



CODE OF ETHICS

CHIEF EXECUTIVE OFFICER'S REMARKS

The AEROSAN team strives to be regional leaders and a model for quality ground handling services provided under the highest safety standards for our employees, users and customers. Since our founding over 40 years ago, we have devoted ourselves to ongoing innovation, employee development and a quest for excellence in order to achieve sustainable growth.

Our strategic principles and corporate values are the foundation of our purpose, motivating us to act with commitment, excellence, respect, innovation and operational safety at all times. This is why we have undertaken the important task of drafting a Code of Ethics that represents our organization and making it a guide for meeting our ethical and legal responsibilities, responding satisfactorily to the expectations of our stakeholders.

This document will help shape the AEROSAN culture, guiding the daily activities of all current and future employees working at airports in the region.

Eric Lobo
Chief Executive Officer



AEROSAN
GROUND HANDLING SERVICES



PURPOSE

We take on any customer need, simplify it and resolve it as if it were our own.

MISSION



To be a company focused on sustainable growth that continuously strives to resolve our customers' needs as if they were our own, thanks to a highly-skilled team that is acutely aware of employee health and safety.

VISION



To be a leading regional operator in the ground handling services we provide.

VALUES



Service



Responsibility



Respect



Safety



Excellence



Trust



Commitment



Honesty

CODE OF ETHICS

ABOUT THIS DOCUMENT

This Code of Ethics includes a set of principles, values and standards of conduct with which all AEROSAN team members must comply. It also establishes the Company's position on the most relevant aspects of its management and serves as a guide for implementing these values on a daily basis.

This Code inspires the standards found in corporate policies and procedures, internal regulations, manuals and other guidelines currently in force. However, it does not intend to cover every possible situation that may arise, nor does it constitute a compendium of the laws and regulations that cover the Company's various areas of compliance.

WHAT IS THE TARGET AUDIENCE?

The guidelines contained in this Code apply to employees, executives and directors of AEROSAN.

It also applies to all those who interact with the Company and who form part of our immediate environment, whether through the provision or rendering of services as suppliers and contractors, or acting on behalf of and/or under the instructions of AEROSAN.

WHO IS RESPONSIBLE FOR COMPLIANCE?

Each worker, executive and director is required to and responsible for understanding and complying with this Code in the exercise of his or her duties. Failure to comply with the principles defined herein may lead to internal and, in some cases, even judicial disciplinary action. Likewise, any worker, executive or director who is aware of a violation of this document must report it through the relevant channels.

HOW CAN I OBTAIN MORE INFORMATION ABOUT THE CODE?

In this document, each corporate value is linked to a number of relevant issues, ethical principles and commitments, as a basis for action. However, if you have any questions or concerns regarding its interpretation or application in these cases or others not addressed in this document, please turn to the following sources of information:

- Your direct supervisor or area manager
- Human Resources Area
- Ethics Committee

Similarly, any concerns can be emailed to: codigoetico@aerosangroup.com

CHAPTER 1.

AEROSAN IS RESPONSIBILITY

We are responsible for our agreements and acts, we meet our objectives and we learn from our mistakes.



At AEROSAN we are committed to operating in a sustainable and safe manner, caring for our employees, community and the environment and contributing to the country's social development.

AEROSAN bases its corporate social responsibility on three main principles:



Collaborating to protect the environment



Workplace accountability with employees



Collaborating on social, humanitarian and local issues

CONTRACTS AND AGREEMENTS

We will fully comply with our commitments and agreements with customers, suppliers, contractors and business partners. We are responsible for making contractual commitments, and all contracts and agreements we sign will be implemented in good faith.

All contracts and agreements must be approved by our legal team, and can only be signed by our representatives with sufficient powers to do so.

LAWS AND REGULATIONS

We will continue and will constantly strive to comply with all laws, standards and rules in force that make up Aerosan's legal framework in all countries where we operate, including airport, tax, commercial, labor, legal and other regulations applicable to our areas of responsibility.

INTERNAL STANDARDS AND CLAUSES

We will respect and comply with Aerosan's internal standards provided through employment contracts, internal labor regulations, hygiene and safety regulations, policies, guidelines, manuals and procedures that have been published or made available by the company to regulate our daily operations.

