

**AirExplore, s. r. o.**  
**WHISTLEBLOWING PROCEDURE**

**Definitions**

Within the context of this policy, the following definitions shall apply:

<b>Definition</b>	<b>Explanation</b>
<b>Assistant</b>	means a natural person who is assisting or in any other manner helping the Whistle-blower and who's support shall be kept confidential.
<b>Applicable laws</b>	mean local laws, under which the Company is registered and acts, including, but not limited to, laws related to the protection of Whistle-blowers.
<b>ASG or Company</b>	means AVIA SOLUTIONS GROUP (ASG) PLC, Legal entity code: 727348, Building 9, Vantage West, Central Park, Dublin 18, D18 FT0C (as the "ASG") or AirExplore, s. r. o., address Krajná 29, Bratislava- municipality Ružinov 821 04, registration number 44 168 802, registered with the Commercial Register of the City Court Bratislava III, Section Sro, File No.: 54013/B (as the "Company").
<b>ASG whistleblowing channel</b>	means a channel through which Whistle-blower can make a Disclosure and which is specified in the Article 8 of the Policy.
<b>Authorized person</b>	means an authorized and assigned person from the ASG Risk Management Department or from HR Department of the Company to be responsible for the administration, and management of the investigation of the Disclosures and for the protection of the Whistle-blower's confidentiality. In a case, Disclosure is related to the employees from the ASG Risk Management Department, the authorized person shall be ASG Head of Audit or person from HR Department of the Company.  For ASG Subsidiaries operating outside of Lithuania, the Authorized person also means the employee, who is appointed by the Subsidiary's CEO, to perform the Authorized person's function.
<b>Case management registry</b>	means a register established and maintained by the Company's HR Department and ASG Risk Management Department, where all the information related to the reported Infringements and their investigation is tracked.
<b>Employee</b>	mean Company's, ASG's or its Subsidiary's former or current employees at all levels whether permanent or temporary, directors, officers, agency workers, shareholders and persons belonging to the administrative, management or supervisory body of the Company, ASG or its Subsidiary, including non-executive members, as well as volunteers and paid or unpaid trainees, volunteers, interns.
<b>Disclosure</b>	means a disclosure of information, including reasonable suspicions submitted by the Whistle-blower through the ASG whistleblowing channel about perpetrated or suspected Infringement in the Company, ASG or its Subsidiary in which the Whistle-blower works or has worked or in another organisation with which the Whistle-blower is or was in contact due to its his or her work. The Disclosure could be submitted in a free-form or by filling a specific form attached to the Policy as Appendix No. 1.
<b>Subsidiary</b>	means any corporation of which more than 50% of the outstanding voting securities are owned directly or indirectly by the ASG, by the ASG and one or more other subsidiaries, or by one or more other subsidiaries.

<b>Policy</b>	means Company's Whistleblowing Policy.
<b>Procedure</b>	means this Company's (ASG) Whistleblowing Procedure.
<b>Infringement</b>	means the criminal or administrative offense, violation of job duties or other infringements that may endanger or violate the public interest, which are in preparation to be performed or are performed and about which the Whistle-blower or anonymous becomes/became aware on the current or former of his or her work-related activities or in any other circumstances.
<b>Whistle-blower</b>	means the Employee who makes the Disclosure about perpetrated or suspected Infringement through the ASG whistleblowing channel.

## I. INTRODUCTION

1. The Company's Whistleblowing Procedure aims to define the process for investigating the Infringements reported by the Whistle-blowers through the ASG whistleblowing channel.

## II. RECEIPT OF THE DISCLOSURE

2. The Employee who has concerns about actual or potential Infringement shall provide Information on Infringement through one of the ASG Whistleblowing channels:
  - 2.1. via the online form (available at Company's website <https://airexplore.sk/air-explore/nasa-spolocnost/> or at ASG website - <https://trustline.integrityline.com/frontpage>);
  - 2.2. via secure email ([compliance@aviasg.com](mailto:compliance@aviasg.com) or [hr@airexplore.sk](mailto:hr@airexplore.sk)). In this case, the Whistle-blower shall have a right to submit the filled form (Appendix No. 1 to the Policy) or send a free form notice containing information defined in paragraph 8.2 of the Policy;
  - 2.3. personally (*tete-a-tete*) to the ASG Risk Management Department or to the HR Department of the Company. In this case, it can be suggested to the Whistle-blower:
    - 2.3.1. to file the Whistleblowing form (Appendix 1 to the Policy); or
    - 2.3.2. to record the meeting or prepare meeting minutes subject to that the Whistle-blower's written consent is received.
3. For ASG Subsidiaries operating outside of Lithuania, ASG acts as a service provider for Whistleblowing channels indicated in paragraphs 2.1 and 2.2 of this Procedure, however, do not perform any investigations as they are conducted internally in the company. Thus, when Disclosure is received through one of the ASG Whistleblowing channels indicated in paragraphs 2.1 and 2.2 of this Procedure and Authorized person identifies that the concern is related to the company, the following actions shall be done by the Authorized person:
  - 3.1. The Disclosure shall be registered in the Case management registry pursuant to the paragraph 22;
  - 3.2. The Disclosure shall be forwarded to the appointed employee of the Company for further investigation pursuant to the conditions agreed in the Service level agreement between ASG and the Company;
  - 3.3. Additional information might be requested from the Company in accordance with the Service level agreement between ASG and the Company.
4. The Whistle-blower shall be informed about the receipt of the Disclosure (not applicable to anonymous disclosure) within 2 (two) business days after the receipt of the Disclosure no later than 7 days after the receipt of the Disclosure. The acknowledgment of the receipt of the Disclosure shall be made in the following manner:
  - 4.1. If the Disclosure was submitted by email or via the online form, the confirmation shall be sent by the Authorised person, unless the Whist-blower opted to remain anonymous no later than 7 days after the receipt of the Disclosure.
  - 4.2. If the Disclosure was submitted personally:

- 4.2.1. the Authorized person in the Company shall inform the Whistle-blower by email by sending a copy of Letter of Acknowledgment (Appendix 1 to this Procedure) subject to that the Whistle-blower's email is known; or
- 4.2.2. the Authorized person in the Company shall sign and deliver in person to the Whistle-blower one copy of the Letter of Acknowledgment (Appendix 1 to this Procedure) and the other copy signed by the Whistle-blower shall remain to the Authorized person.
- 4.3. The requirement to inform the Whistle-blower about the receipt of the Disclosure shall not apply if acknowledging receipt of the Disclosure would compromise the confidentiality of the Whistle-blower.

### **III. INVESTIGATION OF THE INFRINGEMENT**

5. After the receipt of the Disclosure the Authorized person in the Company shall review the Disclosure in-depth and within 10 (ten) business days:
  - 5.1. start the investigation pursuant to paragraph 8; or
  - 5.2. refer the Disclosure to the competent institution for further investigation pursuant to paragraph 11; and
  - 5.3. in all cases, inform the Whistle-blower in writing, except the Disclosure is anonymous, about the investigation status (planned and performed investigation actions) or about the decision to refuse to start the investigation (as the case may be). For this purpose, the notification form (Appendix 2 of this Procedure) shall be used to inform the Whistle-blower.
6. The Head of ASG Risk management department (in a case, Disclosure is related to the employees from the ASG Risk Management Department - ASG Head of Audit and the Authorized person in the Company) has sole discretion (if needed after the consultation with the CEO and/or Chief Legal Officer of ASG) to decide whether any other competent employees (from Human Resource Legal, etc.) shall be involved in the investigation of the Infringement. In such case, the Head of ASG Risk management department shall forward the relevant information about the Disclosure to those employees within 2 business days after the Disclosure was received. The confidentiality of the Whistle-blower and Assistant shall be ensured and not disclosed to the competent employees, if possible. The competent employees shall participate in the investigation of the Infringement and provide all required information, however, the Head of the ASG Risk management department and the Authorized person in the Company remains an Authorized person for the investigation.
7. The Disclosures shall be submitted to protect the Company, Employees, and public interest and should be in relation to:
  - 7.1. conduct which is an offense or a breach of the law (a criminal offense has been committed or failing to comply with any other legal obligation);
  - 7.2. disclosures related to miscarriages of justice;
  - 7.3. health and safety of the public and/or other employees;
  - 7.4. damage to the environment;
  - 7.5. unauthorized use of public funds or other assets;
  - 7.6. possible fraud and corruption;
  - 7.7. neglect or abuse of clients; or
  - 7.8. other unethical conduct.
8. The Disclosure shall be accepted and the investigation opened if:
  - 8.1. Based on the Disclosure is more likely that the Infringement was, is being, or is about to be committed; and
  - 8.2. The Disclosure complies with the Disclosure requirements provided in the Whistleblowing policy.
9. The decision to refuse to accept the Disclosure and start an investigation shall be motivated. However, the Authorized person can reopen the investigation if any meaningful new information on Infringement or new legal or factual circumstances follow-up compared to a past Disclosure in respect of which the relevant decision to refuse to accept the Disclosure and investigate was concluded.
10. In case the Authorized person is unqualified to investigate the Disclosure or the Authorized person, based on received Disclosure, reasonably believes that a criminal offense, administrative offense, or other offense is very likely to occur, is taking place, or was committed, the Disclosure shall be immediately forwarded and

reviewed by ASG Legal Department to decide whether the Disclosure shall be referred to the competent institution. If that is the case, the Disclosure shall be referred to the competent institution within 2 (two) business days after the receipt of the Disclosure.

