Integrations

Stages of the "ITA AIRWAYS I VOLARE BUSINESS CLUB" Program

1. **DEFINITIONS**

FQTB Code: this indicates the numerical code sent to the SME that has correctly registered in the ITA AIRWAYS VOLARE BUSINESS CLUB Program, which allows the company to track the flights of the employees associated with the SME's account.

Company Code: this is the numerical code sent to the SME that has correctly registered in the ITA AIRWAYS VOLARE BUSINESS CLUB, which allows the company to invite its Employees/Collaborators to use the Program.

FF Code: this is the "frequent flyer" code, i.e. the personal numerical code given to the Volare Program member when they first sign up to the said Program.

Co-promoter: indicates Volare Loyalty S.p.A., as identified in Article 2 below.

Employee(s)/Collaborator(s): indicates any employee or collaborator of the SME, registered in the ITA AIRWAYS VOLARE BUSINESS CLUB and the Volare Program.

ITA Airways Connect: indicates the B2B ITA Airways portal, which can be accessed at: www.ita-airways-connect.com.

Marketplace: indicates the https://www.loyaltyprogram.ita-airways.com/it_it/ website

Partner(s): indicates the Promoter's commercial partners, a list of which can be seen at: https://www.loyaltyprogram.ita-airways.com/it it/

Reward(s): indicates the airline tickets, discounts on flight tickets, or any other reward that can be obtained using the earned Points, in accordance with the terms and conditions of these Regulations.

Corporate Program: indicates the program for large-scale companies.

ITA AIRWAYS VOLARE BUSINESS CLUB PROGRAM: indicates this loyalty/reward program for Small-and Medium-sized companies.

Volare Program: indicates the initiative promoted by ITA Airways and Volare Loyalty S.p.A., from 15 October 2021 until 31 December 2025, which is subject to the terms and conditions stipulated in the Regulations, which can be viewed at: https://www.ita-airways.com/it it/volare/theprogram/regulations.html.

Promoter or **ITA Airways**: indicates ITALIA TRASPORTO AEREO S.p.A., as identified in Article 2 below.

Points: indicates the points earned through the ITA AIRWAYS VOLARE BUSINESS CLUB Program when carrying out the qualifying actions in accordance with these Regulations.

Company Contact: indicates the SME's Company Contact, who has the necessary powers to act on the company's behalf for the purpose of these Regulations.

Regulations: indicates the entirety of the laws and regulations contained in this document (which may be subject to change from time to time), published on the ITA Airways Connect portal, which

may be integrated and/or updated from time to time and communicated on the same website and directly to members of the ITA AIRWAYS VOLARE BUSINESS CLUB.

SME/SMEs: indicates the small- and medium-sized companies that use the ITA AIRWAYS VOLARE BUSINESS CLUB Program, i.e. the companies - including third sector and ecclesiastical bodies - that respond to the requirements stipulated in Article 18 of these Regulations.

2. PROMOTER and CO-PROMOTER

The Promoter of the ITA AIRWAYS VOLARE BUSINESS CLUB Program is ITALIA TRASPORTO AEREO S.p.A. (hereinafter abbreviated to ITA Airways), with headquarters at Via XX Settembre 97 – 00187, Rome, Italy; VAT Identification Number, Fiscal Code and Italian Business Register Registration Number 15907661001.

The Co-Promoter of the ITA AIRWAYS VOLARE BUSINESS CLUB Program is Volare Loyalty S.p.A., with headquarters at Piazza San Babila 4A – 20122, Milan, Italy; VAT Identification Number, Fiscal Code and Italian Business Register Registration Number 12281660964.

3. DURATION

The ITA AIRWAYS VOLARE BUSINESS CLUB Program runs from 13 June 2023 until 31 December 2025.

In any event, the total duration of the scheme, including any extensions, will be no more than five years.

4. BENEFICIARIES

Beneficiaries of the ITA AIRWAYS VOLARE BUSINESS CLUB Program are all SMEs with an annual flight expenditure with ITA Airways of up to 80.000 Euro.

The geographical area in which the ITA AIRWAYS VOLARE BUSINESS CLUB Program operates is the national Italian territory.

