

Information about the Internal Whistleblowing System ERA a.s. – Protection of Whistleblowers

The company ERA a.s. (hereinafter referred to as the “Company”) is obligated to enable individuals to safely report violations of Union law and subsequently provide them with protection against any retaliatory measures from employers or other entities. This is based on the Directive of the European Parliament and of the Council (EU) 2019/1937 of 23rd October 2019 on the protection of persons who report violation of Union law (hereinafter referred to as the “Directive”), and the Act No. 171/2023 Coll., on the protection of whistleblowers, as amended (hereinafter referred to as the “Law”).

The Company has implemented a system that allows for both anonymous and non-anonymous reporting of conflict of interest, potential unethical or unlawful actions by the company’s employees, business partners or suppliers in contractual relationship with the Company of which the whistleblower became aware in connection with work or similar activities. All reports will be investigated by the company according to the internal regulations.

Work or similar activities include:

- employment,
- service,
- self-employed work,
- performance of rights associated with participation in a legal entity
- legal performance related to participation of a member of the authority of a legal person who is elected, appointed or otherwise designated (so-called “elected authority”),
- administration of trust fund,
- volunteer work,
- professional practice, internship or
- performance of rights and obligations arising from a contract whose subject is the provision of supplies, services, construction works or similar work.

The areas related to reported unlawful conduct are specified in § 2 of Act No. 171/2023 Coll., on the protection of whistleblowers, as amended.

Important terms to the Law:

- Report – notification made by the whistleblower about a suspicious fact.
- Whistleblower – a person making a report according to the Directive on dealing with reports of the Company.
- Competent person (resolver) – the person who receives the report, reviews it and proposes emergency measures.
- Obligated person – an employee of the Company, including employees temporarily assigned to work for the Company, members of the Company’s body, other persons performing work for the Company and any other natural and juridical persons cooperating with the Company

based on a contractual relationship and their employees, members of the bodies and other cooperating persons.

- Protection of the whistleblower – according to the Law, the whistleblower may not be subjected to any retaliatory measures in connection with the report.

Content of the report

The report should be as specific as possible and should contain all known facts. It is important to provide an accurate description of the place and time when the incident or event causing the report occurred, information about potential witnesses and any other details that would accurately specify the description of the situation.

Anonymous report

Reports can be made anonymously. An anonymous report is one in which the whistleblower does not provide their name, surname or other identifying information. In the case of anonymous reporting, it is recommended to include a phone number or e-mail address through which the whistleblower can be contacted while maintaining anonymity. Failure to contact the whistleblower may negatively affect the investigation of the report.

Deadlines for handling reports

The resolver of the report will judge the validity of the report within 30 days of its receipt. In complex factual or legal cases the resolver may extend this period by up to 30 days, at most twice; in such case the resolver must inform the whistleblower of the extension of the deadline and the reasons for it before the expiration of the original deadline. If the report is found to be valid, there will be an assigned person who will ensure corrective measures. Reports submitted in writing will be kept in evidence for 5 years from the date of receipt.

Outcome of the investigation

The competent person will prepare a report on the progress and results of the investigation. If the investigation confirms the suspicion mentioned in the report, the report will also include a proposal for measures to be taken.

If the resolver finds that the report contains committing a crime, the report will be immediately forwarded to the competent authority in criminal proceedings to deal with it.

If the resolver finds that the report contains committing an administrative offence, the report will be immediately forwarded to the administrative authority competent to deal with it.

Where and how to make a report

1. **Personal report** to the competent person of the company at: Průmyslová 462, 530 03 Pardubice.
2. Through the **web form** available here - <http://www.nntb.cz/c/erapardubice>.
3. Via **e-mail** at: oznamovatel@era.aero.

4. Via **data box** of the Company ID – qiedxkr.
5. **In writing** to the address: WHISTLEBLOWER – DO NOT OPEN . ERA a.s., Průmyslová 462, 530 03, Pardubice.
6. **By phonecall** at phone number: +420 467 004 143 or +420 467 004 159, during working hours from 9:00 to 14:30.
7. The whistleblower can also make a report through an **external reporting system** established by the Ministry of Justice.

Competent persons of submitted reports

In accordance with the transposition proposal of the Directive of the European Parliament and of the Council (EU) 2019/1937 of 23rd October 2019 on the protection of persons who report violations of the Union law, ST NO. 1150, and based on Act No. 171/2023 Coll., on the protection of whistleblowers, as amended, the competent persons responsible for receiving and handling reports have been designated affective from 1st August 2023. The competent persons are listed below. The competent persons will receive reports, communicate with the whistleblowers, keep records and handle the reports.

Competent person

Name and Surname	Mgr. Tereza Kučerová
Email:	oznamovatel@era.aero
Phone.:	+420 467 004 114
Address:	Průmyslová 462, 530 03 Pardubice

Competent person

Name and Surname	Mgr. Tomáš Kužel, DiS.
Email:	oznamovatel@era.aero
Phone:	+420 467 004 159
Address:	Průmyslová 462, 530 03 Pardubice

Processing of Personal Data

The Company processes personal data of whistleblowers and affected persons who are mentioned in the report as persons to whom the violation of legal regulations is attributed or with whom they are associated. Additionally, the Company processes personal data of intermediaries and other individuals (witnesses of reported unlawful activities etc.). The legal basis for processing the personal data of these individuals is to fulfil the legal obligations of the data controller as per Article 6 paragraph 1 letter c) of the GDPR. Special categories of personal data, as defined in Article 9 paragraph 1, GDPR may be processed in relation to the report based on Article 9 paragraph 2 letter e), f) or g) of the GDPR. To learn more about the principles of personal data processing at the Company and the rights of data subjects concerning personal data processed by the Company, please refer to our privacy policy.

Pardubice, 1st August 2023