



Flying With Integrity

Third Party Code of Conduct December 2024

A message to our Business Partners



At IAG, we are a diverse set of operating companies with a shared commitment to ***Flying With Integrity***. For us, that means conducting business ethically, transparently and with integrity, everywhere we operate.

Our common values, embedded in this Code, form the basis of what we stand for as a Group and how we maintain our customers' trust.

We expect that any Third Party engaged to work with us or on our behalf to support our business operations will honour our values, share our commitment to ethical business practices and uphold our high standards.

This Third Party Code of Conduct is a reflection of our expectations. It provides a framework for how to work together and comply with the laws and industry standards that apply to us.

Thank you for your partnership and for helping us to fulfil our purpose to connect people, businesses and countries. The success of our business and our reputation - and yours - depend on doing what is right in every decision and interaction..

A stylized, handwritten signature in black ink, consisting of several overlapping loops and lines.

Jorge Saco

Chief Information, Procurement, Services, and Innovation Officer



CONTENTS

A message to our Business Partners

02

IAG purpose and values

04

Applying our Code

05

Our Third Party Code of Conduct

Complying with laws and regulations

Reporting concerns

People and workplace

06

Health, safety and security

Anti-harassment / anti-discrimination

Fair employment practices

Human rights

Customers and stakeholders

07

Our customers

Our government partners

Sourcing responsibly

Avoiding conflicts of interest

Company resources

08

Information and assets

Data privacy

Electronic assets

Accurate records

Business dealings

09

Anti-bribery and Anti-corruption

Gifts, hospitality and entertainment

Fair competition

Insider dealing

Tax compliance

Trade compliance

Economic crime and money laundering

Corporate responsibility

10

Environment

Illegal wildlife trade

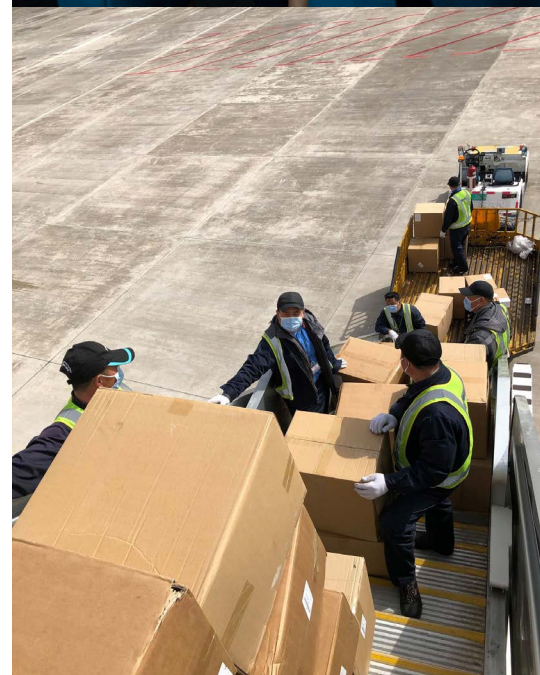
Political engagement

Public statements



IAG purpose and values

IAG is a family of operating companies and platform businesses united by a shared purpose and a set of core values. Our purpose in the world is to **connect people, businesses and countries**. The Group's common values are **ambition, teamwork, innovation, pragmatism, efficiency** and **responsibility**. Our values enable us to fulfil our purpose.



Applying our Code

Our Third Party Code of Conduct

At IAG, we expect and observe the highest standards of business conduct, and we expect no less from any Third Party engaged to work with or on behalf of our Group. This Third Party Code lays out our expectations for those shared standards and is applicable to all Third Parties doing business with IAG, its operating companies and platform companies, as well as its subsidiaries (together, 'the Group').

When conducting business with us or on our behalf, our Third Parties must:

- ✈ Work with integrity and in a way that respects our values as expressed in this Code.
- ✈ Communicate with *their* third parties who will be doing business with our Group, making sure they know and comply with what is expected.
- ✈ Come forward with questions or concerns anytime they are unsure about the right thing to do.

Complying with the law and this IAG Third Party Code

Third Parties engaged to work with IAG must conduct their business in full compliance with all applicable laws of the countries in which the Group operates and the Third Party operates on behalf of the Group. If a situation arises in which the laws of different countries conflict in relation to any aspect of our relationship, Third Parties must seek guidance from their IAG contact before proceeding.