Ineligibility

The following subjects are prohibited from taking part in the ITA AIRWAYS VOLARE BUSINESS CLUB Program:

- Any subjects, such as private individuals or consumers, who cannot be ascribed to corporate
 or institutional activities or to entrepreneurial, commercial, artisanal or professional
 activities:
- Companies that are already members of other promotional programs or incentives offered
 by ITA Airways or companies that have been invited to take part in promotional programs
 but have declined said offer, unless the company's membership has been expressly
 approved in writing by ITA Airways;
- Companies that are already part of corporate groups that are already a member of the ITA AIRWAYS VOLARE BUSINESS CLUB or other promotional programs or incentives offered by ITA Airways, or companies that have been invited to take part in promotional programs but have declined said offers, unless the company's membership has been expressly approved in writing by ITA Airways;
- Companies that have a controlling body, affiliate or controlled company that is already a member of the ITA AIRWAYS VOLARE BUSINESS CLUB or other promotional programs or incentives offered by ITA Airways, or companies who have been invited to take part in

- promotional programs but have declined said offers, unless the company's membership has been expressly approved in writing by ITA Airways;
- Companies and/or individuals that sell flight tickets as a service for third party providers,
 regardless of whether they receive payment for said service, including and not limited to, for
 explanatory purposes only, travel agencies (particularly IATA and non-IATA travel agencies,
 consolidators), tour operators, other travel organizers (particularly companies that provide
 support services, such as, for example, exchange programs), and cruise companies;
- Companies established for the sole aim of earning Points.

5. PROMOTIONAL PRODUCTS

The aim of the VOLARE BUSINESS CLUB LOYALTY Program is to promote the purchase of ITA Airways airline tickets by SMEs.

6. OPERATING METHOD AND STAGES OF THE ITA AIRWAYS VOLARE BUSINESS CLUB PROGRAM

Registered in the ITA AIRWAYS VOLARE BUSINESS CLUB Program is always free of charge.

To join the ITA AIRWAYS VOLARE BUSINESS CLUB Program, the SME must sign up to the program on the ITA Airways Connect website.

Only SMEs that meet the requirements stipulated in Article 4 of these Regulations can become a member of the ITA AIRWAYS VOLARE BUSINESS CLUB Program.

Once a company has signed up to the ITA AIRWAYS VOLARE BUSINESS CLUB Program, the Company Contact for each SME will need to fill in the appropriate form, providing both their personal details and those of the SME for which they are requesting membership, by filling in the mandatory fields and, at the user's discretion, the optional fields in the form. The data provided by the Company Contact at the time of registration in the ITA AIRWAYS VOLARE BUSINESS CLUB Program must be correct and verifiable. The Promoter and Co-Promoter reserve the right to retrospectively verify that the applicant meets the registration requirements to join the ITA AIRWAYS VOLARE BUSINESS CLUB Program. Once the SME has registered in the program, the Company Contact will receive an email containing all the relevant information on how the ITA AIRWAYS VOLARE BUSINESS CLUB Program works, and how to activate their FQTB Code and Company Code. In any case, the SME can access their private account using the e-mail and password credentials provided at the time of registration.

Once the Employee/Collaborator has accessed their personal area on the www.ita-airways.com app, they can access the "Are you a member of an SME?" section of the website, where they can enter their Company Code and associate it with the relevant SME Code. Once the Company Code has been entered and confirmed by the Employee/Collaborator, the user will see the words "BUSINESS CLUB" in their personal Volare Program area.

If the Employee/Collaborator is not already registered in the Volare Program, they will need to sign up for the ITA AIRWAYS VOLARE BUSINESS CLUB Program by associating their Company Code with their personal account.

Each SME will be assigned a single ITA AIRWAYS VOLARE BUSINESS CLUB Program account. Subsequently, each SME will have only one Points wallet for accumulating points earnt by the Employees/Collaborators associated with the ITA AIRWAYS VOLARE BUSINESS CLUB Program, which can be earned in the manner described below.

The ITA AIRWAYS VOLARE BUSINESS CLUB Program is organized in three key stages:

STAGE 1

The ITA AIRWAYS VOLARE BUSINESS CLUB Program commences on 13 June 2023, the date up to which SMEs can registered in the ITA AIRWAYS VOLARE BUSINESS CLUB PROGRAM on the official ITA Airways Connect web page.

Following registration in the Program, the Company Contact can send invitations to Employees/Collaborators, which will enable them to associate their account with the ITA AIRWAYS VOLARE BUSINESS CLUB Program, as described above.

The SMEs hereby acknowledge and understand that their personal SME account will not be available in this initial stage. Consequently, it will not be possible to amend the entered data, make online bookings for the company's Employees/Collaborators, or view the Points balance at this time. In Stage 1, purchases will be made using indirect channels (travel agency), while any changes to data and information on the company's Points balance will only be available on activation of Stage 2.

