



**Code of Ethics of
Grupo Aeroportuario del Sureste, S.A.B. de C.V.**

*LAST UPDATE APPROVED BY AUDIT COMMITTEE: 20/07/20
LAST UPDATE APPROVED BY BOARD OF DIRECTORS: 26/11/20*

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I.- INTRODUCTION

MESSAGE FROM THE CHIEF EXECUTIVE OFFICER OF ASUR

Ethical conduct is one of the most fundamental values of ASUR. If we make our best effort to act according to the principles of honesty and transparency at all times, we benefit as a company because we avoid risks and build a good reputation; we benefit as employees because we enjoy a more solid, reliable source of employment; and we benefit as a society because we avoid encouraging corrupt practices that affect us negatively in our daily life.

This Code of Ethics establishes the rules that we must follow, as associates and business partners of ASUR, to instil respect for the Company's values. It defines the conduct expected from each one of us in the performance of our duties, and clearly sets out which behaviours are and are not acceptable. We hope you will use this as a guide for your day-to-day activities and to resolve any doubts you might have about what constitutes good or bad practice.

Every one of us that works for ASUR has the obligation to follow these guidelines and to report any abuse of them that we become aware of. The Code of Ethics is our main weapon to fight corruption and establish ourselves as an example to be followed, ensuring the reputation of our company and the wellbeing of our employees.

Lic. Adolfo Castro Rivas
Chief Executive Officer of ASUR

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II.- OBJECTIVES

II.1.- The objectives of this Code of Ethics are:

II.1.1.- To establish the fundamental criteria that inform the ethical conduct expected of all people who work for or have a professional relationship with ASUR (“the Company” or “the Group”).

II.1.2.- To provide clear guidance for conduct, defining specific rules and guidelines that provide the necessary orientation to ensure compliance with all obligations and respect for ethical business practice in the Company’s operations.

II.1.3.- To inform all interested parties which behaviours should be avoided and may be subject to disciplinary action as violations of the ethical values of the Company.

III.- VALUES

III.1.- The fundamental values of ASUR, which our employees must apply in all professional activities, are: security, honesty, respect, responsibility, teamwork, commitment, and confidentiality.

III.2.- To complement these values, the Company requires all employees to conduct themselves ethically at all times. Ethics are defined as the set of moral rules that govern human behaviour and obligations. The Company, as a publicly traded, socially responsible entity, has the obligation to observe high ethical standards in all its business dealings.

III.3.- The principles on which ASUR’s Code of Ethics is based are:

III.3.1.- **Ethical Business Practice and Anticorruption.** The Company is committed to the principles of ethical business practice and anticorruption, and will make permanent efforts to maintain robust corporate-governance mechanisms and to eliminate corrupt practices within its sphere of influence.

III.3.2.- **Labour Standards.** The Company upholds good labour standards with a focus on respect for associates and their families, and will promote the latter’s economic, professional and social development.

III.3.3.- **Human Rights.** The Company has assumed the commitment to support and protect the human rights of both its own associates and other stakeholders, and will therefore avoid any practices or situations in which these fundamental rights are violated.

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III.3.4.- **Environment.** The Company is committed to acting in favour of the environment, and will therefore make efforts to reduce the negative effects of its operations on the environment and to promote a culture of environmental protection and rational use of natural resources.

IV.- SCOPE

IV.1.- This Code of Ethics contains provisions that will be applicable to:

- a) The Company in general; including all companies that form part of the Group, as well as its subsidiaries and affiliates;
- b) The members of the Company's Board of Directors, Corporate Committees, and all other corporate-governance bodies ("the Directors");
- c) The Company's chief officers ("the Executives");
- d) All other associates of the companies that make up Grupo Aeroportuario del Sureste ("the Employees");
- e) The employees of subcontracted companies that render services in the Company's facilities; the employees of clients and concession holders that carry out activities in the Company's facilities; and the employees of the Company's suppliers and contractors (jointly, "the Value Chain").

