

GESTAIR GROUP INTERNAL INFORMATION SYSTEM STATUTE

These Bylaws were approved by the Board of Directors of Global Aviation Investment, S.L. (as parent company of the Gestair Group) on November 27, 2023, taking effect in that company and in the rest of the Group's companies.

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1. PREAMBLE

The Gestair Group is, for the purposes of Law 2/2023, obliged to have an Internal Reporting System, as a tool for reporting actions or omissions that, in the course of its business, may be committed, and which involve an infringement of the legal system of European Union law or national law that may involve a serious or very serious criminal or administrative offence, for the purposes of art. 2 of the aforementioned law.

In addition, the Gestair Group, beyond its legal obligations, has among its goals and principles, acting with honesty, transparency and respect for its Code of Ethics.

For this reason, the Gestair Group considers it necessary, in order to carry out its activities with the highest legal and ethical standards, to establish a properly regulated Internal Information System, with the aim of protecting employees and third parties from unlawful acts, as well as preventing and detecting at an early stage possible breaches of regulations.

To this end, its Internal Information System shall be governed by the principles of accessibility, good faith, whistleblower protection, confidentiality, objectivity, respect for the presumption of innocence and transparency.

These Bylaws are the original rules of this System, which shall remain in force indefinitely.

2. SCOPE OF APPLICATION

Article 1

These Bylaws apply to the entire Gestair Group entity and its members, from the governing bodies to the beneficiaries of the entity's activities, including employees and collaborators, whether they are managers or not.

Article 2

For the purposes of Article 12 of Law 2/2023, the Gestair Group recognizes the possibility that other legal entities related to the Gestair Group may join this System, with the prior authorization of the Administrative Body.

Article 3

The prior authorization referred to in the previous article shall not be necessary when the entity adhering to this System is a legal entity legally dependent on Global Aviation Investment, S.L. over which the latter exercises control. In these cases, it will be sufficient that the administrative body of the entity so agrees.

Article 4

For the development of the performance of the Internal Information System, a Management Procedure and a Management Policy will be drawn up, which must be approved by the Governing Body of Global Aviation Investment, S.L..

3. OF THE PERSON RESPONSIBLE FOR THE INTERNAL INFORMATION SYSTEM

Article 5

The person in charge of the Internal Information System, for the purposes of article 8 of law 2/2023, is the Compliance Officer of the Gestair Group, who also acts as Compliance Officer of the various subsidiaries or subsidiaries of Global Aviation Investment, S.L.

Article 6

Priority shall be given to the person holding the position of Head of the Internal Information System who holds the position of Head of the Internal Control Office (OCI) of the Gestair Group. In any case, and in compliance with the provisions of Law 2/2023, it must always be a member of the Gestair Group with relevance in the organization.

The position of Internal Information System Manager shall be compatible with that of Data Protection Officer.

Article 7

The position of Head of the Internal Information System shall have a term of three years, renewable automatically. He/she may not be dismissed, except for legal reasons, or for ceasing to belong to any of the companies that make up the Gestair Group.

If the person in charge ceases to belong to the Gestair Group, the administrative body of Global Aviation Investment, S.L. shall be immediately informed, with a reasoned explanation of the reason for the end of the relationship, in order to ensure that this is not used to dismiss him/her as the person in charge of the Internal Information System.

Article 8

The Head of the Internal Information System, in his/her competencies within the Internal Information System, shall act independently and autonomously with respect to the governing bodies of the Gestair Group (of Global Aviation Investment, S.L. or any of its subsidiaries).

Article 9

The person in charge of the Internal Information System shall act with the utmost confidentiality in the exercise of his/her duties as set forth in these Regulations.

Article 10

Without prejudice to the provisions of the preceding articles, and without detriment to the functions and responsibilities of the Head of the Internal Information System, the management of the Internal Information System may be delegated to Gestair Group employees, members of the OCI, with preferential dedication, or to external professionals.

Functions of the Internal Information System Manager

Article 11

The functions of the person in charge of the Internal Information System are as follows:

- The implementation of the Internal Information System.
- The development of the Complaint Management Procedure through the Internal Information System.
- The development of the Complaint Management Policy through the Internal Information System.
- Reporting to the Gestair Group's governing body regarding the Internal Information System.
- The promotion of the Internal Information System among the members of the Gestair Group and third parties related to it.
 - The periodic review of the System, the modifications derived therefrom and the motivated suggestion to the management body of Global Aviation Investment to apply the modifications that may correspond to this body.
- Notifications to the Independent Whistleblower Protection Authority.
- The management of the Internal Information System and the Information Management Procedure, without prejudice to the participation of external third parties, in accordance with the provisions of the legislation in force and these Bylaws.
- The custody of the register of information and any other information and/or documentation generated by the System.

- The review of the Internal Information System Procedure, as well as proposals for its improvement.
 - The application of whistleblower protection measures, when appropriate.
- Advice, in relation to the Internal Information System, to the entity's governing body, when required to do so.
 - The compilation and preparation of the actions carried out by the Internal Information System. Annually report on these to the OIC and the Board of Directors. It shall also report in extraordinary situations, by its own decision or at the request of the Board of Directors.
 - Any other powers granted by law, the Board of Directors of Global Aviation Investment, S.L. or the internal regulations of Grupo Gestair.

4. PUBLICITY OF THE INTERNAL INFORMATION SYSTEM

Article 12

The Internal Information System and, specifically, the information channel to be set up, shall be adequately publicized for the knowledge of the members of the Gestair Group and third parties that have dealings with the entity.

Article 13

In any case, the Internal Information System and, specifically, the information channel, will be published on the Gestair Group's Employee Portal and on its website.

Article 14

When publicizing the Internal Information System, the External Information Systems, as well as the competent public authorities, shall also be publicized.

5. PROTECTION MEASURES

Article 15

The present Internal Information System includes and promotes the whistleblower protection measures set forth in Title VIII of Law 2/2023.

Article 16

The Gestair Group will not take reprisals, whether labor, economic, reputational or of any kind against whistleblowers who use the Internal Information System in accordance with the established Procedure and Policy.

Nor will it take reprisals against the persons involved, without prejudice to the sanctions and communications to the authorities that may be applied in accordance with the legislation in force and the internal regulations of the Gestair Group.

6. CONFIDENTIALITY AND PROTECTION OF PERSONAL DATA

Article 17

The Gestair Group's Internal Information System complies, in terms of data protection, with the provisions of Title VI of Law 2/2023, particularly with regard to the protection of the informant's data. The guiding principle of the entire system is the confidentiality of your identity, which will only be revealed by judicial or administrative request, if applicable, and any doubt or interpretation of the system must be resolved with respect to this.

Article 18

In any case, informants shall be clearly and expressly informed that their identity, when indicated, shall in any case be confidential, and that it shall not be communicated to the persons to whom the facts reported refer, nor to third parties.

Article 19

Persons who, without being informants or persons identified by information, participate in the processing of the file, will be informed that their personal data may be processed in the processing of the information in this file.

7. MODIFICATION OF THE STATUTE AND DURATION

Article 20

These Bylaws may be amended by the Board of Directors of Global Aviation Investment or of the parent company of the companies comprising the Gestair Group at any time.

Article 21

The person in charge of the Internal Information System may request the governing body to modify these Bylaws, with a reasoned proposal for modification.

Article 22

These Bylaws, as amended, shall have an indefinite duration.
