



Code of Conduct for Third Parties and Third-Party Intermediaries

LATAM group

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2.0	April / 2019	August / 2026	Operational

1. Purpose

LATAM Airlines Group S.A., its subsidiaries and regional offices (“LATAM group”) seek excellence and compliance with the highest safety standards and applicable regulations. The purpose of this document is to formalize these commitments and extend them to any third party that, through a commercial relationship, provides a service or supplies a product to the LATAM group, hereinafter referred to as the “Supplier”.

This Code of Conduct for Third Parties and Third-Party Intermediaries (the “Code”) seeks to provide information regarding situations that could pose risks and how to act under certain circumstances, without purporting to be exhaustive.

This Code is available at www.latamairlinesgroup.net, in the Corporate Governance Guidelines section and on the LATAM Portal.

The directors, leaders at all levels and in all roles, employees (hereinafter, “employees”), interns, apprentices and trainees (“personnel”) of a Supplier, each within the scope of their duties and responsibilities, must respect and promote the guidelines and legal provisions set forth in this Code.

2. Scope

This document applies to the suppliers of the LATAM group, who must commit to complying with and extending its provisions and, to the extent possible, extending them throughout their own supply chain. Likewise, it will also apply to subcontracting cases where such subcontracting has been agreed upon and previously authorized by the LATAM group.

Notwithstanding the foregoing, for certain Suppliers, LATAM group may contractually establish that compliance with one or more guidelines contained in this Code is mandatory.

Likewise, compliance with and, where applicable, adoption of the provisions of this Code will be considered one of the elements in the evaluation of LATAM group’s Suppliers.

3. Responsibilities

Ensuring compliance with the guidelines established by the LATAM group and incorporated into this Code is the responsibility of both the Supplier and all its employees and personnel.

Suppliers undertake to report any concerns regarding potential violations of this Code and to cooperate in investigations when requested to do so.

If situations arise that may constitute violations of this Code, whether because they are illegal, unethical or contrary to the provisions of this Code, Suppliers may contact their direct contact within the LATAM group, who will provide guidance and information regarding the LATAM group's reporting channels, or may directly use the LATAM group's Reporting Channel available at https://www.canalconfidencial.com.br/grupo_latam/, through which reports may be submitted confidentially and/or anonymously, in accordance with applicable local regulations, and without retaliation for reporting. Telephone lines are also available for the different countries, as listed in Annex 1 to this document; calls are handled by trained professionals who will provide the necessary support and explain the reporting process. Reports may also be submitted via WhatsApp.

4. Details

4.1. Compliance with Applicable Laws

The LATAM group promotes an environment of compliance at all times, both at its facilities and at those of its Suppliers, with the applicable laws of each country in which activities are conducted. Suppliers of the LATAM group undertake to act in compliance with applicable laws and regulations.

4.2. Labor Standards and Practices

The LATAM group promotes a positive and respectful work environment both at its facilities and at those of its Suppliers, in compliance with the laws applicable in each country where activities are conducted, respecting the contracts in force with the LATAM group and with subcontractors, including measures to combat all forms of discrimination and harassment.

4.2.1 Therefore, in practice, the Supplier must:

- a. Refrain from abusing their position and/or functions to exercise undue power, in accordance with applicable rules.
- b. Refrain from subjecting its personnel to any form of physical or verbal abuse or any other form of intimidation or inappropriate conduct of any nature, in accordance with applicable rules.
- c. Follow the applicable information security and information protection rules and, to the extent possible, follow best practices associated with data protection.
- d. Provide fair labor practices in compliance with the laws applicable in each country where it operates, including, but not limited to: working hours, working conditions, wages, health and safety, promoting equal access and fair treatment for all employees and personnel.
- e. Respect applicable rules concerning freedom of association and collective bargaining.
- f. Fully comply with the provisions established in the regulations applicable to

contractor or subcontractor companies, as applicable in each country.

4.2.2 Examples of risk situations that are prohibited:

- a. Violate the applicable labor laws where it operates.
- b. Refuse to work or cooperate with certain individuals on the basis of their race, color, religion, nationality, sex, gender, maternity, sexual orientation, language, origin, political opinion, age, physical disability, union affiliation or other characteristics protected by applicable laws. Allow race, color, religion, nationality, sex, gender, maternity, sexual orientation, language, origin, religion, political opinion, age, physical disability, union affiliation, degree of kinship/friendship or other characteristics protected by applicable law to influence hiring, promotion, compensation and other professional decisions.
- c. Create or maintain a hostile work environment (for example, inappropriate jokes or pranks that expose, ridicule or offend an individual because of their race, color, religion, nationality, sex, gender, maternity, sexual orientation, political opinion, age, language, origin, physical disability, union affiliation or other characteristic protected by applicable laws).
- d. Engage in workplace harassment of another employee, a member of personnel, or another person in the workplace (in accordance with applicable law).

