

Volaris Code of Ethics

Dear Ambassador:

It is a pleasure for me to introduce this Code of Ethics laying out our culture and our way of life at Volaris. This document is intended for you to have easy access to all this information, and it is to be used as a tool to help you become familiar with who we are: “with the best people and at the lowest cost, we enable more people to travel ... WELL.” This is also a great opportunity for me to remind you that we are here to “transcend by creating and living the best travel experiences.”

At Volaris, we stand firmly by our three pillars: Safety, Customer Service, and Sustainable Profitability, and the same goes for our expected conduct: Credibility, Respect, Impartiality, Fellowship, and Pride. This Code, our pillars, and our conduct would not mean a thing if you, our Ambassador, didn't make them all your own, assuming them as part of your way of life.

I have always been quite interested in giving the company a deeper sense of moral and ethical value, a fact that gives me tremendous pride as head of the company, which is also why I entirely reject the notion that a private company is set up merely as a market agent to produce goods and/or services that maximize benefits. We should recognize that the environment impacts the business, and the business impacts the environment. When I review company environment surveys, I can't allow myself to forget that you all demand a change in Mexico's aviation industry, and one where you expect the company to integrate into your lives.

Social reality is open, structured, and basically characterized by the existence of internal relations, and is subject to constant transformations and reproductions where two agents play an important role. You are the first of these agents, as Volaris Ambassadors, human beings in every sense of the word, but also with great sense of will. The second agent is the social structures in which we operate, since they are the result of the actions, relationships and constant transformations we willfully take as human beings in our environment.

Thus, we can't possibly view Volaris simply as a profit generating entity, but rather one resulting from the cooperation and trust between the company, its Ambassadors, and its various social structures. To the extent that the company is regarded merely from the perspective of financial value, then a null sense of value or morality is removed or conferred, which is not so, as man is not only driven by individual interest or by maximizing income.

Precisely because of its intrinsic dynamics, our Volaris Family is called to carry out, as part of our momentum, a social function which is profoundly ethical: to contribute to the improvement of man, each and every one, without discrimination, creating an environment where personal skills are developed, achieving a fair, efficient, and reasonable production of goods and services, and making people really work on something they as Ambassadors can truly feel as their own.



We dream of a Volaris that is a community filled with life, a place where individuals in the aeronautical world can develop and interact with society.

Our Code of Ethics is divided into three sections. The first one is titled “Pillars, Conduct, and Applications”, where we explain what each one stands for. We also explain expected behaviors to put these into practice and offer some concrete situations they should be applied to.

The second section develops our Corporate Social Responsibility Strategy as well as our Corporate Volunteering Campaign “Volemos Juntos”.

The third section contains several different attachments. These are all the different forms, which will be of great use in the day-to-day application of this Code. The first one and most important of these is the sheet each one of us needs to complete and turn in upon reading this document.

It is important to underscore that this Code, though stating our basic pillars and conducts, also touches a wide array of issues with ethical implications. Yet it is not intended to cover each and every single instance where an ethical decision must be taken. The spirit of this document is to lay out those key principles serving to guide every Ambassador to participate in responsible decision-making.

All of those who are part of the Volaris Family need to be strongly aware that each one of our actions goes hand in hand with a responsibility. If we want to continue strengthening as a leading company with solid principles and one that is profitable in the market, we must assume at all times what we have to do, remaining a step ahead of the various needs, ready to propose without being tempted by the “oh-this-can’t-be-done” attitude.

We hope these practices become widely known and actively shared with our suppliers, as well as our Customers, and any other Volaris stakeholder.

I am grateful to you for making this a great company, and I especially thank you because as the Volaris Family that we are, we are truly transforming the aviation industry, and granting so many more people -our Customers—the opportunity to travel, making them feel safe and offering outstanding service. Remember that values are in fact a competitive advantage, not only do they help us be better positioned in the market, but also, they strengthen us as people of integrity, so we can truly be regarded as “the best ”.

Enrique Beltranena Mejicano
Volaris CEO



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1. Culture, Pillars, and Conducts



Culture, Pillars, and Conducts at Volaris and their importance

Our Pillars and Conducts represent our solid foundation guaranteeing a solid structure, which guarantee a solid structure, one that is capable to reach great heights.

Our company is distinguished by its growth, efficiency, and quality in service. This compels us to have Ambassadors with a good attitude, and who know to anticipate needs, plus, who are dynamic, creative, and have sense of belonging, and can work as a team and be flexible; worthy representatives of the Volaris sense of pride.

For this reason, as part of our Volaris Culture, at all times we reinforce “Three Chimes of the Bell”:

1. **Linking with the Volaris Family**, to consolidate our strength with a market in crisis.
2. **Customer-centered**, to continue making Volaris an irresistible brand for the Customer, who in the end is our main reason for being.
3. **Create a healthy environment**, one that is satisfactory and productive because, despite of external circumstances, we bet on our Ambassadors and they bet on Volaris.

A. Ethical Conduct

- What is ethical conduct?

Ethical conduct implies an ongoing effort to live day after day according to the highest moral values. Criteria to measure this effort are based on greater or lesser respect for high moral values. Ethical is everything that works in accordance to individual dignity, whereas unethical constitutes anything that would denigrate or diminish it.

Ethical conduct generates a work environment where Ambassadors know they are dignified and well respected and consequently, they encounter an environment that is conducive to human and professional development.

- The ethical conduct we promote is developed through:

Our Pillars: Safety, Customer Service, and Profitability

Our Conducts: Credibility, Respect, Impartiality, Team Spirit, and Pride

A.1 Safety



What is safety?

By safety we mean following safety standards that are essential to guaranteeing our permanence in the market. Protecting the lives of our customers is an absolute priority, which derives from protecting the safety of all our Volaris Ambassadors.

We have an absolute commitment towards the permanence of a safe place to work, for our Ambassadors and our Customers. Also, all Ambassadors are responsible for maintaining a safe place to work, following rules and practices and health and safety procedures at all times. Deviations from these standards are to be reported immediately to a supervisor or a direct manager for the appropriate measures required to solve each situation.

