



Anti-Corruption Policy

**IBERIA LÍNEAS AÉREAS DE ESPAÑA S.A. OPERADORA
S.U.**

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1. Purpose Statement

This Anti-Corruption Policy (hereinafter, the “Policy”) primarily addresses the need to comply with applicable anti-corruption legal requirements, as well as Iberia’s commitment to the highest standards of integrity, transparency, and respect for the law, as set out in the IAG Group Code of Conduct.

In line with major international regulations—such as the U.S. Foreign Corrupt Practices Act (FCPA), the UK Bribery Act, and reforms to criminal legislation in Spain and other countries—and in accordance with the aforementioned standards, it is essential for Iberia to ensure that certain behaviors that would undermine business integrity are not permitted. These include, for example, offering or accepting gifts, hospitality, or other incentives that may reward or influence a business decision, or engaging in potential conflicts of interest that could place personal priorities above collective ones. In this way, Iberia promotes that all individuals involved in its activities act with integrity and do not seek illegitimate benefits for Iberia, themselves, or third parties through misuse of their position or contacts.

This Policy establishes guidelines regarding the acceptance or offering of gifts or hospitality, prohibiting any form of bribery. It is not permitted to promise, offer, or give any benefit or advantage of any kind, directly or indirectly (through a third party), with the aim of influencing decisions of any kind (including governmental, administrative, or judicial decisions) or obtaining undue advantages for Iberia. It is also prohibited to accept any benefit or advantage that may result in a breach of the duties and obligations of directors, executives, and employees of the Company.

2. Scope of Application

Esta Política tiene carácter de mínimos y deberá ser observada por todos los consejeros, directivos y personas trabajadoras de Iberia, así como por aquellos terceros que intermedien, colaboren o participen en negocios en nombre de Iberia.

2. Definitions

Applicable anti-corruption laws: Laws that prohibit bribery or any other form of corruption; in particular, the Spanish Criminal Code.

Item of value: Any tangible or intangible item of value, broadly defined, in any form, including but not limited to cash, cash equivalents (such as gift cards or product discounts), loans, gifts, hospitality, goods, services, employment for relatives, travel, accommodation, entertainment, meals, expense reimbursements, favors, business or employment opportunities, fulfilling requests to provide something of value to a third party, charitable contributions or donations to non-profit organizations, and promotional sponsorships

• **Public Official/Employee:** For the purposes of this Policy, refers to:

- (I) Government, local, or official employees or any other persons performing functions on behalf of a country or territory.
- (II) Individuals exercising administrative, legislative, or judicial functions, whether by appointment, election, or succession, in a given country or territory.
- (III) Individuals affiliated with or otherwise belonging to a political party.
- (IV) Candidates for any political office.
- (V) Individuals performing any other type of official function, at governmental or local level, within the government or any of its departments.
- (VI) Employees or representatives of government-owned or publicly funded organizations.
- (VII) Officials or agents of public international organizations.

• **Related person:** A person who has a family relationship up to the second degree of consanguinity or affinity with the Public Official, as well as their spouse or equivalent partner.

- Business partner: Third parties acting on behalf of Iberia or any entity owned or controlled by Iberia who may interact with external parties, especially when these are Public Officials/Employees.
- Facilitation payments: The provision of an item of value to a public official or a person performing administrative or certification functions to secure or expedite the performance of a routine action that does not involve discretionary decision-making.

4. Gifts and hospitality

4.1 General Prohibitions

- Giving, offering, promising, accepting, or requesting, from a public official or related person, regardless of location, any item of value, directly or indirectly, in violation of applicable regulations, as an incentive or reward for acting or refraining from acting in relation to the performance of their duties. This also includes omissions or delays in actions that the official should perform.
- Facilitation payments are expressly prohibited, even where such payments are not prohibited by the laws of the relevant country or territory.
- Giving, offering, promising, accepting, or requesting, by any Iberia director, executive, employee, or business partner, directly or through an intermediary, any unjustified item of value, benefit, or advantage of any kind with the aim of improperly influencing the procurement of services or business relationships
- Signing false contracts in breach of this Policy.
- Failing to maintain accurate books and records, or concealing or misappropriating funds, or concealing or attempting to conceal their sources.

