



Whistleblowing Regulations

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DEFINITIONS

- a) **ENAV** or the **Company**: ENAV S.p.A.
- b) **ENAV Group** or the **Group**: the ENAV Group, consisting of ENAV and its subsidiaries in Italy and abroad.
- c) **Code of Ethics**: the Group's code of ethics, together with any attachments, as supplemented or amended from time to time.
- d) **Italian Legislative Decree 231/2001** or the **Decree**: Italian Legislative Decree No. 231 of 8 June 2001, which lays down "Provisions on the administrative liability of legal persons, companies and associations, including those without legal personality" and any subsequent amendments and additions.
- e) **Model 231**: the organisational, managerial, and auditing code of ethics adopted by ENAV and the companies in the Group, pursuant to Legislative Decree 231/2001, together with any attachments, as supplemented or amended from time to time. Model 231 outlines all the measures put in place to limit the risks of criminal activity, including rules and procedures, audits on personnel and processes, training aimed at preventing criminal activity, and setting up an internal control environment.
- f) **Procedures**: the term "procedures" should be understood in a broad sense to include all operating procedures, policies, regulations, guidelines, and operating instructions in force within the Group
- g) **Supervisory Body** or **Supervisory Board**: the supervisory body of ENAV and the companies in the Group, endowed with autonomous powers of intervention and control to ensure compliance with Legislative Decree 231/2001 and established in accordance with the provisions of the Confindustria Guidelines for the preparation of the organisation, management, and control models.
- h) **ABCF**: Anti-Bribery Compliance Function, as in paragraph 5.3.2 of ISO 37001 and appointed by Top Management, which has the responsibility and authority to supervise the MSPC, provide advice and guidance to staff on matters of corruption, and report on the performance of the MSPC to senior-level management.
- i) **MSPC**: Management System for the Prevention of Corruption pursuant to the ISO 37001 Standard
- j) **Whistleblower Report**: a detailed report based on accurate and consistent factual information concerning:
 - the commission, attempted commission, or reasonable danger of the commission of a crime (and/or administrative offence) as covered by Legislative Decree 231/2001.
 - violations, even if only suspected, related to: the Code of Ethics, Model 231, the Policy for the Prevention of Corruption, the Management Guidelines for the Prevention and Fight against Corruption, or the Group's corporate procedures.
 - any irregular conduct or event symptomatic of "misadministration", which may present a risk for ENAV and the Group,of which the Whistleblowers have become aware in the course of their duties.
- k) **Reports made in "bad faith"**: any report made with the sole intention of damaging or causing prejudice to ENAV, the person being reported, or any third parties.
- l) **Whistleblower**: the person who submits the Whistleblower Report.
- m) **Reported party**: the subject of the Report
- n) **Whistleblowing Committee**: the Whistleblowing Committee is made up of the Whistleblowing Contact Person and other officials who are chosen collectively by the Internal Audit Body with the involvement of the Human Resources Department. The Committee will be subject to its own

internal regulations prepared by the Internal Audit Body and will operate in accordance with the provisions therein.

1 REFERENCE LEGISLATION AND APPLICABLE PROCEDURES

- EU Directive No. 2019/1937 - Directive on the protection of persons who report breaches of Union law.
- Italian Law No. 179/2017 - Provisions for protection from the perpetrators of crimes or irregularities, which have come to light in the context of a public or private employment relationship.
- ANAC (National Anticorruption Authority) guidelines for the protection of those who report crimes or irregularities of which they have become aware in the course of their employment, pursuant to Art. 54b, of Legislative Decree 165/2001 (concerning whistleblowing), approved by Resolution No. 469 of 9 June 2021.
- ISO 37002:2021(E) - Guidelines for the establishment, implementation, management, evaluation, maintenance, and improvement of a robust and effective whistleblowing management system within an organisation.
- Italian Legislative Decree 165/2001 - General rules on labour law in public administration.
- Italian Legislative Decree 231/2001 – Administrative responsibilities of companies and other bodies.
- Italian Criminal Code.
- Italian Legislative Decree 196/2003, on provisions for the protection of personal data.
- EU Regulation 2016/679 - General Data Protection Regulation (GDPR).
- Code of Ethics.
- Model 231.
- Voluntary Corporate Governance Code for companies listed on the Italian Stock Exchange (Article 7)
- Corporate Governance Code (January 2020).
- Confindustria Guidelines for the preparation of the Organisation, Management, and Control Model pursuant to Italian Legislative Decree 231/2001 (June 2021).
- ANAC Resolution No. 6 of 28 April 2015
- UNI ISO 37001 – Management systems for the prevention of corruption.
- ISO/IEC 27001 – Standard on how to manage information security.
- ENAV policies, procedures, guidelines, regulations and operating instructions.

