

# SUSTAINABILITY REPORT 2021

*Consolidated disclosure of non-financial  
information pursuant to Legislative  
Decree 254/2016*



## INNOVATING THE SKY



Innovating means looking beyond, intuiting the invisible, to anticipate and prepare for the future. It means investing in new technologies and in the continuous training of our professionals, always staying one step ahead and leveraging our biggest asset: people.

It means looking after the peace of mind of the millions of passengers who travel through our skies on a daily basis.

It means remaining at the international forefront of the creation of new digital solutions and technologies.

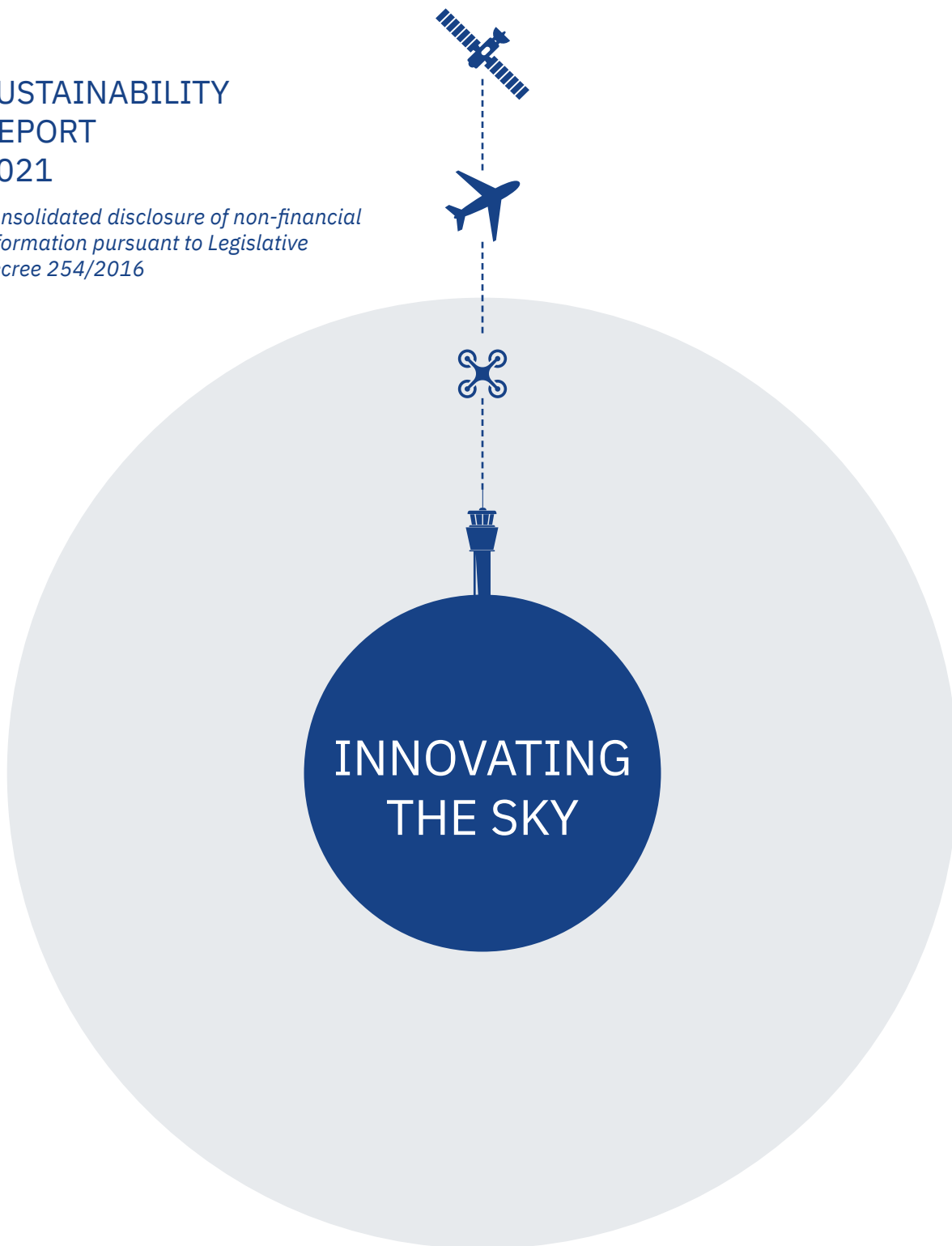
It means maintaining an awareness of our priceless role in the country's infrastructure, managing the airspace with a specific focus on sustainability.