We are a Pro Life company, that is to say, we regard life with the highest care because we defend the dignity of each person, and this is an intrinsic and supreme value for each human being, regardless of their economic, social, and cultural situation, as well as their beliefs. Individuals have dignity in and of themselves, it is not awarded by external factors, and it comes from the very moment of conception and is inalienable. Safety in all that we undertake, is therefore a consequence of how we think about life, how we respect it and how we aim to build with our lives and that of our Customers a system whereby we preserve it at all costs. We can not speak of a culture of safety if we do not have a profound understanding of defending life.

The company strengthens the application of an immunity policy that protects people who directly or indirectly report any safety violations. This policy will be implemented through the Aviation Safety Area, which will regulate it as appropriate. (Annex 1)

Following are some examples of situations where we apply safety

- Handling confidential information

Confidential information that is administrative or technical in nature and is related to current or potential business and individuals, may not and should not be shared, lent, given away or leased in any way. Confidential information constitutes all information that is not regarded as public and that could be somehow used by the competition, or could somehow cause Volaris, its Suppliers, and/or Customers some harm if it were to be shared.

All the information exchanged on a daily basis as part of our processes is considered company property. Breach of this principle is subject to what is established in internal policies and the laws applicable in the country

- Promoting health and safety at Volaris
 - An addiction-free environment policy



The company promotes an environment that is addiction-free, as conducts like this would guarantee the safety of our Customers and Ambassadors. It promotes permanent controls to ensure that “all” our Ambassadors refrain from consuming substances that could somehow lead to acts that somehow foster uncertainty.

The company is quite aware of human realities and the ongoing change processes that determine an increase in the use and abuse of alcohol, drugs, both legal and illegal substances. In order to preserve air safety, administration, operational, and customer service, as an essential objective the company has decided to implement a program for alcohol, drugs and substance prevention and control, as part of the values and principles of this organization. The policy of an Addiction-Free Environment is linked to our vision of preserving life and as a result of the above, safety. We do not conceive of one without the other, therefore we will apply methods that help us preserve them.

A.2. Customer Service

- What is Customer Service?

We create new experiences which make a true difference by listening and proposing solutions, and by responding effectively, creatively, and with a positive attitude to those needs posed by our internal and external Customers

- Following are some examples where we apply Customer Service
 - The quality of our products and services

We have a firm commitment to maintaining the highest standards of quality offering air transportation services. For this reason, we strive to satisfy our Customers, with careful attention, being polite, trustworthy, reliable and warm with the firm intention of maintaining Customer loyalty through constant improving of our services.

Customers are in fact, our strategic partners, in whom we trust our growth and development. Maintaining the firm goal of offering exemplary services, contributing to our business success.

Work, honesty, and decency focused on these ideas will enable a long lasting and fruitful company-customer relationship. We promote transparency and prefer that Customers decide.

Any Ambassador or coworker conducting business practices under terms that are in any way different than those established by our company will be in



violation of this Code's principles, especially when the actions carried out denigrate human quality of our Customers.

However, we are of the idea that the Customer gets what the Customer needs, no more. We are convinced that on many occasions we can't compete with their personal requirements at all stages of service. For this reason, our effort focuses on transporting Customers from one point to the other with outstanding warmth focused precisely on that. The company is convinced this needs to be done at a competitive price, and for this reason some services are charged separately and customers have the possibility of deciding whether they require them. These services are part of our ancillary income, which is key to achieving sustained profitability.

A.3 Sustainable Profitability

- What is sustainable profitability?

The lowest cost always wins. The aim is to grow and maximize profits on a sustainable basis. By meeting the above, we guarantee growth for our Volaris family preserving our source of work.

- Following are some examples where we apply profitability
 - Efficiency in the use of resources and austerity in business

The efficiency criteria enables us to be competitive and therefore contributes to the company's durability. It is an ethical obligation to make an effort towards this optimization in the use of resources. For instance, electricity, email, photocopies, paper, etc.

Time is one of the most valuable resources of any company, so therefore we promote an environment of timeliness in everyday activities, from attendance to meetings, turning in reports on time, and meeting the set goals for the terms set forth. Naturally, flight timeliness is essential to achieve the efficiency levels we hope to reach.

Our commitment as Volaris Ambassadors is to protect and optimize all resources at our disposal through wise usage and exercising behaviors following the law on all our business practices and in all actions we undertake.

We commit to maximizing resources, in addition to saving at all times in terms of operations, launch activities, promotions and ways of doing business and with this communicating a message of austerity and sobriety to avoid unnecessary expenses which in the end will affect our economy.



To our stakeholders, we are fully committed to offering sustainability in terms of profitability to our company.

We are committed to generating and distributing in a timely and accurate manner, and in accordance with applicable law, all necessary information about the company, so that our shareholders can make decisions on solid and consistent foundations.

We believe that business and daily operations must be conducted in a context of sobriety, which is why we are committed to conducting our operations under the principles of safety, austerity, and simplicity. Our facilities and our way of doing business is frugal.

Volaris Ambassadors are by far the company's most valuable asset. Therefore, our time must be well taken advantage of. We work in a company, which pursues the use of our time to maximum levels within our range of working hours without infringing the law in any way, or resulting in excessive work hours that cause fatigue. We respect in terms of rests and breaks, especially those schedulings established by the ICAO for our industry. Taking a vacation in our terms is the obligation of every Ambassador.

- Care of Asset Usage

Care and preservation of Volaris assets is a responsibility of each and every one of the members of the company.

By assets we understand not just the tangible property, but also business plans, designs, processes, systems, technology, illustrations, business strategies, product launch plans, promotional campaigns, and of course our brands.

We are committed to safeguarding our assets, especially Volaris intellectual property, represented by its strategic information, information systems, documents, and merchandising schemes, including financial information and personnel related information.

We will put all Volaris assets to use towards legitimate business purposes favoring the company, in accordance to our plans and strategies, and never in such a way that favors our personal benefits or that of any third party.

We will take special priority to care for those tasks we have been entrusted with and will be ready to inform our managers regarding any information that may lead to a loss or inappropriate use of such assets, particularly when safety is at risk.



Each and every one of us has the commitment to protecting our brand integrity, as well as competitively developing its market value, including its use in any information related media or social media.

