



## **GESTAIR GROUP INTERNAL INFORMATION SYSTEM CHANNEL**

### **GENERAL AND COMPLAINT MANAGEMENT POLICY**



## **WHAT IS THE INTERNAL INFORMATION SYSTEM (I.I.S.) CHANNEL?**

The Internal Information System Channel or Internal Information System (indistinctly, the IIS) is established so that the different stakeholders (employees, collaborators, customers, suppliers and representatives of society in general) with whom the Gestair Group relates can raise questions related to compliance with the Gestair Group Code of Ethics or submit complaints about possible irregular conduct, suppliers and representatives of society in general) with which the Gestair Group relates can raise questions related to compliance with the Gestair Group's Code of Ethics or file complaints about possible irregular conduct taking place within the company that may involve a breach of the Code of Ethics and/or the possible commission of a criminal offense, including the violation of any of the internationally recognized human rights, all in a confidential manner.

## **CAN THE SII CHANNEL BE USED TO REPORT INCIDENTS RELATED TO GESTAIR'S AVIATION OPERATIONS OR SAFETY OR TO THAT OF A PAYMENT METHOD?**

**THE SII CHANNEL IS NOT A SERVICE FOR INCIDENTS RELATED TO GESTAIR'S AERONAUTICAL OPERATIONS OR SECURITY OR TO THAT OF A MEANS OF PAYMENT.**

**DO NOT USE THIS SITE TO REPORT PROBLEMS RELATED TO OPERATIONS OR SAFETY. TO THIS END, PLEASE ADDRESS YOUR COMMUNICATIONS TO: [sms@gestair.com](mailto:sms@gestair.com) (GESTAIR AVIATION), [mroreportingsms@gestair.com](mailto:mroreportingsms@gestair.com) (GESTAIR MAINTENANCE) AND/OR [sms\\_gestair@gestair.com](mailto:sms_gestair@gestair.com) (GESTAIR AVIATION MALTA).**

### **1. General Policy of the Internal Information System**

#### **1.1 Context and objectives**

In order to comply with Law 2/2023 regulating the protection of persons who report regulatory violations and the fight against corruption, the Board of Directors of the company Global Aviation Investment, S.L., the parent company of the companies that make up the Gestair Group (hereinafter, "Gestair"), in its desire to comply with the legislation in force at all times, the recommendations of the public authorities, social responsibility and good corporate practice, approves and subscribes this Policy (hereinafter, the "Policy"), as a necessary requirement for the implementation of the Internal Reporting System and the elements that comprise it, including the General Policy of the Internal Reporting System, which incorporates the guarantees of protection for whistleblowers.

Numerous national and international regulations have referred to the channels of communication or complaints, demanding the following requirements:

- The organization should encourage good faith reporting of a suspicion, violation or weakness in the compliance system;
- The information will be treated confidentially, in order to protect the informant;
- Anonymous reporting is permitted;



- The rights of the complainant and respondent shall be respected;
- Retaliation against the whistleblower shall be prohibited; and
- Personnel shall be allowed to receive technical and professional advice.

This Policy complies with the regulatory requirements applicable to the Gestair Group, considering the nature, activities and structure of the same, for the purposes of prevention and management of possible regulatory violations, being of particular relevance those susceptible of constituting serious or very serious administrative or criminal offenses.

The Gestair Group, in order to comply with the objective for which this Policy has been created, is committed to adapting it to the social environment and to any legislative modifications that may occur, so as to guarantee its effectiveness.

## 1.2 Subjective scope

This GESTAIR Policy includes the following:

- Members of the administrative bodies, managers, employees and collaborators of GESTAIR.
- Employees of suppliers, contractors or subcontractors.
- All third parties with whom GESTAIR maintains a professional relationship directly or indirectly.

**All the subjects included in the previous section refer to any of the subsidiaries over which, directly or indirectly, Gestair exercises effective control.**

The companies over which Gestair has control, under the terms of Article 42.1 of the French Commercial Code (the "Group Entities"), shall also be bound by the ethical principles and standards set forth in this Policy. Global Aviation Investment and the Group Entities are hereinafter referred to as the "Gestair Group" or the "Company".

This Policy has been approved in order to include the general principles of the Internal Information System, which clearly indicates the SII channel, the information that must be made available to whistleblowers or informants, the subjects that may use the channel, the matters that may be reported, data protection, and the rights and duties of all persons involved in the investigation process, among others.