For us at ENAV, innovating means making the sky the safest place on Earth.



# SUSTAINABILITY REPORT 2021

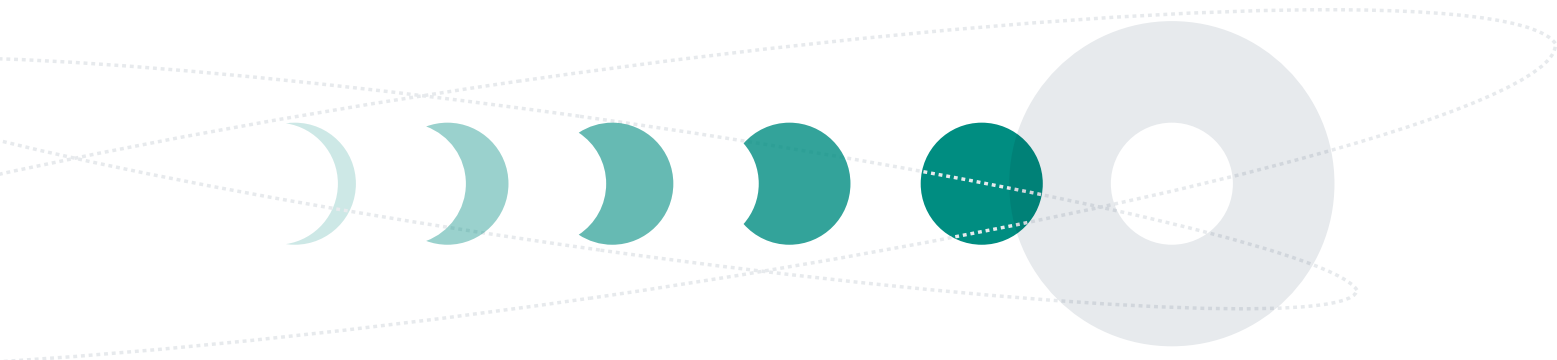
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## LETTER TO STAKEHOLDERS

*Although still characterised by elements of uncertainty due to the continuing Covid-19 pandemic, for the ENAV Group the financial year that has just ended, and which is under review in this non-financial report, was also marked by the achievement of significant milestones in our path towards sustainable development.*

*With regard to **governance**, we are aware that sustainability means strategy and adequate monitoring of risk profiles, in the pursuit of the sustainable success of the company and the creation of long-term value for all our stakeholders, both internal and external. This is why sustainability is an integral part of our business strategy and our daily actions, and will remain increasingly central in the future. The full commitment of ENAV's governance, from the Board of Directors to its internal committees, including the Sustainability Committee, in unison with the commitment of Top Management and all the people of the ENAV Group, has in fact made it possible to keep the commitments made in the 2018-2020 Sustainability Plan, and to set new and ambitious ones in the 2021-2023 Sustainability Plan, as well as to put sustainability at the centre of the Group's strategies and to integrate it organically into compensation policies.*

*From the point of view of the **environment**, in addition to the initiatives already under way, aimed at reducing the emissions of the carriers (it is enough to think of Free Route, which has enabled a decrease of about 640 million kg of CO<sub>2</sub> from 2016 to today), the continuous commitment to decarbonisation has allowed a reduction of direct emissions of Scope 1 and 2 of more than 24% compared to 2019 and the definition of an abatement strategy of Scope 1, 2 and 3 emissions, resulting in validation by the Science Based Target initiative, the international body of industrial excellence which emerged from the collaboration between the Carbon Disclosure Project, the Global Compact of Nations Unite, the World Resources Institute and the World Wide Fund for Nature. In this regard, it should be noted that ENAV is the first Italian company in the airport sector to obtain this important recognition in the fight against climate change. In addition to the results obtained in the reduction of CO<sub>2</sub> emissions, due also to the further progress in replacing the company car fleet with electric, hybrid and plug-in machines, in 2021 we consolidated our commitment to the elimination of single-use plastics from all company locations and completed the development of the platform for the management of the sustainable supply chain, in order to raise the level of oversight of the approach of our suppliers to ESG issues.*

