prohibit any behaviour or action that may result in a breach of current legislation, and to demand, foster and engage in a culture of respect and compliance with the current legal system, its policies and its Code of Ethics, thus laying the basis and principles of regulatory compliance. This policy is aligned with the corporate culture and business ethics of AIR NOSTRUM and takes into consideration the interests of the Company, as well as those of its relevant parties and society as a whole.

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

Therefore, the Corporate Compliance Policy is consistent with AIR NOSTRUM’s strategic goals. Through it, the Company explicitly states that it shall not tolerate any conduct that may constitute a breach. The **governing body** (directors of the AIR

NOSTRUM Companies), the **senior management** (members of the Management Board—also known as the Board of Directors—), and the rest of the **members of the Organisation** (i.e., the governing body and senior management, officers, employees, temporary workers or individuals working under collaboration agreement, volunteers and other persons reporting to any of the above) expressly commits to this goal.

In this way, the basic Corporate Compliance guidelines that make up the AIR NOSTRUM Companies' Corporate Compliance Management System ("SGCC") are established. The SGCC currently comprises the Criminal Compliance Management System and the Tax Compliance Management System. This Policy also seeks to ensure the strict observance of all actions inherent to the activities carried out by the AIR NOSTRUM Companies, specifically those described in the following section.

2. SCOPE

2.1 Concerned companies and individuals

This policy is mandatory and globally applicable to the 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 advise, for the purpose of complying with the company's third-party due diligence processes and thus ensuring regulatory compliance in this regard.

2.2 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.

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  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.

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  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.

3. ORGANISATIONAL MEASURES

3.1 Compliance body

AIR NOSTRUM has a compliance body (also referred to as the Compliance Officer) entrusted with corporate compliance functions (criminal compliance and tax compliance, among other compliance-related functions) that will be responsible for giving effect to this policy by implementing the different measures laid down herein.

The Compliance Officer shall be appointed by the Governing Body, to which he or she shall functionally report and provide direct reporting. The Compliance Officer's functions, responsibilities and authority are defined in **PR SGCC 03 Liderazgo**. In the performance of these duties, the Compliance Officer shall act with full independence and autonomy from the organisation's operational areas, without requiring specific instructions for the ordinary discharge of his or her responsibilities and shall ensure the objectivity of all actions taken at all times.

Under the terms provided for in this policy, the Compliance Officer enjoys the full support of the governing body of the AIR NOSTRUM Companies and is entrusted with the task of implementing, developing, monitoring and overseeing the Corporate Compliance Management System of the AIR NOSTRUM Companies. This includes establishing such internal control measures as may be necessary or appropriate to identify, detect, prevent and avoid the commission of criminal, civil, administrative, commercial and tax infringements that could give rise to liability for the legal entity, as well as defining the consequences arising from any such infringements. For these purposes, the Compliance Officer shall be entitled, whenever necessary for the proper performance of their duties, to obtain expert advice on applicable laws, regulations, codes and standards, whether from internal or external sources within the scope of their responsibilities.

Accordingly, the Compliance Officer is authorised to freely access any Company information and documentation needed to perform their functions properly and effectively. They may also request the collaboration of any member of the Organisation in order to carry out their duties. When required, members of the

Organisation must collaborate and provide any documents and information requested without delay, always observing the principles of proportionality and suitability.

The compliance body carries out its tasks autonomously, without requiring specific mandates, in accordance with the provisions of this policy and the other documents that make up the Criminal Compliance Management System and the Crime Prevention Model of the AIR NOSTRUM Companies.

The independence of the Compliance Body ensures neutrality in decision-making and is reinforced by its functional relationship with, and direct and immediate access to, the Governing Body and Senior Management for the consideration of any matters relating to the Compliance Policy and the Corporate Compliance Management System, in accordance with the level of authority, independence and autonomy described in this section. Furthermore, the performance evaluation of the Compliance Officer ultimately falls within the responsibility of the Governing Body of the AIR NOSTRUM Companies.

The organisation's corporate compliance function operates under a common management and governance structure, ultimately supervised by the Governing Body and centrally managed by the Compliance Department, which provides its services and exercises its responsibilities across all AIR NOSTRUM Companies. Consequently, corporate compliance management procedures and protocols, as well as those relating to associated risks, are primarily established within that department, without prejudice to the necessary cooperation of the various areas and departments of the organisation.

3.2 Governing body and senior management of the AIR NOSTRUM Companies

The governing body and senior management of the AIR NOSTRUM Companies will not only support the compliance body in performing its functions, but will actively foster AIR NOSTRUM's culture of compliance and ethical principles, ensuring that it has sufficient and adequate resources to effectively implement the Criminal

Compliance Management System of AIR NOSTRUM Companies, encouraging the use of the channels and mechanisms made available by the Organisation for reporting potentially irregular or criminal conduct that may affect the Company and its activities, , among other responsibilities and duties, which are duly defined in PR SGCC 03 Liderazgo.

3.3 Officers and persons in particularly exposed positions

Officers at every level and risk owners must ensure that members of the Organisation attached to their departments, functions or projects comply with, observe, enforce and fulfil the requirements of the Criminal Compliance Management System. To this end, they have the support and supervision of the compliance body.

3.4 Members of AIR NOSTRUM

Inasmuch as legal compliance and the proper running of the Criminal Compliance Management System binds all members of AIR NOSTRUM, they are, regardless of their position in the Company, expected to:

- Conduct themselves in a manner governed by ethics and that goes against committing criminal offences or breaches of mandatory internal or external rules or policies of AIR NOSTRUM. They must therefore know, observe and follow the provisions of the AIR NOSTRUM Code of Ethics, the Criminal Compliance Policy and other internal policies, expressly stating their consent and adherence at the appropriate time.