4.3. Health and Safety

For the LATAM group, safety is one of the most important pillars of its operations; for this reason, its Suppliers are expected to comply with high safety standards that also protect the health of each of their employees and personnel, providing a safe and healthy work environment.

4.3.1 Therefore, in practice, the following must be done:

- a. Ensure a safe and healthy work environment that maximizes the well-being and performance of all employees. This includes, but is not limited to, preventing exposure to legal and illegal drugs, alcohol and controlled substances, in order to prevent occupational accidents and occupational diseases, in compliance with applicable rules.
- b. Always act in accordance with the rules stipulated contractually, as well as with the internal procedures and manuals established by LATAM group for the provision of the service and applicable rules: there are no exceptional circumstances under which a safety practice may be ignored or disregarded.
- c. Ensure that personnel and employees are aware of the risks and are also trained regarding measures to control such risks, as well as the proper use of personal protective equipment (PPE), in accordance with applicable rules.
- d. Manage the use of substances hazardous to the health of employees and personnel responsibly and in accordance with applicable occupational health and safety rules, training its employees and personnel accordingly and managing (storing,

transporting and disposing of) hazardous waste responsibly and in accordance with applicable law, in addition to providing the clothing necessary to perform the activities.

- e. Promote compliance by its suppliers with applicable rules in this area and, to the extent possible, establish related best practices.
- f. Fully comply with the safety provisions established in the regulations for contractor or subcontractor companies, in accordance with applicable rules.

4.3.2 Examples of risk situations that are prohibited:

- a. Improper use of Personal Protective Equipment in activities or conditions that could pose a risk to personal safety, use of chemical products without labeling and/or improper handling of safety data sheets, reckless driving of vehicles, handling of exposed wiring or wiring without minimum safety conditions.
- b. Perform reckless activities or activities for which prior training was not received, or without implementing appropriate safety measures.
- c. Allow employees to report to work under the influence of alcohol and/or other illicit drugs, in accordance with applicable rules.
- d. Withhold information regarding identified risk situations related to current contracts from the direct supervisor or the corresponding personnel, where such situations are related to the LATAM group.
- e. Fail to comply with applicable safety manuals and procedures, as well as applicable regulations.

4.4. Brand, Intellectual Property, Confidential Information, Cybersecurity and Data Protection

Assets owned by the LATAM group include, among others, all information, materials, tools, services, facilities, vehicles, equipment, corporate email accounts, trademarks, logos and, in general, everything produced during the provision of services contracted by the LATAM group.

4.4.1 Therefore, in practice, the following must be done:

- a. Promote the development of systems and conduct that contribute to safeguarding both private and organizational information.
- b. Responsibly use the technologies, corporate accounts and tools provided by the LATAM group.
- c. Ensure that personal data provided by consumers, users, suppliers, personnel and/or employees of the LATAM group are not disclosed except in cases provided for by applicable law.
- d. Implement applicable regulations in force regarding data protection and cybersecurity.
- e. Keep the LATAM group's internal information protected and confidential at all times until the LATAM group publishes it, including internal documents, sales, development, maintenance, alliance, marketing and service strategies, and other

information produced internally that comes to the knowledge of the Supplier, its employees or personnel, contractors and subcontractors.

4.4.2 Examples of risk situations that are prohibited:

- a. Use or make reference to a trademark, logo or other intellectual property of the LATAM group, or of other third parties doing business with the LATAM group, without the prior and express authorization of its owner.
- b. Improperly use tools or means to obtain user information without consent.
- c. Publish or disclose, by any means, including, but not limited to, a social network or digital platform, Confidential Information or Inside Information without authorization from the LATAM group.
- d. Provide data and information to third parties without the prior express authorization of the LATAM group and without following the legal guidelines established for such purpose.
- e. Improperly use, disclose or trade, for one's own benefit or that of third parties, using Internal Information, whether Confidential Information or Inside Information.