IV.2.- This document recognises that in most cases, it is clear what the right way to act is, independently of whether or not it is specified in a code. This Code of Ethics, therefore, should not be considered an exhaustive list, and it is expected that Directors, Executives, Employees and the persons that form part of the Value Chain should exercise their own discretion to act honestly and ethically in all matters relating to the operations of the Company, in accordance with the Company's policies and procedures, and all the requirements set forth in the laws applicable to the Company.

IV.3.- In any unforeseen circumstances, the specific case should be brought before the Board of Directors for resolution, in accordance with good corporate-governance practice.

V.- GENERAL OBLIGATIONS OF THE COMPANY

V.1.- Compliance with Legislation

V.1.1.- The Company will at all times comply with the laws, regulations and official provisions applicable to all aspects of its operations, both in Mexico and in any other countries in which it has investments or subsidiaries, and will endeavour to adhere to high standards of ethics, integrity and honour in its business dealings. Consequently, Directors, Executives, Employees and the Value Chain have the



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obligation to observe standards of trustworthiness, conscientiousness and honesty, and to act in full accordance with the law and all official regulations, as well as policies and procedures for internal control established by the Company management that govern or limit their sphere of responsibility.

V.2.- Compliance with Corporate Governance Regulations

V.2.1.- The Company will at all times comply with the regulations established by government and stock-market authorities, as well as any other competent authorities, regarding its corporate-governance structures and practices, including but not limited to requirements regarding transparency, the appointment and independence of board members, and the compensation paid to Directors and Executives, among other aspects. The provision of loans or other forms of financing by the Company to Directors and Executives is specifically prohibited.

V.2.2.- In any cases where bonuses, awards or financial incentives are granted to Executives on the basis of financial results, revenues or profits that are subsequently shown to be incorrect, the Executive in question shall be required to reimburse the full sum to ASUR with immediate effect.

V.3.- Compliance with Financial Reporting and Public Disclosure Regulations

V.3.1.- The Company's shares are traded on the stock markets and are negotiated and exchanged between members of the investing public. Consequently, the Company has a series of obligations to disclose certain financial, operating and other information to the public. The Company must comply in full with all requirements concerning its public disclosures, and shall implement controls and procedures to ensure that they are published on time, that they comply with the relevant regulations, and that they are complete, correct, accurate and comprehensible. All associates responsible for preparing the Company's public disclosures, or any who provide information as part of this process, will have the obligation to ensure that all such disclosures and information are complete, accurate and in compliance with the Company's disclosure controls and procedures.

V.4.- Compliance with Environmental Regulations

V.4.1.- It is the policy of the Company to act in a way that is compatible with and conducive to the good of the environment, and to make continued efforts to improve the integration of the principles of environmental protection into all aspects of its operations, both locally and abroad. Consequently, the Company is committed to: complying with all applicable environmental laws and regulations, and maintaining environmental-assurance certifications in all of its airport facilities; administering its operations in such a way that potentially damaging incidents are prevented, and emissions or discharges

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are kept within the required levels; responding rapidly and effectively to mitigate any incident resulting from its operations; encouraging respect for the environment within its sphere of influence; and carrying out the necessary inspections and assessments of activities with an environmental impact, to measure and control their progress.

V.5.- Implementation of Internal Controls

V.5.1.- The Company will implement the necessary administrative and accounting controls to provide a reasonable degree of certainty that it is in compliance with its obligations, that its financial statements and other reports are accurate and reliable, and that these reveal the required or important information in a way that is complete, timely and correct.

V.6.- Fair Treatment

V.6.1.- The Company will at all times adhere to the principle of fair treatment in its dealings with its clients, suppliers and competitors.

V.6.2.- **Fair Treatment for Clients.** In negotiations with its clients, the Company will act in good faith, and will at all times respect the relevant ethical business standards. In its dealings with clients, the Company will abstain from using data that are false, or have been manipulated in such a way that they might lead to a false conclusion, with the aim of obtaining a benefit. Similarly, the Company shall not implement discriminatory measures against clients that do business with its competitors. The provisions of this Code of Ethics shall be applicable to all the employees of the Company's clients that carry out their professional duties, on a permanent or temporary basis, in the facilities belonging to the companies that are subsidiaries of ASUR.