Aviation is a heavily regulated industry and some obligations placed on airlines within the Group, in particular relating to safety and security, extend to our third parties. In addition, countries in which we operate consider airlines as operators of critical infrastructure and essential services. Therefore, Third Parties supporting our operations directly or through the technology they provide may also fall in scope of these regulatory requirements.

We recognise that other organisations have their own code of conduct that they are required to comply with, and we expect that the values and expectations will align to those under our Third Party Code. Where a Third Party believes there is any conflict between the requirements of this Third Party Code and their own code of conduct they should raise this with their IAG contact.

IAG may require that a Third Party provides assurances to demonstrate compliance with this Third Party Code. A failure to comply with this IAG Third Party Code may lead to appropriate action including engagement with regulators and law enforcement, termination of business relationship or litigation.

Reporting concerns

IAG has a Speak Up Hotline which enables individuals to voice their concerns. All employees and contractors of Third Parties who see or suspect a violation of our Code or any applicable law or regulation in connection with the work they do for us, must speak up. This includes reporting misconduct by IAG employees with whom they do business as well. Third Party's concerns may be reported to their IAG contact or through the [IAG Speak Up Hotline](#). The hotline is available 24 hours a day, seven days a week and translators are available. Third Parties may report anonymously, unless prohibited by local law. IAG strictly prohibits any type of retaliation against anyone who makes a good-faith report.



Our Third Party Code of Conduct is not intended to reduce, replace or limit any other legal or contractual obligations.



People and workplace

Health, safety and security

Ensuring the health, safety and security of employees and customers - whether in the air or on the ground - is our most important responsibility. Our Third Parties are required to provide their employees with a safe, clean and healthy work environment and to operate in compliance with all applicable aviation safety & security and workplace health & safety laws and industry standards. We rely on our Third Parties - as we do with our employees - to report any incident or situation that threatens the health, safety or security of people in or around the places we operate.



Anti-harassment / anti-discrimination

IAG promotes a culture of inclusion where everyone's unique differences are recognised and valued, and we sustain a working environment free of unlawful discrimination, harassment or any other inappropriate behaviour.

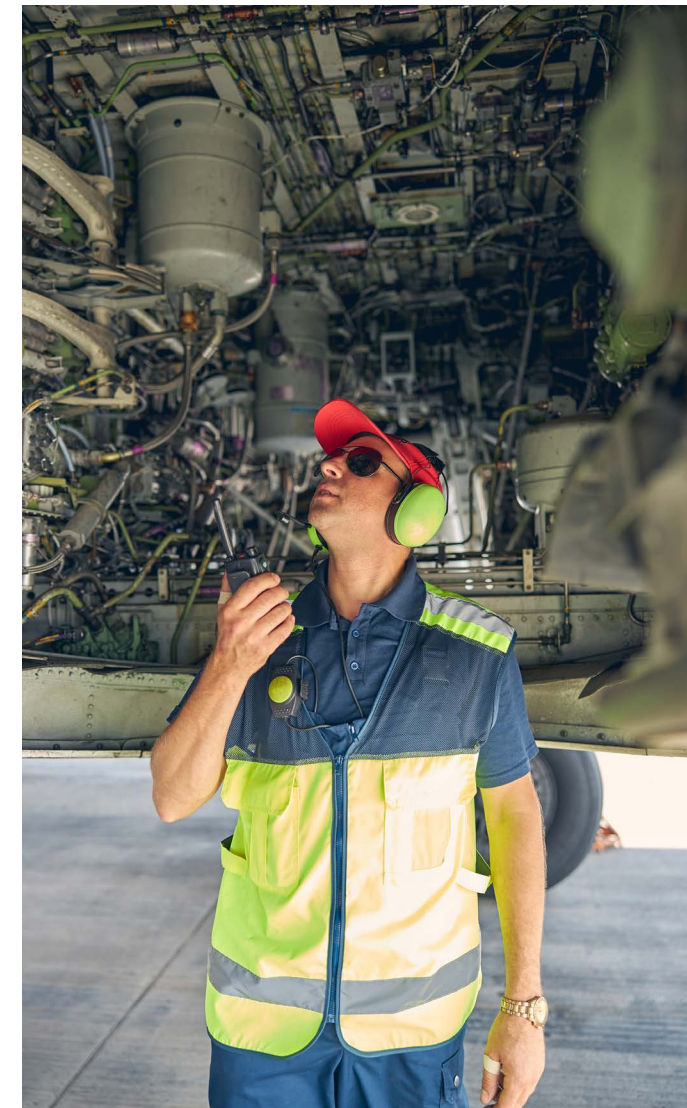
We look to our Third Parties to embrace the same commitment, treating all individuals with dignity and respect and ensuring fair and equal treatment for every employee, regardless of age, sex, disability, race, religion/belief, marital/civil partnership status, pregnancy and maternity, sexual orientation, gender or any other protected characteristics.