- Analysis of future investments

Day after day we are placed before different business opportunities that are different in terms of the implied risks. The higher the risk involved therein, the greater the precaution and the greater care that must be given to the analysis prior to decision making in that regard. The virtue that is directly associated with this care is prudence and caution. We shall practice this virtue for all our decisions. Being prudent, does not mean, however, failing to act, or acting slowly upon decision making, the virtue of prudence demands that one ask for advice, that one is well aware of the environment in which decisions are taken, and being firm in the decision that is in fact taken. Each opportunity should provide the appropriate controls to monitor investment feasibility.

We are to use business opportunities to benefit Volaris interests and shall not take these opportunities for personal or third party benefit.

- Systems related security

Electronic availability of information anytime and anywhere has changed our work: it has accelerated and improved it, yet it has also now incorporated the risk of disclosing confidential or business information accidentally or in some unauthorized way. At Volaris we have created an “Information Protection” policy, which establishes the principles of how information should be seen and dealt with, treated as well as effectively and efficiently protected.

These principles clearly establish both the responsibility as well as the instructions of protecting information to Volaris Ambassadors and are also applicable to other authorized individuals, including independent contractors, temporary personnel, and/or visitors who use the Volaris information systems or have access to information at any point of its lifecycle.

Systems related security involves protecting PCs, communication devices, servers, and computer networks from information abuse and theft. This includes rules for appropriate use of Internet and e-mail.

Use of computer equipment provided by Volaris (including hardware, software, and network computing in general) should be limited exclusively to work purposes.

Systems related security also includes fulfilling the following requirements:



- a. At our workplace, only Volaris acquired equipment and computers can be used
- b. Only Volaris authorized licensed and approved software may be used, which is to be installed only by authorized personnel from Volaris IT staff.
- c. All devices must have passwords that safeguard information on them, these passwords shall be personal and non transferable.

Internet Usage

Some Ambassadors have access to Internet for purposes of their work and function, and/or to communicate with coworkers when they are not in Volaris; the use of this tool needs to be done following these regulations:

- a. It is to be used to access information required by the position or function
- b. Registration for web discussions related to work such as to news groups or chat sessions are only allowed using a private email address that does not bind Volaris in any way, as to maintain confidentiality of your information
- c. Participation in any activity that may discredit Volaris in any way is strictly forbidden, particularly when using the Volaris email address
- d. Volaris confidential information may not be shared

A.4.Credibility

- What is credibility?

Credibility is the result of a coherent lifestyle that generates trust in the environment. This value goes hand in hand with truthfulness and is generated according to honesty, dedication, abilities, and commitment.

- Following are some examples of situations demonstrating credibility

- Coherence/ Integrity

Coherence and integrity refers to the way we consistently demonstrate how we act and make decisions, which goes hand in hand with what is being said and done, in accordance to Volaris Culture. Showing honesty in all our actions with Ambassadors, and internal and external Customers, is crucial.

- Open Communications

There should be communication at all levels, among all people, in a direct manner. We promote saying what you think and discussing ideas openly and assertively. For us communication is in fact the cornerstone of the process to improve the work environment.



○ Closeness With Your Immediate Supervisor

We encourage you to maintain a close relationship with your supervisor so you can conduct your work more efficiently and effectively. Leaders at our company are people who care about every Ambassador's full development as a person who is therefore able to better fulfill their duties.

○ Internal Communications

We have an internal communications division responsible for shaping and distributing the internal information every Ambassador needs to know, an action conducted through different means, which include:

- Internal communication displays, which are placed throughout all work stations sharing daily news, announcements, birthdays, photos, videos, general invitations, internal contests and cultural issues and general type operational information. All Ambassadors are asked to share the necessary information through this means to guide everyone at the company adequately.
- Direct mail, informational releases by email (news, invitations, initiatives)
- Newsletter, digital distribution of a weekly informational piece with news at the end of every week plus announcements for the coming week.

○ Chat with Ambassadors

We invite all our Ambassadors to participate in an open forum where the airline's GM and other company executives can chat directly with Ambassadors to discuss relevant company issues.

○ Lunch Meeting with Ambassadors

The Volaris Managing Director holds periodic lunch meetings with groups of Ambassadors where he gets to know them personally and has an opportunity to directly share their concerns.

The particular group of Ambassadors gets the opportunity to speak directly to management and share concerns and issues, get to know the staff personally and establish direct contact and rapport.

We have set up in the organization a system that ensures everyone is heard. We call this the "Father-Grandfather" policy, whereby if someone wishes to express something, they have full right to do so and after sharing it with their direct supervisor, they can then speak to their supervisor's supervisor, if they are intimidated or if the supervisor is the one to infringe the code. In the case



that the supervisor does not diligently resolve the issue, the individual may go directly to the Talent Department or in the end to the CEO. The use of each situation needs to have exhausted all prior instances.

- Conflict of interest

To avoid having conflicts between personal interests and company related interests, and to promote a solution in case one were required, all Ambassadors are responsible for declaring any and all financial or non financial interest that may come in conflict with their work at Volaris.

If personal interests are regarded as an issue that may in some way influence work performance, this needs to be communicated in writing to the position's supervisors immediately, and in accordance to the form in Annex 5. Not complying with this policy may be the cause of termination of the working relationship.

Individuals may not have financial interests or of any other kind in a competitor's or supplier's interest.

Family members may be allowed to work in the company, as long as the nature of their relationship does not interfere in any way with performance of anyone else's work, or our working relationship with Volaris. The following situations are not allowed:

- A working relationship where there is interaction of processes among family members.
- A supervisor-subordinate relationship.
- If one of the family members were to have an executive level, they may not work in the same area.

From an operational point of view, and for safety reasons we will aim to avoid that a single equipment is operated by two individuals who are related.

To avoid these situations, those who exercise any management or managerial level, have the responsibility to monitor this aspect to prevent possible conflicts and act promptly.

We all have the obligation to inform our supervisors of the existence of any relationship between employees, including those relations that may have not been formalized yet. These relationships must be within acceptable social standards of our society.

- Gifts and Donations



Ambassadors and our families, must refuse gifts, services, discounts, travel or any form of entertainment provided by suppliers.

Occasionally gifts with a maximum value of \$ 5,500 MXN may be accepted.

If the gift were to exceed that figure, notification must be issued to a higher executive level, who will in turn be responsible for deciding actions to follow. Gifts in the form of cash are strictly forbidden.