INTERNAL CONTROL, DUE DILIGENCE AND SUPERVISORY DUTY

We are committed to acting with due diligence, transparency, and due exercise of our duties of management and supervision at different levels. This commitment is paramount when we are leaders of businesses, areas, management areas, divisions, units, subsidiaries or associates that are under the direction and supervision of AEROSAN, or when we manage and are responsible for the work of others. This implies, among other things, that each worker should stress the importance of work done well, ethical culture, compliance and due diligence, integrate them into daily activities and promote them through personal leadership, setting clear, ambitious and realistic objectives, and lead by example.

Likewise, it is our responsibility to maintain an effective internal control system, take responsibility for our processes and manage the risks derived from our operations and activities, and ensure that these are controlled in keeping with the standards required for detecting and preventing any failure or breach in our processes, which may endanger the Company's operational continuity, its ability to generate revenue or fulfill its commitments or obligations, or affect its reputation. We also have the obligation to report any situation of fraud or vulnerability, relevant or not, of which we become aware in the exercise of our duties.

ACCURACY AND VERACITY OF REPORTING AND INFORMATION SYSTEMS

We are fully aware of the importance of information, and we commit ourselves to the truthfulness and accuracy of the information we generate and make available to our stakeholders.

Business records, including financial statements, as well as transaction information, should always reflect all elements of financial transactions and economic events. In particular, the Company's accounting policies and practices will be based on the legal and regulatory standards in force for such purposes, applicable in the territories where we operate, and on reporting and disclosure standards under the principles and criteria of International Accounting Standards.

Likewise, all transactions, regardless of their amount, must be duly authorized, executed, registered and supported by the pertinent documentation. All of us who are responsible for the information generated must have the corresponding authorizations before carrying out an operation or transaction, and must keep accurate and reliable records of all operations performed.

INDEPENDENT AUDIT PROCESSES

As a Company, it is our responsibility to preserve at all times and in all circumstances the independence of judgment and objectivity of the auditing processes carried out by the Company's external and internal auditors, preventing any improper influence on the audits they carry out, in any area of management, and facilitate the provision of information and the examination of books, records, documents, information systems and background that are requested in the exercise of their duties.

USE OF INSIDER INFORMATION

We are committed to protecting confidential information at AEROSAN. Confidential information is all information related to the Company, its customers, suppliers, business partners or third parties, to which we have had access through our position or through the service we provide to the Company (includes employees and directors as well as external consultants), that has not been published or made available to the public.

Confidential Information includes, for example, financial data or projections, technical information, acquisition, disposal or merger plans, expansion plans, strategies, important contracts, relevant changes in management and other corporate developments.

Confidential Information also includes information that the Board must provide to shareholders and the public regarding the Company's legal, economic and financial situation in conformity with article 46 of Law No. 18,046, the Corporations Act (Chile); article 143 of the Companies Act (Ecuador) and the laws in force in each country, as long as the information has not been made available to shareholders and the public. We are obligated to maintain absolute confidentiality with respect to such information and we must always take the reasonable and necessary precautions to prevent disclosure, either for personal benefit or for purposes outside the Company, even after our contract has terminated. It is important to always consider any AEROSAN information that we have access to as confidential. This information can only be disclosed to the market and the general public through the channels formally established by the Company.

EXTERNAL COMMUNICATIONS AND MEDIA RELATIONS

All communication and information provided by the Company and its executives must be truthful, sufficient and timely, in response to the expectations and needs of its stakeholders. These should be reviewed and approved by the responsible area, and disseminated through authorized communication channels or spokespeople, through appropriate and formal means.

AEROSAN maintains a proactive relationship with the media, in order to guarantee an adequate understanding of the nature and scope of the Company's activities, in order to ensure that the information disseminated by the media is truthful and useful to the interests and needs of our stakeholders.

If a communication involves an event or information that is essential to the evolution of the Company and its business, the rights of investors and the general public to make informed decisions on an equal basis must be guaranteed, in compliance with the requirements established in the Chilean Securities Market Act, the administrative regulations of the Superintendency of Securities and Insurance, the Securities Market Act of Ecuador Official Registry Supplement 215, the Superintendency of Industry and Commerce, the Company's Manual for Handling Information of Interest to the Market and other applicable regulations in the markets where it has a presence.

