

Integrity Hotline Policy

1. Purpose

Corporación América Airports (together with all of its subsidiaries and affiliates, "the Company") adopts this policy in order to ensure compliance with its Code of Conduct and related policies.

2. Scope

This policy applies to the Company and to all members of the Board of Directors and the boards of directors of each subsidiary, members of committees, and employees and trainees.

With regards to the Company's joint ventures, application of this policy is subject to an agreement with the other shareholders of the relevant joint venture.

3. Responsibilities

The Board of Directors and the Audit Committee of the Company will be the primary decision-making bodies with regards to the implementation of this policy.

Senior Management and its teams, each in their respective countries where the Company operates, are responsible for monitoring their team's activities in order to prevent and detect violations of the Code of Conduct, including any risk of fraud.

Any detected or suspected violation of the Code of Conduct that cannot be resolved by the ordinary supervision channels, must be immediately reported to the Or contacting any member of the Compliance Department (or Audit Department or Legal Department, in the order listed).

The information reported in accordance with this policy will be received by an independent and specialized company entrusted to treat each matter with confidentiality.

The Internal Audit Department, in coordination with the Human Resources Department and Legal Department, is responsible for investigating fraud complaints and coordinating with other departments to investigate any other type of complaints. In addition, it is responsible for collaborating with joint venture shareholders to establish procedures applicable to cases involving joint ventures that already have their own audit team.

4. Reference documentation

- Code of Conduct
- Code of Ethics for Senior Financial Officers
- ABC Compliance Policy

5. Meaning of fraud

For purposes of this policy, fraud is defined as any and all behavior committed intentionally by an employee, director or third party, to the detriment of the Company (real or potential), and/or for the purpose of obtaining any unearned benefit for himself/herself, and/or for third parties, and/or for the Company.

The following is a non-exhaustive list of examples of fraudulent behavior:

- Involvement in: bribery, national or international influence peddling, negotiations incompatible with the exercise of public service duties; extortion (illegal exaction); illicit gain of public servants.
- Economic fraud: misappropriation, robbery, advantages improperly obtained in connection with excessive purchases, unreceived goods/services certifications, and/or inappropriate expense reports.
- Information manipulation: adulteration, falsification, unauthorized destruction of information, robbery, misuse and/or disclosure of information (accounting, operational, financial, legal, labor, etc.).
- Abuses/commercial excess: to grant benefits out of the ordinary course with the intention of favoring an individual improperly and/or pursuing a personal benefit.
- Occupational abuse: inappropriate actions to obtain any kind of extra compensation, abusing the use of the Company's assets for personal objectives.
- To accept or give gifts, attentions, trips, etc. in a manner that violates the Company's Code of Conduct and its policies.

In case of uncertainty about whether an act is in violation of the Code of Conduct, consult the Compliance Department, Internal Audit Department and/or Senior Manager.

6. Procedure

Any employee who detects or suspects an activity that violates the Code of Conduct should report such activity through the following communication channels:

- Company intranet:
- Internet:
- E-mail:
- By telephone (please check your country number):
- By telephone (internationally):
- Or contacting any member of the Compliance Department (or Audit Department or Legal Department, in the order listed)

Any reports, generated by these or any other channels, will be sent to an independent and specialized company entrusted to treat each matter with confidentiality and the Compliance Department.

Allegations of fraud will be reviewed by the Internal Audit Department. If the activity involves any member of the Internal Audit Department, it will be sent to the Audit Committee, which will prescribe the procedures to follow.

All complaints or behaviors that affect the work environment, such as discrimination, threats, harassment, acts of violence, or that affect occupational security, order, reputation, discipline, must be resolved by the departments overseeing those matters in coordination with the Human Resources Department.

Other complaints will be sent to the appropriate department overseeing the nature of such complaints.

The investigation will be conducted in an objective, thorough, and confidential manner, with the proper professional diligence.

Individuals not authorized should not attempt, personally, to investigate or interview persons in connection with any suspected act of violation.

At all stages of the reporting process, the complainant's identity will remain confidential, if so requested. Once the investigation is complete, the Compliance Department (or Audit Department or Legal Department, in the order listed) will present the results of the investigation to the Integrity Committee that is composed of the CEO, Legal Director, Human Resources Director and the director of the involved department; local and/or corporate, as appropriate. The results will not be transmitted to the complainant.

The above procedures are designed to ensure the fair treatment of the personnel involved and protect his/her right of defend himself/herself against the allegations.

7. Assurances

Protection: The Company recognizes that the decision to report may be difficult for fear of retaliation, among other things. The Company will take measures to protect all persons who report in good faith. The Company encourages employees to report any attempt to restrict the right to report or expose fraudulent conduct, which in turn will enable the Company to take immediate action against those who carry out such actions. The principles of this policy supersede any instructions given by an employee at any level of authority to his/her subordinates.

Anonymity: Complaints may be made anonymously. However, this policy encourages people to identify themselves and provide contact information in their complaints, in order to allow the complainant to be contacted for cooperation and/or further information vital to the investigation. In certain cases, a statement by the individual may be necessary for evidentiary purposes.

Confidentiality: The identity of the complainant and the accused and the content of the complaint will be kept confidential by the Company, barring any legal or regulatory mandates requiring disclosure. The same confidentiality obligation will apply to the complainant and the accused.

False complaints: The Company reserves the right to initiate internal actions or legal proceedings against any complainant acting in bad faith.

8. Final provisions

This policy will be updated at the request of the Chief Audit Executive, the Audit Committee or the CEO.

It is prohibited to create or exercise powers not provided for in this policy, such as the initiation of investigations or the disclosure of the contents of complaints by unauthorized persons.

For the efficient handling of complaints, the authorities in charge will take into account the following factors:

- the seriousness of the issues raised, considering the potential economic and reputational impact;
- the credibility of the complaint;
- the degree of detail of the complaint; and
- the probability of confirming the allegation.

In any case, each and every case will be classified and will be available for review upon the request of the CEO and/or the Audit Committee.