Ambassadors may not use any equipment, materials or resources owned by the airline for activities that are unrelated to their work.

- Relations with Labor Organizations

We uphold the basic commitment to respecting the independence of the labor organizations that represent legitimate interests of our Ambassadors, always seeking to make sure that relations are in the spirit of true collaboration and mutual respect.

Ambassadors acting as representatives of union interests will seek to protect at all times collective interests and the common good, above and beyond that of their personal interests, being subjected to voting processes if they are deemed necessary.

- Participation in Political Activities

Volaris does not maintain ideological affiliations, or political or party affiliations yet motivates civic collaboration in professional associations and citizen organizations, and also promotes responsible exercising of political rights.

Volaris is an apolitical company and as such, does not support political campaigns of any kind.

Ambassador participation in political processes and / or electoral processes will be on a personal basis and may not be in the form of time related contributions, financial support or resources that belong to the company. When an Ambassador chooses to participate in politics, express an opinion, this must be done clearly as an individual, with an explicit clarification that they are acting on their own, and should not appear to be doing so in the name of and/or in representation of Volaris. Company executives however, may not participate in such activities without informing General Management.

Volaris and its Ambassadors commit to strictly complying with all national legislation, as well as state and local legislation and from other countries where operations are conducted.



Pursuant to the above, I can say that:

- I am informed regarding issues and significant changes in my area.
- I am informed regarding Volaris expectations.
- I have access to speaking with my supervisors.
- I agree that the company contracts individuals who match the company culture.
- I believe my superiors do a good job of ably managing the company.
- My superiors do a good job assigning and coordinating staff.
- My superiors trust that I do a good job without having to constantly supervise me.
- My superiors have a clear vision regarding the future of Volaris and how to achieve it.

A.4 Respect

- What is respect?

Respect is the recognition of self worth as well as the rights of individuals and society. It is a value allowing man to recognize, accept, appreciate and value those qualities in others and their rights, and in turn, for society to live in peace, in healthy coexistence, based on rules and institutions.

Respect towards ourselves, our work, our time and contributions, grants value that is deserved by each element of our Company, which can in turn be reflected towards our Customers.

- Following are some examples of situations demonstrating respect
 - Mutual Respect

We recognize the value and dignity of people at all times.

Some particular situations where respect should be manifested include:

- Punctuality
- Protection of privacy and physical and emotional integrity. Violence and abuse, including verbal abuse, it totally unacceptable in any of our relations
- Care for the workplace



- Committed to results

In Volaris 40% of the compensation is variable. Such compensation is always bound to individual and Company results. These schemes are reviewed every trimester, to ensure that all Ambassadors are aligned and oriented with Volaris' strategy and results.

In the variable compensation scheme, the term “enabler” exists, it is an essential requirement that all Ambassadors must comply with; if this is not the case, the Ambassador can have an impact in terms of compensation and even the termination of the agreement. In the enablers aspects include those of every day work, no Ambassador is obligated to the impossible.

It is important to mention that all Ambassadors are committed with the Company results, not only because these are bound to our variable compensation, but because we are convinced that the permanence of Volaris in the market, depends on our every day to day job, meeting the objectives that are periodically traced always aligned to the Company strategy. In Volaris we have very low tolerance to noncompliance of commitments and it has its consequences.

- Legislation Compliance

In all of our activities, and at any level of responsibility, we must fully comply with the law, regulations, and any other dispositions that are in place, regardless of their nature and reach, including legislation and regulations of abuse of privileged information (“insider trading”), both in Mexico as well as in any of those countries where Volaris operates in or conducts business in.

Volaris and its Ambassadors have the commitment of complying pointedly and honestly with payment of all our corresponding taxes.

At Volaris we will not incur in any unlawful or inappropriate payment of any kind to authorities or individuals and we will abstain from partaking in any kind of activity that may be deemed or understood, tacitly or explicitly, as corruption or collusion.

Along with our policies regarding compliance with legislation, we also implement business transparency policies. For this reason we apply towards all our processes, the presentation of required data and wherever necessary, all requirements of the Sarbanes Oxley legislation.

- Respect for Customs and Local Legislation

By having a presence in countries with different cultures and legislations, we will apply our business practices with full compliance of local legislation and



to the degree that is possible, we will respect the customs and practices of each location.

In case there is legislation affecting our values, we must turn to the appropriate authorities to let them know their difference and have the opportunity to act as a change agent.

Volaris Ambassadors shall meet and participate in local customs that encourage those behaviors consistent with our principles and values. In no way shall we participate in cultural and business practices that are contrary or prejudicial against these. This Code of Ethics shall have precedence over customs and practices of local business, when a conflict is reached, setting a minimum standard of behavior.

○ Truth in Records and Information

All of our records, accounting and financial reporting are subject to internal and external audits and are a reflection of the reality of our operations. Altering, forging, or creating fraudulent records to conceal information, is considered a serious offense and may be grounds to take legal action.

Through authorized individuals, in the company, we will ensure, that all sensitive information (financial, environmental, social, strategic, etc.) that is generated, published, or communicated through any means be authentic, timely, complete, truthful, and accurate.

We are committed to take no undue advantage of any customer, supplier, competitor or Ambassador as a result of manipulation, abuse or concealment of information.

Failure to comply with these principles is subject to what is established in applicable laws and what is set as policy for the organization.

Pursuant to the above I can say that:

- I receive training or other forms of development for my career growth.
- I have the resources and necessary equipment to perform my job.
- I appreciate good work and extra effort.
- I acknowledge that I can make inadvertent errors in doing the job.
- I can get involved in decisions that affect my job or work environment.
- I'm in a psychologically and emotionally healthy place to work.
- The facilities contribute to a good working environment yet are frugal.

A.5 Impartiality

- What is impartiality?



Impartiality is the criterion of justice based on decisions made objectively. That is, the individual must judge the facts maintaining impartiality and without being influenced by prejudices or interests that lean toward the benefit of either party, as all individuals should be treated in the same way regardless of circumstances.

- Following are some examples of situations demonstrating impartiality

- Diversity

Diversity means accepting all existing sources of diversity: religion, sex, gender, education, political beliefs, marital status, age, disabilities, socioeconomic background, ethnicity, professional profile and level, health conditions, language, and xenophobia, among others. Discrimination is a product of society, resulting from learning about certain valid guidelines in the sociocultural environment. A non-existent product in our company.

