

Suppliers Ethics Policy/Suppliers Code of Ethics

The purpose of this Policy is to establish a collaborative framework between Controladora Vuela Compañía de Aviación, S.A.B. de C.V. (“VOLARIS” or “The Company”) and its Suppliers, which promotes strong and lasting business relationships and mutual benefit- with the following objectives:

- Integrate sustainability into your supply chain by supplying products and services that minimize your environmental footprint and maximize your positive social impact.
- Create value in mutual trust, transparency, long-term relationships, joint innovation, and knowledge.
- Optimize the relationship with Suppliers from an ethical, economical, and quality perspective of product /service.
- Ensure that the selection and contracting of Suppliers is appended to the internal regulations and to the values of the culture of VOLARIS.
- All Suppliers working with VOLARIS must behave to the highest standards of honesty, justice, and personal integrity. It is essential that Suppliers, as well as VOLARIS Ambassadors¹, maintain the highest ethical standards, comply with all applicable laws, and even avoid conflict of interest.

The commitment to act based on principles of sustainability - the care and respect of the environment, and people, and act under ethical principles in all operations, to address the needs of the current generation without sacrificing the ability of future generations to meet their own needs- adds value to all the stakeholders and allows to achieve sustainable growth over time.

All business opportunities are attractive to The Company if they are businesses that are framed in a legal, ethical, respectful behavior. We do not negotiate with our moral values. The vision of a business should be valuable for everyone who is part of the profit circle of a trade operation. VOLARIS understands that any practice of blackmail, bribery, extortion, or fraud is wholly incompatible with the operations of The Company, even more, if these practices cause real harm to a third party including the same company.

Declaration of *Ethical Principles* governing the VOLARIS - Suppliers relationship

The Company maintains commercial relations with Suppliers who share the ethical values held by VOLARIS and that possess a strong reputation for fairness and integrity in their business transactions. VOLARIS Ambassadors must offer and require Suppliers to treat each equitably and honestly during transactions, based on quality, profitability, and service criteria.

In the processes of selection and contracting of Suppliers, the concurrence and diversification of offers between the different Suppliers will be ensured, understanding that, at times, there will be no variety of suppliers because it is a monopoly market or because of the urgency of a need. In the selection and recruitment will be carried out ensuring the application of objective and weighted criteria.

¹ Volaris' employee

It is prohibited to initiate business relationships with friends and relatives, even if they meet the criteria of quality, profitability, and service. They should not be considered as suppliers for The Company, to avoid conflict of interest issues, among others.

For Volaris, Suppliers are very important from the beginning of the proposed purchase process. Volaris is committed to ensuring that its bidding, awarding, and purchasing processes are transparent and inclusive and grant Suppliers the opportunity to participate in the other Volaris Group companies.

Each Supplier shall be properly incorporated into the competent and current legislation (laws, regulations, and policies) applicable to its organizations and transactions with VOLARIS. In case of incurring any type of subcontracting for the goods or services offered to Volaris, it will be responsible for the subcontracted companies working under the rules promoted by this document and within the corresponding legal framework.

- A) In terms of **respect, protection, and promotion of Human Rights**, VOLARIS Suppliers must respect compliance with internationally recognized Human Rights and ensure that they do not abuse these rights within their business operations. Each Supplier shall promote and respect the following points:
1. *Child labor and decent work for young workers*: the Supplier's use of child labor is strictly prohibited. No child under the age of 15 is allowed to work, subject to exceptions permitted by the International Labour Organization (ILO). If the event that child labor is identified, the Supplier should take appropriate measures to responsibly manage the elimination of child labor from its business in a manner that is in the best interest of the child. If the Supplier employs young people between the ages of 15-18 years. They will not carry out work that, because of their nature or the circumstances in which they are carried out, threaten their health, safety, or morals.
 2. *Forced labor*: the Supplier should employ only persons whose presence is voluntary and who refuse to accept any form of slavery or similar practice, forced or coerced labor, as well as any use of violence (physical or psychological), threats, or corporal punishment, among others. Suppliers should treat workers with respect and dignity.
 3. *Working hours*: the Supplier should not require any employee to work for more than 48 regular hours per week (as stipulated by the ILO). Also, overtime should not exceed 12 hours per week, and forced overtime must be limited. In any case, all overtime must be paid at a rate higher than the normal rate. Finally, all staff members must have at least one day off for each 7-day period.
 4. *Freedom of association and collective bargaining*: the Supplier must grant its employees the right to freedom of association and collective bargaining, as permitted by and in accordance with applicable laws and regulations.

