

Integration

Phase – Program “ITA AIRWAYS I VOLARE BUSINESS CLUB”

1. DEFINITIONS

FQTB Code: means the numerical code provided to SMEs that correctly register in the ITA AIRWAYS I VOLARE BUSINESS CLUB Program, in order to track flights taken by Employees associated with the SME.

Company Code: means the numerical code provided to SMEs that correctly register in the ITA AIRWAYS I VOLARE BUSINESS CLUB Program, to allow the invitation of Employees/Collaborators.

FF Code: means the frequent flyer code, i.e., the Member’s personal numerical code provided upon registration in the Volare Program.

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

Employee/Collaborator: means the SME’s employee or collaborator, registered in the ITA AIRWAYS I VOLARE BUSINESS CLUB Program and in the Volare Program.

ITA Airways Connect: means the ITA Airways B2B portal accessible at: www.ita-airways-connect.com.

Marketplace: means the website https://www.loyaltyprogram.ita-airways.com/en_gb/airline/

Partner: means the Promoter’s commercial partners, a list of which is available at https://www.loyaltyprogram.ita-airways.com/en_gb/airline/

Reward(s): means the airline ticket, discounts on the purchase of airline tickets or other rewards obtainable using the Points accumulated in accordance with these Regulations.

Corporate Program: means the program dedicated to large companies.

ITA AIRWAYS I VOLARE BUSINESS CLUB Program: means this Phase aimed at fostering the loyalty of Small and Medium-sized Enterprises.

Volare Program: means the reward operation promoted by ITA Airways and Volare Loyalty S.p.A., from 15 October 2021 to 30 March 2026, subject to the terms and conditions of the Regulations available at https://www.ita-airways.com/en_it/volare/theprogram/regulations.html.

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

Points: means the points accumulated within the ITA AIRWAYS I VOLARE BUSINESS CLUB Program through qualifying actions under these Regulations.

Company Representative: means the SME’s representative, vested with the powers necessary for the purposes of these Regulations.

Regulations: means the set of rules contained in this document (as amended from time to time), published on the ITA Airways Connect portal and integrated/updated through communications on the portal and communications to registrants of the ITA AIRWAYS I VOLARE BUSINESS CLUB Program.

SME: means the small and medium-sized enterprises targeted by the ITA AIRWAYS I VOLARE BUSINESS CLUB Program, including third-sector entities and ecclesiastical entities, meeting the requirements in Article 18 of these Regulations.

2. PROMOTER and CO-PROMOTER

The Promoter of the ITA AIRWAYS I VOLARE BUSINESS CLUB Program is ITALIA TRASPORTO AEREO S.p.A. (short form: ITA Airways), with registered office at Via XX Settembre 97 – 00187 Rome, VAT No., fiscal code and Companies' Register No. 15907661001.

The Co-Promoter of the ITA AIRWAYS I VOLARE BUSINESS CLUB Program is Volare Loyalty S.p.A., with registered office at Piazza San Babila 4A – 20122 Milan, VAT No., fiscal code and Companies' Register No. 12281660964.

3. DURATION

The ITA AIRWAYS I VOLARE BUSINESS CLUB Program runs from 13 June 2023 until 30 March 2026.

In any event, the overall duration of the operation, including any extensions, shall be less than five years.

4. RECIPIENTS

The recipients of the ITA AIRWAYS I VOLARE BUSINESS CLUB Program are all SMEs with annual spend on ITA Airways air travel less than or equal to EUR 80,000.

The geographical scope of the ITA AIRWAYS I VOLARE BUSINESS CLUB Program is the national territory of Italy.

Ineligibility

The following entities may not be admitted to participate in the ITA AIRWAYS I VOLARE BUSINESS CLUB Program:

- entities acting as private individuals or consumers, i.e., for purposes not attributable to their corporate, institutional or social role, nor to any business, commercial, artisanal or professional activity they may carry out;
- companies already participating in other promotional or incentive programs for companies offered by ITA Airways, or that were offered participation in such programs but declined, unless their participation is expressly approved in writing by ITA Airways;
- companies belonging to corporate groups already participating in ITA AIRWAYS I VOLARE BUSINESS CLUB or in other promotional or incentive programs for companies offered by ITA Airways, or that were offered participation but declined, unless expressly approved in writing by ITA Airways;
- companies whose parent companies, affiliates or subsidiaries already participate in ITA AIRWAYS I VOLARE BUSINESS CLUB or other corporate promotional/incentive programs offered by ITA Airways, or that were offered participation but declined, unless expressly approved in writing by ITA Airways;
- companies and entities that sell airline ticketing as a service on behalf of third parties, whether or not they receive compensation for such service, including, by way of example, travel agencies (in particular IATA and non-IATA agencies, consolidators), tour operators, other travel organisers (in particular companies providing support services, e.g., within exchange programs) and cruise companies;
- companies established solely for the purpose of acquiring Points.

