



LATAM

**Global Code of Conduct for
Third Parties and Third
Party Intermediaries (TPIs)
of LATAM Airlines Group
Policy**



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1. Purpose

LATAM Airlines Group (“LATAM Group”) is committed to the global sustainability standards, which is the reason it seeks that its suppliers and third parties comply with this Code of Conduct, the Anti-Corruption Laws of all countries where it operates and with the universal human rights. Therefore, we emphasize our commitment by providing further guidance and clarification on the provisions mentioned in the Global Code of Conduct for Third Parties and Third Party Intermediaries (*TPIs*) (“Code”).

This Code establishes, at a global level, the applicable principles under which there will be a commercial relationship between the LATAM Group and its Third Parties and Third Party Intermediaries (*TPIs*) in a partnership relation in the future.

2. Scope

This Code applies to all Third Parties and Third Party Intermediaries (*TPIs*) of the LATAM Group, who undertake to act in accordance with applicable laws and regulations, as well as the provisions of this Code, by themselves or by their legal representatives.

3. Provisions

3.1. Compliance with the Laws

In addition to the obligations undertaken in the clauses and contractual conditions, the Third Parties and Third Party Intermediaries (*TPIs*) also commit themselves to the items listed below.

3.1.1. Antitrust and/or Competition

Comply with all, national and international, antitrust and/or competition laws, regulations and best practices.

3.1.2. Negotiations with Privileged Information (“Insider Trading”)

Not to carry out transactions with shares of the LATAM Group while in possession of any privileged or confidential information of the LATAM Group, obtained in the previous negotiations and/or during the life of the contract or relationship of any nature with the LATAM Group, nor to disclose such information.

3.1.3. Anti-Corruption - Financial Crime and Money Laundering

Not to perform any act that implies an undue advantage, whether financial or not, regarding: fraud, bribery, corruption, robbery or theft by Third Parties or Third Party Intermediaries (*TPIs*), nor money laundering, financing of terrorism, receiving stolen goods, or any act intended to prevent the detection and investigation of such violations carried out on LATAM Group’s behalf or benefit.

3.1.4. Social Medias

Not to use or refer to the brand, logo or any property of the LATAM Group, without previous and express authorization, including strategies, suppliers, products, services or clients when accessing or publishing content on social medias.

3.1.5. Labor and Human Rights

Protect the safety, dignity and health of the employees, and create healthy, dignified and safe working conditions for all those in charge of attending the LATAM Group, directly or indirectly. Consequently, the suppliers, Third Parties and or Third Party Intermediaries (*TPIs*) of the LATAM Group must comply with the ILO conventions and the other international standards of labor, social and security human rights in force in the country of operation, such as, among others, non-discrimination, no slave labor or child exploitation and free association.

3.1.6. Brand, Privacy, Personal Data Security and Confidentiality

Not to mention, use or refer to the brand, logo or other intellectual property of the LATAM Group, or of other third parties that have business with the LATAM Group, without previous and express authorization. It is worth highlighting that the prohibition applies to everything, for example, the strategies, suppliers, products, services or clients of the LATAM Group, etc.

Keep protected any and all confidential information received, disclosed or owned by the LATAM Group. The collection use and disclosure of client's information is particularly sensitive and subject to the rules and restrictions set out in the contract, as well as in the laws and regulations applicable to each country.

3.1.7. Digital or Cyber Crime

Not to use any tool or mean to obtain information without the owner's consent.

3.1.8. Sustainability: Environment and Corporate Social Responsibility

Comply with the applicable environmental laws in each country where the LATAM Group operates with offers at the same price as well has favor suppliers that have implemented an environmental management system following the international standards.

Ensure the prevention and protection of the environment in its activities and ensure that there are no questions or conflicts with the neighboring communities.

3.1.9. Relationship with Suppliers

The LATAM Group urges its suppliers to encourage their own suppliers to also have their code of conduct.

3.2. Conflict of Interest

Ensure that there are no Conflicts of Interest when interacting on behalf or benefit of the LATAM Group, either with Government Officials or any private individual.

Not to receive or offer gifts, entertainment or travel, values or any other undue advantage to any Government Official or person related to him/her, while acting on behalf or benefit of the LATAM Group. Third Party and Third Party Intermediaries (*TPIs*) are prohibited from performing any such act.

3.3. Political Contributions

Not to contribute or make political contributions in the name or benefit of the LATAM Group. Third Party and Third Party Intermediaries (*TPIs*) are prohibited from performing any such act.

3.4. Gifts and Attention to Third Parties

The Third Parties and Third Parties Intermediaries (*TPIs*) must comply with the policies defined by the LATAM Group relating to gifts to public and private third parties, which policy will be duly disclosed to them at the time of their retainment.

3.5. Report Duty

If there is any suspicion of irregularity, the Third Parties and Third Parties Intermediaries (*TPIs*) undertake to immediately report it to the LATAM Group by using the Ethics Channel www.etica-grupolatam.com or the telephone, calling free of charge the numbers available at this website.

4. Management of Consequences

The Third Parties or Intermediary Third Parties (*TPIs*) of the LATAM Group that do not comply with this Code will be subject to sanctions by the LATAM Group that may include termination of the contract without payment of compensation, collection of damages, among other measures provided in the contract.

Additionally, in case the LATAM Group is aware of the performance of an act against the local regulation of each country, it must proceed to report the Third Parties or Third Party Intermediaries (*TPIs*) to the corresponding authorities.

5. Definitions

Anti-Corruption Laws: group of laws and regulations that prohibits the asset or Money Laundering, Financing of Terrorism and Bribery, according to the definition of each jurisdiction.

Conflict of Interest: activity and/or behavior that is or appears to be conflict with the contractual and/or professional responsibilities assumed before the LATAM Group or with the interests of the LATAM Group.

Government Official: regardless of the title, a Government Official is:

- Any person holding a legislative, administrative or judicial office in a country, whether appointed or elected, even if for a specified time and without remuneration, as well as any person exercising a Public Function for a country, including for a public agency or public enterprise (*i.e.*, certain members of royal families and certain personnel of private airport management companies).
- An official or employee of a public international organization (*e.g.*, the World Bank or the United Nations).
- Any person officially acting on behalf of a state, government or public international organization (*e.g.*, an agent or external official advisor).
- A leader or employee of a political party.
- A candidate running for elected office.
- An employee of a state-owned or state-controlled entity. An entity is deemed state-owned or state-controlled when:
 - The State owns more than 25% of the entity's shares.
 - The State controls the entity (*e.g.*, as a member of the Board of Officers or Board of Directors or the State controls the appointment of its members, or by exercising the control *de facto* or exercises another form of control recognized by LATAM Group).
- Relatives of any of the aforementioned persons.

Third Parties: individuals or legal entities that maintain commercial relations with the LATAM Group, such as LATAM Travel franchisees, suppliers of products and/or services, service providers, consultants, travel agents and commercial representatives (if any).

Third Party Intermediaries (*TPIs*): individuals or companies acting as agents of the LATAM Group in its name or on its behalf before local or foreign Government Officials (*e.g.*, LATAM Travel franchisees, service providers, sales agents, consultants, commercial representatives and lawyers who represent the LATAM Group before public authorities, for example, in court).