

Anticorruption Compliance Policy

Controladora Vuela Compañía de Aviación, S.A.B. de C.V. (“VOLARIS” or “The Company”) as stated in its Code of Ethics and Conduct is committed to maintaining high ethical standards of business conduct at home and abroad. The Company is committed to a zero-tolerance policy toward bribery and an effective program of internal systems and controls to support compliance with the letter and the spirit of the U.S. Foreign Corrupt Practices Act (FCPA) as well as with any anti-corruption provision of the Mexican laws.

Prohibited conducts

The FCPA and similar laws prohibit companies and individuals from corruptly offering, promising, or giving anything of value to a Government Official to assist the Company or individual in obtaining or retaining business or to obtain any improper advantage.

It is also unlawful to make payments to agents, sales representatives or other intermediaries while knowing or having reason to know that any portion of the payment will be used illegally.

Due diligence should be conducted on all third parties that the Company seeks to engage to act as agents, representatives, or consultants in connection with business in any country in which Volaris intends to or has currently established.

The Company’s Legal Department shall provide guidance on the level of due diligence required for a particular business arrangement. All due diligence should be conducted prior to entering into any contractual or binding arrangement.

Facilitating payments for routine governmental actions

Payments that are minor in value and that are made to expedite or secure the performance of routine governmental actions may be permitted under anticorruption laws and regulations applicable to Volaris in Mexico and abroad including FCPA.

Facilitating payments should be avoided to the maximum extent possible. The prior written approval of the Legal Department is required unless there is an emergency affecting an individual’s health or safety.

Handling of promotional expenses

Payments to Government Officials for expenses related directly to the promotion, demonstration, or explanation of products or services, or execution or performance of a contract (i.e., promotional expenses) that are reasonable and bona fide are permissible under FCPA and/or the anticorruption laws and regulations applicable in the Mexican law.

Gifts to government officials

Exchanging gifts with Government Officials is intended to build good will and sound working relationships, but not to gain any special advantage in the relationship.

A gift of any value given for corrupt purposes violates the FCPA and/or the anticorruption provisions of the Mexican Laws, is prohibited. Company personnel must only provide gifts in good faith and not with any corrupt intent or to obtain any improper advantage.

Charitable donations

All charitable donations should be transparent and permissible under the anticorruption laws and regulations applicable to Volaris in Mexico and abroad including FCPA.

Prior to making a charitable contribution to an organization in which a Government Official is known to have an interest or position, consult with the Legal Department.

Political donations

The anticorruption laws and regulations applicable to Volaris in Mexico and abroad including FCPA may permit companies to make political contributions to political parties or candidates to the extent that political contributions are permitted under local written law.

Prior to engaging in any political activity, including the provision of political contributions, consult with the Legal Department.

Consequences of violation

Violations of this policy will result in corrective action that may include, but is not limited to, verbal or written warnings, suspension from work, or other disciplinary action up to and including employment termination. Verbal or written corrective action is intended to eliminate inappropriate workplace conduct of a more minor nature. Immediate termination without use of progressive discipline may be appropriate for serious incidents. Violations could also result in criminal and civil charges in Mexico or abroad, with significant penalties if an employee and/or the Company is convicted. The Company also could face civil litigation and serious harm to its reputation as a result of anticorruption law violations. Employees who are convicted also could face imprisonment.

Roles and responsibilities

It is the individual responsibility of each director, officer, employee, and agent to:

- a. Comply with this Policy, the FCPA and other anti-corruption laws and the Code of Ethics and of Conduct.
- b. Participate in training as directed.
- c. Make sure subordinates get the training needed to understand laws and regulations governing international transactions.
- d. Raise concerns regarding this Policy, the FCPA and other anti-corruption laws or the Code of Ethics and conduct including any suspected violations - to Management, the Legal Department, or the Whistleblowing hotline.

By: _____ Date: _____

Signature

Printed Name: _____ Position: _____