

	GENERAL GUIDELINES OF THE ANTITRUST COMPLIANCE PROGRAM	Guidelines for Related Third Parties, Strategic Allies and Suppliers
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1. Introduction

Antitrust law protects the market and consumers against conduct that distorts the free interaction between supply and demand, promoting independent, transparent and fair actions among competitors.

The Program defines the essential concepts (the "Policies") as general principles of conduct and develops good practice Guides that guide all AVIANCA staff to ensure free and fair competition in their activities.

2. Definitions

"Code of Ethics" means the Company's Code of Ethics and Standards of Business Conduct.

"Company" or **"AVIANCA"** is the company to which the Program applies, i.e., Aerovías del Continente Americano S.A. Avianca

"Competitor" or **"Competitors"** are the companies authorized for the air transportation of passengers in Colombia, from Colombia and to Colombia.

"Competition" and/or "competition" is the free and responsible exercise of business to conquer the market¹

"Consumer" means passengers of the air transportation service in or to Colombia.

"Guides" are specific guidelines or recommendations that arise from the adopted Policies. The Guides explain in more detail the actions that all people in AVIANCA must take in terms of competition.

"Policies" are general postulates of behavior in the field of competition law that are part of the Program.

"Program" means the competition law management system that is part of the Company's general management system. Through the Program, policies, guidelines and procedures are adopted as self-regulation and with a preventive spirit to manage the risks that the Company may face in terms of competition law and prevent them from materializing.

¹ In terms of NTC 6378, it is understood as "the ability to apply knowledge and skills in order to achieve the intended results".

"Risk" is a deviation from what is anticipated or considered. It is a possible effect of the uncertainty produced by achieving the objectives, according to the circumstances surrounding each action.

"Related Third Parties" are individuals other than the Company's employees, who provide their services to the Company under any contract other than an employment agreement, or who are at the service of a strategic partner, contractor or Supplier of goods or services, whether individuals or entities, who has entered into a civil or commercial agreement with the Company, and that by virtue of any of these agreement performs tasks or functions of operational, technical, administrative or commercial support for the Company.

"Supplier" means any third party that directly or indirectly has a transactional or any type of commercial agreement to provide services to the Company.

"Strategic Allies" are the partners, customers, suppliers, distributors with whom it is intended to improve the services aimed at a market, and who are not considered as direct competition.

3. Program Objectives

- i) Prevent antitrust Risks and their materialization, protecting the market, consumers, freedom of access and economic efficiency;
- ii) Manage contingencies arising from risky conduct that may involve non-compliance with competition law;
- iii) Promote knowledge, culture and compliance with applicable law and self-regulatory guidelines on the protection of free competition;
- iv) Provide clear guidelines for management, employees and third parties to act autonomously and free from anticompetitive or unfair practices; and
- v) Comply with AVIANCA's institutional policy of self-regulation, promoting awareness of the positive impact of respect for rules, especially those of competition.

4. Program Principles

In general terms, the Program is oriented towards the following principles:

- i) Promotion of compliance with the Code of Ethics;
- ii) Self-regulation within the framework of the Program;
- iii) Responsibility for the application by AVIANCA's management and employees;
- iv) Focus on Consumer welfare;
- v) Protection of free and fair economic competition;
- vi) Transversal effect to all areas of the Company;
- vii) Focus on refraining from acting when in doubt;
- viii) Commitment not to affect free competition;
- ix) No retaliation against people who reported violations of competition law; and
- x) Focus on the identification and timely mitigation of Risks.

5. Applicable antitrust law

For the protection of free competition, general applicable law includes Law 1340 of 2009, Decree 092 of 2022, Decree 2153 of 1992, Law 155 of 1959 and Law 256 of 1996 (the latter related to unfair competition). Similarly, as a regulatory normative reference to AVIANCA's activities, obligations and responsibilities derived from Aeronautical Regulations RAC 3 and 5 must be considered.

Why is free competition encouraged?

Competition allows a greater variety of goods and services at different prices and also drives innovation and technical development. This diversity generates efficiencies, productivity and competitiveness, which results in greater benefits for Consumers and greater social welfare.

What does antitrust law protect?

Antitrust law protects the market and Consumers against conduct that distorts the free interaction between supply and demand. Its rules require agents to make autonomous, transparent and good faith offers, acting loyally in the market. They are based on the principle of economic and business freedom, which obliges each organization to make independent decisions when offering goods and services.

6. Consequences of non-compliance with antitrust law

Legal Risk. Violation of antitrust law in Colombia can lead to administrative investigations by the Superintendence of Industry and Commerce, as well as contentious and even criminal proceedings before the judicial authorities.

Financial Risk. Individuals and entities that violate any regulation of antitrust law, or who act passively in the face of the violation of a regulation (for example, remaining silent or tolerating behavior), incur in substantial economic penalties.

Reputational. The violation of antitrust law exposes the Company that participates to reputational risks and impacts, since investigations are regularly covered by the media.

7. Case reporting

The Company has official channels to make reports of violations of this Program or antitrust law. It has an Ethics Hotline so that third parties can submit **confidentially and/or anonymously** complaints about violations of the Program. The Ethics Line is available via the website: <https://secure.ethicspoint.com/domain/media/es/gui/42418/index.html>

Complaints must provide all the necessary details to allow the internal investigation to move forward. Individuals who use the Ethics Hotline must ensure the validity of the information they provide.