

GOGO INC.

CODE OF FINANCIAL ETHICS

Adopted by the Board of Directors

May 31, 2013

Revised May 4, 2021

Gogo Inc. (the “**Company**”) is committed to maintaining high standards related to our accounting and reporting processes and internal accounting controls. This commitment must be supported by the high ethical standards of our financial employees. This Code of Financial Ethics embodies these principles and has been approved pursuant to the Company’s Code of Business Conduct and Ethics.

While the Company expects all financial employees to adhere to these principles, our financial leaders play a key role in ensuring compliance with these principles. As such, individuals holding the following positions shall acknowledge in writing his or her responsibility for adherence to the Code of Financial Ethics:

- Chief Executive Officer
- Chief Financial Officer
- Chief Accounting Officer
- Treasurer
- Controller
- Head of Financial Planning & Analysis
- Head of Tax
- Head of Internal Audit
- Other key financial, accounting or information technology employees as may be designated by the Chief Executive Officer or Chief Financial Officer

As an employee covered by this Code of Financial Ethics, I will:

- Act with honesty and integrity in my professional relationships. I will promote and be an example of ethical behavior as a responsible partner among my peers and subordinates in the work environment;

- Avoid conflicts of interest. In doing so, I will ethically handle any actual or apparent conflict of interest in personal and professional relationships and will promptly disclose to the Company's General Counsel the nature of any transaction or relationship that reasonably could be expected to give rise to such a conflict of interest;
- Provide full, fair, accurate, timely and understandable financial disclosures in documents filed with, or submitted to, the Securities and Exchange Commission, any other government agency or self-regulatory organization, or used in other public communications. Any accounting records for which I am responsible that underlie the financial statements included in these disclosures will be prepared in accordance with generally accepted accounting principles applied consistently with the principles used to prepare the audited financial statements;
- Comply with applicable laws, rules and regulations of federal, state, provincial and local governments, the Securities and Exchange Commission, the NASDAQ Stock Market, and other applicable private and public regulatory agencies;
- Act in good faith, responsibly, with due care, competence and diligence, and without misstating, misrepresenting or omitting material facts or circumstances or allowing my independent judgment to be subordinated;
- Maintain the confidentiality of information acquired in the course of my work, except where disclosure is authorized and appropriate to carry out my assigned responsibilities, or where I am otherwise legally obligated to disclose such information. I will not use confidential information acquired in the course of my work for personal advantage;
- Responsibly use and control assets and other resources employed or entrusted to my supervision;
- Maintain professional skills and share knowledge with my peers and subordinates to enable me to carry out my assigned responsibilities and obligations;
- Not improperly or fraudulently influence, coerce, manipulate, or mislead any authorized audit or interfere with any auditor engaged in the performance of an internal or independent audit of the Company's financial statements or accounting books and records;

- Report questionable accounting, internal accounting control, auditing or fraud matters, or allegations of non-compliance with this Code of Financial Ethics to management. If I do not feel that any such issues raised have been resolved appropriately, I will report my concerns to any member of the Company's Board of Directors, or by using the Gogo Ethics Line as provided in the Company's Code of Business Conduct and Ethics; and
- Be accountable for my actions and decisions. I acknowledge that failure to adhere to this Code of Financial Ethics or to the Company's Code of Business Conduct and Ethics may result in disciplinary action, up to and including termination.