PROTECTION AND PRIVACY OF PERSONAL DATA

We are responsible for the safeguarding, legal protection and proper treatment of the personal information we collect and maintain from our employees, executives, directors, shareholders, business partners, customers, suppliers, contractors and any other person who interacts with us.

Company records include electronic data, information or communications created, transmitted or stored on devices, computer equipment, servers or other company materials.

The exchange of information along different channels is fundamental for the efficiency and effectiveness of our work and the achievement of our objectives. However, given the advantages of this open communication, risks must be foreseen and measures taken to protect the privacy and security of data from unauthorized access and exposure to vulnerabilities. It is the duty of everyone, on all levels, to respect and comply with current Policies and Procedures for addressing this responsibility.

INTELLECTUAL PROPERTY

We respect intellectual property, trademarks and patents, copyrights, software property rights and licenses. We are responsible for their use, under the conditions of the owner or the licensing conditions.

CHAPTER 2.

AEROSAN IS RESPECT

Our actions are based on respecting the environment around us, our neighbors and our fellow team members.



RESPECT FOR PEOPLE AND ANTI-DISCRIMINATION

We value the ideological and cultural diversity of our team, which enriches perspectives for analysis and problem solving within AEROSAN. To this end, we have defined policies and procedures to prevent discrimination in all its forms.

We promote treatment based on respect, dignity and trust. We condemn any discrimination in the workplace on the basis of race, gender, age, marital status, political opinion, sexual orientation, religion, disability, nationality or any other condition that fails to recognize the dignity and diversity of people.

DIVERSITY, INCLUSIVENESS AND EQUAL OPPORTUNITIES

We facilitate diversity in the workplace, encouraging a commitment to inclusiveness in the workplace, with an underlying respect and value for individual differences in order to leverage the talent and strengths of each employee. It is the responsibility and obligation of the Company and all people working at AEROSAN to help foster an inclusive environment and diversity on their teams, in compliance with the Inclusiveness and Diversity Policy.

LABOR RIGHTS

We promote trust-based relationships with our workers to mutually create value. We foster constructive dialog for sharing and channeling concerns, providing timely responses and proactively resolving discrepancies in a context of mutual respect.

Compliance with the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work, laws in force in each country where we operate, and individual and collective bargaining agreements are a basic imperative for our management.

HUMAN RIGHTS

We adhere to the Universal Declaration of Human Rights of the United Nations General Assembly. In compliance with this, we have policies on non-discrimination, prohibition of forced and child labor, prohibition of all types of harassment and degrading treatment, promotion of diversity based on personal merit and talent, as well as a compensation policy with objective criteria for fair pay.





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HARASSMENT

We strictly comply with current labor legislation to ensure treatment that protects the dignity of workers. Sexual and workplace harassment are not tolerated by the Company. AEROSAN has implemented reporting channels and formal procedures for investigating and sanctioning such actions, while safeguarding any affected parties.

COMMUNITIES AND THE SURROUNDING AREA

We are committed to managing the impacts of our operations and projects in the economic, environmental and social spheres, so as to maximize the benefits and minimize the damages of any alteration on our workers, neighbors, ecosystems and the environment as a whole. We seek to contribute to increased prosperity and the identity of the towns and communities that take us in, contributing to their economic and social development, with respect for the cultural and material heritage of each. We strive to empathize with different points of view and ways of life, indistinctly fostering collaborative work in the areas where we operate.

In our largest operations, we maintain ongoing communication with neighboring communities and we are committed to keeping them informed about our management of significant impacts. In keeping with the aforementioned, we have defined guidelines for the Company's social investment, limiting its scope to projects that contribute to the economic and social development of local towns or to the harmonious integration of its facilities with the environment.

THE ENVIRONMENT

We work to ensure compliance with environmental regulations and the standards we have adopted with our stakeholders, focusing our work on protecting the environment. We are committed to developing a culture of environmental protection and respect for communities, implementing an environmental management system that prevents and controls impacts, promotes efficient management of available water and energy resources, minimizes waste generation and ensures the protection of biodiversity.



CHAPTER 3.

AEROSAN IS HEALTH AND SAFETY

We ensure a protected and safe work environment that guarantees the safety of our employees, infrastructure, cargo, flights, passengers and the customers we serve.