## 1.3 Target Scope

Communications, inquiries and/or complaints of possible non-compliance made through the SII Channel will refer to:

- In the case of consultations: on the scope and applicability of the Canal SII Charter, the Group's Code of Ethics, the Labor Procedures applicable to the Gestair Group (Equality Plan or Anti-Harassment Protocol), this General Policy of Canal SII or its Procedure or any element of the Criminal Compliance Program of the Gestair Group as a whole;
- In the case of complaints about possible breaches of the System: shall refer to any breach of the elements of the Group's Code of Ethics, of the Labor Procedures applicable to the Gestair Group (Equality Plan or Anti-Harassment Protocol) and in general to any breach of the Criminal Compliance Program, which includes any other NON-OPERATIVE internal regulations, as well as

breaches of any external regulations, legislation or regulation that is part of the applicable legal system, including especially (but not exclusively) infractions of a criminal nature (with special attention to corrupt conduct) and antitrust regulations, due to their particular seriousness and the specific commitment that the Group assumes with respect to their compliance.

- In the case of allegations of regulatory and anti-corruption violations, it shall be understood as such:
  - Any act or omission constituting an infringement of European Union law, provided that they fall within the scope of the European Union acts listed in the Annex to Directive (EU) 2019/1937, relating, *inter alia*, to:
    - Public procurement.
    - Financial services, products and markets, and prevention of money laundering and terrorist financing.
    - Standards relating to the marketing and use of sensitive and hazardous products o Transportation safety.
    - Environmental protection.
    - Standards related to water and soil protection and management. o Radiation protection and nuclear safety.
    - Food and feed safety, animal health and animal welfare.
    - Public health.
    - Consumer protection.
    - Protection of privacy and personal data, and security of networks and information systems.
  - Acts affecting the financial interests of the European Union.
  - Acts affecting the internal market, including:
    - competition infringements and aid granted by States in the field of competition
    - acts in violation of corporate income tax regulations
    - practices to obtain tax advantages
  - Actions and omissions that constitute a serious or very serious criminal or administrative offense.

The provisions of this Policy shall also apply to complaints of Harassment, which shall be processed in accordance with the respective Harassment Action Protocol for the prevention and action in cases of harassment and discriminatory acts.

Outside the scope of application of the SII Channel are matters related exclusively to labor issues without generating legal breaches (such as personal conflicts not constituting harassment, facts related to job promotion, hiring conditions, etc.) or claims related to operational safety or the ordinary management of the services provided by the Group. Such queries or complaints must be communicated through the channels provided for this purpose or processed through the Company's ordinary channels, such as communication to the direct superior or the Management assigned for this purpose.

## Responsibilities

The Board of Directors of the Gestair Group has appointed the Company's Compliance Officer as Head of the Internal Information System.

- Responsibility for the definition and approval of the Policy
  - o Administrative Body.
- Responsibility for the appointment, dismissal or removal of the person in charge of the Internal Information System.
  - o Administrative Body.
- Responsibility for the implementation of the Internal Information System
  - o Administrative Body
- Responsibility for reviewing and proposing the modification of the Internal Information System Statute.

Responsible for the Internal Information System - Compliance Officer

- Responsibility for reviewing and proposing the modification of the General Policy of the Internal Information System and the Complaints Management Procedure:

Responsible for the Internal Information System - Compliance Officer

- Responsibility for keeping the documentation associated with the regulations up to date:
  - o Responsible for the function of Legal Counsel, members of the Internal Control Office (OCI) and Human Resources.
- Responsibility for the performance of the tasks described in the standard:
  - o The members of the administrative bodies, employees, managers and directors of the Gestair Group, as well as any person or entity that maintains any type of business relationship with the Gestair Group.

## 3. Definition of Denunciation

Whistleblowing is defined as a concern communicated in good faith and consciously by an employee or third party identified in any of the means available to the Gestair Group and related to issues of accounting, finance, corruption, anti-competitive practices, disclosure of confidential information, conflicts of interest, product safety, processes or workers, quality, harassment or any other practice contrary to the applicable regulations, as well as the Group's Code of Ethics and other internal policies, as well as doubts, improvements or differences of interpretation of the latter document.

If the complaints refer to differences of professional opinion in the organizational or operational management of any area of the business and have no ethical implications whatsoever, they shall be referred to the head of the corresponding department.

Complaints regarding product or service deficiencies by customers or users will be forwarded to Customer Service for handling, acknowledging receipt.