11. The Authorized person shall close the case in the Case management system, if the decision not to start an investigation or forward the information to the competent authorities has been taken.
12. During the investigation under the Disclosure, the Authorized person shall have a right:
  - 12.1. to determine the nature and scope of the investigation as well as the nature of any technical, financial or legal advice that may be required;
  - 12.2. to determine a timeframe for the investigation;
  - 12.3. to receive the necessary information and data from the Company's, ASG's or its Subsidiaries' employees;
  - 12.4. to make binding decisions necessary to ensure the proper investigation of the Infringement and confidentiality of the Whistle-blower and/or the Assistant (as the case may be);
  - 12.5. to review and collect records, information and other data within the Company, ASG or its Subsidiaries to the extent it is necessary for proper investigation;
  - 12.6. to ask the Whistle-blower to provide additional data or information or specify any other details;
  - 12.7. to meet personally with the Whistle-blower, conduct the interview (interviews can be recorded or meeting minutes prepared if the Whistle-blower agrees);
  - 12.8. to approach other departments, including within the Company, ASG and its Subsidiaries, where additional investigation might be required.
13. During the investigation the Authorized person shall:
  - 13.1. act as the main point of contact in the matter and be responsible for keeping the Whistle-blower up-to-date on the outcome of the investigation carried out and any actions taken as a result of the investigation no later than 90 days after receipt of the Disclosure;
  - 13.2. to review and collect internal records, systems, and data;
  - 13.3. to conduct interviews with Whistle-blower (such interviews can be recorded or protocol prepared if the Whistle-blower agrees), witnesses to the Infringement, and possible participants;
  - 13.4. to approach other departments, including within ASG and its subsidiaries, where additional investigation might be required.
14. If there are any concerns (from the Whistle-blower or other sources of information) that the rights of the Whistle-blower (as defined in Chapter 7 of the Policy) might be violated, the Authorized person shall immediately escalate this to the Head of the Risk Management Department, who must initiate relevant measures to address possible violations of the Whistle-blower rights.
15. The Authorized person shall save all the data collected when investigating the Infringement. The data shall be saved in a password-protected folder for each Disclosure (by indicating the assigned reference number of the Disclosure) and can be accessible only to an Authorized person who is investigating the case.
16. The data related to the Infringement shall be kept during the investigation of the Infringement. The longer retention period shall be determined pursuant to the nature of the Infringement, i.e. whether it is a civil, administrative, or criminal infringement, in order to protect the above-mentioned interests of the Company. However, the data shall be stored in any case for the period not exceeding 5 (five) years from the date of the last decision or action made while investigating the Disclosure.

#### **IV. OUTCOMES OF THE INVESTIGATION**

17. The Authorized person shall complete the investigation within 3 (three) months (90 days) after the Whistle-blower's Disclosure receipt and:
  - 17.1. declare that the Infringement has been committed or was likely to be committed and decide on disciplinary actions against employees involved in the Infringement, compensate losses, conduct training, etc., and, if needed, escalate the decision to other units (Legal, HR, CEO, etc.) for taking necessary actions; or

- 17.2. declare that the Infringement has not been committed;
  - 17.3. prepare an internal report consisting of the summary of the investigation, proposed mitigative actions and other relevant information;
  - 17.4. inform the Whistle-blower about the decision taken, the results of the investigation, and the actions taken or anticipated to be taken in writing (not applicable to anonymous reporting or if the Whistle-blower refused to provide contact details).
18. The Authorized person shall initiate preventive measures to mitigate future risks based on the observation of the Investigation thereof. The director of the Company, ASG or its Subsidiary and other responsible persons shall be informed about such measures in order to implement them.
  19. Following the completion of the investigation and actions named in paragraphs 18 and 19, the Authorized person shall close the case in the Case management registry.

#### **V. CASE MANAGEMENT REGISTRY**

20. Authorized person shall ensure that all actions related to the receipt of the Disclosure and the investigation of the Disclosure are tracked and logged in the Case management registry with an indication of the status.
21. Despite the ASG whistleblowing channel used by the Whistle-blower to report the Infringement, all received Disclosures shall be registered into the Case management registry by the person who receives the Disclosure within 24 hours (during business days) after the receipt thereof.
22. All received Disclosures shall be logged into the Case management registry with the reference number of the Disclosure. The Authorized person shall assign the reference number manually when registering the received Disclosure in the Case management registry.

#### **VI. CONFIDENTIALITY**

23. The Authorized person shall ensure that the identity of the Whistle-blower and the Assistant (as the case may be) remains confidential at all times despite the ASG Whistleblowing channel used and the outcome of the investigation unless Applicable laws require otherwise. The confidentiality of the Whistle-blower and the Assistant (as the case may be) shall be ensured from the moment the Disclosure is received.
24. The Authorized person is not required to ensure the confidentiality of the Whistle-blower and/or Assistant, if:
  - 24.1. the Whistle-blower or Assistant requests that in writing; or
  - 24.2. the Whistle-blower or Assistant makes an allegation that is knowingly to be false at the time of its submission; or
  - 24.3. such information is publicly known or in the public domain prior to the time of disclosure.

#### **VII. OTHER PROVISIONS**

26. In case the Infringement occurred, or the investigation is performed in other jurisdiction than Company is established, any local Applicable laws in relation to whistleblowing, implementation of the Policy and this Procedure shall be applied.