4.5. Sustainability

Through its Sustainability strategy, the LATAM group promotes sustainable development by establishing guidelines that must be implemented by both the LATAM group and its Suppliers. These guidelines address both compliance with applicable regulations and the voluntary adoption of practices that strengthen sustainable management.

4.5.1 Therefore, in practice, the following must be done:

- a. Fully comply with the environmental laws and regulations of the countries in which operations are conducted.
- b. Promote proper waste management and strive for its reduction and recycling, complying with the legal provisions established for its handling (storage, transportation and disposal), and make supporting documentation for such management available to the LATAM group when required.
- c. Seek to apply Circular Economy strategies, such as reducing, reusing, repairing and recycling products and materials to the extent possible.
- d. To the extent possible, avoid the use of single-use plastics at LATAM facilities.
- e. Establish measures to prevent, mitigate, reduce and manage environmental impacts in the performance of its activities.
- f. Make efficient use of the natural resources available in the workplace.
- g. To the extent possible, manage its greenhouse gas emissions and energy consumption by incorporating energy-efficiency and emissions-reduction measures, and make such information available to the LATAM group when requested.
- h. Prioritize the procurement of materials from sustainable and local sources where feasible, and favor those that allow their useful life to be extended and that can be reused, recycled, composted or recovered.

- i. As applicable and in accordance with applicable regulations, establish risk management by applying a mitigation hierarchy (avoid, minimize, restore and offset) with respect to biodiversity, no-deforestation and land conservation.
- j. Avoid causing or contributing to deforestation, conversion or significant degradation of natural ecosystems in its direct operations. Likewise, Suppliers must apply proportionate due diligence, traceability and risk-management measures in their applicable supply chains, in order to prevent, mitigate and, where appropriate, remediate adverse impacts on biodiversity.
- k. Have adequate risk management in its supply chain, as required by applicable legislation and, to the extent possible, implement the best practices associated therewith.

4.5.2 Examples of risk situations that are prohibited:

- Fail to comply with applicable laws.
- Carry out inadequate management of waste or chemical products, cause soil contamination and/or place different stakeholder groups at risk.
- Use natural resources inefficiently.
- Fail to manage the environmental impacts generated within its operations.

4.6. Human Rights

The LATAM group is committed to respecting human rights in accordance with internationally accepted standards, recognizing both their importance and universality, and requires this commitment from its Suppliers in order to cover its entire supply chain.

4.6.1 Therefore, in practice, the following must be done:

Follow the guidelines established in International Conventions on respect for Human Rights, particularly, but not limited to, the following:

- a. Respect at all times the principles of the Declaration of Commitment on Human Rights, as well as the guidelines of the International Labour Organization (ILO).
- b. Equal opportunities and non-discrimination: Promote equal opportunities by establishing formal policies and strategies to achieve them and rejecting any form of discrimination based on race, color, nationality, sex, gender, maternity, sexual orientation, language, origin, religion, age, physical disability, union affiliation, political opinion and/or any other protected characteristic.
- c. Safety and Health: Promote a safety culture under safe and healthy working conditions, fostering a culture of self-care among its personnel, developing prevention-oriented processes, identifying hazards, and assessing and mitigating risks associated with its various operational and administrative activities.
- d. Wages, benefits and working conditions: Promote decent and dignified work, complying with local labor regulations in the country or countries in which it operates, in matters such as: payment of a decent wage, working hours, overtime or additional hours, rest periods, statutory holidays, payment of social security

contributions, statutory benefits, leave, termination compensation, personal protective equipment in activities where necessary, etc.

- e. Child Labor, minimum age for admission to employment and worst forms of child labor: Do not tolerate child labor within its operations.
- f. Forced or compulsory labor. Modern slavery: Oppose any type of forced labor, labor under conditions of servitude or compulsory labor, human trafficking, human smuggling, any type of exploitation and other forms of slavery within operations.
- g. Freedom of Association and Collective Bargaining: Recognize the right to freedom of association and collective bargaining as provided by applicable rules, respecting employees' choices to associate freely and participate in collective bargaining in accordance with local law.
- h. Right to privacy: Comply with applicable laws protecting the personal data of its personnel, suppliers and customers through privacy and confidentiality, accompanied by continuous reinforcement of a cybersecurity culture.
- i. Commitment to the environment: Contribute to environmental protection by complying with applicable legislation and preventing pollution; and, to the extent possible, manage its carbon footprint and operate under a circular economy approach.
- j. Risk Management: To the extent possible, establish a risk control and management process for human rights due diligence.
- k. Governance System: To the extent possible, design and implement a governance system, roles and responsibilities.