5. *Wages and hours of work:* the Supplier must comply with all labor applicable legal and regulatory requirements and shall compensate its employees for overtime work. The Supplier must provide a living wage to its employees, i.e. the necessary retributions to meet their essential needs and those of their families (where there is no applicable legislation in this regard). Make contributions to all legal social security and social assistance funds to which employers and/or employees contribute by law, including health insurance, industrial injury insurance, pension, accommodation, and unemployment funds, and make contributions to these funds on behalf of all employees, in accordance with all relevant laws and regulations. Incapacities and maternity/paternity leave stipulated in the law must be guaranteed.
 6. *Health and safety:* the Supplier should provide to its employees with a safe and healthy workplace, to prevent accidents and health injuries. Therefore, the Supplier should take a proactive approach to health and safety by implementing policies, systems, and training designed to prevent accidents and injuries. The Supplier must ensure that buildings, workplaces, machinery, equipment, and work processes, as well as the chemical, physical and biological substances, and agents subject to control do not pose any threat to the hygiene, health, and safety of employees. Similarly, if necessary, appropriate protective equipment should be provided to prevent the risks of accidents or harmful health effects. The Supplier should identify and be prepared for emergency situations and should regularly train its employees in emergency planning.
 7. *Equal opportunities and non-discrimination:* the Supplier should avoid any type of discrimination against employees, in terms of employment, profession, hiring, remuneration, or other fundamentals, based on characteristics of people, such as race, color, gender, religion, political opinion, sexual orientation, ethnic or national origin, social origin, among others.
 8. *Local communities:* The supplier should understand and respect the cultural and economic context of local communities and indigenous peoples, as well as their rights and customs.
- B) In terms of **environmental protection**, VOLARIS Suppliers must comply with the environmental and climate change applicable laws, regulations, and administrative practices in the countries in which it operates, and in accordance with international agreements, principles, objectives, and standards. In addition, the Supplier must understand and consider the impact of its operations on the environment and should implement the necessary actions to minimize negative impacts to protect the environment. The Supplier agrees to commit in the following respects:
1. Comply with applicable local, national, and international environmental legislation.
 2. Dispose of hazardous waste according to legislation.
 3. Use natural resources efficiently and try, whenever possible, to consider the total lifecycle of the product or service at the design stage.

4. Implement reduction, reuse, recycling, and recovery measures for implemented resources.
5. Implement practices to measure and reduce greenhouse gas emissions (GHG) e.g. carbon offsetting.
6. Reduce the use of natural resources as far as possible by proactively seeking sustainable and/or renewable alternative.
7. Use environmentally friendly materials to produce its products.

Volaris also recommends that its Suppliers conduct an environmental certification process, such as ISO 14001 International Standard or comparable, designed to identify, control, and mitigate their environmental impact.

C) In terms of **ethics, transparency, and business practices**, VOLARIS Suppliers must comply with the applicable laws, regulations, and administrative practices in the countries in which it operates, and in accordance with international agreements, principles, objectives, and standards. Each Supplier shall promote and respect the following points:

1. *Bribery, corruption, and money laundering*: VOLARIS Suppliers must comply with all applicable anti-corruption laws and regulations and, for this purpose, must have a zero-tolerance policy against any form of bribery, corruption, extortion, and embezzlement. Suppliers will not pay bribes or give any other incentives (including bribes, facilitation payments, excessive gifts, grants, and donations, among others) in connection with their business with clients and public officials. Suppliers are expected to conduct all business dealings with transparent processes and these deals will be accurately reflected in their business books and records. When necessary, based on a reasonable risk assessment, Suppliers must carry out the required verifications to know their clients in accordance with the applicable anti-money laundering legislation. Suppliers will not hire third parties to do something they cannot do themselves.
2. *Gifts and bribes*: Suppliers, their representatives, or their employees are prohibited from offering bribes, favors, gratuities, or any object of value to VOLARIS Ambassadors, to obtain favorable treatment. Likewise, it is prohibited for VOLARIS Ambassadors to request bribes, gratuities, and favors, among others. This restriction extends to the direct relatives of Suppliers and VOLARIS Ambassadors, as set out in the Policy POL-DGR-CDG-03 Management of Gifts and Benefits from Third Party Providers".
3. *Conflict of interest*: VOLARIS Ambassadors will act in the best interests of The Company. They may not have any relationship with any Supplier that may conflict with the employee's obligation to act in VOLARIS' best interests. Suppliers may not make payments or favors to any VOLARIS Ambassador during a transaction between the Supplier and VOLARIS.

Friendships outside the sphere of business are inevitable and acceptable, but Suppliers should be careful that no personal relationship is used to influence the commercial judgment of VOLARIS Ambassadors. If a Supplier's employee has a family relationship (up to the fourth degree of inbreeding and second degree of affinity) or any other relationship with a VOLARIS Ambassador, that may represent a conflict of interest, the Supplier must disclose this fact or ensure that the Volaris Ambassador does so.

4. *Confidential information:* Suppliers must protect VOLARIS' confidential information². Those who have been granted access to The Company's confidential information as part of their business relationship, may not share such information with third parties unless authorized in writing by VOLARIS. Suppliers may not trade securities or securities or encourage others to do so, taking advantage of the confidential information they have received from VOLARIS. If the Supplier believes that have been granted access to VOLARIS' confidential information by mistake, they must immediately notify The Company through their VOLARIS' contacts or through the *VOLARIS Ethics Line*³ and abstain from distributing such information. In addition, suppliers may not share confidential information related to another company with any representative of VOLARIS.