V.6.3.- **Fair Treatment for Suppliers.** When contracting suppliers, the Company will act with transparency and integrity at all times, and will adhere to the policies established by its Acquisitions and Contracts Committee, as well as any other applicable regulations. The Company will base supplier-selection decisions on objective criteria, taking into consideration the parameters of price and quality offered by suppliers, as well as the characteristics of the product or service to be acquired. The Company will not implement discriminatory measures against suppliers that do business with its competitors. The provisions of this Code of Ethics shall be applicable to all the employees of the Company's suppliers that perform their professional duties, on a permanent or temporary basis, in the facilities belonging to the companies that are subsidiaries of ASUR.

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V.6.4.- Fair Treatment for Competitors. The Company will at all times comply with the applicable official regulations that exist to protect and promote competition in the industry, and will avoid unfair competition and other unethical business practices. The Company will not disclose or communicate erroneous information about companies or persons it is in competition with. Similarly, the Company will not attempt to gain access to its competitors' confidential information and will not divulge any such information.

VI.- OBLIGATIONS OF THE COMPANY TO ITS EMPLOYEES

VI.1.- Fair Treatment of Employees

VI.1.1.- The Company values the important contribution made by each one of its Employees and will treat them respectfully and professionally at all times. The Company has the obligation to defend and promote the fundamental rights of its Employees, including the right to physical and personal integrity, the right to non-discrimination, freedom of association, and freedom of assembly, among others. The Company may under no circumstances compel an Employee to work without compensation or under any other condition of forced labour, and will not profit from child labour. The Company will also protect the personal data of its Employees, taking reasonable steps to safeguard the confidentiality of the corresponding records. It shall not attempt to obtain private information about its Employees when this information is not relevant to the professional activities carried out by the person in question.

VI.2.- Prohibition of Discrimination and Harassment

VI.2.1.- The Company will provide the same employment opportunities to any persons that can provide the appropriate evidence that they are qualified for the task in hand. Discrimination on the basis of ethnicity, nationality, gender, gender identity, sexual orientation, marital status, age, physical capacity, social standing, religious beliefs, or political affiliation is strictly prohibited. Similarly, the Company will at all times endeavour to protect the personal integrity of its Employees, and physical or verbal harassment is therefore prohibited, as well as any other conduct that is demeaning or harmful for associates' physical and mental wellbeing.

VI.2.2.- The Company will not permit discrimination of any kind against any person that is a carrier of a pandemic virus, such as COVID-19, or who is suspected of coming into contact with such a virus, while the disease lasts or thereafter. All vulnerable groups may continue to exercise all of their employment rights and will be afforded the available resources for their protection and recovery.

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VI.3.- Safety and Hygiene

VI.3.1.- The Company will make permanent efforts to provide and maintain an appropriate working environment that is free of alcohol and drugs and ensures proper, healthy working conditions and the wellbeing of Employees. High standards of health and safety in the workplace will be upheld in all facilities operated by ASUR. The Company will provide Employees with the necessary equipment for their physical protection and with the required training to implement good safety practices.

VI.3.2.- The Company hereby assumes the commitment to apply, in all locations where it has operations, the protocols established by national and international airport and health authorities to prevent and manage any pandemic virus, such as COVID-19. The Company will apply all subsequent measures to prevent further transmission and to protect both workers and passengers.

VI.4.- Cultural context

VI.4.1.- The Company assumes the commitment to act at all times in a way that is respectful of the culture, the principles and the traditions of the communities where it operates, and the countries in which it has investments or subsidiaries. This commitment includes the obligation to avoid activities or operations that might damage or degrade communities' cultural heritage.