2 SUBJECT MATTER AND OBJECTIVES

2.1 OBJECTIVES

The purpose of the Whistleblowing Procedure is to implement a process that will allow the ENAV Group to be made aware of situations of potential risk or damage that may arise and to address the problems reported as promptly as possible. Whistleblowing is a process that helps to identify and combat corruption or any other unlawful activity, protects shareholders from financial loss and damage to their image, spreads a culture of ethics, legality, and transparency within the Group, and strengthens the system of internal audits and risk management.

Therefore, Whistleblowing is a way in which people can report incidents to specific individuals or bodies (in particular, to the Whistleblowing Contact of ENAV's Internal Audit Body, to the ABCF, and to the Supervisory Body of the companies in the Group that have implemented a management system compliant with Legislative Decree 231/2001), any unlawful or irregular conduct or violation of Model 231, the Code of Ethics, or company procedures, committed by parties belonging or connected to the ENAV Group (employees, but also including suppliers, intermediaries and, more generally, anyone who has a relationship with the Group).

In brief, this document:

- identifies the parties who can submit Whistleblowing Reports
- outlines the conduct, events or actions that may be the subject of such Reports
- identifies and prescribes the general principles and rules that govern the Reporting process, including the protection of the Whistleblower and the Reported Party.

The objectives are, therefore, to encourage and facilitate Whistleblowing within the company and to reduce the risks of offences being committed, building and strengthening the relationship of trust with *stakeholders* and promoting and spreading a corporate culture based on transparency, integrity, good governance, and corporate *compliance*.

This document, prepared by the Internal Audit Body with responsibility for Whistleblowing within the Group, as per the organisational provisions in place and the organisational manual, envisages the contribution of the ABCF, as well as the Chairpersons of the Supervisory Body of each company in the Group.

2.2 WHAT IS A WHISTLEBLOWER REPORT

In order to prevent and effectively combat fraudulent activity, illegal or irregular conduct, and violations, and to support the effective application and operation of the Code of Ethics, Model 231, and other company procedures, ENAV and its subsidiaries provides the opportunity for its employees to submit Whistleblowing Reports concerning:

- offences pursuant to Legislative Decree 231/2001, for example, activities suggesting fraud or corruption.
- non-compliance with procedures, Model 231, or the Code of Ethics or any conduct that is in conflict with or does not conform to or is not in line with the provisions of Model 231 and/or the Code of Ethics.
- events that could lead to the suspicion of the commission of acts of misconduct or of “maladministration”, or events or actions that may involve a degree of risk for the company.

2.3 THE SUBJECT OF THE WHISTLEBLOWER REPORT

The subject of the Report can include, but is not limited to: violations of national and international regulations (e.g. fraud and corruption); unlawful conduct pursuant to Legislative Decree 231/2001, including crimes against the Public Administration referred to in the Criminal Code; violation of internal company rules (e.g. policies and procedures); conflicts of interest leading to the abuse of power for personal gain by those in a position of trust; events in which, regardless of whether they are criminal acts or not, *maladministration* can be shown to have taken place by individuals using

their position in the company for personal gain, including interference with the administrative function from *outside*.

The offences or irregularities reported may include, but are not limited to, the following types of conduct:

- gross negligence
- harassment
- discrimination
- mismanagement
- wastage
- nepotism
- demotion
- repeated failure to respect procedural timeframes
- non-transparent recruitment procedures
- irregularities regarding administration or accounting and tax obligations
- false declarations
- violations of environmental and occupational safety regulations
- theft of assets owned by the Group or third parties
- embezzlement of money, assets, or supplies belonging to the Group
- falsification or alteration of documents
- destruction, concealment, or inappropriate use of documents, archives, furniture, installations, or equipment
- acceptance of money, goods, services, or other benefits as incentives to favour particular suppliers or other companies
- falsification of expenses claims (for example, "inflated" expenses or false travel expenses claims)
- falsification of work attendance
- disclosure of information that by its nature, or expressly under law or company provisions, is confidential, whether information belonging to the Group or belonging to third parties (e.g. competitors)
- use of the resources and assets of companies in the Group for personal gain, without authorisation
- irregularities involving money laundering
- violations of the regulations governing the business activity being carried out, or of EU regulation No. 596/2014 (*market abuse*), such as the unlawful disclosure of privileged information and the manipulation of the market, and other irregularities in services and investment activities.
- computer fraud
- actions or omissions that result in damage or danger to human rights, the environment, public health, safety, or the public interest.
- other cases that may constitute a violation of the rules governing the specific activity of the business sector in which the ENAV Group operates;
- the existence of relationships with subjects (natural or legal persons) belonging to criminal organizations of any nature or participating in violation of the principles of legality in contrast with the Code of Ethics;
- the violation of restrictive measures in economic and commercial relations and / or sanctions adopted at national, EU and international level.

The Reports can also be used to bring attention to any unlawful conduct or attempted unlawful conduct in the following regulatory areas, including, but not limited to:

- a) public procurement
- b) financial services, products and markets
- c) prevention of money laundering and the financing of terrorism
- d) safety and compliance of products placed on the Internal Market
- e) transport safety
- f) protection of the environment
- g) public health
- h) consumer protection
- i) protection of personal data
- j) security of networks and IT systems
- k) violations of European competition and state aid regulations
- l) violations concerning the Internal Market and corporate taxation.

Without prejudice to the objectives of the Whistleblowing procedure, the Reports must take into due consideration the existing regulatory constraints concerning privileged, *price-sensitive* information and other relevant information pursuant to the Market Abuse Regulation (EU Regulation No. 596/2014).

The Reports may not contain mere suspicions, rumours, or grievances, nor personal demands, claims, grievances, or requests by the Whistleblower.

However, it is not necessary for the Whistleblower to be 100% certain of the veracity of the facts reported and the identity of the perpetrator, although it is necessary that:

- the Report is detailed and is based on accurate and consistent factual information such as would lead the Supervisory Bodies, the Internal Audit Body, or the ABCF to reasonably believe that there is a possibility that a significant event has taken place to trigger the submission of the Report.
- The Whistleblower has reasonable grounds, in light of the circumstances and information available to them at the time they made the Report, to believe that the facts reported are true or that they have direct or sufficient knowledge of such facts, based on their role in the company.

The Report must be made in good faith and must not contain abusive language, personal insults, or moral judgements intended to offend or harm the reputation or personal or professional standing of the person or persons claimed to be responsible for the events being reported.

In particular, it is forbidden to make Reports in "bad faith" and more specifically:

- to submit reports with purely defamatory or libellous intent
- to submit reports that exclusively concern aspects of the Reported Party's private life, or that have no direct or indirect connection with the Reported Party's business role.
- to submit Reports of a discriminatory nature with regard to the Reported Party's sexual, religious, or political orientation, or their racial or ethnic origin.
- to submit reports that are in violation of the law.

Reports in "bad faith", which are abusive, offensive, defamatory, libellous, or discriminatory may give rise to civil and/or criminal action against the Whistleblower and lead to the imposition of sanctions, as indicated in Paragraph 6.3 below.

Furthermore, the recipients of the Reports are not required to take into consideration any anonymous Reports that are not sufficiently detailed, not adequately documented, or that do not provide sufficient evidence of facts and situations by relating them to specific situations or events.

3 THE PARTIES INVOLVED

This document applies to ENAV and to all the companies in the ENAV Group.

The scope of the Reports may concern unlawful cases or maladministration that may have occurred as part of the operational activities of the companies in the Group.

The main parties involved in the implementation of this regulation are the following.

3.1 THE WHISTLEBLOWERS

The Reports can be submitted either by the internal personnel of one of the companies in the Group or by external parties.

In addition to the employees of the companies in the Group, internal parties include:

- members of the corporate bodies
- parties whose employment relationship has not yet started, in cases where information regarding a violation has been acquired during the selection process or other stages of the pre-contractual negotiations.
- volunteer workers
- trainees

External parties may include, but are not limited to:

- shareholders in the ENAV Group
- suppliers, consultants, agents, partners
- any person working under the supervision and direction of contractors, subcontractors, and suppliers.
- former employees
- customers or users of the ENAV Group's services.