4.2 Acceptable Practices

Business gifts and hospitality must never be offered or accepted for unlawful purposes and must, in all cases:

- Comply with laws and regulations in both the offering and receiving countries.
- Be given or accepted without expectation of reciprocity; their purpose must be to build business relationships within normal standards of courtesy, not to influence decision-making.
- Be socially acceptable; the gift or hospitality should be reasonable and able to be disclosed without reputational concern.
- Be consistent with Iberia's business interests and common business practices.
- Be occasional and not excessive, in line with local or industry standards.
- Be recorded in appropriate, accurate documentation with reasonable detail. Gifts or hospitality valued up to €150 do not need to be recorded and may be accepted or offered without prior authorization. If the value exceeds €150, prior authorization from the relevant supervisor is required and must be recorded in Iberia's Gift Register available on the Intranet.

To breach this Policy, it is not necessary for the exchange to actually take place; an offer or a promise is sufficient.

The following table outlines the six key tests that all Corporate Hospitality events and courtesy offerings must meet:

TEST	EXPLANATION
Reasonableness and Proportionality	Reasonable and proportionate hospitality and promotional expenses aimed at improving the Company's image or presenting its products/services or fostering cordial relationships are considered an integral part of business activity.
Legitimate Professional Purpose	The professional aspect of events is important and should represent a significant portion of the time spent with third parties.
Timing Considerations	It is essential to consider whether business negotiations are ongoing with the relevant parties.
Benchmarking with Similar Companies	Events must align with industry practices and not aim to obtain undue advantages through excessive cost, scale, or scope.
Transparency	Gifts exceeding €150 must be recorded.
Context	The number and frequency of invitations to individuals or organizations must be considered.

4.3 Additional Considerations

- Inviting spouses/partners makes it more difficult to pass the “Legitimate Professional Purpose” test and is therefore discouraged.
- It should be stated that if the invited person cannot attend, other representatives of their company may attend instead, to avoid targeting specific decision-makers.
- Changing invitees without proper documentation and procedure is not acceptable.
- Declining an invitation will not have any commercial consequences.
- In exceptional circumstances, the Company may invite public officials. In such cases, it is essential that the legitimate professional purpose is clearly defined, properly

documented, and approved in advance by the relevant supervisor, unless specific exceptions apply.

The definition of public office is broad; therefore, caution must be exercised. If a public official legitimately participates in Company activities (e.g., a mayor participating in a joint international promotion), the scope of participation and covered expenses must be clearly documented.

In all cases, when inviting a public official, a copy of the invitation must be sent to the official's office to ensure transparency and proper public record.

5. Queries and Communications

If any director, executive, or employee has doubts regarding the compliance, application, or interpretation of this Policy, they must consult the Compliance Unit.

Anyone aware of a breach or suspected breach must report it via the confidential channel available on the Intranet or through any other Company-provided means.

The Company appreciates such cooperation and prohibits any retaliation against individuals who report in good faith.

6. Disciplinary Regime

All directors, executives, and employees are responsible for strict compliance with this Policy. Directors and executives are responsible for communicating and enforcing it among their teams.

Monitoring activities may be carried out to ensure compliance. If potential breaches are detected, appropriate investigations will be conducted. Audits may be performed, and annual reports will be provided to the Compliance area and the Board of Directors.

Any breach of this Policy will be considered an offense subject to disciplinary action as determined by the People Department, in accordance with applicable labor regulations.

Any form of corruption is considered a serious offense.

7. Policy Review

This Policy will be reviewed and updated at least every three (3) years to ensure compliance with applicable legal requirements, internal changes, and best practices.

VERSION CONTROL

Revisión	Aprobación	Fecha	Descripción
Review	Board	29/07/2025	Adaptation to the "Framework for IAG policies". Removal of conflict of interest regulation following approval of a new IAG policy.
Basic	Board	26/07/2022	Initial version