VII.- OBLIGATIONS OF DIRECTORS, EXECUTIVES AND EMPLOYEES TO THE COMPANY

VII.1.- Conflicts of Interests

VII.1.1.- As a general rule, all Directors, Executives and Employees should avoid any situation in which their personal interests enter into conflict with the best interests of the Company. If circumstances arise where there is a potential conflict of interests, it will be the responsibility of the person involved to report this situation immediately to their superior and/or to the Internal Auditing Department, either directly or via the reporting system established by the Company (see Section IX.1 of this Code). Cases in which it will be considered that there is a conflict of interests may include, but shall not be limited to, the following:

VII.1.1.1.- **Conflict of Interests through Third-Party Relations.** The Executives and Employees of the Company may not be simultaneously employed by any other corporation or individual that has business dealings with the Company, nor will they render paid or unpaid services to any such parties. In particular, the Executives and Employees may not be employed by or in any capacity work for the clients,

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commercial concession holders, suppliers, service providers, contractors, authorities and/or competitors with which the Company has a relationship of any kind. The Directors, Executives and Employees of the Company may not be the owners of or hold interests or investments in other businesses that buy from, sell to or provide services to the companies that form part of the Group. Any transaction with or link to related companies must be reported to the Audit Committee via the Internal Auditing Department or the reporting system.

VII.1.1.2.- Conflict of Interests due to Family Relations and Related Parties. The Directors, Executives and Employees of ASUR must refrain from carrying out or authorising purchase transactions with, or from assigning business or services to, companies owned by family members or related persons. The term *family members* will be understood to mean any person that is related by blood or marriage in the first or second degree; the term *related persons* shall be understood to mean any associated individual that may exercise influence over a Director, Executive or Employee of ASUR, or who has common financial interests with the Director, Executive or Employee of ASUR, as may be the case of a business partner, for example. Executives and Employees of ASUR may not have family members working under them in the organisation, except in those cases authorised in writing by the Nominations and Compensations Committee.

VII.1.1.3.- Conflict of Interests due to Public Activities. The Company recognises the importance of its associates' playing an active role in civic activities within their local communities. However, any such participation of this nature must be conducted on a strictly personal basis, and not in representation of the Company. In the event of any possible conflict of interests, for example if a matter is being negotiated between the community and the Company, the affected Director, Executive or Employee must immediately inform the Internal Auditing Department, either directly or via the reporting system, and will recuse him or herself from any decision-making role in the matter in hand.

VII.1.1.4.- Conflict of Interests due to Relations with Media. Only the official ASUR spokesperson designated in each of the Company's airports may conduct relations with Mexican or foreign press or media in any format. All requests for information or opinion relayed by the different media must be referred to the spokespersons appointed by the Chief Executive Officer, so that they may be responded to in accordance with the authorised public information and the image guidelines established by the Company's Chief Executive Officer.

VII.2.- Protection of Company Assets and Resources

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VII.2.1.- The Directors, Executives and Employees have the obligation to protect and safeguard at all times the Company's tangible and intangible assets, as well as all other resources at the Company's disposal, and will avoid and prevent any misuse of funds or mishandling of assets.

VII.3.- Misuse of Company Time and Assets

VII.3.1.- The Executives and Employees will not dedicate the Company's time and assets to uses other than those authorised by the Company. Consequently, they will refrain from carrying out any work unrelated to the Company, whether paid or unpaid, during working hours (that is, the time during which the Company pays for their professional services). Similarly, the use of Company assets (including the name and registered trademarks of the companies that form part of the Group, as well as facilities, equipment, materials, resources and information that belong to the Company) for any unauthorised purpose, with or without a personal benefit for the person or persons involved, is strictly prohibited.

VII.4.- Principle of Austerity

VII.4.1.- As a publicly traded business, the Company has a responsibility to ensure that it makes efficient use of its resources at all times. The Directors, Executives and Employees must respect this principle of austerity, and will take the necessary steps to ensure that there is due justification for any payments that they process or authorise, that the internal regulations regarding the authorisation of the acquisition of goods and services have been adhered to, and that no unnecessary expenditures are incurred or paid out.

VII.5.- Appropriate Financial Information, Accounts and Records

VII.5.1.- The Directors, Executives and Employees have the duty to ensure that the administrative and accounting controls established by the Company are respected at all times, to provide a reasonable degree of security that financial reporting standards are complied with, and that the Company's financial statements and other communications are prepared accurately and reliably, and comply with all disclosure requirements. The Company will create and maintain books, invoices, registers and accounts that contain sufficient detail and are reliable and accurate, in order to correctly reflect all transactions and all assets.