Our commitment is reflected in our [Equity, Diversity & Inclusion Policy](#).



Fair employment practices

Our Third Parties must provide wages, benefits and overtime pay that comply with all applicable wage and hour laws and regulations. They must also comply with all applicable laws that relate to working hours, rest periods and overtime hours. And they must observe ethical hiring practices that include verification of a worker's age and legal right to work in the appropriate country.



Human rights

IAG is committed to working with Third Parties who demonstrate ethical principles in the way they conduct their business.

We expect our Third Parties to honour IAG's support of human rights and never engage in, or allow any form of forced or involuntary labour, human trafficking or modern slavery anywhere in their own operations or in the operations of their own third parties.

Expectations for those in our supply chain are detailed in our [Modern Slavery & Human Trafficking Statement](#). As a Group, we are committed to taking swift action in the event any evidence related to slavery or human trafficking is identified.

We support the 2018 International Air Transport Association (IATA) resolution denouncing human trafficking.



Customers and stakeholders

Our customers

IAG is a customer service business. We expect Third Parties who interact with our customers to earn and preserve their trust. In every business transaction, our Third Parties must: take a customer-first approach; be fair, courteous, respectful and non-discriminatory; immediately address or report any safety or security concerns, and; follow all applicable laws and regulations related to customer rights, advertising and marketing.

Our government partners

We work to preserve the trust of government personnel in the various localities where we operate. We are committed to meeting all the requirements that apply to working with governments, including any legal, regulatory or contractual requirement, and we expect the same level of compliance from our Third Parties because many of these requirements flow down to them. Third Parties must never engage in any acts of bribery or corruption with government personnel.

Sourcing responsibly

We take great care in selecting our Third Parties. We expect any Third Party working with or on behalf of IAG to do the same in the selection of their third parties. They must exercise due diligence and engage partners that share a commitment to safety, quality assurance and ethical conduct. They must also remain objective and never let personal relationships or other conflicts of interests interfere with their decision-making. Third Parties must never engage in any acts of bribery or corruption when sourcing their own third parties.

Avoiding conflicts of interest

Third Parties must avoid any situation or relationship that creates – or could even appear to create – a potential conflict between their interests and the interests of IAG. Conflicts can arise under many circumstances (including situations that involve family relationships, employment or business opportunities, investments or financial interests). Third Parties must immediately disclose any relationship or situation that poses a potential conflict of interest, including instances where an IAG employee may have an interest of any kind in the Third Party's business or any kind of economic ties with the Third Party.



Company resources

Information and assets

In the course of working with us, Third Parties may be entrusted with IAG assets, including funds, facilities, equipment, information and intellectual property. We expect Third Parties to use these assets in the manner they are meant to be used, in compliance with relevant policies and procedures, and to protect them from loss, damage, theft, waste or improper use.

The creation and protection of confidential information is especially critical to our business. We require that our Third Parties keep it secure, limit access to those who have a business need to know it, use it only for authorised purposes and protect it from inadvertent disclosure now and in the future.