We recognize the value of each person as unique and unrepeatable. We are committed to ensuring that all of us who work at Volaris are respected in our dignity and that we can find in the company a suitable place for our development, both professionally and personally, all the while respecting the common good.

We value every individual's participation and contribution to achieve our company's objectives and respect diverse ideas and opinions. We recognize the close relationship between the acting and being of a person, and expect of everyone working in Volaris, personal conduct that in no way and for any reason, harms the enterprise's reputation, and that seeks the good of the organization, society, and the majority of our stakeholders.

- Equal Opportunity Employment

Right from the beginning, our candidates at Volaris are treated with respect and dignity. We seek and value diversity, which is why in our recruitment and selection processes we do not differentiate our candidates for these concepts, but rather based on their skills and affinity with ours, and in the specific skills testing and background investigations.

Competencies and qualities are evaluated through specific tests that are applied to all candidates.

We recognize the importance of safety and service as crucial elements of our business and ones that are highly valued by our Customers, and so in our recruitment processes we seek compliance with these requirements through selection tests that will help us find such qualities in all our candidates.

We have an addiction-free environment, so all candidates must pass exams helping us keep this vital principle within our organization. The purpose of having such a rigorous selection process is to ensure that Ambassadors are



fully matched with Volaris Culture to be part of this great family and that once inside, we don't destroy it with actions and attitudes, which have been achieved as of today, or that we attempt against safety in any way.

In addition, we want all our Ambassadors to grow and develop personally and professionally, proposing ideas and taking on positions within the organization without discrimination whatsoever.

Whenever there is a case of behavior divergence or behavior understanding, we will seek to benefit the majority in favor of the common good.

Pursuant to the above I can state that:

- I receive fair pay for the work I do.
- I have opportunities for receiving special recognition.
- I am treated well regardless of my position at Volaris.
- I am aware that promotions are given to those who most deserve them.
- I know that favoritism among Ambassadors is avoided.
- I am treated with fairness regardless of my age, race, gender, and/or religion.
- When I am unfairly treated, I know I will have the opportunity to be heard and treated fairly.

A.6 Fellowship

- What is fellowship?

It is the reciprocal and voluntary exchange of resources and skills, which ensures the achievement of common objectives outlined in the Company, with the efficiency and innovation that characterizes us. Relations among Ambassadors must be characterized by expressing attitudes of kindness, respect, and trust.

- Following are some examples demonstrating fellowship

- Fellowship

By fellowship we mean the mutual and voluntary exchange of resources and expertise that will ensure the achievement of common objectives outlined in the company.

- Responsibility and Compliance With Acquired Commitments

The success of enterprises depends to a large extent on the rapport, communication and commitment existing among employees. When working in teams, activities and projects are developed in a comprehensive manner, as each one of us thinks, acts, and possesses different skills. The key is fellowship not believing that our opinion prevails over that of our colleagues,



but rather a willingness to listen and work together to be on the same page, pursuing a common goal.

Fellowship means commitment, it's not just about the strategy and procedure the company carries out to achieve common goals. There also needs to be leadership, harmony, responsibility, creativity, will, organization, and cooperation between each and every one of us.

Hence, the importance of assuming our responsibility recognizing and accepting the consequences of those decisions and actions that we carry out freely. This responsibility includes not only the immediate effects of our actions, but also those side effects to the extent they are reasonably foreseeable.

To achieve profitability, the first step entails complying with acquired commitments, which means turning in quality work on time, because our performance affects either positively or negatively our work as a team.

- Entrepreneurship

For us, leadership is important at all company levels. Our leadership style is based on trust, credibility and respectful treatment afforded to all ambassadors. The formal leaders of the organization must show through their behavior, decisions and actions, our fundamental values and beliefs.

It is everyone's responsibility, especially managers and leaders, to promote an inclusive work environment where it is possible to share and learn from different perspectives.

It is the responsibility of formal Volaris leaders, to foster fellowship, as well as empowerment, communication, coordination, and synergy between themselves and the rest of the people. Serving as guides and paving the way towards achieving business goals and Ambassador goals.

From the moment of our inception, we have been leaders in a number of different areas, generating changes and creating synergies that have consolidated us as a leading company in our field. All of us, as Ambassadors are called to be leaders in what we do, being recognized as key people for the enterprise and at all times seeking to fulfill not just with what is our responsibility, but going a step further, proposing and aiming to be more efficient and effective.

Leadership means knowing ourselves, accepting our mistakes and forging ahead. A true leader is one who knows and recognizes their defects, works on them and transforms them into opportunity areas for improvement.



For this reason we need entrepreneurs who can visualize, execute, develop, and finalize:

Visualize:

- Know the goals of my position and focus day to day efforts to achieving these.
- Proactively seek ways to improve processes and procedures for my position.
- Take the initiative to solve every day or urgent problems in my field and show constant interest for learning and understanding my work more, as well as the company and the industry.

Execute:

- Be accountable for established results and achievements.
- Assume responsibility for the results and objectives linked to my job.
- Manage my time efficiently as well as all assigned resources to meet my goals.
- Focus efforts on offering internal / external Customers outstanding service
- Conduct our activities in an environment guaranteeing internal control, yet that under no circumstances promoted bureaucracy.

Develop:

- Support my colleagues in the achievement of their goals and objectives.
- Initiate actions and activities that improve my skills and expertise in my current job.
- Share with others those acquired experiences and knowledge.
- Listen to others with empathy and communicate with assertiveness.

Finalize:

- Comply and commit to Volaris policy and guidelines.
- Comply with acquired commitments and promises.

○ Efficiency

Efficiency is the competence that enables us to carry out our day to day activities in a practical and optimal way to achieve results and the lowest possible cost.

○ No Bureaucracy

Bureaucracy means inefficiency in processes and creates a model for inefficient and ineffective ways that incorporates unnecessary formalisms guaranteeing control over all processes.

For this reason we promote a culture of efficiency in all our work processes to carry out our activities efficiently, promoting a true spirit of fellowship.