5. PROMOTED PRODUCTS

The ITA AIRWAYS I VOLARE BUSINESS CLUB Program is intended to promote the purchase of ITA Airways airline tickets by SMEs.

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

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

To join the ITA AIRWAYS I VOLARE BUSINESS CLUB Program, the SME must register via the ITA Airways Connect website.

All SMEs meeting the requirements set out in Article 4 of these Regulations may participate in the ITA AIRWAYS I VOLARE BUSINESS CLUB Program.

At the time of registration, the Company Representative of each SME must complete a form entering their data and the data of the SME on whose behalf registration is being carried out, completing the mandatory fields and, at their discretion, the optional fields. The data provided must be correct and truthful. The Promoter and the Co-Promoter reserve the right to carry out ex-post verification activities regarding compliance with registration requirements.

Following successful registration, the Company Representative will receive an email containing information on how the ITA AIRWAYS I VOLARE BUSINESS CLUB Program works, the FQTB Code (activated at the same time) and the Company Code. The SME will then be able to access its restricted area using the email and password registered at sign-up.

The Employee/Collaborator, once logged into their Personal Area on www.ita-airways.com and via the app, will be able to access the “Are you part of an SME?” feature, through which they can enter the Company Code and be associated with the SME Code. After entering and confirming the Company Code, the “BUSINESS CLUB” label will appear in the Employee/Collaborator’s Volare Program Personal Area.

To participate in the ITA AIRWAYS I VOLARE BUSINESS CLUB Program, any Employee/Collaborator not already registered in the Volare Program must register and associate the Company Code.

Each SME will be associated with one single profile for participation purposes and therefore each SME may have only one Points wallet, composed of the Points accumulated by the associated Employees/Collaborators, as described below.

The ITA AIRWAYS I VOLARE BUSINESS CLUB Program is divided into the following three phases:

PHASE I

The ITA AIRWAYS I VOLARE BUSINESS CLUB Program starts on 13 June 2023, the date on which SMEs may register in the Program through ITA Airways Connect.

Following registration, the Company Representative may invite Employees/Collaborators to associate with the ITA AIRWAYS I VOLARE BUSINESS CLUB Program as described above.

SMEs acknowledge and accept that in this first phase the SME Personal Area will not be available: therefore, it will not be possible to modify data, make online bookings for Employees/Collaborators or view

the Points balance. In Phase I, purchases will be made solely through the indirect channel (travel agency), while data changes and information on the Points balance will be possible only with the start of Phase II.

Only purchases relating to Employees/Collaborators associated with the Program will allow the SME to earn Points.

Purchases made through the indirect channel (travel agency) during Phase I will be tracked via the FQTB Code and entry of the Employee/Collaborator's FF Code, with the aim of facilitating crediting of earned Points, which will be visible starting from Phase II.

PHASE II

Starting from 31 July 2023, by accessing its restricted area on ITA Airways Connect, the SME may:

earn Points by purchasing, for consideration, airline tickets for its Employees/Collaborators also via ITA Airways Connect, associating the FQTB Code and the Employee/Collaborator's FF Code to the booking; view its updated Points wallet, composed of (i) Points earned for ITA Airways flights taken after 13 June 2023 and, in any case, from the moment of registration up to 31 July 2023 (previously only tracked) and (ii) Points subsequently earned following each ticket purchase for the Employee/Collaborator that entitles to Points;

view the list of employees who have associated with the SME through their Personal Area.

SMEs may also modify their data and make online bookings.

PHASE III

Starting from 31 October 2023, SMEs will be able to use the Points earned by converting them through the Redemption Cash & Points feature to obtain Rewards (see the paragraph below and Article 7).