#### 4. Basic principles

The Governing Bodies, the management and the Head of the Internal Information System of the Gestair Group state that the SII Channel is based on the following principles, guarantees and rights:

- **Principle of good faith.** All members of the Gestair Group and all third parties who maintain business relations with the Company must act in good faith and not make false accusations when expressing their concerns. Good faith consists of giving information without malice, without regard to personal gain and considering truthful information in a reasonable manner and with the means at one's disposal. A whistleblower who knowingly makes false or misleading statements or statements made in bad faith may be subject to disciplinary action in accordance with applicable law.
- **Confidentiality.** The necessary measures shall be taken to preserve the identity and guarantee the confidentiality of the data corresponding to all persons affected by the information provided in the reports. All those involved shall keep confidential the information relating to the complaint to which they have access. In particular, in the case of non-anonymous complaints, the identity of the complainant shall be kept confidential at all stages of the process of investigation and resolution of the complaint, and therefore shall not be disclosed to third parties or, therefore, to the person complained of, or to the complainant's management. Notwithstanding the foregoing, the data of the complainant and the other parties involved may be communicated to the Courts or Tribunals, the Public Prosecutor's Office, the State Security Forces and Corps and other competent authorities when necessary for the processing of legal proceedings which, where appropriate, may arise as a result of the investigations carried out as a result of the complaints made.
- **Right to protection against retaliation,** the Gestair Group will not take, or allow to be taken, retaliation of any kind against the persons who make the reports or communications that have been sent to the SII Channel in good faith, or against the persons affected by them, and will adopt the appropriate disciplinary measures to avoid it, in accordance with the Disciplinary System. In this sense, whistleblowers will be protected against any type of extortion, discrimination or penalization for the reports made. This protection for whistleblowers will operate as long as they act in good faith and without prejudice to the adoption of such measures as the Group deems appropriate in the event of intentionally false reports or reports made in bad faith. In no case does the protection of the whistleblower guarantee his immunity from any infringement in which he is implicated and which is revealed in his report or in the subsequent investigation of the same. The whistleblower is considered to be acting in good faith when his or her report is made in accordance with the SII Channel

Procedure and is based on indications from which the existence of a violation and/or any other matter within the scope of this Policy could reasonably be inferred.

- **Right to be informed** of the resolution (or filing, as the case may be) of the communication. The informant will receive acknowledgement of receipt of his complaint within 7 calendar days, as well as of the resolution of the same within the maximum terms established in the Law.
- **Right to honor, presumption of innocence and defense.** The right to the honor of individuals is one of the Gestair Group's main principles of action. It will pay the utmost attention to safeguarding these rights, guaranteeing the rights of the persons reported to defend themselves against any accusations made against them with the maximum legal guarantees. To this end, the complainant may provide the information and documents it deems appropriate and will be informed of the admission, if any, and the resolution of the complaint filed. For his part, the accused will be informed of the facts attributed to him, may testify to defend himself against them and provide the evidence he deems appropriate to exercise his right of defense.

## 5. SII Channel. COMPLAINT MANAGEMENT

The different configuration options of the SII Channel will allow:

- Face-to-face communication:
  - the complainant may make the request to file the complaint in person, which will be dealt with within a maximum period of 7 days.
- Communication through the electronic channel on the corporate website: The whistleblower may submit complaints by voice recording, as well as through the written submission form of the electronic channel implemented in the Gestair Group.

In this regard, the electronic channel implemented in the Gestair Group is accessible to all members of the Gestair Group and to third parties (with the scope established in the subjective scope) through its website:

<https://whistleblowersoftware.com/secure/canaldenuncias-grupogestair>

The electronic SII Channel is developed through an external tool to ensure the confidentiality and security of the information. The application administrator is the Internal Information System Manager (Compliance Officer, with the support of OIC staff). This tool allows for the submission of anonymous reports.

Grupo Gestair's Ethics Channel establishes mechanisms to ensure communication with the whistleblower throughout the whistleblower investigation process.

In those cases in which the communications are sent through channels of complaint other than those established in this Policy or are addressed to members of the personnel not responsible for their treatment, these employees, being aware of their confidentiality obligations, shall immediately forward it to the person in charge of the Internal Information System.

In addition, potential whistleblowers may also denounce or report violations included in the material scope of the SII Channel to the Independent Authority for Whistleblower



Protection and to the corresponding regional authorities or bodies, through their respective channels enabled for these purposes.

Complaints received through the SII Channel shall include, at a minimum, the following required information:

- Acceptance of the terms and conditions of use of the service
- Reason for the complaint
- Date of the event
- Continued production of the reported events
- Description of the complaint
- Anonymous/non-anonymous communication

In addition to the mandatory fields described above, the SII Channel includes the possibility of completing the following fields:

- Persons involved in the event
- Informants (to be filled in, except in the case of anonymous reporting)
- Attachments

The SII Channel requires the implementation of appropriate security measures to ensure the protection of personal data, the confidentiality of the whistleblower and access only by authorized persons.