Whistleblowers can also be persons who were, or will be, in one of the positions listed above.

3.2 THE REPORTED PARTY

The Reports may concern members of the corporate bodies, management, employees, external associates, non-subordinate associates of the aforementioned Group companies, as well as business partners, suppliers, and all those who have a relationship with the Group and are involved in any type of unlawful conduct.

If the Reports concern one or more members of the Whistleblowing Committee, the Internal Audit Body and the HR Department will decide, for each individual case, how the composition of the Committee shall be determined.

3.3 RECIPIENTS OF WHISTLEBLOWING REPORTS

The Reports are to be submitted to the competent authorities through the appropriate communication channels described in Paragraph 4.2.

In compliance with the provisions of Model 231, the Supervisory Body of ENAV and, if they exist, of the other companies in the Group, will be the recipient of the Reports concerning (i) the commission, the attempted commission, or the reasonable risk of the commission of a crime (and/or administrative offence) pursuant to Legislative Decree 231/2001; (ii) violations, potential or actual, relating to Model 231, the Code of Ethics and/or the Group's corporate procedures as governed by Model 231.

In compliance with the provisions of the MSPC, the ABCF shall be the recipient of reports relating to attempted, alleged, and actual acts of corruption, or any violation or deficiency concerning the MSPC. Reports of irregular conduct or events are to be compiled by ENAV's Internal Audit Body and managed by the Whistleblowing Contact for all the Group's companies, to ensure a centralised response.

Any Reports that do not fall within the scope of the body's jurisdiction shall be immediately sent on to the relevant department/body, to ensure a constant flow of information and the timely management of the Reports and to safeguard the confidentiality of the Whistleblower's identity and personal information. Any additional information and documentation relevant to the facts reported that may have been received as a result of the Report must also be sent on to the competent body.

Without prejudice to the centralised coordination of information received by the Whistleblowing Contact, every report received will be shared with, and analysed by, the Whistleblowing Committee. Likewise, members of the Committee will receive copies of the Reports received by the Whistleblowing Contact, who will simultaneously convene the members to carry out a collective analysis of the reports.

All Reports received through channels other than the IT platform (ref. Par. 4.2 REPORTING METHODS) must be promptly brought to the attention of the relevant Whistleblowing Contact.

4 MINIMUM CONTENT AND REPORTING METHOD

4.1 MINIMUM CONTENT

In order that the Report can be used as intended, it should contain all the elements necessary to ascertain the validity of the facts covered by the report and include, as a minimum, the following essential items:

- **Subject matter:** a clear and complete description of the facts with an indication (if known) of the circumstances in which the reported events would have been committed/omitted (e.g., contracts, transactions, locations).
- **The Reported Party and other parties involved:** any information (such as the corporate function/role of the party) that would allow the alleged perpetrator(s) of the reported behaviour to be identified, along with any other parties that would have potentially been aware of the facts being reported.

The Whistleblower may also include the following additional items:

- their personal details, should they not wish to avail themselves of the right to anonymity
- details of any documentation that could confirm the validity of the facts being reported

- details of any other parties who could have information concerning the facts being reported
- any other information that may facilitate the gathering of evidence to support the claims being made in the Report.

4.2 REPORTING METHOD

Reports can be submitted via the channels described below.

ENAV recommends that Whistleblowers use internal reporting channels in preference to external reporting channels, unless they have reasons to prefer an external reporting channel, such as, for example, a fear of retaliation.

The Whistleblower has the right to choose the most appropriate reporting channel according to the specific circumstances of the case.

Furthermore, in order to make Whistleblowers more aware of the serious nature of the Reports, for those who intend to submit a Report ENAV has made a communication channel available, through which messages can be sent in an anonymous and confidential manner, and which can be used to start a dialogue, initiate meetings, and gather support. This will help the potential Whistleblower to recognise the offences being carried out, and remove any doubts they may have and provide any information they need to empower them to proceed independently with the presentation of the Report.

The Whistleblowing Portal – The preferred channel

The ENAV Group has set up a Whistleblowing portal that guarantees the confidentiality of the Whistleblower, and makes it possible to submit anonymous reports using on-line tools and the methods described in detail below.

The application can be accessed by employees on the company intranet, and by external parties through a dedicated page on the ENAV website (www.enav.it).