*As part of **social** initiatives, the achievement of ISO 37001 certification by the Parent Company in the field of anti-corruption management systems and the strengthening of adequate internal anti-corruption safeguards have confirmed the Group's commitment to the highest ethical levels in business management, with a zero tolerance approach to ensure compliance and the continuous monitoring and improvement of the Anti-Corruption Management System. With regard to diversity & inclusion policies, we conducted an in-depth analysis that led us to define a three-year action plan of measures aimed at improving and developing inclusion, personal well-being, motivation and sense of belonging to one's working context. We are continuing to invest in people and the full realisation of their potential as a driver of achievement of industrial objectives. The "Improve yourself" project, launched in 2021, and intended for people with disabilities, goes in this direction with a view to creating a balance of skills aimed at enhancing work. The project also includes a life coaching path to accompany our people in their professional career. The "Regulation for the protection of the dignity of female and male workers against harassment, violence and abuse in the workplace" was also adopted and the role of Confi-*

Chairman  
**Francesca Isgro**



Chief Executive  
Officer  
**Paolo Simioni**



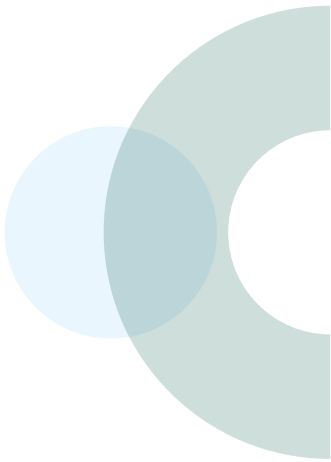
*dence Advisor was created: these two important will have an impact over the next few years in continually increasing our focus on inclusion, the well-being of people and the fight against discrimination of any kind.*

*Our **stakeholders** have increasingly become strategic partners in ENAV's growth and together we have travelled, in a coherent and significant way, the pathway towards deeper collaboration to achieve new goals in sustainable development and innovation. And it is precisely innovation that today represents for ENAV an inseparable combination with sustainability.*

*Our Group is a strategic asset for Italy in the management of airspace, an intangible infrastructure that must be continuously innovated to accommodate, for example, the new means of remotely piloted aircraft, indispensable tools to ensure the development of sustainable mobility. ENAV is a key element in this modernisation process, thanks to the professionalism of our people and the push towards new dimensions of cutting-edge technology, such as artificial intelligence or data-driven applications.*

*Sustainability-centric, attentive to innovation and digital transformation: these are the concepts and key words that will define the ENAV Group's new industrial model focused, as always, on talent, a spirit of service and attention to creating long-term value for our stakeholders and well-being for the community.*

## Our history



*Every day on our routes we accompany those who fly with reliability and safety. We design the sky of the future, investing in people and innovation for sustainable air transport and for Italy's economic growth.*

