



## **COMPLIANCE POLICY**

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

**JULY 29, 2025**

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## **1. Introducción**

Iberia's leadership position is the result of many years of effort and commitment. However, inappropriate conduct by a single employee may potentially damage its image and reputation within a very short period of time. In this regard, IBERIA must actively prevent and mitigate this risk by fostering a strong compliance culture within the Company, led at all times by the Board of Directors and Senior Management.

To this end, all employees and collaborators are required to carry out their activities with a firm commitment to comply with applicable laws and regulations, the values and ethical principles set out in the IAG Group Code of Conduct, Iberia's internal policies, and all procedures and internal controls applicable to the Company.

Following the reform of the Spanish Criminal Code introduced by Organic Law 5/2010 of 22 June, and particularly the amendment introduced by Organic Law 1/2015 of 30 March, companies are required to implement **Criminal Risk Prevention Models**; that is, control systems designed to prevent, detect and respond to the commission of criminal offences within organisations. This requirement has been further reinforced by doctrinal and case law developments, including Circular 1/2016 of the Spanish Public Prosecutor's Office on the criminal liability of legal entities, as well as recent Supreme Court rulings.

As a result of these developments, and in line with its compliance culture, IBERIA has implemented a **Compliance and Criminal Risk Prevention Model**, which consolidates the procedures and controls in place to ensure the effective prevention, detection and management of criminal risks within the Company.

## **2. General principles of conduct**

The purpose of this Policy is to communicate to all IBERIA directors, officers and employees, as well as to third parties interacting with the Company, a clear and unequivocal message of zero tolerance towards any unlawful conduct, whether criminal or otherwise.

IBERIA is committed to preventing and combating such conduct, as well as safeguarding its reputation and corporate image.

In addition, the behaviour standards set out in the **IAG Group Code of Conduct** apply and define Iberia's expected standards of behaviour, aligned with ethical principles and procedures appropriate to its business activities.

## **3. Key elements of the compliance and criminal risk prevention model**

Iberia's Compliance and Criminal Risk Prevention Model comprises the set of procedures and controls implemented within the Company to mitigate and prevent criminal risks.

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The Model is structured around the following key pillars:

**Governance and Committees**

- ✓ **Compliance Committee:** Iberia has established a Compliance Committee responsible for overseeing the effectiveness and compliance of the Criminal Risk Prevention Model. This body acts with autonomous powers of initiative and control in accordance with the Spanish Criminal Code.
- ✓ **IAG Internal Audit Function:** IAG performs internal audits of Iberia based on an audit plan approved by the IAG Audit Committee. These audits provide comprehensive coverage and assess compliance, operational efficiency and control effectiveness across all relevant business areas
- ✓ **Compliance Officer:** Iberia has appointed a Compliance Officer, who supports the Compliance Committee and is responsible for monitoring the effectiveness and compliance of the Criminal Risk Prevention Model.
- ✓ **IAG Ethics and Compliance Committee:** This committee is composed of Compliance representatives from IAG Group companies and promotes a consistent compliance culture across the Group, as well as the continuous improvement of compliance frameworks and practices.

➤ **Policies, Codes and Protocols:**

- ✓ **IAG Group Code of Conduct:** Iberia adheres to the IAG Group Code of Conduct, which establishes the fundamental principles, standards of behaviour, and compliance and control framework applicable across the Group.
- ✓ **Supplier Code of conduct:** Iberia applies the IAG Supplier Code of Conduct, which sets out the principles of integrity, transparency and compliance expected from suppliers. Iberia ensures that suppliers acknowledge and accept this Code.
- ✓ **Anti-corruption Policy:** Iberia has an Anti-Corruption Policy applicable to all employees, which establishes specific guidelines on facilitation payments, interactions with political parties, consultancy services, cash controls, private sector corruption, related-party transactions and other relevant areas. This Policy is reviewed and updated on a regular basis.

- ✓ **Protocol for breaches of the criminal risk prevention model:** Iberia has established a protocol governing the management of breaches of the Model, including the operation of the Internal Reporting (Whistleblowing) Channel, and which is periodically reviewed by the Compliance Officer.
- ✓ **Procedures, tools and other control activities:**
- ✓ **Speak up Chanel:** Iberia has implemented a Speak Up Channel within the Company and has developed the corresponding governing procedure, applicable at a corporate level. This channel is a tool made available to all employees, professionals, customers, suppliers and related third parties, aimed at facilitating the submission of queries regarding the scope and application of Iberia's Criminal Risk Management and Control Model, as well as enabling the secure and confidential reporting of potential breaches or risks of breaches of such Model or the Compliance Framework.
- ✓ **Direct Compliance Chanel:** Iberia provides a direct Compliance channel through the email mailbox (cumplimientonormativo@iberia.es), which allows employees, customers, suppliers and any third party interacting with the Company to report any conduct that may be considered irregular or reportable, in line with the principles of the Compliance System.
- ✓ **Disciplinary procedure:** Iberia has established a disciplinary system as part of its Criminal Risk Management and Control Model, which complements the disciplinary regime set out in applicable regulations. This system is interpreted and applied in accordance with the Spanish Workers' Statute and the applicable Collective Bargaining Agreements governing Iberia employees..
- ✓ **Code of conduct training:** Iberia provides mandatory online training on the Company's Code of Conduct to its employees, ensuring awareness, understanding and proper application.
- ✓ **Compliance training:** Iberia delivers regular training to its employees on Compliance matters, including criminal risk prevention, ensuring adequate knowledge of the applicable legal framework, including the Spanish Criminal Code.
- ✓ **Awareness activities:** Iberia carries out awareness initiatives for its employees on key areas for the Company, such as compliance, competition law and data protection, with the aim of reinforcing a strong compliance culture and adherence to internal policies and procedures
- ✓ **IAG External Auditor Services Policy:** Iberia applies the IAG Group External Auditor Services Policy, effective since May 2011 and approved by the Group's Audit and Compliance Committee. This policy primarily regulates the services that external

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auditors are prohibited from providing, as well as those considered audit services, including financial audits and advice on the interpretation of accounting principles.

- ✓ **Compliance system procedures, controls and policies:** Iberia has implemented a set of procedures, policies and controls that develop its Compliance and Criminal Risk Prevention System, aimed at mitigating the criminal risks identified within the Company..

#### **4. Review and approval of the policy**

This Policy, as well as the Compliance and Criminal Risk Prevention System, are subject to continuous improvement and will be updated whenever required due to regulatory, social, business or other relevant changes. In any case, they will be reviewed periodically, at least every three (3) years.

#### **VERSION CONTROL**

Revisión	Aprobación	Fecha	Descripción
First revision	Board of directors	29/07/2025	Adaptation to the IAG Policies Framework
Initial approval	Board of directors	25/10/2016	Initial approval



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**Versión N° 2-  
Review**

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