OCCUPATIONAL HEALTH AND SAFETY

Any activity developed by the Company must provide and promote safety as an essential value, observing the following principles:

- We recognize the respect for life and the protection of the people who make up AEROSAN as the basis of our culture of safety.
- We prevent workplace injuries and illnesses by implementing adequate risk control measures in all our operations by identifying and evaluating hazards and establishing, implementing and maintaining measures specifically aimed at preventing serious and fatal incidents.
- We comply with the legal requirements and other standards that the Company subscribes to on its own and with its customers, guaranteeing their strict application by our workers, suppliers and contractors.
- We encourage self-care and mutual care.
- We promote leadership as a driver of our culture of safety.
- We persevere in efforts to continually improve the performance of our Occupational Health and Safety Management System, encouraging learning opportunities, constructive criticism and implementation of improvements.

DRUG AND ALCOHOL CONTROL

We aim to promote human development and commitment to others, promoting in our workers a healthy, responsible lifestyle, free from drug and alcohol abuse.

In line with this commitment, we must perform our duties without being under the effects of illegal or legal drugs, including alcohol, with the understanding that this jeopardizes our priority commitment to health and safety.

The Company implements random drug testing on all personnel as a control measure. In addition, under the strictest confidentiality within the legal framework in force in each country, support is provided for employees who acknowledge having problems with drug and alcohol consumption and voluntarily request help with the rehabilitation process, making use of channels and institutional and social programs available in each country. The procedure to follow in these cases is defined in the Drug and Alcohol Abuse Prevention Policy currently in force.

WORK-LIFE BALANCE

We promote the comprehensive wellbeing and satisfaction of our workers, seeking a high commitment to work and productivity, based on an adequate work-life balance. We demand respect for the maximum daily working hours and we manage a set of benefits focused on the health, education, recreation and healthy life of our workers and their families.

CHAPTER 4.

AEROSAN IS COMMITMENT

We are committed to maintaining ties with our stakeholders, while caring for our employees and our company.



COMMITMENT TO OUR CUSTOMERS

Customer Relations

The Company's commitment to customer satisfaction is reflected in the respect for their rights and the constant search for solutions that serve their interests, always in line with the Company's development and profitability objectives.

We are committed to building correct, ethical and honest business relationships, in accordance with good business practices and our principles and values to generate trust-based relationships that add value to customer operations.

COMMITMENT TO OUR SUPPLIERS

Relations with Our Suppliers and Contractors, Fair Trade and Objective Selection Criteria

We are aware that positive relations with our suppliers and contractors can contribute significantly to our success. Therefore, we foster a mutually beneficial business relationship, based on integrity and respect, through a sustainable relationship with high standards of quality and compliance.

The selection and retention of suppliers and contractors, as well as all purchasing decisions, should always be based on objective, professional, ethical and operational criteria in accordance with the Company's needs, such as competitive pricing and bidding, quality of the goods or services, performance, suitability and compliance with current legislation applicable to its operations.

We expect our suppliers and contractors to share our values and principles, and share our commitment to:

- Respect the human and labor rights of workers, especially those related to integrity, occupational health and safety.
- Develop activities in keeping with applicable environmental protection laws.
- Not commit crimes within the context of their activities, especially corruption or bribery, money laundering, terrorism financing or providing cash or in-kind benefits to employees of their customers.
- Comply with applicable internal procedures and controls.





COMMITMENT TO OUR COMPETITORS

Relations with Competitors and Participation in Trade Associations

We seek to compete openly and independently in the markets where we have a presence, inspired by loyalty and respect for customers and competitors, and we are committed to complying with the laws that govern competition and to actively promoting and protecting free competition.

In this context, we assume the following commitments:

- We do not discuss with competitors or customers issues regarding prices or conditions that contravene the laws that protect free competition.
- We avoid engaging in any type of program or practice that may be considered unfair, misleading or abusive.
- We comply with the general terms and conditions of trade policies and all free competition regulations, without exception.
- We do not enter into non-compete agreements designed to inhibit or limit competition through the formation of cartels.
- We do not abuse a potentially dominant position through predatory pricing, imposition of agreements, sale discrimination and refusal to hire, among others.
- We do not compete unfairly or illegitimately divert our customers in order to achieve or maintain a position of market domination, using practices that tarnish the reputation of others, spreading false information or abusing the legal system.



