GOVERNANCE AND COMPLIANCE

Whistleblowing

Official document of Air Corporate Srl, private aviation operator since 1999.

You never fly alone.

LAST UPDATED

18 November 2026

ONLINE VERSION

aircorporate.it/en/whistleblowing-en

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Air Corporate Srl has established an internal reporting channel pursuant to Legislative Decree No. 24 of 10 March 2023, which transposes Directive (EU) 2019/1937 on the protection of persons who report breaches of Union law and of national laws and regulations. This page summarises who may report, what may be reported, how and with what protections; the operational details are set out in the company Whistleblowing Procedure.

1. Who may report

Reports may be made by persons working within the work-related context of Air Corporate: employees and self-employed workers, collaborators, freelance professionals and consultants, volunteers and trainees, shareholders and persons with administrative, management, control or supervisory functions, including where the relationship has not yet begun, is in its probationary period or has already ended.

2. What may be reported

Conduct, acts or omissions that harm the public interest or the integrity of Air Corporate, of which the reporting person has become aware in the work-related context, including:

- administrative, accounting, civil or criminal offences;
- breaches of European Union law in the areas indicated by the decree, including transport safety, protection of the environment, consumer protection, protection of privacy and personal data, security of network and information systems, and competition;
- unlawful conduct relevant under Legislative Decree 231/2001 and breaches of the Organisation, Management and Control Model, where adopted.

Disputes, claims or requests of a personal nature relating exclusively to one's own employment relationship or to relations with colleagues and superiors fall outside the scope of the procedure.

Reports relating to flight safety and occurrences to be reported under Regulation (EU) No 376/2014 continue to follow the channels provided for by the Safety Management System.

3. How to report

Reports may be made:

- in writing, including by electronic means, through the channel indicated below, which guarantees the confidentiality of the reporting person's identity;
- orally, at the request of the reporting person, by means of a face-to-face meeting with the report handler, scheduled within a reasonable time.

Internal reporting channel: Access the reporting channel (https://wb-portal-client.edok.it/?companyCode=c9804191-3cfa-46ff-9067-7c98f964c635). Access arrangements, the person handling reports and operating instructions are set out in the Whistleblowing Procedure, available on this page and communicated to staff.

Privacy notice for whistleblowing reports

The report should be detailed and should indicate, where known, the facts, the period, the persons involved and any supporting documents. Anonymous reports are also accepted and will be dealt with if sufficiently detailed.

4. Handling of the report

The report is received and handled by an autonomous and specifically trained person or body, which:

- issues an acknowledgement of receipt to the reporting person within 7 days;
- maintains communication with the reporting person and may request additional information;
- follows up on the report and provides feedback within 3 months from the date of the acknowledgement of receipt.

5. Confidentiality and prohibition of retaliation

The identity of the reporting person and of any other person involved, and any information from which it may be inferred, may not be disclosed, without the express consent of the reporting person, to persons other than those competent to receive or follow up on the report.

Any form of retaliation against the reporting person and persons connected with him or her (facilitators, colleagues, relatives, entities owned by him or her) is prohibited. Retaliatory acts are null and void. The protections apply if, at the time of reporting, the reporting person had reasonable grounds to believe that the information reported was true. Criminal and disciplinary liability remains unaffected in the case of reports made with wilful misconduct or gross negligence.

6. ANAC external channel and public disclosure

The reporting person may contact ANAC – Italian National Anti-Corruption Authority (www.anticorruzione.it) if the internal channel is not active or not compliant, if the internal report has not been followed up, if he or she has reasonable grounds to believe that an internal report would not be effectively followed up or would give rise to a risk of retaliation, or if the breach may constitute an imminent or manifest danger to the public interest. Under the conditions laid down in Art. 15 of the decree, public disclosure is also possible.

7. Processing of personal data

The personal data contained in reports are processed by Air Corporate Srl, as controller, solely in order to handle the report and to fulfil the obligations under Legislative Decree 24/2023 (Art. 6(1)© GDPR), in compliance with the principles of data minimisation and confidentiality. Data that are manifestly not useful are erased immediately. Reports and the related documentation are retained for the time necessary for their handling and in any event for no longer than 5 years from the communication of the final outcome. The rights provided for by Arts. 15–22 GDPR may be restricted pursuant to Art. 2-undecies of the Privacy Code in order to protect the confidentiality of the reporting person. For further information, please refer to the Privacy Notice.

The version published on the website at the date of consultation prevails. aircorporate.it/en/whistleblowing-en · Last updated: 18 November 2026

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You never fly alone.

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