VII.5.2.- It is strictly prohibited for any person to alter or attempt to distort any accounting item with the aim of hiding the true nature of a transaction on the books or in the accounts of the Company, whether in order to simulate achievement of goals or objectives, for personal gain, or for any other purpose. The Directors, Executives and Employees may not under any circumstances remove or conceal financial information.

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VII.5.3.- All information generated in the Company's financial records must be treated confidentially and may only be provided to authorised users.

VII.5.4.- All transactions carried out by the Company must be included in its financial information, and the applicable financial reporting regulations must be observed. The carrying out of any "off-the-books" transactions is expressly prohibited.

VII.5.5.- It is strictly prohibited to make any attempt to influence the external auditors with the aim of registering transactions in the Company's accounts that misrepresent financial information or which fail to adhere to financial reporting standards, or of manipulating their opinion regarding any transaction or value.

VII.6.- Validity of Payments

VII.6.1.- The Directors, Executives and Employees will under no circumstances process, authorise or make payments using Company funds when they are aware that all or part of said funds will be used for a purpose other than that described in the documentary support for the outlay in question.

VII.7.- Use of Privileged Information

VII.7.1.- The Directors, Executives and Employees that have access to privileged information, as defined in the Mexican Stock Market Law [*Ley del Mercado de Valores*] and related provisions, must refrain from revealing any such information to any person by any means. Privileged information is defined as any internal data regarding the operations or activities of the Company that have not yet been disclosed to the public.

VII.7.2.- The use by any person of information from any of the companies in the Group for personal gain or the benefit of third parties is strictly forbidden, provided that such information has not been disclosed to the public.

VII.7.3.- The Executives and Employees are strictly prohibited from buying or selling shares or other financial instruments issued by the Company, either in person or through third parties, without the express authorisation of the Chief Executive Officer of the Group within a context of a general scheme open to all staff members.

VII.8.- Protection of Confidential Information

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VII.8.1.- All information existing within the Company shall be considered an intangible asset, and therefore the property of the Company. Consequently, the Directors, Executives and Employees of the Company have the obligation to safeguard it and use it for authorised purposes only, in the same way that they would safeguard and use any other asset or resource.

VII.8.2.- Confidential information is defined as that which is not in the public domain, which may confer a competitive or economic advantage on the Company in its business dealings with third parties, or which may expose the Company to damages or losses if it is disclosed prematurely or inappropriately. Confidential information includes, but is not limited to, all internal information regarding the technical, legal, financial and commercial aspects of the operations of Grupo Aeroportuario del Sureste, S.A.B. de C.V. and its subsidiaries and affiliates, as well as any information regarding policy, procedure or internal controls, which is obtained by any means.

VII.8.3.- Directors, Executives and Employees have the obligation to protect the Company's confidential information and will not reveal any such information by any means, unless they have obtained the express consent of the Company's Chief Legal Counsel or they are required to do so by a competent authority. All information relating to third parties, such as the Company's clients, associates, suppliers or competitors, must also be treated confidentially. The obligation to safeguard confidential information shall not end with the conclusion of the employment or professional relationship between the Company and the Director, Executive or Employee, but shall remain in force even after the person in question has ceased to work for or with the Company.

VII.9.- Protection of Personal Data

VII.9.1.- In the Company's day-to-day operations, Directors, Executives and Employees may have access to the personal data of third parties, including passengers and other members of the public that visit the airports, as well as clients, suppliers, and the Company's associates, among others. The term *personal data* will be understood to mean name, address, employer and position, telephone numbers, e-mail addresses, gender, date of birth, level of education, medical history, professional experience, and any other information directly relating to person's life or employment history.

The Directors, Executives and Employees must treat any such information in strict compliance with the Mexican Personal Data Protection Law [*Ley Federal de Protección de Datos Personales en Posesión de los Particulares*] and the Company's internal policies. Personal data will be considered the personal property of each individual; they must be treated as confidential and may not be communicated, revealed

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or published in any way. Directors, Executives and Employees will also refrain from collecting or saving personal data that have not been freely shared with them by the owner of said data.