The Company recognizes the positive role it plays in Trade Associations, in terms of facilitating interaction and cooperation between competitors, but at the same time it recognizes that such actions may facilitate or lead to behavior that hinders free competition. Therefore, in this area we encourage participation under the principles of due care and diligence, ensuring that ethical conduct prevails and respecting all aspects of the principles of free competition.

COMMITMENT TO COMPANY RESOURCES

Adequate Use of Resources

We are responsible for the efficient use and care of Company resources and assets. We must all efficiently and responsibly protect and use the assets that are under our control or supervision, whether these are facilities, machinery, vehicles, cash resources or securities, computer and communication equipment, computer hardware and software and all data stored in information systems, and we must take appropriate precautions to prevent the theft, sale, loan, donation, misuse or damage of such assets. If we become aware that the Company's resources are being misused, we must notify and report this through the appropriate communication channels, through our direct or area supervisors, or through the use of the Complaint and Reporting Systems that the Company has in place.

COMMITMENT TO OUR EMPLOYEES

Work-Life Balance

We promote the comprehensive wellbeing and satisfaction of our workers, seeking a high commitment to work and productivity, based on an adequate work-life balance. We demand respect for the maximum daily working hours and we manage a set of benefits focused on the health, education, recreation and healthy life of our workers and their families.

Fair Treatment and Equal Opportunities

We strive to promote an environment in which all employees can access the same development opportunities in an environment of fair treatment and evaluation based on merit, experience, training and competencies.



CHAPTER 5.

AEROSAN IS HONESTY

We work with honesty and transparency. Integrity is the basis of our actions, avoiding any type of conflict of interest or attitude contrary to market freedom and ethical, transparent business development.



CONFLICTS OF INTEREST

We strive for our employees, executives and directors to fulfill their duties without conflicts of interest that compromise the quality of their work or influence their ability to make decisions in AEROSAN's best interest. Conflicts of interest arise when the interest of a person—financial or otherwise—interferes with, affects or appears to interfere with or affect, in any way, his/her judgment, objectivity and independence in the decisions that he/she must make in the fulfillment of his/her duties. We must refrain from making decisions or undertaking actions in the event of a conflict of interest and we must notify direct management and other bodies established by the Company for this purpose, always and without exception.

A current or potential conflict of interest does not necessarily constitute a breach of this Code, insofar as such a conflict is not explicitly prohibited. However, failure to report it in a timely manner is a breach.

We respect the rights of workers, executives and directors to engage in activities outside the Company, as long as they do not harm, interfere or conflict with the performance of their duties.

The following is specifically prohibited:

- Engaging in negotiations on one's own behalf or for third parties within the scope of the businesses in which we operate.
- Proposing or trying to approve businesses, policies or decisions that are not in the interest of the Company, such as: I) granting commercial benefits or special deals to customers and/or suppliers with whom we are directly or indirectly related (through a relative or stake in a company); or II) hiring, supervising or

directly reporting to (or in the same operating area) a relative, partner or person with whom we maintain a close relationship that affects our impartiality and objectivity.

- Developing activities that compete or appear to compete with Company interests (in a personal capacity, through a relative or stake in a company), or that adversely affect our work performance or interfere with our responsibilities in our area, even if these are carried out outside the Company's premises and after hours.

CORRUPTION AND BRIBERY

We strive to develop our activities and achieve our business objectives by acting honestly, transparently and in good faith.

Employees, executives and directors of AEROSAN cannot directly or indirectly engage in behavior with third parties in order to obtain a favor or a benefit from them or distort their regular decision-making processes.

Within the context of its business activities, AEROSAN rejects and prohibits its employees from offering, promising, granting or consenting to receive or deliver valuables, cash or in-kind benefits to counterparts, be they customers, suppliers, authorities, public officials or others, in exchange for improper actions or omissions in their work, with a view to obtaining or maintaining any improper business or advantage.



GIFTS, INVITATIONS AND HOSPITALITY

Gifts, invitations and hospitality offered and/or received may lead to a misinterpretation by the recipient and/or giver. For this reason, AEROSAN prohibits offering or giving third parties, as well as accepting or receiving from third parties, donations or gifts that may be construed as falling outside commonly accepted business practices or courtesy, in keeping with all local regulations and always in accordance with Company guidelines.

