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Date: June 2025	Date: June 2025	Date: June 2025

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CHANGE LOG

Revision	Date	Change
01	12/23	Initial Draft
02	03/25	Policy Update
03	06/26	Inclusion of explicit references to the concept of harmful conduct and conceptual clarifications recommended by the AIPI

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1. AIR EUROPA HOLDING'S POLICY ON THE INTERNAL REPORTING SYSTEM AND WHISTLEBLOWER PROTECTION

Law 2/2023, dated February 20, regulating the protection of persons who report regulatory violations and the fight against corruption (hereinafter, Law 2/2023) transposes into Spanish law Directive 2019/1937 of the European Parliament and of the Council, of October 23, 2019, on the protection of persons who report breaches of Union law. The Directive uses the term "whistleblower," and Law 2/2023 has opted for the designation "whistleblower" and, consequently, this is the term also used in this document by Air Europa Holding (hereinafter, "Air Europa" or "the organization") and its constituent companies (Air Europa Holding, Air Europa Líneas Aéreas, Aeronova, and Air Europa Suma Miles).

Law 2/2023 explains and clarifies in its preamble that its purpose is to protect, against possible retaliation, individuals who, in a work or professional context, detect serious or very serious criminal or administrative violations and report them through the mechanisms regulated therein. This Law applies exclusively to the aforementioned violations.

In accordance with Law 2/2023, the organization, as a regulated entity, must have a dedicated channel for receiving and managing reports regarding the violations covered by the law, known as the "Internal Reporting System" or Ethics Channel. Furthermore, the law requires the adoption of a policy establishing the general operating principles of the system and protective measures for whistleblowers; therefore, Air Europa Holding has approved the Policy on the Internal Reporting System and Whistleblower Protection (hereinafter, the Policy).

Furthermore, this Policy forms part of the compliance culture established within our Organization.

The Board of Directors of Air Europa promotes and approves this Policy, thereby fulfilling its role of establishing the necessary foundations for the proper and efficient management of the Internal Reporting System and promoting compliance with the principles and safeguards set forth in this Policy.

2. PRINCIPLES GOVERNING AIR EUROPA'S ACTIONS IN IMPLEMENTING THE INTERNAL REPORTING SYSTEM AND WHISTLEBLOWER PROTECTION

The basic principles of action upon which this Policy is based are as follows:

- **Regulatory Compliance:** Legality and corporate ethics are integral pillars of the System. Therefore, communications will be handled with integrity and professionalism, in compliance with applicable laws, internal regulations, and, in particular, data protection regulations.
- **Independence and Impartiality:** The System will guarantee an impartial hearing and fair treatment for all individuals involved. All persons participating in the proceedings will act in good faith in the pursuit of the truth and the clarification of the facts.
- **Transparency and accessibility:** Care will be taken to ensure that information about the System and its regulations is communicated clearly and comprehensibly, and that the System is publicized and accessible.
- **Traceability and security:** The System will incorporate all necessary measures to

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ensure the integrity, traceability, and security of the information.

- **Confidentiality and Anonymity:** The System will guarantee the anonymity and, in any case, the utmost confidentiality of the whistleblower's identity, the information reported, and the actions taken in the management and processing of such information. Furthermore, the System will allow for the submission of anonymous reports.
- **Confidentiality:** The System will ensure that individuals involved in the processing and investigation of reports act with the utmost discretion regarding the facts of which they become aware by virtue of their position or role.
- **Diligence and Speed:** The System will ensure that the investigation and resolution of reported incidents are handled with due professionalism and diligence and without undue delay, so that the process can be completed in the shortest possible time while respecting due process.
- **Good faith:** The System will ensure that information is communicated honestly, with integrity, and truthfully, notwithstanding any inaccuracies or omissions that the informant may unintentionally make.
- **Respect for and protection of individuals:** The System will ensure that appropriate measures are taken to guarantee the right to protection of the dignity and privacy of the individuals concerned.
- **Respect for fundamental rights:** The System guarantees the right to information, the right to privacy and data protection, the right to a defense, the right to be heard, the right to the presumption of innocence, and the right to honor for all individuals involved in the proceedings. Furthermore, these individuals have the right to be heard at any time, in the manner deemed appropriate, to ensure the successful conclusion of the investigation.
- **Principle of Prohibition of Retaliation or Adverse Actions Against the Whistleblower (Harmful Conduct)**
- **Principle of Objectivity, Neutrality, and Integrity**

The principles underlying this Policy apply to all entities that make up AIR EUROPA.