4.6.2 Examples of risk situations that are prohibited:

- a. Put the human rights described above and/or any other applicable right at risk of being violated, in accordance with what has been indicated and/or suggested above.

4.7. Free Competition

Suppliers of the LATAM group must observe and uphold the free competition regulations in the places where they conduct operations and/or provide services.

4.7.1 Therefore, in practice, the following must be done:

- a. Comply with all applicable laws, procedures and rules governing the protection of free competition, as well as any instruction received from the LATAM group to promote respect for and compliance with applicable regulations.
- b. Do not propose or enter into contracts or agreements of any nature with any competitor without first ensuring that such action does not infringe applicable free competition rules.
- c. Do not engage in actions contrary to applicable free competition rules.

4.7.2 Examples of risk situations that are prohibited:

- a. Discuss or agree with competitors on matters relating to (among others) prices, volumes, sales terms or conditions, costs, profits or profit margins, service offerings, territorial allocation, in relation to tenders and/or contracts being entered into or to be entered into, or other activities prohibited under applicable rules.
- b. Disclose inside information or confidential information obtained in negotiation processes and/or in the development and performance of contracts entered into.
- c. Engage in and/or appear to engage in actions contrary to free competition rules.

4.8. Anti-Corruption and Crime Prevention

Suppliers must conduct their activities in accordance with the highest ethical standards and in compliance with the laws and regulations applicable in each country.

This obligation extends to all relationships that Suppliers have with Public Officials, government representatives or private individuals in connection with their commercial relationship with any entity of the LATAM group.

4.8.1 Therefore, in practice, the following must be done in particular:

- a. Comply with all applicable laws and regulations. Special emphasis must be placed on compliance with the requirements established for entering into government transactions and contracts and/or interacting with Public Officials.
- b. Act in good faith during the performance of contracts entered into with the LATAM group, whether such contracts involve Public Officials, authorities and/or government agencies or private individuals.
- c. In the context of commercial relationships with entities of the LATAM group, do not carry out acts that involve giving, promising to give, or agreeing to provide an economic or other advantage to a Public Official, authority, government agency or private individual.
- d. Do not carry out acts intended to prevent the detection and investigation of potential breaches of the Crime Prevention Program of the LATAM group, committed in the name or for the benefit of entities of the LATAM group.
- e. Ensure that there are no conflicts of interest with the LATAM group, its employees and personnel, as well as with Public Officials or any private individual with whom the Supplier must interact by virtue of the commercial relationships it maintains with entities of the LATAM group.
- f. Do not receive, offer, give or promise to give gifts, entertainment or travel, valuables or any other improper advantage to any Public Official (including Politically Exposed Persons - "PEPs", as defined by local laws), persons related to them, or any private individual, when acting on behalf of or for the benefit of the LATAM group.
- g. Do not make political donations or contributions on behalf of or in connection with

the LATAM group.

- h. Know, comply with and support compliance with the LATAM group's Crime Prevention Program, where applicable.
- i. Under applicable legislation, in the case of Suppliers whose services include the representation or management of the interests of entities of the LATAM group before third parties, whether Public Officials, government representatives or private individuals, implement their own crime-prevention system that complies with the provisions of Law No. 20.393, for the purpose of preventing the provision of services from giving rise to criminal liability for entities of the LATAM group.

Additionally, the guidelines of the LATAM group's Anti-Corruption Corporate Policy and Crime Prevention Corporate Policy will apply.

4.9. Consumer Protection

Respect and protect customers' rights in accordance with applicable local and international laws.

5. Audits

Allow the LATAM group to conduct audits to verify compliance with the contractual obligations and/or with activities related to the services for which the Supplier is responsible, as well as compliance with this Code of Conduct for Third Parties and Third-Party Intermediaries and any other LATAM Procedure, Manual and/or Policy applicable to the Supplier. Such audits may be scheduled or conducted without prior notice and may be carried out virtually or on site.

6. Exceptions

Any exception to this Code of Conduct for Third Parties and Third-Party Intermediaries must be approved in writing by the Compliance Department of the LATAM group.

7. Sanctions

Suppliers that violate this Code or its spirit, other policies, rules, procedures and other Internal Documents of the LATAM group that are applicable to them will be subject to the measures established in this Code and in the contracts entered into, which may range from fines to termination of the contract, without prejudice to any judicial actions that may apply.