Earning Points

The SME may earn Points up to 30 March 2026 inclusive.

The SME earns Points through the purchase, for consideration, of airline tickets for its Employees/Collaborators via agency (starting from 13 June 2023) or via ITA Airways Connect (starting from 31 July 2023), associating the FQTB Code and the Employee/Collaborator's FF Code to the booking.

The SME earns 5 Points for every EUR 1.00 (one) spent on purchasing the promoted products; amounts relating to taxes, VAT, purchases made via Cash & Points mode and any other charges are excluded from Points earning.

The SME may also earn Points by purchasing, for consideration, goods or services provided by Partners, as described in Article 7 below.

The Employee/Collaborator may earn Points within the Volare Program on the basis of tickets purchased by the SME within the ITA AIRWAYS I VOLARE BUSINESS CLUB Program, in accordance with the Volare Program rules. Conversely, tickets purchased directly by the Employee/Collaborator for personal purposes – and therefore without entry of the FQTB Code – will not allow the SME to earn Points for the ITA AIRWAYS I VOLARE BUSINESS CLUB Program, but will allow the Employee/Collaborator to earn Points within the Volare Program, under the ordinary rules described in the Volare regulations.

Redemption Cash & Points

The “Redemption Cash & Points” method will be available until 30 March 2026 inclusive. After that date, SMEs may use Points until 30 April 2026 through alternative methods communicated by the Promoter to SMEs and exclusively for the goods/services offered by Partners of the ITA AIRWAYS I VOLARE BUSINESS CLUB Program.

Starting from Phase III, Points may be used in the manner defined and communicated from time to time by ITA Airways and the Co-Promoter. In particular, before completing each purchase, at any time and for any travel class of all flights available on ITA Airways Connect, the SME, having ensured it has logged into its restricted area, must enter its FQTB Code and the transaction will occur automatically by deducting from the Points balance an amount equivalent to the price of the purchased goods/service (the “Redemption Cash & Points” system). Taxes and other applicable charges (including VAT) cannot be paid with Points.

For refunds of goods/services purchased using Points, ITA Airways refund policies apply and, where the relevant conditions are met, refunds will be granted using the same payment method as the original purchase (Points, cash or a combination of Points and cash, it being understood that airport taxes will always be refunded in cash). Where the refund is made in whole or in part by re-crediting Points, the SME will see the updated Points balance in its Points wallet.

7. NATURE AND VALUE OF THE REWARDS OFFERED

By using Points as specified above, the SME may redeem Rewards consisting of airline tickets or discounts on airline tickets purchasable by the SME for its Employees/Collaborators and/or services available on the Marketplace, as better specified below.

The value of the individual Rewards can be determined based on the value of airfares in force at the time of their issuance or on the value of the services/products of ITA Airways or commercial Partners at the time of issuance.

The estimated total value of the prize pool is **EUR 500,000 (five hundred thousand)**. Pursuant to Article 7 of Italian Presidential Decree No. 430 of 26 October 2001, a surety deposit equal to 20% of the overall estimated value of the prize pool has been paid, within the statutory time limits.

The Employee/Collaborator may benefit from the following additional benefits:

Priority check-in, i.e., priority check-in service available at dedicated desks to proceed quickly to boarding;
Priority lost&found, i.e., access to a priority channel at the *Lost&Found* desk.

Using Points

The “Redemption Cash & Points” method will be available until 30 March 2026 inclusive. After that date, SMEs may use Points until 30 April 2026 through alternative methods communicated by the Promoter and exclusively for Partner goods/services.

Redemption Cash & Points: through this system (see Article 6 above) the SME may convert and use accumulated Points to purchase airline tickets for Employees/Collaborators associated with its account, as provided for by the ITA AIRWAYS I VOLARE BUSINESS CLUB Program. The Points conversion rate is EUR 0.005 per point. Points, even after conversion, cannot be used to pay taxes, VAT or other charges connected with ticket purchases.

For goods purchased using Points, the statutory legal guarantee of conformity pursuant to Articles 128 et seq. of Legislative Decree No. 206 of 6 September 2005 (Consumer Code) shall apply, where relevant.

Volare Partners: through accumulated Points and using their credentials, the Company Representative may access the Marketplace and purchase goods and services available there.

