



***POLICY FOR
PREVENTION
OF CORRUPTION***

**Approved by the ENAV
Board of Directors – 27/9/2021**

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POLICY FOR PREVENTION OF CORRUPTION

ENAV recognises that corruption is a negative social force to be fought and prevented since it feeds illegal markets, distorts competition, exacts a high social and economic price from the community, alters the mechanisms of competition between companies and individuals, benefitting some to the detriment of others regardless of business acumen and professional qualification, and damages the economy, the cultural and social growth of the country, and the trust of citizens in institutions, thereby undermining democratic and ethical values.

The ENAV Group therefore considers it essential to develop its national and international *business* with loyalty, correctness, transparency, honesty, and integrity in order to protect its reputation, the expectations of stakeholders, its business associates, and the work of its employees and partners.

The ENAV Group therefore bases its actions on the broadest possible *compliance* with anti-corruption rules and consequently adopts a *zero tolerance* approach with regard to any act of corruption, fraudulent behavior and/or more generally unlawful or clandestine conduct.

In this context, the ENAV Group adopts this *Policy for prevention of corruption* to define the systematic reference framework of the values, principles, and rules aimed at mitigating and combating corruption risks.

This translates into the following objectives:

- to prohibit all forms of corruption and fight without exception corruption or attempted corruption with reference to all possible manifestations (active and passive, public and private, direct and indirect);
- to guarantee, in the conduct of business and company activities, compliance with internal and external legal and voluntary regulations and with national and international best practices relating to anti-corruption;
- to ensure, in relation to its activities and the internal and external context in which the ENAV Group operates, the ongoing identification and assessment of risks relating to corruption in order to adopt and implement effective and proportionate mitigation measures to counteract those risks;
- to pursue, through allocation of all necessary resources, the continuous improvement of the Anti-Corruption Management System, of the company processes, and of the technical and organisational measures for the prevention of corruption, particularly given the evolving internal and external context;
- to ensure, through training, information, and communication processes that staff and business associates are aware of the ENAV Group's commitment



to fighting corruption and of the role they themselves play within the Anti-Corruption Management System;

- to promote awareness and knowledge among staff and business associates with respect to the activities and initiatives that the ENAV Group undertakes to establish, implement, maintain, update and improve the Anti-Corruption Management System.

ENAV has appointed an Anti-bribery Compliance Function (ABCF) to ensure the utmost transparency of its business processes and to reduce the risk of corruption as far as possible

The ABCF manager is assigned the responsibility and authority to:

- supervise the definition and implementation of the management system for prevention of corruption;
- provide advice and represent a point of reference for staff in relation to the anti-corruption management system as well as for all issues related to corrupt conduct;
- ensure compliance of the management system for prevention of corruption adopted by ENAV with the requirements of the UNI ISO 37001 standard;
- report on the performance of the aforementioned system to the Board of Directors, the Control, Risks and Related Parties Committee (CRRPC), and the Supervisory Body;
- continuously assess and verify that the management system for prevention of corruption is implemented effectively and is adequate to prevent and deal with the corruption risks to which the Company could be exposed.

This function possesses:

- the expertise to carry out the aforementioned tasks;
- the necessary authority to perform these tasks;
- sufficient independence to guarantee the absence of overlaps between the anti-corruption function and the activities exposed to corruption risk.

Autonomy and independence are also guaranteed by the allocation, by the Board of Directors, of a specific budget for corruption prevention activities. The compliance function also has direct and timely access to the Board of Directors and the CRRPC to directly report critical issues relating to acts of corruption or violations of the management system.

All addressees of this *Policy for prevention of corruption* are required to report attempted, alleged, or actual acts of corruption of which they become aware. The ENAV Group guarantees that:

- there shall be no retaliation of any kind either for making a report in good faith or for refusing to engage in unlawful conduct, including in instances where said refusal has had negative consequences for the Group's business;



- All reports and events that may lead to the presumption of corrupt conduct shall be subject to a timely, transparent, independent, and fair analysis performed by the competent corporate departments and where necessary with the support of independent professionals.

The *Policy for prevention of corruption* applies to ENAV and, as part of the management and coordination activity exercised by it, to the Subsidiaries, which are therefore required to take note of, adopt, and ensure the adequate implementation and dissemination of said Policy to allow for full compliance with the same.

The Subsidiaries implement all appropriate resolutions and provisions in order to apply this *Policy* within their own organisation.

ENAV and the Subsidiaries undertake, as far as possible, to encourage and promote the adoption of safeguards relating to the prevention of corruption similar to those referred to in this *Policy for prevention of corruption* by companies in which they hold equity investments even though not exercising control and/or dominant influence over the same.

Violation of the *Policy for prevention of corruption* by ENAV Group employees may result in the Group Company concerned adopting disciplinary measures pursuant to the penalty system provided for in the National Collective Bargaining Agreement NCBA.

Violation by business associates of the principles or provisions of the *Policy for prevention of corruption* may result in the failure to establish or the termination of contractual relationships.

In adopting an Anti-Corruption Management System compliant with the ISO 37001:2016 standard as a tool for pursuing the strategic objectives identified and their improvement, Senior Management formally undertakes to disclose, publish, and periodically review this *Policy for prevention of corruption* and promotes awareness and sharing of it by all ENAV Group personnel and by all those who collaborate in various capacities in the pursuit of corporate objectives.

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