○ Innovation

Innovation is the constant practice of implementing new and better ideas to make Volaris a better company. Ambassadors are encouraged to generate and carry out their ideas, individually or as a team.

○ Proactivity

When we talk about being proactive, we don't just mean taking the initiative, we mean assuming responsibilities about the way things are done, deciding at all times what we want to do and how we want to do it to make sure our team, our society, and the company all do well.

Proactive people are moved by values, a lot can happen around them, but they own how they want to react to these stimuli. Being proactive does not mean acting quickly, or chaotically and without order, driven by momentum. Proactive people are not aggressive, arrogant or insensitive, rather they know what they want and need and act accordingly, seeking the greater good.

At Volaris we promote proactivity to solve problems, in other words, seeking "how things can be done" so that when an obstacle arises we are able to respond with solutions.

A.7 Pride

• What is pride?

Pride is the personal satisfaction experienced by its own or something related to oneself, which is considered valuable. Pride for the Ambassadors, represents the satisfaction of belonging to a recognized organization, one that is honorable and which they feel an important part of. Pride should lead to a good working environment, commitment, motivation, enthusiasm, results and enthusiasm for work, among others.

• Following are some examples demonstrating pride

○ Customer Service

Customer service is one of our pillars, but it is also a reflection of the pride we feel for being part of the Volaris Family. For companies offering a service, it is essential to have the best professionals. Volaris will be a better team, and will do so following our mission statement: "With the best people and at the lowest cost, we enable more people to travel WELL."

When we sell what we do and if we excel offering our service, we strengthen Volaris and promote a sense of belonging, however, if we offer mediocre service, we are only contributing towards a Volaris that is also mediocre.



By customer service, we don't just mean externally, we also mean having the commitment to offering outstanding service to our internal Customers.

It is up to us to strengthen our sense of belonging.

Pursuant to the above, I can say that:

- I believe my participation makes a difference in Volaris.
- My work has special meaning, for me it isn't "just a job".
- When I see what we achieve, I feel proud.
- I am willing to go the extra mile to complete my work.
- I want to work here for the time to come.
- I am proud of sharing with others where I work.
- As Ambassadors, we like coming to work here.
- I feel good about how we give back to society.

B. Social Responsibility

- What constitutes Social Responsibility?

We fully recognize that our reason for being is the society we are part of, this society is who we owe ourselves to and for whom we work. For this reason we are fully committed and entirely support with our day-to-day work and with our daily attitudes, those values and principles that sustain our society as a whole, and particularly the community we live in.

We commit to the notion that our advertising and promotional campaigns will promote strengthening ethical values and universal rights for mankind.

We are entirely convinced of the Family concept, which is why it is essential for us that individuals have physical and emotional integrity, as well as respect universal children's rights, respect for people with disabilities, senior citizens, and those belonging to different ethnicities, religions, genders, races or social conditions.

We firmly reject direct or indirect sponsorship of any promotional or advertising campaign containing elements of vulgarity, violence or any other element that violates or affects individual values, family and society.

We are committed to economic and social growth of those communities where our company operates in through the creation and maintenance of sources of productive



employment. Both respect and protection for the environment have the highest priority and regard within in our operation and management.

We are a Socially Responsible Corporation, and ensure that we follow guidelines established by the Mexican Center for Philanthropy (CEMEFI) in terms of quality of life for the company, ethics and a culture for legality, sustainable and effective use of the environment, and community relations. As a company committed to the society we live in, all of the above is reflected in our culture and business strategy.

- Following are some examples where we apply social responsibility

- The “Volemos Juntos” Corporate Social Responsibility Campaign

Based on the airline’s vision to ‘transcend by creating and living the best travel experiences’, Volemos Juntos, which translates into ‘Let’s Fly Together’, is an effort whereby we carry out activities and donations serving to support various organizations and causes that will help strengthen our commitment to society. For this reason, the “Volemos Juntos” corporate social responsibility campaign was conceived.

With this campaign we cover the four aspects of our commitment to society: leadership, health and life, sustainability, and corporate volunteering efforts.

We have a CSR Committee made up of a group of Ambassadors in charge of managing and establishing guidelines for Corporate Social Responsibility issues in the company, coordinating and selecting programs, projects, and volunteer drives that our company partakes in.

True Corporate Social Responsibility is effective when it is integrated into an organization’s foundation, which is why it is important to underscore that we do not engage in social marketing, but rather we seek the greater good for all our stakeholders, starting with our Ambassadors.

The email address volemosjuntos@volaris.com.mx, is at your entire disposal so you can share with us corporate social responsibility initiatives that we could launch in your particular work area. With this email we seek to pull efforts together and create partnerships that help us be more effective in our initiatives. No Ambassador can execute their own proposal without first discussing the matter with the CSR Committee.

We have a corporate volunteer policy that seeks to support all Ambassadors who for their values and altruistic and humanitarian character, wish to participate in social activities, giving them the opportunity to do so, either with programs that have been set up with social organizations where Volaris has a connection or with projects driven by Ambassadors themselves or the company.



➤ Leadership

We support the development of talent and leadership among young men and women with a strong degree of commitment and responsibility to positively influence Mexico and the world's reality.

We are interested in strengthening leadership in young Mexican men and women, supporting their education through conferences and forums at universities and schools.

We support and promote university projects because we firmly believe that young leaders will reach key positions to transform our country's reality.

➤ Health and Life

We are a company in favor of life, as this is a fundamental right of humans, so we support health programs and projects nationwide.

➤ Sustainability

We have always been interested in being a company that ensures strengthening environmental awareness and protection, and we decided to bring this together, through a number of strategies we've implemented in our daily operations, with specific actions, where we engage Ambassadors, customers and other stakeholders, with our campaign "Por un Cielo Azul".

We respond to natural disasters, by using our mode "Avión Ayuda" (support via air transportation) which works as a bridge to support and be part of collection efforts for centers nationwide, transporting goods and clothing to areas in need. Further, we invite Ambassadors to partake in these efforts, providing space in the various stations and corporately to operate a goods collection center and channel what is received to a solid institution who can make sure aid reaches the disaster zone.

We encourage the participation of our customers in caring for the environment through our "Carbon Offset" campaign, through which we invite our customers to contribute \$20 pesos per travel segment (through our website www.volaris.mx). The money is transferred to the selected institution, which commits to undertake activities such as forest fire prevention, eradication of grazing, logging, hunting, and extraction of flora.