Any gift, invitation or hospitality given or received must be a courtesy of a modest value and within the framework of industry practices, and must be reported to upper levels using the channels made available by the Company for that purpose.

If gifts, hospitality and invitations to events or other activities of a public or protocol nature are received from government entities, public officials or state-owned enterprises, within the context of the industry in which AEROSAN develops its business activities, these must, without exception, comply with the considerations contained in guidelines provided by the Company.

DONATIONS, SPONSORSHIPS AND POLITICAL CONTRIBUTIONS

AEROSAN only grants donations in cash or in kind, based on legislation in force in the territories where it operates, for educational, cultural, sports and social development purposes, following current Policies and Procedures in all aspects, without exceptions. Donations in cash or in kind to individuals, for-profit entities or organizations is prohibited, as well as any payment through private or personal accounts, on domestic or foreign soil. Likewise, no contributions are allowed to institutions whose objectives are inconsistent with our ethical principles and corporate values, or any contribution that could damage our reputation.

AEROSAN does not finance activities classified as political or make contributions, in cash or in kind, to parties, candidates for public office or their representatives, in any of the countries where it operates. Prohibited political activities or contributions include, but are not limited to:

- Sponsoring or hosting functions or events organized by, or associated with, any political party, politician or candidate for public office for the explicit purpose of fundraising.
- Using Company facilities or equipment free of charge or at a discount as a gift in kind to a political party.
- Workers, executives and directors may personally participate in political campaigns and processes, clearly specifying that it is in a personal capacity and that they do not represent the Company.
- Interaction with Government Entities, Public Officials and State-owned Enterprises

AEROSAN's operations play a strategic role in national economic development, permanently interacting with government entities, public officials and state-owned enterprises. AEROSAN respects institutions and their authority, maintaining such relationships in accordance with the legal framework in force in each country and upholding the highest ethical standards for the achievement of its objectives.

In order to prevent practices that constitute bribery, AEROSAN has established protocols for interacting with public officials, which include how to define and treat gifts, invitations and hospitality to such individuals.

LIABILITY OF LEGAL ENTITY IN THE EVENT A CRIME IS COMMITTED

Law No. 20,393 in Chile, Law 599 in Colombia and the Comprehensive Organic Criminal Code in Ecuador establish criminal liability for legal entities in the event a crime is committed.

The legal entity's liability is based on failure to comply with its duties of management and supervision when one of its owners, controllers, persons in charge, senior executives, representatives or other individuals performing managerial or supervisory activities, or the persons under direct management or supervision of any of them, commits one or more of the crimes indicated in those laws, provided that it was committed in the interest or benefit of the legal entity, or for its direct advantage.

Our goal is to maintain business relationships based on trust, integrity and transparency with customers or suppliers involved in lawful business activities whose funds come from legitimate sources and activities and are not intended to finance terrorism or other criminal activities. It is particularly important for us to fulfill our commitments to legal and regulatory compliance, as well as compliance with all related policies, procedures, protocols, controls or regulations that seek to prevent irregularities as well as to exercise due diligence in the tasks with which we are charged.

For that reason, AEROSAN expressly prohibits any conduct that can give rise to criminal responsibility for the mentioned crimes, and, therefore, generate any criminal liability for the individual directly committing the illicit act as well as for the company. Each employee is responsible for knowing and complying with the controls that the Company has implemented as preventative measures, which are set forth in the respective Internal Labor Regulations, Internal Regulations on Order, Hygiene and Safety, their respective employment contracts or appendices and/or otherwise communicated to them as a result of their position. Similarly, employees must attend training sessions to which they are invited or which they are asked to complete based on their job functions.