VII.10.- Security in the Use of Information Technologies

VII.10.1.- The Company is the designated proprietor of any and all information produced, stored, processed and/or transmitted using the systems that belong to it, and it therefore establishes the following rules concerning usage and security:

VII.10.1.1.- **Use of Accounts and Passwords.** Each individual user of the IT systems authorised by the Company is responsible for the appropriate use and safeguard of any and all accounts assigned by the Information Technology Department. Passwords are strictly confidential and non-transferable.

VII.10.1.2.- **Use of Network Services.** Network services may not be used for personal benefit and/or entertainment. Users are not authorised to modify network settings on their computer equipment.

VII.10.1.3.- **Use of Internet Service and Electronic Mail.** Only those active Employees that have been duly authorised may use the internet service and a personalised e-mail account provided by the Company. When applicable, external personnel working for the Company under contract may be provided with access to these services; for the purposes thereof, prior authorisation in writing must be submitted to the Information Technology Manager.

The Company reserves the right to control internet traffic and the use of this service, which includes regulating which websites may and may not be visited. Accessing the following kinds of websites shall be considered an inappropriate use of the internet service, and is strictly prohibited: sites that contain obscene or pornographic material; sites that encourage the pirating of proprietary material; sites that exist for video streaming or uncontrolled software downloads; sites that provide online gaming or gambling; sites that are liable to introduce malicious software of any kind into the Company's networks; or sites that in any other way jeopardise the security of the Company's IT resources.

The use of blogs, RSS sources of web information, instant messaging, internet forums, and social networking sites is only permitted for those Employees that have been duly authorised by the Company. Activities on such sites must be carried out in accordance with the guidelines established in this Code of Ethics.

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VII.10.1.4.- Use of Software. All software installed on the computer equipment assigned by the Information Technology Department must be authorised by said Department and shall have a valid user licence.

VIII.- OBLIGATIONS OF DIRECTORS, EXECUTIVES AND EMPLOYEES TO THIRD PARTIES

VIII.1.- Bribery, Extortion, Fraud, Facilitation Payment, Gifts and Gratuities

VIII.1.1.- In all interactions with third parties on behalf of the Company, the Directors, Executives and Employees must observe the highest standards of honesty, transparency and business ethics. Consequently, under no circumstances may they take part in practices such as bribery (offering money or any other incentive in exchange for personal gain or for the benefit of the Company); extortion (requesting money or any other incentive in exchange for the concession of favours to the third party); fraud (misleading a third party, or taking advantage of a third party's error, with the aim of misappropriating an asset or acquiring an unlawful gain); facilitation payments (offering small payments or gifts to accelerate a government process, to obtain a permit, licence or service, or to prevent an abuse of power); or giving and receiving gifts and favours with a significant monetary value.

Any case of non-compliance by a Director, Executive or Employee with these provisions will be considered a serious breach of the terms of this Code of Ethics, and will constitute justification for the immediate termination of any employment or other relationship between the Company and the person in question, independently of any legal consequences under the applicable national and international legislation.

VIII.1.2.- Bribery of Government Officials. The bribery of government officials, whether Mexican or foreign, is expressly prohibited. The Directors, Executives and Employees must therefore under no circumstances make or promise to make payment of any sums, make gifts of any items of value, or offer services or favours, including trips, meals or entertainment, with a significant monetary value to any employees or officials of any national or foreign government body, independently of whether the person in question requests this treatment or not. This includes making payments via intermediaries, such as sales representatives, agents, advisors or consultants.

In their interactions with government officials, the Directors, Executives and Employees may not make facilitation payments, which are defined as small amounts of money or gifts offered with the aim of accelerating a government process, obtaining permits, licences or services, or preventing an abuse of power.

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Gifts and presents offered to government officials during the Christmas period, in accordance with customary practice, must adhere to the guidelines established by the applicable legislation and must be authorised by the Company's Chief Executive Officer.

VIII.1.3.- Relations with Suppliers. Suppliers must be contracted in accordance with the regulations of the Acquisitions and Contracts Committee, and avoiding any conflicts of interests under the provisions of Section VII.1. of this Code.