At times, Ambassadors are invited to make financial contributions that can be deducted from payroll to facilitate the donation, and/or through



fundraising activities, when the CSR Committee deems it is possible to do so.

➤ Corporate Volunteering

We promote volunteering among our Ambassadors to consolidate what is authentic social awareness, establishing strategic alliances that will help achieve effective synergies for CSR to have greater reach in benefit of mankind and society.

✓ Donations

Through the CSR Committee, we receive and assess donation requests. These donations must be approved by the Committee, the GM office where the statutes allow, or must have approval by the Board when necessary. We have a Donations Policy that can be reviewed for more information.

✓ Projects and Campaigns

Among our Ambassadors, we promote projects and campaigns to support various foundations and institutions, as well as causes that go hand in hand with our Volemos Juntos campaign efforts.

Examples of internal campaigns include: Universidad Corporativa Volaris, Tómate la Ayuda en Serio, Misión Galáctica, Jeans con Causa, to mention a few.

○ Explicit Rejection of Conducts that Harm Our Community

● Sexual Harassment

Harassment, sexual harassment or abuse in all its expressions and forms (verbal, psychological, or physical) is strictly forbidden as are actions of provisioning contracts, performance evaluations, promotions and/or promotion in exchange for giving in to sexual demands. Failure to observe this norm shall be subject to what is provided in applicable laws and company policies.

● Underage Work

We comply with current legislation prohibiting the employment of minors, and also encourage compliance with these regulations with our various stakeholders. Failure to observe this norm shall be subject to what is provided in applicable laws and company policies.

○ Relations with individuals who are not part of the Volaris team



- Suppliers

We are committed to doing business transparently, honestly, and in absolute fairness with our suppliers. We grant the highest value to fair competition in the evaluation process to select the best of the best. We are committed to building long-lasting business relationships that are equitable, fair, without discrimination or impositions of any kind. We are committed to protecting the rights of our suppliers with respect to the confidentiality of provided information, processes, industrial and commercial secrets.

When doing business with a supplier, one that also serves the competition or not, we will demand respect for the confidentiality of our information.

From the supplier, we will only seek to obtain benefits for the same negotiation under consideration, without garnering personal benefits at the expense of contract allocations for the purchase of goods or services. We will ensure that our relationships with suppliers are always a win-win proposition.

All of us who work for the company, particularly those who are related to negotiations with suppliers, will have to resolve conflicts of interest in the procurement of goods and services for Volaris, in accordance with established provisions, before engaging in any negotiations.

Those of us who work at Volaris are not empowered to give money or gifts of significant value to customers, suppliers or any other related party that could be seen as an advantage to opening, increasing or maintaining a business relationship or to obtain undue benefits in any way.

Our suppliers, particularly those who help us to serve, should commune with the principles contained in this code and are, in collaboration with the company, guardians of our pillars, helping us to present them along with authorities.

As part of our Corporate Social Responsibility, our suppliers must also have the ESR Distinction, to strengthen our value chain and help us create solid relationships with competitive value in favor of our society.

- Our Competition

We are committed to competing in the market freely and responsibly and demand the same from our competitors and officials.



Those merits, advantages and excellence in our brand and service, are aimed at finding fair trade practices, transparent, fair and equal conditions.

All advertisement and promotion must be based entirely on the truth and needs to be clearly presented to our Customers. We will compete through quality, service and commercial strategy in accordance to our principles and values.

We regard the competition as a channel of our energies to offer better products and services and gain the preference of our Customers.

We respect our competitors and whenever we have to speak of them, we shall use fact-based information. Any comparison with the competition will be done using accurate terms, without qualifications or using misleading information or arguments. In the event that Ambassadors have to refer to our competition's products and services, they should avoid derogatory or offensive remarks and that may damage your good name.

Confidential competitor information may only be obtained and used if it is public or in case the owner expressly states the revelation to Volaris, and for this reason we reject any and all forms of industrial espionage, or the recruitment of Ambassadors or former employees of the competition for the purpose of obtaining confidential information, such as business strategies, production capacities, product plans, technology, etc.

2. Management of the Volaris Code of Ethics

- Responsible

Strict compliance with this code is the responsibility of ALL Ambassadors. The Code of Ethics was created as a tool for decision making every day, so its success will contribute to meeting its provisions and contributing ideas for continuous improvement.

Every Ambassador, particularly those exercising leadership roles, leadership or supervision, are required to be an example of compliance with this Code of Ethics and of not allowing faults to the standards, practices, and ethical conducts set forth herein and other associated or complementary policies.

Those who hold a managerial or supervisory positions, are required to make all staff aware of the contents of the Code of Ethics, promoting it and making sure everyone has read it, making it an everyday practice in their activities, their conduct and behavior towards the various stakeholders.



- Ethics Committee

The Ethics Committee will be composed of the CEO, the General Legal Counsel, the Director of Talent and the Internal Auditor. It will hold monthly sessions and its main role will be to ensure compliance with the Volaris Code of Ethics resolving conflicts that may arise, by making effective and timely decisions.

- How to notify of good conduct or failure to non-compliance with the Volaris Code of Ethics

- Personal Notifications

The natural and most valued way of notifying good conduct or meritorious action of breach or default of the Code of Ethics is by holding a personal conversation between the notifier and their immediate superior. Any ambassador who is responsible for a team working under his/her command, must optimize their leadership skills so that their team feels due confidence to report good or bad behavior, by such meaning those conducts that are good or go against the Code of Ethics.

- Anonymous Notifications

In case the rare situation arises where the Ambassador does not feel the necessary confidence to make a personal notification, he/she may do so through any of the following measures that favor anonymity: email, letter deposited in mailboxes, letter sent to one of the heads of ensuring compliance with the Code of Ethics or through a phone call to the numbers for compliance with the Code of Ethics.

- Confidentiality Policy

At Volaris, we guarantee absolute confidentiality for any notice of non-compliance with the Code of Ethics. Those who receive such notices and get involved in their assessment due to the positions they hold, must use all means at their disposal to ensure compliance with such confidentiality.