Only purchases made by Employees/Collaborators who are associated with the ITA AIRWAYS VOLARE BUSINESS CLUB Program can be converted into points for the SME.

Purchases made via indirect channels (travel agency) during Stage 1 will be tracked via FQTB Code and when the relevant Employee/Collaborator registered in the Volare Program activates their FF Code, with the aim of earning points, which will be visible on the account on activation of Stage 2.

STAGE 2

From 31 July 2023, SMEs that access their personal account on ITA Airways Connect can:

- Upon payment of the flight tickets, earn points for the company's Employees/Collaborators
 also using the ITA Airways Connect function, by associating the FQTB Code and the FF Code
 of the Employee/Collaborator in question with said booking;
- View the updated Points wallet, which contains Points (i) earned on ITA Airways flights purchased after 13 June 2023 until 31 July 2023 (previously only tracked) or, in any case, from the moment the SME registers in the program, and (ii) any Points successively earned following the purchase of an airline ticket for the registered Employee/Collaborator who has signed up to earn Points.
- View the list of employees associated with the SME's account through their Personal Area.

Furthermore, the SME can modify its own data and make bookings online.

STAGE 3

From 31 October 2023, SMEs will be able to use the Points earned, by converting them using the Cash & Points Redemption function, to redeem their Rewards (see the following paragraph and Article 7 for further information).

Earning Points

- Upon payment of the airline tickets, SMEs can earn Points purchased on behalf of the company's Employees/Collaborators, even when purchased via a travel agency (commencing 13 June 2023) or ITA Airways Connect (commencing 31 July 2023), by associating their booking with the FQTB Code and FF Code of the Employee/Collaborator in question. SMEs earn 5 points for every 1.00 (ONE) Euro spent on promotional products; for the purpose of earning Points, amounts connected with tax, VAT, purchases made in Cash & Points mode, and any other duties are excluded.
- SMEs can also earn Points when they purchase Partner goods or services, as illustrated in Article 7 below.
- The Employee/Collaborator can earn Points through the Volare Program on all tickets purchased by the SME within the ITA AIRWAYS VOLARE BUSINESS CLUB Program, in accordance with the Regulations of the said Volare Program. Inversely, tickets purchased directly by Employees/Collaborators that are not for work purposes, i.e. all bookings that do not require the insertion of the FQTB Code, will not entitle the SME to earn points towards the ITA AIRWAYS VOLARE BUSINESS CLUB Program. However, the Employee/Collaborator will continue to earn Volare Program Points, in accordance with the regulations of the said Volare Program, as described in the relative regulations, which can be consulted at: www.ita-airways.com/it it/volare/theprogram/regulations.html.

Cash & Points Redemption

From Stage 3 onward, Points may be used in the manner defined and communicated each time by ITA Airways and/or the Co-Promoter. More specifically, before completing each purchase, at any time and for any category of flights available on ITA Airways Connect, after the SME has ensured they have correctly logged into their personal account and inserted their FQTB Code, the equivalent sum of the purchased goods/services will be automatically deducted from the SME's Points balance (see "Cash & Points Redemption" system). It is hereby understood that any duties and/or taxes (including VAT) cannot be paid for using Points.

In the case of refunds for goods/services purchased using Points, the ITA Airways refund policy will apply and, should circumstances permit, the refund will be made via the same payment method used for the original purchase (Points, cash or a combination of Points and cash, excluding any airport taxes/duties, which will always be refunded as a cash payment). In the event the refund involves the refund of Points, either in part or full, the SME will be able to view their updated Points balance in their Points wallet.

7. NATURE AND VALUE OF THE AVAILABLE REWARDS

Using the Points in the manner specified in the following paragraph, the SME can redeem their Rewards, which consist of flight tickets or discounts on flight tickets purchased by the SME for its Employees/Collaborators and/or services offered in the Marketplace, as described below.

The value of the individual Reward is based on the value of the air fares in force at the time of issue of the same or the value of ITA Airways or its Partners services/products at the time of issue of the same.

The estimated value of the rewards is Euro **500.000 (five-hundred thousand)**. In accordance with Article 7 of Italian Presidential Decree No. 430 of 26 October 2001, a 20% deposit of the overall, estimated value of the rewards has been paid, in accordance with the laws in force.

The Employee/Collaborator is also entitled to the following benefits:

- Priority check-in, available at dedicated priority check-in desks, which allows users to board their flight quicker and easier.
- Priority Lost&Found service, which provides users with a preferential luggage recovery service.