8. DELIVERY DEADLINE FOR THE REWARDS OFFERED

Rewards offered in the ITA AIRWAYS I VOLARE BUSINESS CLUB Program may be requested by the SME until 30 March 2026. From 30 March 2026 to 30 April 2026, only Partner goods/services may be requested.

Rewards will be made available to the entitled person immediately, except for any physical Rewards that must be delivered to the Employee/Collaborator's address or the SME's registered office (address to be provided when requesting physical Rewards). The Promoter and the Co-Promoter undertake to deliver within 90 days from the request for the physical Reward.

9. COMPLAINTS HANDLING

Complaints handling until 26 February 2026

Any complaints may be brought to the attention of ITA Airways and the Co-Promoter by sending an email to reclami@ita-airways.com for Italy and complaints@ita-airways.com for foreign participants.

Complaints handling after 26 February 2026

From 27 February 2026 until 31 December 2027, any complaints may be submitted to ITA Airways by sending an email to volaremembersupport@ita-airways.com. Thereafter, it will be possible to contact ITA Airways Customer Service using the contacts in Article 11 below. ITA Airways Customer Service will respond as soon as possible and, in any case, within 20 days of receipt of the complaint.

10. AMENDMENTS TO THE REGULATIONS

ITA Airways and the Co-Promoter reserve the right to amend, in whole or in part and at any time, the participation methods in the ITA AIRWAYS I VOLARE BUSINESS CLUB Program, in compliance with applicable law, provided that such amendments do not prejudice rights already acquired by SMEs and Employees/Collaborators, and that adequate notice is given using the same methods by which the Program was brought to the attention of SMEs or equivalent methods (e.g., by email).

11. PROMOTER CONTACTS

Certified email address (PEC): italiatrasportoaereo@legalmail.it.

ITA Airways Customer Service: +39 06 85960020.

For Smart Members, a dedicated ITA Airways Customer Service channel is active until 30 April 2026, reachable at +39 06 85960020 (*), option 5. The service is available every day from 07:00 to 22:00 (Italian time) and the cost of the call may vary depending on the Member's telephone operator.

For Plus, Premium and Executive Members, a dedicated phone number is available until 30 April 2026: +39 800 939 074, active every day from 07:00 to 22:00 (Italian time).

For contacts from abroad, please consult: https://www.ita-airways.com/en_it/volare/theprogram/volare-contacts.html.

12. PERSONAL DATA PROCESSING

ITA Airways and the Co-Promoter, as joint controllers, inform SMEs that personal data freely provided for participation in the ITA AIRWAYS I VOLARE BUSINESS CLUB Program will be processed in accordance with

the privacy notice available at: https://www.ita-airways.com/en_it/volare/theprogram/privacy.html, which the SME undertakes to bring to the attention of its Employees.

13. FINAL PROVISIONS

By completing registration in the ITA AIRWAYS I VOLARE BUSINESS CLUB Program, the SME unconditionally accepts these Regulations.

Each SME may withdraw from the ITA AIRWAYS I VOLARE BUSINESS CLUB Program at any time and free of charge, using the relevant section of the ITA Airways Connect portal (available from Phase II) or by calling the dedicated SME number +39 06 8596 0018. Profile deletion will take immediate effect and therefore the SME's personal data will be deleted and any Points still in its Points wallet will be cancelled.

ITA Airways and the Co-Promoter reserve the right to carry out appropriate compliance checks and deny participation and/or exclude SMEs from the ITA AIRWAYS I VOLARE BUSINESS CLUB Program and/or cancel Points and/or Rewards requested, for entities that do not meet the requirements set out in these Regulations or, at ITA Airways' sole discretion (or that of third parties appointed by ITA), where participation is deemed suspicious, fraudulent or in violation of the normal operation of the initiative.

14. REFERENCE AND CONFLICT OF RULES

For anything not expressly provided for in these Regulations, reference is made to the applicable laws and regulations, with particular reference to Italian Presidential Decree No. 430 of 26 October 2001 (published in the Official Gazette of 13 December 2001, No. 289), as subsequently amended and supplemented.

15. APPLICABLE LAW AND JURISDICTION

These Regulations are governed by Italian law.

Any dispute relating to the ITA AIRWAYS I VOLARE BUSINESS CLUB Program shall be submitted to the exclusive jurisdiction of the Court of Rome, without prejudice to any different mandatory jurisdiction provided by law.