- Report, through the channels made available by the Organisation for that purpose, any offences or irregularities which they are aware of that involve breaches of internal or external rules or mandatory policies, as well as any actions that could reasonably avoid or remedy the risk detected and that have not been applied.

- Comply and act in accordance with the instructions given by the bodies and departments of each of the AIR NOSTRUM Companies, as well as any directions from the compliance body in the exercise of their duties, where appropriate.
- Attend and participate in the training sessions on compliance that are delivered.
- Cooperate with the compliance body when required and provide any information required of them without delay.

4. KNOWLEDGE AND STATEMENT OF AGREEMENT

This policy will be shared with all members of the Organisation (i.e., employees, officers and directors) via email and will also be made available to them on the Company's intranet. In addition, all members of AIR NOSTRUM will be asked, at the appropriate time, to adhere to it by means of a clause of employee acceptance and adherence to the Corporate Compliance Policy.

Notwithstanding the foregoing, the acknowledgements of awareness, understanding and acceptance executed by members of the organisation prior to the effective date of this Policy shall remain fully valid and effective for all purposes. Accordingly, individuals who have previously executed such acknowledgements in connection with earlier versions of the Criminal Compliance Policy and the Tax Compliance Policy shall not be required to execute a new acknowledgement following the approval of this Corporate Compliance Policy.

5. REPORTING NON-COMPLIANCE

The compliance body must be aware of any potential non-compliance with this policy or existing legislation in order to address the issue promptly and effectively and to try to avoid or mitigate its impact.

Therefore, in the event that any member of the Organisation, business partner or third party with a direct relationship and legitimate commercial or professional interest, detects a breach of this policy or has doubts as to whether any observed

practice may constitute an offence, they are obliged to report it through the channels made available by the Organisation for this purpose, and preferably through the internal information system enabled on the website, using the following link:

https://channel.globalsuitesolutions.com/airnostrum

Information reported through the Internal Information System shall be kept confidential, as shall the identity of reporting persons. In any event, the System enables reports to be submitted anonymously, in accordance with applicable law and the relevant procedure. The Company welcomes and values the cooperation of reporting persons and guarantees protection against any form of detrimental treatment, including retaliation.

The compliance body may also investigate any sign of non-compliance with this policy on its own initiative.

The person responsible for the internal information system will verify whether the reported breach exists or not and will include it in a written report that will be kept in their files. They will share the written report findings with the department concerned for them to make a decision based on the content of the report and the specific circumstances of the contractual relationship following the procedure laid down in the Internal Information System Policy at all times.

6. CONSEQUENCES OF NON-COMPLIANCE

In the event that a breach of the applicable law, the Code of Ethics or any of AIR NOSTRUM's policies is confirmed, action will be taken immediately in accordance with the regulatory procedure and the current legal framework.

Disciplinary action may be taken not only against the individual whose conduct has caused the risk or damage, but against any employee who, having learned of the irregularity, has not followed the procedures established by the Company for its prevention and response.

Any work-related measures taken will always comply with the applicable regulations; they will be proportionate with the seriousness of the facts on which they are based, informing the workers' legal representatives where appropriate. In any case, the confirmed breach may give rise to the relevant disciplinary sanctions pursuant to the Collective Agreement, labour legislation and other applicable civil and commercial obligations.

When the compliance body follows up on and confirms a breach of the AIR NOSTRUM Code of Ethics or any of the Company's policies when engaging with third parties, whether natural or legal persons, with whom AIR NOSTRUM engages, it will propose the termination of the relationship to the contracting department.

Similarly, when it becomes clear that a working procedure or a line of action of the Company needs to be modified, the compliance body will inform the management of the relevant department so that appropriate measures can be taken. If the matter so requires it, measures to be adopted that are deemed proportionate to the risk or damage caused will be proposed to AIR NOSTRUM's governing body.

If the action of a member of the Organisation proves to constitute a criminal offence attributable to the legal person, this shall be immediately reported to the compliance body and, where appropriate, to the governing body. It shall also be brought to the attention of the competent public authority for their knowledge and prosecution. Such communication shall be accompanied by the evidence collected. AIR NOSTRUM will help in the investigation and cooperate with the public authorities.

7. CONTROL, MONITORING AND OVERSIGHT

The Compliance Body is responsible for monitoring and continuously overseeing the implementation of this Policy, which must be kept up to date as part of AIR NOSTRUM's commitment to the continual improvement of its Corporate Compliance Management System.

The Compliance Body is also responsible for assessing any proposals to amend this Policy, while the Governing Body retains authority for approving such amendments. Minor changes, such as the correction of typographical or clerical errors, may be made by the Compliance Body, provided that they are duly recorded in the Documented Information Control Register (RG SGCC 01-01).

This Policy must be reviewed whenever: (i) significant changes occur in AIR NOSTRUM's organisation, structure or activities that make such review advisable; (ii) legal or regulatory amendments make such review advisable; or (iii) significant breaches or non-compliance incidents are identified that make such review advisable.

8. APPROVAL AND VALIDITY

Version 1 of the Corporate Compliance Policy was approved by the governing body of the organisation on 22 September 2026 and is applicable from 1 October 2026.

The Compliance Body is responsible for promoting the actions necessary to ensure the adequate communication and awareness of this Policy, with the aim of fostering a culture of ethics, respect for human rights, sustainability and compliance throughout AIR NOSTRUM and among its other stakeholders.

This Policy will be communicated to all employees, managers and directors by email and will also be made available through the AIR NOSTRUM Companies' intranet sites.

For external communication purposes, the Policy will likewise be published on the corporate websites of the AIR NOSTRUM Companies.