Using Points

- A. Cash & Points Redemption: using the aforementioned system (see Article 6 above), an SME can convert its Points and use them to purchase airline tickets for the Employees/Collaborators who have associated their account with the SME's account, as foreseen by the ITA AIRWAYS VOLARE BUSINESS CLUB Program. Point conversion rate: one point equals 0.005 Euro. Even after conversion, the earned Points cannot be used to pay taxes, VAT and any other duties in relation to ticket purchases.
 In terms of the purchase of goods/services using Points, where applicable, said purchases are governed by Article 128 et. seq. of Italian Legislative Decree No. 206 of 6 September
- B. Volare Partners: when they have earned enough Points, the Company Contact can access the Marketplace to purchase the goods and services available on same.

8. FINAL REWARD REDEMPTION DATE

2005 (Italian Consumer Code).

The SME can request the Reward(s) by 31 January 2026, and these will be available to the rightful claimant, with the exception of any Rewards that will need to be delivered directly to the home address of the Employee/Collaborator or the SME's headquarters (at the address that must be provided whenever a request for material Rewards is made). The Promoter and Co-Promoter hereby agree to deliver the material Reward to the rightful claimant within 90 days from the date of the redemption request.

9. COMPLAINTS PROCEDURE

Any complaints should be brought to the attention of ITA Airways and the Co-Promoter by sending an email to reclami@ita-airways.com for members domiciled in Italy, while overseas members should contact complaints@ita-airways.com.

The ITA Airways Customer Center will respond to any complaints as soon as possible and, in any case, within 20 days of receipt of same.

10. AMENDMENTS TO THE REGULATIONS

ITA Airways and the Co-Promoter reserve the right to amend, even partially and at any time, the Regulations of the ITA AIRWAYS VOLARE BUSINESS CLUB Program, in accordance with the laws in force, and it is hereby understood that such amendments will not affect the rights acquired in the meantime by the SME and its Employees/Collaborators, and that adequate notification will be given to same, using the same means with which the Program was brought to the attention of the SME, or equivalent means of communication (e.g. email notification).

11. PROMOTER'S CONTACT DETAILS

Certified email address (PEC): <u>italiatrasportoaereo@legalmail.it</u>

ITA Airways customer service (Italy): +39 06 85960020

ITA Airways customer service (overseas): see Link to contact page

12. PROCESSING OF PERSONAL DATA

As Co-owners of the data, ITA Airways and the Co-Promoter, hereby inform the SME that the personal data that was freely provided for the purpose of registering in the ITA AIRWAYS VOLARE BUSINESS CLUB Program will be handled in accordance with the Privacy Policy that can be consulted on the website [Privacy Policy], and the SME hereby agrees to make participating Employees/Collaborators aware of same.

13. FINAL PROVISIONS

By registering in the ITA AIRWAYS VOLARE BUSINESS CLUB Program, the SME hereby unequivocally accepts and agrees to these Regulations.

Each SME can cancel their registration in the ITA AIRWAYS VOLARE BUSINESS CLUB Program at any time, at no additional cost, by filling in the appropriate form on the ITA Airways Connect portal (accessible after activation of Stage 2) or by calling the SME call line on +39.06.8596.0018. The account will be deleted with immediate effect, and all of the data on the SME and the Points that have been earned in the Points wallet will be deleted.

ITA Airways and the Co-Promoter reserve the right to carry out the appropriate checks to verify compliance with these Regulations and to deny participation and/or exclude SMEs from the ITA AIRWAYS VOLARE BUSINESS CLUB Program and/or cancel any Points and/or requested Rewards to any subject that fails to meet the requirements set out in these Regulations, or in the case of any actions which, at the discretion of ITA Airways or any third parties appointed by same, do not respect the terms and conditions provided for by these Regulations, or have used any means, methods and/or tools, which at their sole discretion, are considered suspicious, fraudulent or in violation of the normal execution of the initiative.

14. DEFERMENT AND LEGAL CONFLICTS

For everything else not expressly foreseen and governed by the present Regulations, please refer to the applicable laws and regulations, in particular Italian Presidential Decree 26 October 2001, No. 430, published in the Official Gazette (Gazzetta Ufficiale -G.U.) on 13 December 2001, No. 289), and successive amendments and integrations.

15. APPLICABLE LAW AND JURISDICTION

These Regulations are subject to Italian law.

Any disputes relating to the ITA AIRWAYS VOLARE BUSINESS CLUB Program will be under the exclusive jurisdiction of the Court of Rome, except where otherwise required by law.	e