In implementing the Internal Reporting and Whistleblower Protection System, Air Europa designates the Compliance Officer as the System Manager, ensuring that cases are resolved promptly while guaranteeing continuous operation, an objective and multidisciplinary review of the information, and compliance with legally established deadlines.

Air Europa will ensure, through the independent actions of the System Administrator, the completeness, integrity, and confidentiality of the information; the prevention of unauthorized access; the long-term storage of the information; the comprehensive protection of the whistleblower; and respect for good faith. To this end, in addition to the provisions of this document, the aforementioned principles will be incorporated into the information management procedure required by Law 2/2023, which the System Administrator must follow when reviewing the information received. Access to the Ethics Channel or Internal Reporting System is public and available via the following link:

<http://aireuropa.canaletico.es/>

Air Europa will also ensure, by respecting the independent role of the System Administrator, objectivity and impartiality in the review of the information received ; it will avoid conflicts of interest; it will respect the presumption of innocence; and it will guarantee the right to a defense. These principles will likewise be incorporated into the information management procedure, which is public and accessible on the Air Europa website.

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Air Europa ensures access to the internal whistleblower reporting and protection system through an external technology platform, the purpose of which is to receive, process, record, and retain the actions taken as a result of reports submitted by whistleblowers.

3. PERSON RESPONSIBLE FOR AIR EUROPA'S INTERNAL REPORTING SYSTEM

The Head of the Internal Reporting System (hereinafter, RSII or System Head) is the Compliance Officer.

The RSII may delegate the authority to manage and conduct investigative proceedings to a member of the Compliance Department, who shall be considered a delegated manager.

In the performance of their duties, neither the RSII nor the person designated by the RSII shall receive instructions from any superior at Air Europa, nor are they subject to any external hierarchy of said collegiate body, nor may they be removed from their positions for matters related to their legitimate participation in the Internal Reporting System. Therefore, they must perform their duties independently, impartially, and autonomously, with the executive authority to decide on the actions to be taken upon learning of evidence of any alleged criminal act that may have criminal consequences or any other type of consequences for the Organization. Likewise, the Compliance Officer has the authority to report alleged criminal acts to the Board of Directors whenever deemed necessary and, in any case, when such acts could seriously affect the Organization's reputation or Air Europa's corporate interests.

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4. ESTABLISHMENT OF AIR EUROPA'S INTERNAL REPORTING CHANNEL

Air Europa has established an internal channel to receive reports/communications (hereinafter, CII) regarding actions or omissions that may constitute a serious or very serious criminal or administrative offense, as well as other acts provided for in Article 2 of Law 2/2023, which are listed in Section 5.2. The scope of this document includes all situations that violate Air Europa's Code of Ethics, its Anti-Corruption Policy, or any other applicable internal or external regulations.

The channel is administered by the RSII. Access to this channel shall be limited, within the scope of their responsibilities and functions, to:

- The System Manager (Compliance Officer) and the designated manager.
- The Director of Human Resources or a duly designated representative from that department, only when disciplinary action against an employee may be warranted.
- The external investigating expert, if applicable.
- The Data Protection Officer.
- The head of the entity's legal department or the person performing those functions internally, if legal action is warranted in connection with the facts described in the report.

The CII must technically ensure the confidentiality or, where applicable, the anonymity of the whistleblower, to protect them from any leaks and subsequent retaliation and/or harmful conduct to which they may be subjected.

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5. WHO CAN BE A WHISTLEBLOWER, AND WHAT KIND OF INFORMATION DOES AIR EUROPA'S INTERNAL REPORTING SYSTEM COVER?

5.1 Eligibility

Individuals who have an employment or professional relationship with Air Europa may use the internal reporting channel and benefit from the protection granted by Law 2/2023 as whistleblowers to report information regarding the actions or omissions described in Article 2 of Law 2/2023. This employment or professional relationship, which entails a dependency on Air Europa, is what makes special protection against possible retaliation or harmful conduct necessary and appropriate.

