

 A STAR ALLIANCE MEMBER 	INTEGRAL SECURITY POLICY	Revision date: MAY-28-2024
		Rev.: 01

REVISION LOG

Revision Number	Date	Section	Changes Made
00	14-dic.-2021	New document	New document
01	28-May.-2024	Objective and Scope	<p>Inclusion of applicability to all organizational workplaces.</p> <p>Inclusion of PESV and ERP within management systems.</p>
		Responsibility	Change in review policy frequency from Biennial to Annual.
		Content	<p>Inclusion of a paragraph on road safety.</p> <p>Revision of wording regarding creation and promotion of safety culture.</p> <p>Inclusion of ERP and PESV within systems subject to continuous improvement processes.</p>

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1. OBJECTIVE AND SCOPE

The Integral Security Policy is developed to reflect the organizational commitment to Integral Security and Compliance through the establishment of guidelines defined by the Responsible Executive for the creation, development, implementation, and maintenance of management systems encompassing Integral Security and Compliance by the relevant organizational areas.

This policy is binding and mandatory for all levels of the Organization, including every person employed under a labor contract with any of the companies that are part of the Organization (the “employees”) and third-party associates, meaning individuals other than employees who provide services to the Organization under any modality other than an employment contract, or who work for a contractor or supplier of goods or services, whether natural or legal persons, under a civil or commercial contract with the Organization, and who, by virtue of such contracts, perform operational, technical, administrative, or commercial support tasks (the “third-party associates”).

Service providers to the Organization who act as employers or contractors of third-party associates are likewise contractually obligated to know and apply this policy within their organization and ensure their employees are equally informed and compliant (the “Providers”).

The purpose of this policy is to protect operational security, the health and safety of employees and third-party associates, safeguard the Organization’s assets, and ensure its sustainability and continuity by aligning best practices and guaranteeing regulatory compliance.

This policy applies to all employees, third-party associates, and providers, [and is applicable to all organizational workplaces.](#)

For the purposes of this policy, “the Organization” refers to Avianca S.A.

[Our Integral Security Policy integrates various management systems, programs, and plans that address critical aspects of safety and regulatory compliance. These include: Operational Safety Management System \(SMS\), Occupational Health and Safety Management System \(SST\), Civil Aviation Security Management System \(SeMS\), Fatigue Risk Management System \(FRMS\), Quality Assurance Program \(QA\), Emergency Response Plan \(ERP\), Strategic Road Safety Plan \(PESV\)](#)

2. RESPONSIBILITY.

Responsibility for this policy lies with the Responsible Executive of Avianca S.A.

The design, maintenance, and updating of this policy will be delegated to those responsible for the management systems.

This policy, as a commitment of senior management, will be reviewed [annually](#) or whenever applicable regulatory or organizational changes occur, to ensure its relevance and applicability to the Organization.

This review will be conducted comprehensively through the consensus of an interdisciplinary group involving those responsible for the management systems.

3. AUTHORITY

The authority to approve this policy lies with the Responsible Executive of Avianca S.A.

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4. CONTENT

Safety is the supreme value that ensures the permanence and success of the Organization. It is the **essential** prerequisite for earning the loyalty of our customers, suppliers, third parties, shareholders, and **the** community.

To achieve and maintain this commitment, **our** organization, under the direction of the Responsible Executive, ensures, promotes, and facilitates:

- The allocation of financial, human, technical, and infrastructure resources for the implementation of this policy and the safe development of operations.
- The implementation of **effective Integral Security and Compliance Management Systems, as well as all associated plans involving** all employees, third-party associates, and providers; framed within a security and occupational risk management cycle that facilitates the identification and analysis of hazards, threats, or vulnerabilities, risk assessment and consequences, **as well as the elimination**, mitigation, **and/or** reduction of such risks within the Organization.
- The execution of operations within a **Safety** framework **and** in compliance with applicable regulations and legal requirements for operating certificates (**including those related to Occupational Health and Safety**), aligned with the Organization's standards and best practices in the aviation industry.
- The prioritization of **Safety** standards over commercial needs.
- **Through road safety management, reducing the frequency and severity of traffic accidents related to work-related and commuting travel, promoting self-care and safe use of vehicles and other means of transportation, and generating intervention strategies aimed at ensuring that personnel traveling on roads in any role—user, pedestrian, passenger, or driver of any type of vehicle—are trained, aware, and comply with the road safety guidelines defined by the Organization.**
- The training, updating, and continuous development of knowledge and skills of employees, third-party associates, and providers in their respective roles, to ensure the safe execution of their responsibilities and tasks. No employee, third-party associate, or provider should perform functions for which they lack the required skills and training.
- The creation and promotion of a **Safety** culture **to provide safe and healthy working conditions, preventing work-related injuries and/or health deterioration, adopting** safe practices, and maintaining an effective two-way communication flow between employees, third-party associates, providers, and management based on acceptable and unacceptable behaviors.
- The **implementation**, promotion, and administration of a confidential and/or anonymous **voluntary reporting system without punitive purposes**, encouraging timely reporting of errors, hazards, threats, vulnerabilities, human performance issues, fatigue, organizational deficiencies, and/or events that compromise operational Safety and Compliance, accepting human error as an opportunity for improvement.
- Reports or occurrences evidencing criminal acts, regulatory violations, negligence, recklessness, deliberately unsafe behaviors, and/or lack of professional conduct will not be covered under the confidentiality and non-punitive guidelines previously established.
- The periodic review and necessary adjustments to operational standards to achieve continuous improvement within the Organization, through the establishment of Integral

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Security objectives and performance measurement of the Organization and Management Systems (SMS, SST, SeMS, FRMS, QA, ERP, and PESV), including this policy, to adopt and maintain the highest Safety standards.

- The contracting, supervision, and control of providers and third-party associates to ensure compliance with the standards and requirements demanded by the Organization's Management Systems.

All executives, employees, providers, and third-party associates must ensure:

- The adoption of a lifestyle that minimizes the likelihood of incidents, accidents, and/or injuries that could endanger the health and integrity of employees, travelers, and others with whom they interact.
- Identification and reporting within the timeframes established by authorities of occurrences (in the case of Mandatory Occurrence Reports - MOR) observed during operations through the means established by these authorities.
- Identification and reporting within the timeframes established by management systems, as soon as possible, of any error, hazard, threat, vulnerability, human performance issue, fatigue, organizational deficiency, event, or occurrence observed during operations through the means established by the Management Systems.
- Compliance with the Organization's policies and standards and applicable regulations.

Every person in a managerial role is responsible for disseminating, applying, and enforcing this policy and the guidelines of the Integral Security and Compliance Management Systems, establishing processes and procedures that guarantee safe and compliant operations, conducting risk analysis in the face of changes that may affect integral security or compliance within their area of responsibility, and being accountable for the management of their respective areas.



Eduardo Mendoza de la Torre
Responsible Executive Avianca S.A