The following crimes generate criminal liability for legal entities in each of the countries where we operate:

- Asset laundering, which involves hiding or concealing the illegal origin of certain assets, with the knowledge that they come from crimes related to illegal drug trafficking, terrorism, arms trafficking, child prostitution, kidnapping, smuggling, corruption, bribery and other crimes.
- Contraband and participating in or facilitating illicit transportation of merchandise by evading any type of formal controls set up by authorities for import or export duties or domestic taxes.
- Terrorism financing, which consists of soliciting, collecting or providing funds, by any means, for use in committing any terrorist offenses, which are essentially a violation of human rights in whatever shape or form they take.
- Receipt of stolen property, which refers to storing, transporting, buying, selling, transforming or marketing, in any form, unduly obtained, misappropriated, looted or stolen goods.
- Incompatible negotiation, which consists of directors, managers or senior executives of a corporation taking an interest in a negotiation, deal, contract, transaction or operation involving the company, thus violating the conditions established by law. In other words, these persons have an undisclosed conflict of interest.
- Bribery, which consists of illegitimately offering, giving or consenting to give a Chilean or foreign public employee economic or other benefits for this individual to do or refrain from doing something to benefit the person bribing him or a third party.
- Private bribery, which consists of accepting or receiving a benefit, whether economic or of another type, for self- or third-party benefit, in order to favor or facilitate the choice of one bidder (supplier) over another. In other words, it consists of benefiting the person making contracting decisions so that person favors a given supplier.
- Misappropriation, which consists of appropriating or acting as the owner of money or personal property that would have been received by a third party and not returning it upon request, as well as using cash or in-kind gifts for an unintended purpose.

- Unfair administration, which occurs when a person in charge of third-party assets, by virtue of the law, a regulatory order, a judicial act or contract, causes damage, abusively exercises the powers he/she holds or carries out or omits an action that is overtly contrary to the interest of the owner of the affected assets.
- The crime of water pollution, which consists of intentionally, maliciously or negligently dumping or ordering someone to dump chemical, biological or physical pollutants that harm hydrobiological resources into the ocean, rivers, lakes or any other body of water.



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CHAPTER 6.

AEROSAN IS TRUST

Trust is an essential value for the Company and is reinforced on a daily basis with both internal and external stakeholders.



TRUST

WITH OUR EMPLOYEES

A workplace where trust in all employees comes first is a more beneficial setting for carrying out processes and meeting the Company's goals. This value fosters collaboration between the members of the organization and leads to tasks being carried out in the best way possible. AEROSAN is committed to building trust among employees and between them and the Company, thus maintaining an excellent workplace climate.

TRUST

WITH EXTERNAL STAKEHOLDERS

At AEROSAN all stakeholders are essential. They inspire us to strengthen our service focus on a daily basis and continuously evolve.

We promote harmony and trust in each stakeholder and seek a mutually beneficial relationship. We are responsible for reciprocating the trust they have placed in us and we firmly believe that the satisfaction of all stakeholders is our gratification as employees of AEROSAN.

REPORTABILITY

We have set the objective of developing a culture of reporting and documented feedback, spurring us to build a company with an open-door policy and listen to our employees in the quest for a good workplace climate that precipitates appropriate professional and personal development. In our daily actions we are committed to listening and preserving the confidentiality of the information we receive from employees that may feel affected by substandard situations at the company.



CHAPTER 7.

AEROSAN IS EXCELLENCE

We strive to meet the specific needs of our customers and, therefore, work to continuously improve our processes.



CONTINUOUS IMPROVEMENT

We are committed to the continuous improvement of our processes and strive to innovate in order to deliver better service to our customers. Being innovative makes us more efficient and capable of responding to current market needs and generating a positive impact on those who place their trust in us.

Continuous improvement enables us to stay ahead of the game and be prepared to adapt to change so as to make real improvements in response to new challenges and harness new opportunities.

We are committed to opening spaces of collaboration so that any idea, regardless of its origin, is analyzed and evaluated in order to boost employee and corporate development.

TEAM WORK

At AEROSAN, we know we are a team and that the only way to achieve our objectives, maintain our leadership and stay efficient is to work together to achieve common goals. Therefore, we strive to build collaborative, inclusive and open work spaces with the purpose of fostering a culture of organization-wide involvement from our employees. Working as a team, we each give our best, placing our effort, perseverance, attention, intelligence, leadership, pride, passion, creativity and innovation at our stakeholders' disposal and, as a result, delivering excellent service.



CHAPTER 8.

AEROSAN IS SERVICE

Our customers are the backbone of our activity. Therefore, we strive to provide timely, efficient and friendly service.



SERVICE QUALITY AND SATISFACTION



We put the customer at the center of our management efforts, in order to ensure service that meets and exceeds their needs and expectations.

We are committed to the quality of our services and, to ensure this, we assess customer satisfaction and strive for efficient processes.