In any case, for the purposes of Law 2/2023, Air Europa considers the following to be whistleblowers:

- a) Individuals who are employees of Air Europa.
- b) Self-employed individuals who currently carry out, or have previously carried out, professional activities with Air Europa.
- c) Shareholders, equity holders, and members of Air Europa's board of directors, executive management, or supervisory board, including non-executive members.
- d) Any person working for or under the supervision and direction of Air Europa's contractors, subcontractors, and suppliers.
- e) Whistleblowers who report or publicly disclose information regarding violations obtained in the course of an employment or statutory relationship with Air Europa that has already ended, as well as volunteers, interns, and trainees—regardless of whether they receive compensation—and those whose employment relationship has not yet begun, in cases where the information regarding violations was obtained during the selection process or pre-contractual negotiations.

5.2 Scope

With regard to the subject matter of the information, natural persons who report any of the following matters are protected:

- a) Any acts or omissions that may constitute violations of European Union law, provided that:
 - 1. They fall within the scope of the European Union acts listed in the annex to Directive (EU) 2019/1937 of the European Parliament and of the Council of October 23, 2019, on the protection of persons who report violations of European Union law, regardless of how such acts are classified under domestic law;
 - 2. They affect the financial interests of the European Union as set forth in Article 325 of the Treaty on the Functioning of the European Union (TFEU); or
 - 3. Affect the internal market, as set forth in Article 26(2) of the TFEU, including violations of European Union rules on competition and state aid, as well as violations relating to the internal market concerning acts that infringe the rules of the on corporate income tax or practices intended to obtain a tax advantage that undermines the object or purpose of the legislation applicable to corporate income tax.

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b) Acts or omissions that may constitute a serious or very serious criminal or administrative offense. In any case, this shall be understood to include all serious or very serious criminal or administrative offenses that result in financial loss to the Treasury and to Social Security.

Furthermore, as set forth in Law 2/2023 itself, cases governed by specific regulations are excluded from the scope of application; that is, regulations governing the mechanisms for reporting violations and protecting whistleblowers as provided for by sector-specific laws or by the European Union instruments listed in Part II of the Annex to Directive (EU) 2019/1937.

Matters relating to potential harassment situations, regardless of their nature and given their criminal nature and the potential implications for the company's criminal liability, will be handled in accordance with Air Europa's existing Harassment Protocol, following the deadlines specified in said Protocol. Similarly, the team responsible for implementing the Harassment Protocol must maintain constant communication with the System Manager, to whom it must report in writing on all matters related to the case, from its initiation until its closure.

Furthermore, this internal reporting channel is not the appropriate avenue for expressing dissatisfaction or disagreement with the criteria established by Air Europa in the legitimate exercise of its functions. Nor is it the appropriate channel for reporting on equal employment opportunities, labor disputes, or employee complaints related to issues such as work schedules, vacation time, salaries, etc. These matters should be referred to the People or Human Resources department, which is the appropriate department to handle them.

Finally, any customer complaints should not be submitted through this internal channel either; rather, they should be redirected to the Customer Service department of the relevant division for resolution, noting that the System Administrator is not responsible for these matters.

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6. PROTECTION OF PERSONAL DATA

The processing of personal data arising from the application of Law 2/2023 shall be governed by the provisions of the GDPR and Organic Law 3/2018 of December 5 on the Protection of Personal Data and the Guarantee of Digital Rights (LOPDPGDD).

The internal reporting system prevents unauthorized access, protects the identity of, and ensures the confidentiality of data pertaining to the individuals concerned and any third parties mentioned in the information provided—particularly the identity of the whistleblower, if he or she has been identified. The identity of the whistleblower may only be disclosed to the judicial authority, the Public Prosecutor’s Office, or the competent administrative authority in the context of a criminal, disciplinary, or sanctioning investigation, and such cases shall be subject to the safeguards established in applicable regulations.

Under no circumstances will personal data that is not necessary for the examination and investigation of the acts or omissions be stored or processed; such data will be immediately deleted, where applicable. Likewise, all personal data that may have been disclosed and that relates to conduct not covered by the scope of the Whistleblower Protection Act will be deleted.

If the information received contains special categories of personal data subject to special protection, such data will be immediately deleted, unless the processing is necessary for reasons of substantial public interest in accordance with the provisions of Article 9.2.g) of the GDPR, as provided for in Article 30.5 of Law 2/2023.