The Whistleblower can access the application using automatically-generated credentials, separate from those they have for any personal accounts they may have, thereby giving them the option of total anonymity. These credentials can also be used to receive messages and requests for clarification from the Whistleblowing Contact responsible for managing the Whistleblowing Reports within the Internal Audit Body.

To facilitate the investigation while guaranteeing confidentiality to the user, the application also makes it possible to set up a "dialogue", and for the Whistleblower to send and receive electronic documents, as attachments, to/from the Whistleblowing Contact.

The system ensures that the Whistleblower is automatically kept informed of the status of the processing of the Report, allows them to be contacted again for more details during the preliminary phase, and can be used to send further information to corroborate the events being reported.

The application is also used to notify the Whistleblower that the investigation has been completed.

The information collected is stored electronically on the platform, with defined access profiles, mandatory authentication, and automatic tracking of any transactions carried out. The platform also acts as the electronic register for the reports received, making all the essential data readily available.

If the Whistleblower uses the Whistleblowing portal, they will be able to assign their Report to a specific category, depending on the law or internal standard to which the possible case of fraud, the unlawful act, or irregularity reported relates. The classification is chosen by the Whistleblower within the application using a drop-down menu, which identifies the type of violation being reported as:

- corruption or fraud
- a violation of company procedures, Code of Ethics, or Model 231
- irregular conduct or suspicious activity that may involve risk to the company
- misadministration
- the commission, attempted commission, or risk of potential commission of a crime and/or an administrative offence, referred to in Legislative Decree 231/2001.
- other.

Other reporting channels

It is also possible to submit the Report:

- by email to whistleblowing@pec.enav.it
- by email to the Supervisory Bodies of the Group: organismodivigilanza@enav.it; odv231@technosky.it; odvidsairnav@enav.it; odv@d-flight.it
- by e-mail to the Anti-Bribery Compliance Function FCPC@enav.it
- by post to the company address: Via Salaria n. 716, 00138 Rome. For the attention of the Internal Audit Body or the Supervisory Board of ENAV (or of the other companies in the Group, if they have one).

External reporting channels

Whistleblowers can also report violations and illegal conduct through external reporting channels to the competent authorities identified by the Italian State, as well as to those at a European level.

5 THE REPORTING PROCESS

ENAV guarantees the systematic, accurate, transparent, impartial, objective, and timely management of Reports, and the documentability and traceability of the entire process.

The Whistleblowing process is based on the principles of trust, impartiality, and protection of the Whistleblower and consists of the following phases:

- a) receipt and evaluation of the Report (*triage*)
- b) management of the Report
- c) definition of the subject of the Report and the resolution of the case.

ENAV's Internal Audit Body carries out the activities described below for all types of reports received.

With reference to Reports relevant to Legislative Decree 231 and Model 231, the Internal Audit Body works in close coordination with the Supervisory Body of the companies in the Group, the recipient responsible for the type of Report received, and notifies the Supervisory Body of the outcome of each individual phase of the Whistleblowing process, involving this body in any related activities, where

appropriate, and obtaining the prior consent of the latter for the implementation of any measures decided upon.

Furthermore, if the report contains any potential acts of corruption (committed, attempted, or presumed) or violations or deficiencies in the management system for the prevention of corruption, the Internal Audit Body will provide detailed information to the ABCF, as part of its supervisory duty to monitor the performance of the system itself, to ensure the process is in compliance with the requirements of ISO 37001, without prejudice to any information being passed on to the relevant Supervisory Bodies.

5.1 RECEIPT AND EVALUATION OF REPORTS

Upon receipt of the Report, the Internal Audit Body:

- accepts the Report and prepares a Report summary containing the details of the report and the data needed for its classification
- sends the Whistleblower confirmation of receipt of the Report within 7 working days
- starts, also using the expertise of the Whistleblowing Committee, the preliminary verification of the existence of the conditions necessary for the assessment and prioritisation of the Report on the basis of what is stated in the report itself and any other information that is already available (to evaluate, for example, (i) whether the Report brings "attention to behaviour that puts the Company and/or any third parties at risk and is not merely a personal complaint; (ii) the seriousness of the risk for the Company and/or any third parties, including reputational, financial, and environmental damage, or injury to persons; (iii) if the Report contains sufficient evidence or if it is too vague and lacks the information necessary to justify a subsequent investigation, etc.). Assuming there is sufficient cause, the Audit Body proceeds to carry out further investigations and asks for the clarification from the Whistleblower, taking into account the methodological criteria set out in the Internal guidelines for the management of Whistleblowing Reports.