We seek to fulfill our legal and contractual responsibilities with our customers, committing ourselves to:

- Give all customers equitable and fair treatment.
- Provide our services as agreed in contracts and with competitive conditions in terms of price, rates, quality, quantity, terms and profitability.
- Comply with confidentiality obligations imposed by law, our own guidelines and applicable ethical principles, protecting confidential and private information to which we have access.
- Establish contractually-defined monitoring and satisfaction indicators, accompanied by a system for managing and periodically following up with customers.



ETHICS MANAGEMENT SUPPORT TOOLS

COMPLAINT SYSTEM

To facilitate our commitment to report or declare events, behavior or circumstances that may, in the opinion of the informant, constitute an infringement, breach or violation of the principles of this Code and general policies, procedures and regulations, we have implemented an anonymous and confidential Complaint System.

That system is available on our webpage (www.aerosan.com), along with instructions for use and procedures for addressing complaints.

Our system involves three forms of reporting and/or filing complaints:



Web platform: accessible anywhere with Internet connection. The informant can access a confidential independent platform and select the Company where he or she wishes to report an event.



Email: complaints can also be sent via email: denuncias@aerosangroup.com



In person: Another alternative for reporting complaints is directly through your direct supervisor, area manager or CEO, who will channel your report through the appropriate systems for proper and timely management.

Our system is available to all parties covered by the scope of this Code of Ethics.

The web platform is managed by an external international provider, whose system complies with international standards that guarantee secure, independent, efficient and expeditious communication between the platform and the informant, safeguarding his or her confidentiality and anonymity.

■ Managing Complaints Received

All reports received are attended by personal with the necessary competencies to make a preliminary analysis and are managed under the protocols established by the Company for Complaint Management. This internally regulates the management of each case, from its reception, investigation, scaling and referral to subsidiaries within the scope of our Complaint System, communication to the Ethics Committee and eventual penalties, and finally reporting to audit entities, where relevant.

■ Anti-Retaliation Measures

Our ethical principles, obligation to report events that violate or breach the principles of this code, added to the spirit of our Grievance System and its Management Procedure, go against any retaliatory action that is exercised directly or indirectly, by any means, to complaints made in good faith.

We consider retaliation to include dismissal, separation from duties or work without due cause, transfer from position, public degradation or attack, exclusion from professional or social activities, exacerbated efforts to identify the informant or to personify anonymous complaints, among other attitudes and actions aimed at intimidating the informant or violating the anonymity and confidentiality of the accusation.

■ Ethics Committee

The Ethics Committee is the body within the Company that is in charge of ensuring the correct application of the Code of Ethics. Its main duties include:

- Promoting ethical values and principles.
- Updating the Code of Ethics based on suggestions and situations observed or reported.
- Establishing improvements to compliance of the Code of Ethics.
- Evaluating disputes, conflicts, faults related to the Code of Ethics and their potential sanctions.
- Being a consultative and resolute body.

The Corporate Ethics Committee will consist of the Chief Executive Officer and the managers in charge of Human Resources, while the Regional Ethics Committees will consist of the Country Manager for the employee involved in the complaint, as well as the HR & HSE Regional Managers and the Financial & Management Manager.

CODE OF ETHICS

LETTER OF ADHESION AND COMMITMENT

This copy of the Code of Ethics has been given to:

Name: _____

Identification Number: _____

Company: _____

Country: _____

Area / Unit / Section: _____

Job or position: _____

Company start date: _____

Direct Supervisor: _____

I hereby declare that I have received a free copy, which I undertake to read and study in detail, keeping it in my possession for possible consultations, and I declare that I understand the importance and context of the principles contained herein.

I understand that compliance with this code is mandatory in all areas of the activities that I undertake, and in this act I commit to respect these.

I undertake to consult the corresponding sources if I have doubts regarding its interpretation and application, and I will participate in outreach and training activities that are relevant for my position.

I declare that I comply with the standards of conduct established herein and I am obliged to report any conflict of interest, which may be or may appear to be real or potential, and I will address it through the proper channels available. Likewise, I am obliged to report to the sources described herein any event that I am party to or take notice of, which violates the principles of this Code.

Date: _____

Signature: _____

**The document is signed electronically in accordance with Law 19,799*



CODE OF ETHICS