Privacy and data protection

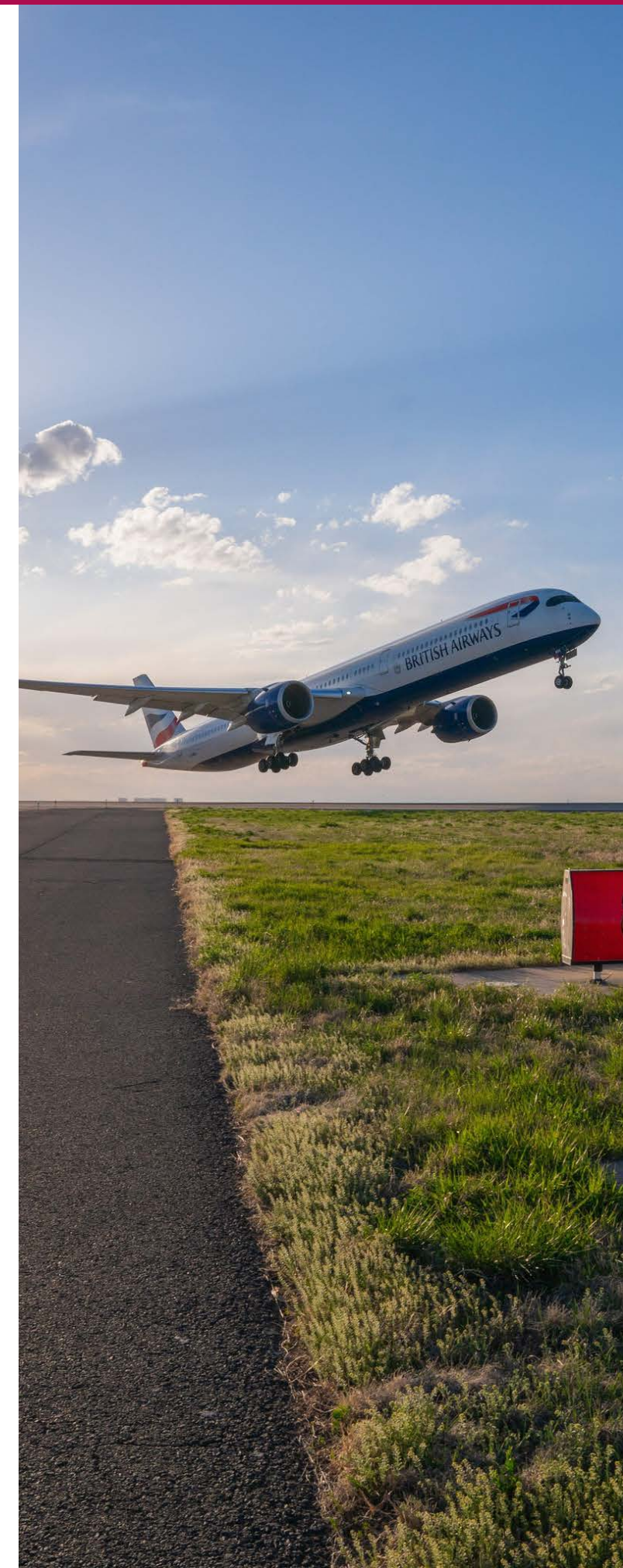
IAG is committed to protecting the personal data that we process in the course of our business, and we expect our Third Parties to do the same. Third Parties must follow all applicable data protection laws in collecting, accessing, using, storing, sharing and disposing of personal data. They must process it only for legitimate business purposes and put effective security measures in place to avoid unauthorised access, destruction, loss or alteration. Third Parties should notify their IAG contact immediately if they become aware of any actual or potential data breach. If their primary contact cannot be reached, Third Parties should report through the IAG Security Operations Centre at iagsoc@iairgroup.com.

Electronic assets

We trust our Third Parties to keep any IAG hardware, software and networks secure and to protect our systems and data from breach or unauthorised disclosure. Third Parties must be responsible in the use of technology, practice good cybersecurity and have policies, technologies and procedures in place that ensure their staff (and staff of their own third parties) appropriately manage cybersecurity risks to IAG.

Accurate records

The accuracy and completeness of our business and financial records is integral to helping us make informed business decisions. Like us, our Third Parties must create, maintain and retain accurate, complete and truthful records and documentation that demonstrates compliance with all applicable laws and industry standards. Third Parties must never alter, falsify, tamper, or remove any record or document provided to IAG or to any person or entity on behalf of IAG. In cases where it is appropriate for Third Parties to destroy records pertaining to IAG, they will comply with all applicable laws governing retention periods and disposal of records.