Directors, Executives and Employees must not request or accept remuneration of any kind for their personal benefit from suppliers. Under no circumstances will they accept money, service discounts, gifts, trips or objects of value from companies or individuals that provide goods or services to the Company, nor may they request or receive any other type of compensation, reward or personal favour from any such companies.

Generally speaking, the Directors, Executives and Employees may accept promotional gifts with a low monetary value, as well as invitations to business meals, normal leisure activities or entertainment events, provided that such gifts and invitations are infrequent, are in accordance with commonly accepted practice in the business world, and there is no conflict with the interests of the Company.

To ensure compliance with these regulations, the following model clause must be inserted into all contracts entered into between the Company and external suppliers:

“The parties state that during negotiations for the execution of this agreement, and for the duration thereof, they have conducted themselves and shall continue to conduct themselves in accordance with the regulations set forth in (i) the Rules of Conduct to combat extortion and bribery published by the International Chamber of Commerce (“the Rules”); (ii) the Mexican Law on Anticorruption in Public Contracting [*Ley Federal Anticorrupción en Contrataciones Públicas*] and the U.S. Foreign Corrupt Practices Act (jointly “the Anticorruption Legislation”); (iii) the Code of Ethics of the company (“the Code”); and (iv) any other similar legislation that is applicable to them; and that they hereby agree to be bound by the terms thereof for the duration of this agreement in their dealings with each other and with third parties. The parties expressly accept that any violation of the provisions of any of the aforementioned codes shall constitute a serious breach of the terms of this agreement and shall be justification for the rescission hereof.”

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VIII.1.4.- Relations with Clients. The sale of services to clients must be conducted in accordance with the principles of business ethics and the provisions of this Code of Ethics at all times. Any conflict of interests, as set forth in Section VII.1. of the Code, must be avoided.

The Directors, Executives and Employees may not offer or provide compensation of any kind for the personal benefit of their clients. Under no circumstances will Directors, Executives and Employees award said employees money, presents, trips or objects of value, nor will they offer or provide any kind of remuneration, gift or personal favour. This provision will not apply to any strategic commercial incentives offered by the Company to its clients, provided that these are offered transparently and with the authorisation of the Company's Chief Executive Officer.

In general terms, Directors, Executives and Employees may offer promotional gifts with a low monetary value, as well as invitations to business meals, normal leisure activities or entertainment events, provided that such gifts and invitations are infrequent, are in accordance with commonly accepted practice in the business world, and there is no conflict with the interests of the Company.

VIII.2.- Investigations by Competent Authorities

VIII.2.1.- The Directors, Executives and Employees will have the obligation to cooperate fully with any investigation carried out by a competent authority at any time. The Company may not dismiss, demote, suspend, threaten, harass, interfere with the employment rights or in any other way discriminate against a Director, Executive or Employee for providing information, assisting in providing information or in any other way collaborating with an investigation arising from a presumption of non-compliance with any law, any regulatory provision established by the Company, or this Code.

IX.- ADDITIONAL PROVISIONS

IX.1.- Reporting System

IX.1.1.- Any Directors, Executives or Employees that become aware of any instance of non-compliance with the provisions of this Code of Ethics, or of any other applicable regulations, have the obligation to report the matter in question via the reporting system established by the Company for this purpose. Reports may be sent by two means: by e-mail to **cod_conducta@asur.com.mx**; or by voicemail to telephone number **01800-280-2787 (01800-280-ASUR)**.

IX.1.2.- The reports sent will be received by the Internal Auditing Manager of ASUR, who reports directly to the Company's independent Audit Committee. The reporter may choose to leave an

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anonymous report, but in the event that the reporter's identity is confirmed this information will be treated confidentially. Other than the Internal Auditing Manager, no person within the Company has access to the information presented via the reporting system.

IX.1.3.- The reporting system may be used by the associates of the Company, by the employees of any other company that forms part of the Value Chain (see Section IX.4. of this Code), or by any member of the public that has been the victim of or has knowledge of any case of unethical conduct. All reporters are guaranteed that any communications sent in good faith will be handled quickly, professionally and with complete confidentiality, regardless of whether the report is found to be justified as a result of the subsequent investigation. All reporters will be protected from any risk of reprisal in their professional activities.