5.2 MANAGEMENT OF REPORTS

Having verified the necessary prerequisites referred to in the preceding paragraph, the Internal Audit Body begins a thorough investigation to assess the relevance and validity of the Report.

The internal investigation is conducted in confidence and impartially, to preserve the confidentiality of the Whistleblower.

In order to carry out the aforementioned activities, the Internal Audit Body may (i) request further information or documentation from the Whistleblower; (ii) acquire information and documents from the competent corporate bodies; (iii) make use of the support of external professionals, the specialist skills of which will help to ensure impartiality and independence in the assessment being made.

Investigations must not interfere, directly or indirectly, with any judicial investigation. It is an essential requirement to cooperate with the prosecuting authority.

The Internal Audit Body sends the Whistleblower updates on the action being taken, the status of the investigation, the actions planned or instigated by the Company to follow up on the Report, and on the expected outcome of the investigation within a reasonable timeframe, to be determined by the

Internal Audit Body, based on the nature of the Report, the complexity of the investigation that needs to be carried out, and the time that is actually available. This period may not exceed three (3) months from the date of receipt of the Report or, if no notice has been sent to the Whistleblower, three (3) months from the expiry of the period of seven (7) days from the receipt of the Report.

5.3 DEFINITION OF THE SUBJECT OF THE REPORT AND RESOLUTION OF THE CASE.

Upon completion of the appropriate checks and investigation, the Internal Audit Body archives any Reports determined to have been made in "bad faith", or that were not sufficiently detailed, or were unfounded, as well as those containing facts that have already been subject to investigation, unless the Report contains new information that would make further verification advisable.

For any Reports determined to be well-founded, the Internal Audit Body formulates the recommendations it deems appropriate or that require disciplinary action, identifies any protective measures deemed necessary and proposes measures aimed at rectifying any deficiencies found in the organisational or auditing processes, without prejudice to the possible implementation of disciplinary action, managed by the competent bodies. The competent corporate bodies then implement these recommendations and corrective actions, which are monitored by the Internal Audit Body, with the support, where authorised, of the Supervisory Bodies of the companies in the Group.

The results of all the checks, investigations, assessments, and decisions of the Internal Audit Body, the Supervisory Board, and the ABCF, along with any recommendations and proposals for disciplinary measures are formalised in writing in a dedicated report.

At the conclusion of the assessments and the aforementioned activities, the Internal Audit Body informs the Whistleblower of the outcome or status of the investigation.

The maximum term for the conclusion of the procedure is set at three (3) months from the date of receipt of the Report, without prejudice to any extensions of the terms justified by the specific circumstances of the case or by the nature and complexity of the subject of the Report (for example, in case of a lengthy investigation).

5.4 TRACEABILITY AND ARCHIVING

The documentation relating to each Report received (i.e. all the information and supporting documents received) must be kept, in compliance with the terms of confidentiality, for the time necessary to carry out the investigation and until the expiry of the prescribed deadlines based on the type and nature of the proceedings (judicial/extrajudicial, civil, administrative, tax, or criminal) undertaken by the Company or by third parties in relation to the facts in the Report.

6 GENERAL PRINCIPLES AND PROTECTIONS

The discreet and effective management of the Whistleblowing portal will help to promote the spread of a culture of ethics, transparency, and legality within the ENAV Group. This can only be achieved if Whistleblowers have the appropriate means of notification available to them, and are secure in the

knowledge that they will not be subject to any retaliation by colleagues or superiors, and that their report will not be ignored.

In addition, the technical system and the related management process fall within the scope of the guarantees provided by the ISO 27001 certified IT security protection system and, in particular, the principle of the segregation of duties, guarantee the transparency and traceability of the line processes and controls at the various levels of management, and the highest levels of classification of information with the relative protection measures.

The principles and protection measures that ENAV, as the Parent Company, undertakes to guarantee, are set out in detail below.

6.1 PROTECTION OF THE WHISTLEBLOWER AND OTHER INTERESTED PARTIES

The ENAV Group is committed to strengthen the relationship of trust between the Company and its *stakeholders*. For this reason, the ENAV Group shall protect the Whistleblower and the other persons concerned against any retaliatory, harmful, discriminatory, or otherwise unfair direct or indirect conduct, threatened or actual, consequent to the Report and carried out during the Whistleblowing process and after the conclusion of the investigation. The Report may not be prejudicial to the continuation of the employment relationship.