In any case, personal data whose relevance to processing specific information is not evident will not be collected; if such data is collected by accident, it will be deleted without undue delay.

Communications that have not been acted upon may only be retained in anonymized form, and the blocking obligation provided for in Article 32 of the LOPDPGDD shall not apply.

The data subject to processing may be retained in the information system only for the time strictly necessary to determine whether to initiate an investigation into the reported facts. If it is established that the information provided, or part thereof, is untrue, it must be immediately deleted as soon as such a circumstance is confirmed, unless such falsehood constitutes a criminal offense, in which case the information will be retained for as long as necessary while the legal proceedings are ongoing.

In any case, if three months have elapsed since the receipt of the report without any investigative proceedings having been initiated, the information must be deleted, unless the purpose of retention is to provide evidence of the system’s operation. Reports that have not been acted upon may only be retained in anonymized form.

The maximum data retention period in any case is 10 years.

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7. MEASURES FOR PROTECTION FOR WHISTLEBLOWER AND AFFECTED PERSONS

7.1 Acts Constituting Retaliation and/or Harmful Conduct

Acts constituting retaliation and/or harmful conduct, including threats of and attempts at such acts against individuals who file a report in good faith in accordance with the provisions of the law, are expressly prohibited.

Retaliation and harmful conduct are understood to mean any act or omission that is prohibited by law, or that, directly or indirectly, constitutes unfavorable treatment that places the persons subjected to it at a particular disadvantage compared to others in the workplace or professional context, solely because of their status as whistleblowers or because they have made a public disclosure.

For the purposes of Law 2/2023, and by way of example, the following are considered retaliation and harmful conduct:

- a) Suspension of the employment contract, dismissal, or termination of the employment or statutory relationship, including the non-renewal or early termination of a temporary employment contract after the probationary period has ended, or early termination or cancellation of contracts for goods or services; the imposition of any disciplinary measure; demotion or denial of promotions; and any other substantial modification of working conditions; and the failure to convert a temporary employment contract into a permanent one, if the employee had legitimate expectations that he or she would be offered permanent employment; unless these measures are carried out within the regular exercise of managerial authority under labor law or regulations governing the status of public employees, based on proven circumstances, facts, or violations, and unrelated to the submission of the complaint.
- b) Intimidation, harassment, or ostracism.
- c) Negative evaluations or references regarding work or professional performance.
- d) Inclusion on blacklists or the dissemination of information within a specific sector that hinders or prevents access to employment or the awarding of contracts for works or services.
- e) Denial or revocation of a license or permit.
- f) Denial of training.
- g) Discrimination, or unfavorable or unfair treatment.

All of the above applies unless these measures are carried out within the regular exercise of managerial authority under labor law, due to proven circumstances, events, or violations, and unrelated to the submission of the report.

In the event of retaliation or any other harmful conduct, the Head of the Internal Reporting System must be notified immediately. The Head of the System will conduct an investigation and periodically monitor the situation of the whistleblower and, where applicable, of those individuals covered by the protection program. If the System Manager determines that, during the term of the protection program, retaliation, harmful conduct, stigmatization, or harassment has occurred, in addition to any disciplinary measures and/or administrative sanctions that may apply to the perpetrators, the necessary and available measures will be taken to restore the

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affected individual to the situation they were in prior to the harm suffered.

Any person whose rights are infringed upon as a result of a communication or disclosure made after the two-year period has elapsed may request protection from the competent authority, which, in exceptional and justified cases, may extend the protection period after hearing the persons or bodies that may be affected.

Administrative acts intended to prevent or hinder the submission of reports and disclosures, as well as those that constitute retaliation or result in discrimination following the submission of such reports and disclosures under Law 2/2023, shall be null and void and shall give rise, where appropriate, to disciplinary or liability measures, which may include the corresponding compensation for damages to the aggrieved party.

7.2 Measures to Protect Whistleblowers from Retaliation or Harmful Conduct

Persons who report information regarding the acts or omissions set forth in paragraph 3, or who make a public disclosure in accordance with Law 2/2023, shall not be deemed to have violated any restriction on the disclosure of information and shall not incur any liability whatsoever in connection with such report or public disclosure, provided that they had reasonable grounds to believe that the communication or public disclosure of such information was necessary to reveal an act or omission under said law, all without prejudice to the provisions of the specific protection rules applicable in the workplace. This measure shall not affect criminal liabilities.