The LATAM group considers the following, among other actions, to constitute violations:

- a) Act contrary to this Code or the LATAM group policies mentioned in clause 4.8, as applicable.
- b) Request others to violate this Code and/or the policies indicated above.

- c) Have knowledge of acts that violate this Code and fail to report them through the communication channels previously indicated in clause 3 of this document.
- d) Failure to comply with the regulations referred to throughout this Code and/or any other regulation applicable to the Supplier.

8. Change Control

Version	Date	Main changes
1.0	Apr-2019	Creation
2.0	Aug-2026	Incorporates requirements regarding: - Health and Safety: Use of PPE, handling of waste/chemicals, and prohibition of alcohol/drugs. - Sustainability: Adds circular economy goals (elimination of single-use plastics), carbon footprint management, and non-deforestation. - Work Environment: Explicitly prohibits harassment and abuse of power. - Compliance: Requires a crime prevention model for third-party representatives.

Annex 1: Telephone reporting channels by country

Country		Number
	Argentina	08006660657
	Australia	61290524978
	Bolivia	800104048
	Brazil	08000201737
	Chile	56442044346
	Colombia	018005185305
	Ecuador	1800000929
	Spain	900963269
	United States	18008983158
	France	0805088996
	United Kingdom	08000969046
	Netherlands	08000221408
	Hong Kong	0800902016
	Italy	800797078
	Japan	08002221186
	Mexico	8006816500
	New Zealand	0800425489
	Paraguay	98005420198
	Peru	080055305
	Sweden	46101389466
	Uruguay	0004162056399

Annex 2: Glossary of Terms of the LATAM Code of Conduct for Third Parties and Third-Party Intermediaries

1. Conflict of Interest: A circumstance in which the personal, commercial or financial interests or activities outside the LATAM group of an Employee, a member of Personnel, or a Supplier may (potentially, actually or apparently) compromise their judgment, influencing their final decision or resulting in a personal or family benefit.
2. Terrorist Financing: An activity carried out by any means, directly or indirectly, including the solicitation, collection or provision of funds or contributions of any kind, for the purpose of having such funds or assets used to facilitate or commit an offense or terrorist activity classified as such in accordance with applicable local laws.
3. Confidential Information: Information related to products and services, development of technologies and methods, systems, plans and business activities, market strategies, costs and any type of confidential or proprietary information of the LATAM group.
4. Internal Information: Any data, report, presentation, summary, email, list or analogous item that has neither been reviewed nor expressly authorized for publication or disclosure. Any type of “internal information” is therefore confidential and may not be disclosed internally or externally without prior authorization from the competent department.
5. Inside Information: Any information that is not in the public domain and that an investor may consider important when making an investment decision. Any non-public information about a company that could influence one’s own decision to buy or sell shares or securities of that company is also likely to be inside information.
6. Money Laundering/Asset Laundering: A process used for the specific purpose of making money or assets derived from criminal activity appear legitimate, including criminal proceeds from activities such as drug trafficking, arms trafficking, terrorism, human trafficking, kidnapping, bribery, and crimes against the financial system, among others. This process includes concealing or disguising the unlawful origin of such money or assets by acquiring, possessing, or using them while knowing that they derive, directly or indirectly, from unlawful activities, as defined under the laws applicable in each jurisdiction.
7. Single-use plastic: A product made wholly or partly of plastic that is not designed, manufactured or marketed to be used multiple times.
8. LATAM Portal: Corporate intranet of the LATAM group.

9. Receiving Stolen Property (Receptación): Acquiring, receiving, transporting, conveying, concealing, storing, dismantling, assembling, reassembling, selling, offering for sale, or otherwise using, for one's own benefit or that of another, whether in the course of a commercial activity or otherwise, property that one knows or should know is the proceeds of a crime.
10. Bribery: Giving, promising, approving or offering money or anything of value to Public Officials, Suppliers, Third-Party Intermediaries (TPIs), customers or other persons or private-sector companies, or receiving money or anything of value from any such person, with the intent to secure an improper advantage.
11. Third-Party Intermediary (*TPI*): Natural persons or legal entities that act as agents of the LATAM group, representing or acting on its behalf before a public body or public official, whether domestic or foreign (e.g., Lawyers, Customs Brokers, Franchisees, Service Providers, Sales Agents, Consultants, or Commercial Representatives).