IX.2.- Audits, Investigations and Disciplinary Action

IX.2.1.- On the basis of a risk analysis, the Internal Auditing Department carries out regular audits of the Company's different business units, its commercial partners and other aspects of its operations, to ensure the correct application of the internal control measures established by the Company. The Internal Auditing Manager will also investigate all matters presented via the reporting system. The Directors, Executives and Employees will have the obligation to cooperate with any such audits and investigations, and will provide any and all information when it is requested of them.

IX.2.2.- The Company's Internal Auditing Department will follow up on all matters reported or otherwise detected until these cases are resolved. It will rely on the collaboration of all Directors, Executives and Employees, and will report the progress and findings of its investigations to the Audit Committee.

IX.2.3.- In the event that it is found that any Director, Executive or Employee has violated any applicable legal provision or the internal regulations of the Company, said person may be subject to penalty in strict compliance with the corresponding laws and legal precepts, and the appropriate internal disciplinary-action measures may be taken. Such measures may include the termination of the relationship between the Company and the person in question. The penalty applied in each case will be reported to the Company's Audit Committee.

IX.3.- Exceptions to the Code of Ethics and Orientation

IX.3.1.- Any request for an exception to the guidelines contained in this Code of Ethics must be presented to the Internal Auditing Department, either directly or via the reporting system, for approval by the Company's Chief Executive Officer or Audit Committee.

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IX.3.2.- Any Employees that have doubts or require orientation about any topic contained in this Code of Ethics are free to consult the matter with the human resources representative at their place of work, or with the Internal Auditing Department, either directly or via the reporting system.

IX.4.- Value Chain

IX.4.1.- It is expected that the people that make up the Company's Value Chain will at all times act in accordance with the standards of ethics, honesty and transparency that are applicable for the Directors, Executives and Employees of the Group. The Value Chain is defined as the employees of companies subcontracted to provide services in facilities belonging to the Company; the employees of clients and concession holders that perform their professional duties within facilities belonging to the Company; and the employees of suppliers and contractors that provide goods and services to the Company.

IX.4.2.- The provisions of this Code of Ethics that must be observed by members of the Company's Value Chain include, but are not limited to, the following:

- V.1.- Compliance with Legislation
- VII.2.- Protection of Company Assets and Resources
- VII.3.- Misuse of Company Time and Assets
- VII.4.- Principle of Austerity
- VII.5.- Appropriate Financial Information, Accounts and Records
- VII.6.- Validity of Payments
- VII.7.- Use of Privileged Information
- VII.8.- Protection of Confidential Information
- VII.9.- Protection de Personal Data
- VIII.1.- Bribery, Extortion, Facilitation Payments, Gifts and Gratuities
- VIII.2.- Investigation by Competent Authorities
- IX.1.- Reporting System
- IX.2.- Audits, Investigations and Disciplinary Action
- IX.3.- Exceptions to the Code of Ethics and Orientation

IX.5.- Training and Statement of Compliance

IX.5.1.- The Company's Human Resources Department will be responsible for carrying out internal communications activities and providing the necessary training to the Company's associates in order to



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ensure that the Executives and Employees are familiar with the content of this Code. It will also carry out campaigns aimed at members of the Company's Value Chain to promote awareness of their obligations under this Code and the reporting systems that the Company has.

IX.5.2.- The Directors, Executives and Employees of the Company will have the obligation to sign a statement on a yearly basis, in which they confirm their knowledge of the provisions of this Code of Ethics, and state that during the year in question they have adhered to said provisions in all matters and have not incurred any violations or carried out practices contrary to the Company's ethical standards.

IX.6.- Validity

IX.6.1.- This Code of Ethics will become valid and generally applicable from the date on which it is approved by the Company's Audit and Business Practices Committee and/or Board of Directors, and will remain in force until said Committee and/or Board repeals it or replaces it with another code. Amendments to the Code will also be valid as from the date of approval by the Company's Audit and Business Practices Committee and/or Board of Directors.