Therefore, any retaliation or discriminatory dismissal, transfer, change of duties, or any other retaliation or discriminatory measures taken against the Whistleblower are to be considered null and void, including:

- a) suspension or equivalent measures
- b) demotion or failure to promote
- c) a cut in pay
- d) a change in working hours
- e) a suspension of training
- f) negative assessments or references
- g) the imposition or administration of unjustified disciplinary measures
- h) coercion, intimidation, harassment or ostracism
- i) discrimination, unfair or disadvantageous treatment
- j) the failure to convert a fixed-term employment contract into a permanent employment contract, where the employee had legitimate expectations of being offered permanent employment
- k) non-renewal or early termination of a fixed-term employment contract
- l) damages, including to the person's reputation, particularly on social media, or financial losses, including loss of financial opportunity and loss of income
- m) the inclusion on any "Black list" on the basis of a formal or informal sectoral or industrial agreement, which may make it impossible for the person to find employment in the sector or industry in the future
- n) the termination of the contract for goods or services
- o) the cancellation of a license or permit
- p) being subject to psychiatric or medical examination

The aforementioned measures are also recognised in respect of the following parties, in order to avoid any "cross" retaliation:

- (i) facilitators, i.e. those who assist the Whistleblower during the reporting process and whose assistance must be confidential
- (ii) third parties with a connection to the Whistleblower (e.g. colleagues or family members)
- (iii) legal entities with a connection to the Whistleblower.

Discriminatory measures taken against Whistleblowers can be reported to the Ispettorato Nazionale del Lavoro (Italian National Labour Inspectorate) that has the authority to take action, initiated by the Whistleblowers themselves, or by the trade union designated by the Whistleblower.

Even if the facts reported prove to be unfounded and/or inconsistent based on the assessments and investigations carried out, any Whistleblower who has made the Report in good faith will not be prosecuted.

In Reports containing offensive judgements, insults, or that are defamatory or libellous, the confidentiality of the Whistleblower may not be protected by law.

The confidentiality of the Whistleblower can also not be guaranteed if disclosure is necessary to cooperate fully with the Judicial Authorities or the Police.

6.2 PROTECTION OF THE REPORTED PARTY

To prevent any abuse of the Whistleblowing process and any unfounded indictment, defamation, discrimination, retaliation or other disadvantage to the Reported Party, or the disclosure of their sensitive personal data, which could be detrimental to their reputation, until their guilt is established they cannot be sanctioned on the basis of the contents of the Report in the absence of any supporting evidence and until a thorough investigation into the claims made in the Report has been carried out.

6.3 SANCTIONS

The following are liable to the imposition of sanctions:

- any Whistleblower who makes, with malicious intent or gross negligence, Reports that prove to be groundless or to have been made in "bad faith"
- any company employee that has taken discriminatory measures against the Whistleblower
- those who obstruct or attempt to obstruct the submission of a Report
- the person responsible for carrying out verification, in the event that the verification and analysis are not carried out
- any party who does not adhere to the general principles of protection with particular reference to the confidentiality of the identity of the Whistleblower
- any Reported Party that, following the results of checks carried out by ENAV, was found to have carried out illegal or irregular acts, or actions that are not in compliance with the Code of Ethics, Model 231, the MSPC or company procedures, or that are not in compliance with the company's disciplinary regulations as stipulated in the Contratto Collettivo Nazionale del Lavoro (National Labour Collective Agreement).

Finally, if after all the checks have been carried out following the Report, further details have come to light regarding the commission of an unlawful act by an employee, the company may lodge a complaint with the judicial authorities. Similarly, if the checks carried out have revealed unlawful conduct on the part of a third party (e.g. a supplier), the Company may proceed, without prejudice to

any further options provided for by law and or by contract, to suspend/remove the aforementioned party from the company's employ.

6.4 CONFIDENTIALITY AND PRIVACY

In the case of Reports containing personal information (in which the identity of the Whistleblower and any other information that could make it possible to identify them are known by the recipient of the Whistleblowing Report, but is not disclosed), the ENAV Group guarantees the confidentiality of the Report and the Whistleblower who submitted it.