The provisions of the preceding paragraph extend to the communication of information by employee representatives, even if they are subject to legal obligations of confidentiality or non-disclosure of confidential information. All of this is also without prejudice to the specific protection rules applicable in the workplace.

Whistleblower protection measures shall also apply, where appropriate, to:

- 1) individuals who, within the framework of Air Europa, assist the company in the process;
- 2) individuals who are related to the whistleblower and who may be subject to retaliation or harmful conduct, such as the whistleblower's coworkers or family members; and
- 3) a legal entity for which the whistleblower works, with which the whistleblower has any other type of relationship in a work context, or in which the whistleblower holds a significant interest. For these purposes, an interest in the capital or in the voting rights corresponding to shares or equity interests is considered significant when, due to its proportion, it allows the person holding it to exert influence over the legal entity in which the interest is held.

Whistleblowers shall not be held liable for the acquisition of or access to information that is reported or publicly disclosed, provided that such acquisition or access does not constitute a crime.

Any other potential liability of whistleblowers arising from acts or omissions that are not related to public communication or disclosure, or that are not necessary to disclose a violation under Law 2/2023, shall be enforceable in accordance with applicable regulations.

In proceedings before a court or other authority concerning harm suffered by whistleblowers, once the whistleblower has reasonably demonstrated that he or she has reported or made a public disclosure in accordance with Law 2/2023 and has

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suffered harm, it shall be presumed that the harm resulted from retaliation or harmful conduct in response to the report or public disclosure. In such cases, the burden of proof shall rest with the person who took the harmful action to demonstrate that such action was based on duly justified grounds unrelated to the report or public disclosure.

In legal proceedings, including those relating to defamation, copyright infringement, breach of confidentiality, violation of data protection regulations, disclosure of trade secrets, or claims for compensation based on

labor or statutory law, whistleblowers shall not incur any liability whatsoever as a result of communications or public disclosures protected by Law 2/2023. Such persons shall have the right to assert, in their defense and within the framework of the aforementioned legal proceedings, that they made a communication or public disclosure, provided they had reasonable grounds to believe that the communication or public disclosure was necessary to bring to light a violation under Law 2/2023.

7.3 Measures for the Protection of Affected Individuals

During the processing of the case, individuals affected (under investigation) by the report shall have the right to the presumption of innocence, the right to a defense, and the right to access the case file under the terms set forth in Law 2/2023, as well as the effective protection of their rights. The person under investigation shall be entitled to the same protections established for whistleblowers, with their identity protected and the confidentiality of the facts and details of the proceedings guaranteed. The presumption of innocence and the right to honor and privacy of the affected person shall be guaranteed at all times and under all circumstances.

Individuals who have been reported through the Channel may never be penalized based solely on a report; in all cases, the veracity of the report must first be verified, and the individuals involved must be given the opportunity to provide an explanation regarding the reported situation.

In order to guarantee the affected person's right to a defense, they may be heard when the Organization so determines, and they will be informed of the possibility of appearing with legal counsel and of presenting whatever evidence they deem appropriate and relevant.

8. HANDLING OF INFORMATION RECEIVED BY THE OFFICER IN CHARGE OF AIR EUROPA'S INTERNAL REPORTING SYSTEM

Information may be reported to Air Europa anonymously. Otherwise, the identity of the whistleblower will be kept confidential and will be known only to Air Europa's RSII and the person delegated by the RSII.

Information will be reported through the ethics channel available via the following link: <http://aireuropa.canaletico.es/>, accessible from the Air Europa website, as well as via email at canaletico@aireuropa.com. The online platform allows for both written and verbal reports. Any information received by Air Europa through any other means that relates to the scope of Law 2/2023 will be forwarded to the ethics channel administered by the Head of Air Europa's Internal Reporting System.

At the whistleblower's request, the report may also be submitted through an in-person meeting, by videoconference, or by telephone with the Head of the Internal Information System (RSII) or a designated representative from the Compliance Department, which will take place within a maximum of seven days.

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Where applicable, the whistleblower will be notified that the communication will be recorded and will be informed of the processing of their data in accordance with the provisions of the GDPR and the LOPDPGDD.