VOLARIS Ambassadors are subject to maintaining the strictest confidentiality in aspects that are strategic and vital to obtaining and/or maintaining advantages over our competitors. The information of the Customers and Suppliers is confidential, so it is strictly forbidden to disclose information about them.

5. *Confidentiality agreements with Suppliers:* Suppliers entrusted with a task, project, or trusted study, are obliged to maintain strict confidentiality of the task entrusted by VOLARIS. Suppliers must sign confidentiality agreements, whereas all information provided to them is kept under professional secrecy. Confidentiality contracts will be requested from

² It is considered confidential concerning:

- a) Financial accounting information, budgets, securities, and financing operations (other than public)
- b) Organizational systems, goals, and strategic objectives
- c) Planning information, strategic plans, mergers, acquisitions, partnerships, comprehensive improvement projects, organizational changes, expansion, or growth projects
- d) The marketing, cost, and marketing strategies of VOLARIS' services
- e) Purchasing systems, procedures, and strategies
- f) Unofficial information to suppliers
- g) The nature, characteristics, and specifications of VOLARIS' services
- h) The methods or processes related to the service offered by VOLARIS
- i) The manuals, compasses, and materials that are part of VOLARIS' policies, processes, and information systems
- j) VOLARIS's Ambassadors' personal information
- k) Training and training manuals
- l) Judicial or administrative disputes
- m) Other documents or information classified as confidential by the organization

³ See item D)- 7. Notifications or complaints

the Legal area following the procedure of "PRC-JUR-ERC-01 Preparation or Revision of Contracts".

6. *Professional secret:* Suppliers that visit VOLARIS' facilities should not share verbal or written information about The Company's systems or work processes that are considered confidential unless this is manifested in a confidentiality agreement.
7. *Quality of products and services:* VOLARIS Suppliers are committed to transforming The Company's needs into solutions that bring tangible improvement to VOLARIS. The Company is committed to listen to the Suppliers, and make fair agreements, and both parts are committed to comply with them in the stipulated time. Based on the professional solvency of Suppliers' staff and the use of their technologies, VOLARIS establish working methods, control their execution, measure, and communicate the results-oriented to excellence.

D) Volaris' Suppliers must comply with the **implementation, administration, and application** of the present Policy.

1. *Compliance and supervision:* VOLARIS values positively those Suppliers that express their commitment to the principles promoted in this Policy, through their acceptance and compliance. All Suppliers will be required to review the *Volaris Supplier Ethics Policy* and to return a written acknowledgment of the Policy. The requirements of the Policy must be communicated to all Suppliers' staff. VOLARIS also reserves the right to end the contractual relationship with those Suppliers who systematically fail to comply with the principles promoted in this Policy.
2. *Self-assessment questionnaire:* an annual evaluation will be carried out for Suppliers that have a relationship with VOLARIS, to analyze whether they remain the best choice for The Company in terms of prices, quality, delivery dates, sustainability practices (labor, environmental, ethics, transparency, and business), etc. If the results are not satisfactory in such evaluation, it shall be decided whether to apply a corrective plan or to stop working with that Supplier and another will be sought.
3. *Sanctions and penalties:* if a Supplier does not comply with this Policy, it will be subject to sanctions and penalties ranging from verbal or written notification to the loss of the contractual relationship and civil or criminal sanctions according to the infraction(s) committed. The Volaris Ethics Committee shall be responsible for determining the sanction that applies, based on the infraction committed.

4. *Corrective actions:* Suppliers must identify and correct any activity that does not meet the standards set forth in this Policy. Suppliers must immediately inform VOLARIS of any serious non-compliance with the Policy and submit a schedule of corrective actions. If non-compliance with the Policy persists, VOLARIS will consider ending the commercial relationship with the Supplier in question.
5. *Communication:* VOLARIS will communicate its Supplier Ethics Policy to its stakeholders, both internal and external. Inquiries regarding this Policy may be sent to reporte@lineadeescuchavolaris.com
6. *Training and awareness:* VOLARIS and its Suppliers will ensure that all persons involved in supplier relations processes receive the necessary information and guidelines to support this Policy.
7. *Notifications or complaints:* in the event that any person becomes aware of any probable inappropriate behavior on the part of the Supplier or any of its collaborators, as well as of any behavior of any Volaris Ambassador, whether there is evidence of the facts or any suspected violation of the guidelines set forth in this Policy, the person must promptly notify VOLARIS. There are four channels of the Volaris Ethics Line to make a notification or complaint:
 - Website: www.lineadeescuchavolaris.com
 - E.mail: reporte@lineadeescuchavolaris.com
 - Free phone number: 800-T-ESCUCHO (837-2824)

Signature of acknowledgment

Suppliers shall take appropriate measures to ensure that the provisions of this Policy are communicated to their employees.

I, _____ (Name), on behalf of _____ (Company name), I have read and understood this Policy. The company I represent understands the standards set forth in this Policy.

Date & signature: _____

It is the responsibility of each of Volaris' Suppliers and Ambassadors, to comply, enforce and promote the Policy, as well as to report on the Volaris Ethics Line any violation of it, unethical conduct, or against the principles of Volaris' culture.