The identity of the Whistleblower and of the other parties involved, for whatever reason, in the Whistleblowing Report, is to be protected at all stages of the Whistleblowing procedure. Therefore, the above information cannot be disclosed to persons not directly involved in the evaluation or investigation process. All those who receive or are involved in the management of the Reports are required to protect their confidentiality.

This protection also applies to the Company's senior management, which is not allowed to start investigations or request information that would allow them to trace the identity of the Whistleblower. Therefore, if the Report is shared with other departments, bodies, or third parties as part of a preliminary investigation, the Internal Audit Body, the Supervisory Board, or the ABCF shall forward only the content of the Report, removing all references that would make it possible to trace, even indirectly, the identity of the Whistleblower.

The identity of the Whistleblower may only be revealed when:

- the Whistleblower has given their express consent to the disclosure of their identity.
- criminal liability for defamatory content may be suspected. In such cases, ENAV reserves the right to carry out investigations into the identity of the Whistleblower and to adopt the measures deemed most appropriate.
- anonymity is not enforceable by law and the identity of the Whistleblower is necessary for the purpose of carrying out the investigation or is required by the judicial authorities in relation to other investigations (criminal, tax, or administrative, or inspections being carried out by supervisory bodies).
- the identity of the Whistleblower is essential information for the defence of the Reported Party.
- the identity of the Whistleblower is necessary to prevent or reduce threats to the health or safety of persons.

6.5 PROCESSING OF PERSONAL DATA

The personal data of the Whistleblowers, the Reported Parties, and all other parties involved in the Whistleblowing process are processed in compliance with the current legislation on the protection of personal data. In particular, ENAV guarantees that the processing of personal data will be carried out in compliance with the parties' fundamental rights and freedoms, and with respect for the dignity/honour of the data subjects, with particular reference to privacy and data security. All information processed for the purposes of this document is also required to be in compliance with the provisions of the Security Management System. In particular, it should be noted in this context that:

- The privacy policy is available on the Whistleblowing portal, which is an integral and substantial part of this regulation, and which specifies the purposes and methods of the processing of personal data, the Data Controller, and the person in charge of processing personal data, the internal data

processors, the categories, and the offices to which the reported data can be transmitted in the context of the management of the Reporting process, the data retention times, as well as the rights of the Whistleblower in relation to their personal data.

- the Whistleblowing process provides for the processing of personal data only when strictly necessary and relevant to the purposes for which they have been collected. Reports that have been deemed to be irrelevant pursuant to this procedure are archived and not processed further.
- technical and organisational measures have been put in place to guarantee the security of personal data, in compliance with current legislation, and the encryption of transmitted data and data stored in the IT systems relating to the reports is guaranteed.
- in the context of a Report, the Reported Party, the alleged perpetrator of the offence, with reference to their personal data processed by ENAV or by any other company in the Group, in accordance with the provisions of the Legislator in Art. 2-undecies of Legislative Decree No. 196 of 30 June 2003, (The Italian Privacy Code on the protection of personal data) as amended by Legislative Decree No. 101 of 10 August 2018, and in line with the provisions of the ENAV and Group companies' policies on the protection of personal data, cannot exercise the rights provided for in Articles 15 to 22 of EU Regulation No. 2016/679 - the right to access personal data, the right to rectify them, the right of cancellation or the right to be forgotten, the right to limitation of processing, the right to portability of personal data and the right to object to processing - since exercising these rights could compromise the confidentiality of the Whistleblower's identity and the protection of the rights and freedoms of the Whistleblower. In this case, the interested party is precluded from contacting the Data Controller and, in the absence of a response from the latter, of lodging a complaint with the Privacy Guarantor (pursuant to Art. 77 of EU Regulation No. 2016/679). This is without prejudice to the rights of the Reported Party to exercise their rights in the manner provided for by Art. 160 of the Italian Privacy Code.

6.6 REPORTING TO SENIOR MANAGEMENT

Periodically, and at least annually, a report shall be drawn up by ENAV's Internal Audit Body, with the support, to the limits of their jurisdiction, of the Supervisory Body of the companies in the Group and the ABCF, and submitted to the Control Committee and Risks and Related Parties, and the Board of Directors and the Board of Statutory Auditors. This report will provide information about the Whistleblowing Reports received and on the progress of the verification process and any actions taken (corrective actions or disciplinary measures).