- Prohibition of Any Form of Retaliation

There will be absolute rejection towards every attitude of retaliation for reports or inquiries about any non-compliance with the Code of Ethics or applicable laws. Retaliation shall be considered serious misconduct of the Code of Ethics as these would involve an attack on justice, transparency, and accountability.

- Application of the Volaris Code of Ethics



This Code of Ethics shall be applicable to all Volaris Directors, Executives, Officials, and Ambassadors.

- Sanctions

Failure to comply with one or more sections of the Code of Ethics is subject to sanctions ranging from a verbal or written warning, to the loss of employment according to the fault(s) committed, in accordance to the policies and procedures established by the organization. There may also be applicable civil or criminal penalties, in accordance with applicable legislation.

I recognize the importance of identifying with and fully living out the Volaris pillars and behaviors, and also recognize that I should carry out my work with passion and enthusiasm, working in constant synergy and entirely committed to being part of a unique culture and work environment to achieve healthy, productive and trustworthy relationships between all people and areas of the company.

I fully commit to reading it in its entirety, agreeing to fully implement this Code and to become a role model in my team.



3. ANNEXES

Annex 1 Volaris Code of Ethics Immunity Policy

Volaris is firmly committed to maintaining the highest safety standards in all its operations, and for this reason, the company has implemented a NON PUNITIVE reporting system for all events where safety might be somehow compromised. To this end, every Ambassador will be held responsible for communicating information that may somehow affect the integrity of aviation security, without fear of reprisals.

Volaris not take any kind of disciplinary or administrative action against any Ambassador who notifies, uncovers, or is somehow involved, inadvertently or unintentionally, in any event that affects operational safety, however, this policy does not apply if the information is obtained or received by Volaris from another source than that of the involved, when the event is present during the execution of a function outside the work environment or when such actions have been premeditated or classified as willful or criminal offense.

The methods of collection, storage, and dissemination of information obtained from air safety reports have been developed to protect in any way the possible identity of any Ambassador who provides information affecting operational safety and when required, confidentiality will be guaranteed to people who voluntarily report to Aviation Safety Management or any of its members, any information to ensure, improve, or correct any situations that could in any way affect aviation safety.

The No Punitive Incident Reporting Policy is managed by Aviation Safety Management. We invite all Volaris Ambassadors, and particularly pilots, flight attendants, dispatchers, mechanics, and ramp personnel to report to management, any discrepancy, deficiency, or potentially hazardous situation that may somehow affect the safety of air operations. Such information will help Volaris to provide our customers and Ambassadors the highest level of security.

This policy does not absolve of the responsibility to file obligatory reports of any particular event especially when they are required in accordance with Volaris policies or by regulations applicable to Aeronautical Authorities.



Annex 2

Volaris Code of Ethics

Confirmation of Receipt of the Volaris Code of Ethics and acknowledgement of responsibility

In the City of _____

And dated _____ of the month of _____ in the year of _____.

I _____

Ambassador Number _____

Serving as (position) _____

Hereby declare that I have received, read, and accepted the Volaris Code of Ethics and its entire contents, and therefore, I fully acknowledge and express my full commitment and adherence to it, taking the responsibility for its enforcement and compliance.

I fully and responsibly understand that though there are situations, conditions, and actions that are not outlined in this document, anything that is not in line with the concept of "good actions" set forth by the Volaris pillars and conducts, will be subject to the implementation of disciplinary measures in this document and work contract, as well as those consequences, including legal ones, that may be involved.

Signature _____

C.C. Talent Management Office



**Annex 3
Volaris Code of Ethics**

**Report of Breach or Non-Compliance with Code
Talent Management Office**

Based on what is set forth in the Volaris Code of Ethics, I want to report the following breach or non-compliance situation for further investigation and in order to take corresponding measures.

Breach and how it happened:

Reasons for considering this a breach to the Volaris Code:

When did it happen? (date and time)

Where did it happen?

Who was involved? Who did it? (individual's name and position)

Name (optional) _____

Job Title (optional) _____

Signature (optional) _____



**Annex 4
Volaris Code of Ethics**

Notice of Good Conduct or Meritorious Conduct

Talent Management Office

Based on what is set forth in the Volaris Code of Ethics, I wish to notify the following meritorious conduct, which I strongly recommend be publicly acknowledged through the use of our internal communications screens.

I inform that (Ambassador name and position)

Who demonstrated the following value (mark with an X)

- Ethical behavior
- Genuine leadership
- Social Responsibility
- Other

In the following situation (please use all relevant details in the description):

Name of person notifying: _____

Job Title: _____

Signature: _____



**Annex 5
Volaris Code of Ethics
Statement of Potential Conflict of Interest**

To my immediate supervisor: _____
Based on what is set forth in the Volaris Code of Ethics, and for the purposes of any potential conflict of interests, I hereby declare that I have the following vested interest in these organizations and with these individuals:

1. Company Name: _____

This company and/or person is:

- A Supplier
- A Customer
- An Ambassador
- Other: _____

My relation with this company and/or person is:

- Relative
- Partner / Owner
- Consultant / Collaborator
- Other: _____

2. Company Name: _____

This company and/or person is:

- A Supplier
- A Customer
- An Ambassador
- Other: _____

My relation with this company and/or person is:

- Relative
- Partner / Owner
- Consultant / Collaborator
- Other: _____

Place and Date: _____

A conflict of interests emerges when an Ambassador places the good of the company on the backburner to favor a particular organization or person, or when the Ambassador derives additional benefits from those set forth in their work contract.

Name of individual notifying: _____

Job Title: _____

Signature: _____

C.C. Talent Management Office



**Annex 6
Volaris Code of Ethics
Statement of Gifts and Presents**

To Talent Management Director:

Based on what is set forth in the Volaris Code of Ethics, I wish to declare the following gift(s) because it (they) exceed(s) the maximum amount for the value of a gift that may be accepted set forth in this Code of Ethics, of \$5,500 pesos or its equivalent amount in another currency. I am also forwarding this gift to you so the company may determine how to best direct it.

Name of Supplier:

Name of Sender:

Type of Gift:

Reason for the Gift: _____

Estimated gift value in pesos: _____

Name and job title of the person who receives it:

Name and job title of the person who reports it:

Place and Date: _____

Signature: _____

C.C. Talent Management Office