When submitting the information, the whistleblower must provide an address, email address, or secure location for the purpose of receiving notifications, unless they expressly waive the right to receive any communication regarding actions taken by the RSII as a result of the information.

In the case of verbal communications, including those made during in-person meetings, the RSII must document them in one of the following ways:

- a) By recording the conversation in a secure, durable, and accessible format, or,
- b) through a complete and accurate transcript of the conversation prepared by the staff responsible for handling it.

Without prejudice to the rights to which the informant is entitled under personal data protection regulations, the informant will be given the opportunity to verify, correct, and sign to confirm the transcript of the message.

Once the information has been submitted, it will be recorded in the information management system by assigning an identification code. This information will be stored in a secure database with access restricted exclusively to duly authorized Air Europa RSII personnel, where all received communications will be recorded with the following details:

- a) Date of receipt
- b) Identification code
- c) Actions taken
- d) Measures taken
- e) Closure date

Upon receipt of the information, within a period not exceeding 7 calendar days from such receipt, an acknowledgment of receipt will be sent to the whistleblower, unless the whistleblower has expressly waived the right to receive communications regarding the investigation or unless Air Europa's RSII reasonably determines that acknowledging receipt of the information would compromise the protection of the whistleblower's identity.

Once the information has been recorded, the RSII will assess its admissibility in accordance with the substantive and personal scope set forth in Articles 2 and 3 of Law 2/2023. The resolution of the investigation may not exceed three months from the date of the acknowledgment of receipt of the report or, if no acknowledgment of receipt was sent to the whistleblower, three months from the expiration of the seven-day period following the submission of the report, except in cases of particular complexity, in which the investigation may be extended for up to an additional three months.

Likewise, all stakeholders of the Organization have at their disposal external regional, national, and European channels, including the Independent Whistleblower Protection Authority (A.A.I.), in accordance with Law 2/2023. However, the internal reporting channel is established as the preferred means for reporting potential violations, ensuring effective and confidential handling. Specifically, as of the date of this policy's publication:

1. Catalan Anti-Fraud Office via the following [link](#)
2. Andalusian Office Against Fraud and Corruption via the following [link](#)

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3. Agency for the Prevention and Combating of Fraud and Corruption of the Valencian Community - [link](#)
4. Galician Authority for the Protection of Whistleblowers - [link](#)
5. Transparency and Data Protection Council of the Community of Madrid: canalexternoinformantecm@madrid.org
6. AIPI - Independent Whistleblower Protection Authority - [link](#)
7. Independent Authority on Corruption in Castile and León - [link](#)
8. Regional Council for Transparency and Good Governance of Castile-La Mancha

9. TRAINING AND OUTREACH

The content of this policy will be included among the training topics linked to AIR EUROPA's criminal risk prevention training plan, as well as in any additional outreach initiatives determined from time to time.

This Policy, which forms part of Air Europa's Compliance System, will be published on Air Europa's corporate website and on the corporate intranet. It will also be sent to all employees of the companies listed above and communicated, to the extent applicable, to third parties with whom Air Europa does business.

In any case, the intake process and subsequent actions will be carried out in accordance with the information management procedure adopted for this purpose by Air Europa.

10. DISCIPLINARY PROCEDURES

Failure to comply with the provisions of this policy may result in the imposition of disciplinary sanctions (including disciplinary dismissal) or in appropriate actions depending on the relationship the offending individual has with AIR EUROPA.

11. APPROVAL, PUBLICATION, AND ENTRY INTO FORCE OF THE POLICY

The Board of Directors, as Air Europa's highest governing body, is responsible for implementing the Internal Reporting System and overseeing this Policy.

This Policy was approved by Air Europa's governing body on October 25, 2023, and took effect immediately; it will remain in force until any amendments are made, which will be duly communicated.

This Policy will be reviewed, updated, approved, and disseminated periodically and whenever it is necessary to make any changes. Any changes made will also be published on the Air Europa website.

Once approved by Air Europa's governing body, it will be implemented through a system management procedure and communication channels.

12. INTERPRETATION OF THIS POLICY

The provisions of this Policy constitute the minimum regulations applicable to all companies

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in which Air Europa Holding holds a majority stake, without prejudice to applicable law. The Principles and Guarantees are intended as interpretive guidelines. However, in the event of a conflict between this Policy and the law, the law shall always prevail.