Business dealings

Anti-bribery and Anti-corruption

IAG has zero tolerance for bribery and corruption, and all Third Parties must comply with local and international anti-bribery and anti-corruption laws. We prohibit the offer, payment, request or acceptance of anything of value in exchange for an improper advantage, decision or action, whether offered directly or through a Third Party. Third Parties working with IAG are required to operate in strict compliance with the anti-bribery laws of the countries where they and IAG operate and to know and follow our policies on gifts and entertainment. We rely on our Third Parties to maintain accurate records of all transactions and report to their IAG contact any actual or suspected acts of bribery or corruption.

Gifts, hospitality and entertainment

We believe that gifts and hospitality must always be handled in an appropriate way – and in strict compliance with the policies of both the giver and receiver. Third Parties working with or on behalf of IAG are not expected to offer any gifts or hospitality to any employee or representative of the Group. Any gift or hospitality to be offered by a Third Party to someone else on our behalf must be approved by IAG in advance. Third Parties should follow all applicable laws and speak to their IAG contact about what is permitted under our policies and procedures. Note that offering or receiving anything of any value during business negotiations or during a competitive tender process is strictly prohibited.

Fair competition

We believe in free and open competition and never engage in improper practices that may limit competition. We expect our Third Parties to follow all applicable competition laws of countries in which they and the Group operate and to never seek to gain a competitive advantage through illegal business practices. They must never agree, or appear to agree, with IAG competitors or others to restrict trade or limit supply, and they must not discuss pricing, bidding or costs with their competitors.

Insider dealing

We believe in the importance of maintaining the integrity of financial markets. Through their Third Parties' work with us, our third parties may learn of information about IAG or other companies that could be considered inside information (information of a precise nature, not available to the public and likely to have a significant effect on the price of securities). Third Parties must not trade in securities while in possession of such information or 'tip off' inside information to others so that they may trade. Third Parties must comply with all applicable securities laws and prohibit their own third parties from engaging in insider dealing or any other market abuse practices in connection with their business with – or relationship to – IAG.

Tax compliance

Fulfilling tax obligations is part of accurate recordkeeping and maintaining financial integrity. Our Third Parties must comply with all applicable tax laws and obligations in the countries where they operate, including import duties, social security contributions and similar levies. Third Parties must never commit tax evasion or facilitate tax evasion by others.

Trade compliance

We have global operations that support a worldwide customer base. We require our Third Parties to comply with all international trade laws that regulate the cross-border transfers of goods, services and technologies, including imports and customs, exports and export controls, trade embargoes and economic sanctions.

Economic crime and money laundering

IAG has zero tolerance for economic crime, including money laundering and terrorist financing activities. IAG only conducts business with Third Parties who are involved in legitimate business activity, whose funds are not derived from or channelled to illegitimate sources. Third Parties must not provide any service or enter into any arrangement that facilitates or may constitute IAG involvement, either directly or indirectly, in economic crimes.



Corporate responsibility

Environment

Our commitment to sustainability and serving communities is an important part of how we do business. We measure and mitigate our impact on the environment, both on the ground and in the air. We expect our Third Parties to adopt procedures and practices that promote corporate responsibility, minimise the environmental impact of their operations and comply with applicable environmental laws and regulations everywhere they operate. We also expect them to work collaboratively with us to meet our environmental sustainability goals, particularly with respect to climate, waste and noise.

Illegal wildlife trade (IWT)

We take a zero-tolerance approach to illegal wildlife trading and employ strict IWT criteria in the assessment and procurement of our Third Parties. We require that Third Parties embrace the same zero-tolerance commitment, practise the same due diligence in the sourcing of their third parties and comply with all applicable wildlife trafficking laws.

Political engagement

IAG does not support political parties, nor do we donate funds to promote party political interests. Our Third Parties must follow all applicable laws when participating in political activities and – at no time – make financial contributions in IAG’s name or use or donate IAG assets.

Public statements

IAG has dedicated spokespersons authorised to speak on our behalf. Any Third Party that wishes to make public comments on behalf of IAG or its operating companies, such as press comments or statements on social media, must do so only if they have obtained previous and express approval from IAG.

Our commitment is reflected in our [Environmental Sustainability Policy](#).



We support the 2018 International Air Transport Association (IATA) IWT Assessment Program.