## **SII CHANNEL PRIVACY POLICY**

### **BASIC PRIVACY INFORMATION**

We inform you, in accordance with current data protection regulations, that Gestair, S.A.U., (hereinafter, "Gestair") with registered address: c/ Anabel Segura, nº 11-Alcobendas, Madrid, will process your data to manage the reports received in the SII Channel in accordance with Law 2/2023, of February 20, regulating the protection of persons who report regulatory infringements and the fight against corruption.

**Responsible for the SII Channel data processing:** GLOBAL AVIATION INVESTMENT, S.L.

**Responsible for data processing of the SII Channel:** Gestair SAU

**Purpose:** To manage the complaints received, investigate the facts reported and take the appropriate measures within the framework of the legislation in force in this regard.

We also inform you that we will obtain the data provided by you through the SII Channel or through third parties in case of public disclosure, and if applicable, we will process the information contained in such disclosure.

The category of data to be processed for the management of the channel will be identification and contact data, as well as the various data provided by those who contact through this channel.

**Legitimation:** Legal obligation.

**Recipients:** Your personal data will not be transferred to third parties, unless legally required.

**Rights:** You may exercise your rights of access, rectification, deletion, opposition, purpose limitation and portability with respect to the personal data you have provided by sending an e-mail to [dpd@gestair.com](mailto:dpd@gestair.com).

**Additional Information:** you can consult additional information on Data Protection below.

## ADDITIONAL INFORMATION ABOUT PRIVACY

### Responsible:

- **Contact details of the responsible party:** GESTAIR SAU. COMPLIANCE OFFICER with registered address: Anabel Segura, nº 11 , Alcobendas - Madrid, 28108 (hereinafter Gestair).
- **Contact details of the Data Protection Officer:** you can contact the following telephone number 91 6259900 and/or via e-mail: [dpd@gestair.com](mailto:dpd@gestair.com).

### Purpose:

**- For what purpose do we process your data?** To deal with complaints filed within the framework of the Crime Prevention Program implemented in Gestair.

**- For how long do we keep the data?** For a maximum period of three months from the time the data is entered into the Channel. Additionally, data may be retained for an additional 3 months in cases of special complexity. After this period the data may continue to be processed in a different environment until the end of the investigation. Once the complaint has been resolved, the data may be kept for the purpose of leaving evidence of the functioning of Gestair's crime prevention system, and the data may be kept duly blocked as long as they are necessary for the exercise by Gestair of its rights in court in the event of legal action. In no case will they be kept for a period longer than the statute of limitations of the crimes reported in each case.

### Legitimation:

- The legal basis for the processing of your data is Article 31 bis Penal Code, as well as Article 24 of the LO 3/18, of December 5, on the Protection of Personal Data and guarantee of digital rights.
- The processing of internal communications data is necessary to comply with a legal obligation under Article 6.1.c of the GDPR pursuant to Law 2/2023, of February 20, regulating the protection of persons who report regulatory violations and the fight against corruption.
- In case of public disclosure, the processing has as a basis of legitimacy the performance of a task carried out in the public interest in accordance with Article 6.1.e of the GDPR.
- Information received containing data considered as special category data will be deleted immediately without being recorded and processed, provided that such

data is not necessary to carry out the investigation and unless the processing is carried out for reasons of essential public interest, pursuant to Article 9.2.g) of the GDPR.

Likewise, failure to provide the requested personal data implies the impossibility of being able to manage the complaints you make to us and to manage the System correctly.

**Target audience:**

- To whom do we give your data? The personal data contained in the SII Channel are not transferred to any third party outside Gestair, except by legal obligation. Personal data will be treated confidentially, except in the case of anonymous data, in which case no personal data will be processed.
- However, for the proper management of the Canal, the processing of data by other persons shall be lawful, including its communication to third parties when necessary to adopt corrective measures in the entity or, where appropriate, for the processing of sanctioning or criminal proceedings.
- In the event of international transfers outside the European Economic Area to Gestair's subsidiaries for the purpose of handling complaints within their competence, Gestair guarantees that your personal data collected for the above purposes will not be transferred outside the European Union in the absence of standard contractual clauses in accordance with Article 46 of the GDPR, or will be transferred when necessary for reasons of public interest in accordance with the exceptions in Article 49 of the GDPR.

\*\*\*\*\*