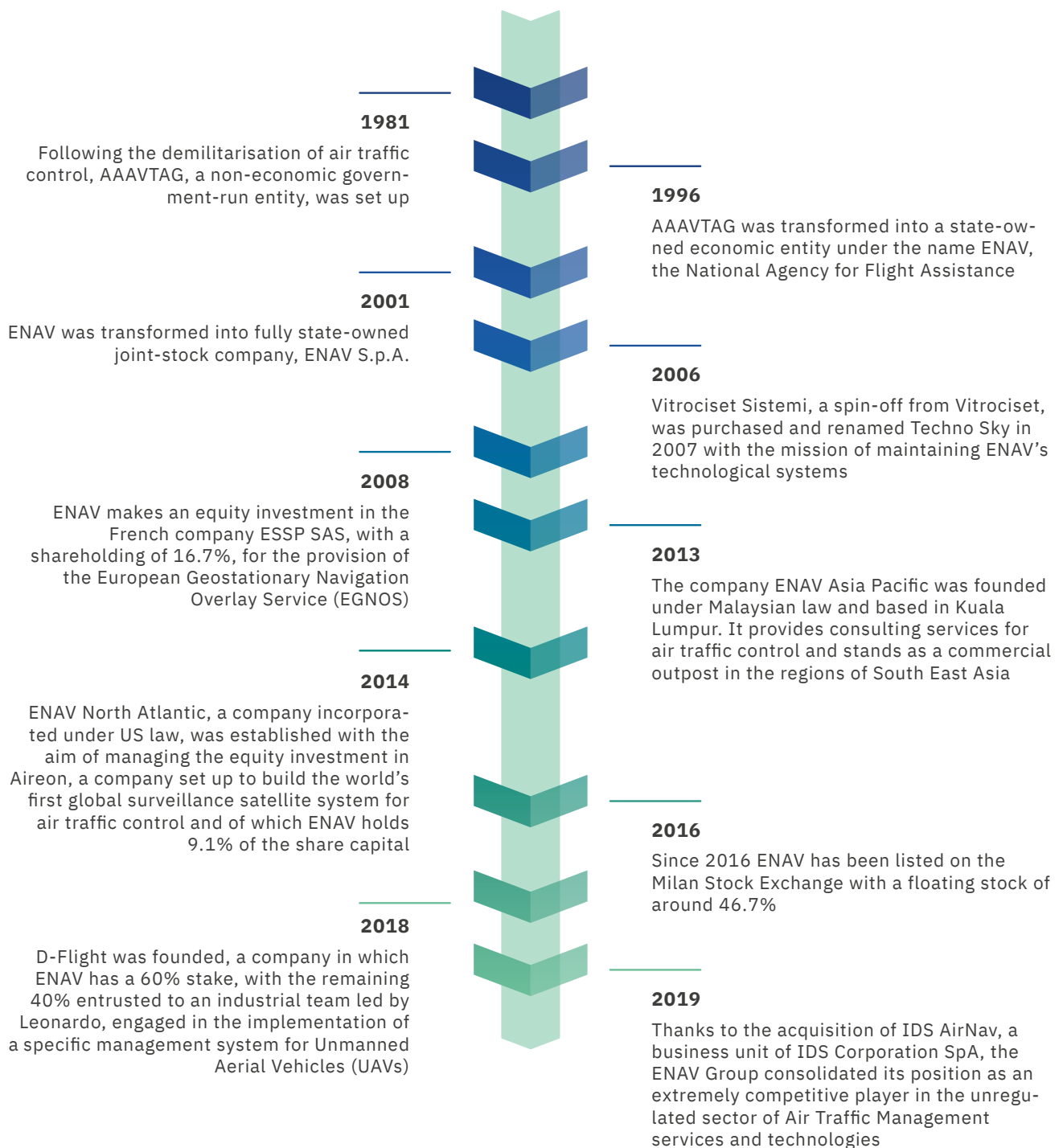
ENAV S.p.A. is an Italian joint-stock company that operates as an exclusive supplier of civil airspace management and control services under Italian competence.

The present company has its origins in the Autonomous Company providing Flight Assistance for General Air Traffic (AAAVTAG), established in 1981. The Autonomous Company took over from the commissariat for flight assistance established three years earlier as the GAT (General Air Traffic) Control Company to manage the passage of part of the air traffic controllers and of airports previously run by the Italian Air Force classified in what was then the Flight Telecommunications Inspectorate (ITAV), a military entity reporting to the Air Force General Staff.

Today the company is controlled by the Ministry of Economy and Finance (53.3% of the share capital). It operates in a market regulated at European level and provides its services in Italy under the supervision of the Ministry of Sustainable Infrastructures and Mobility and the National Civil Aviation Authority (ENAC).

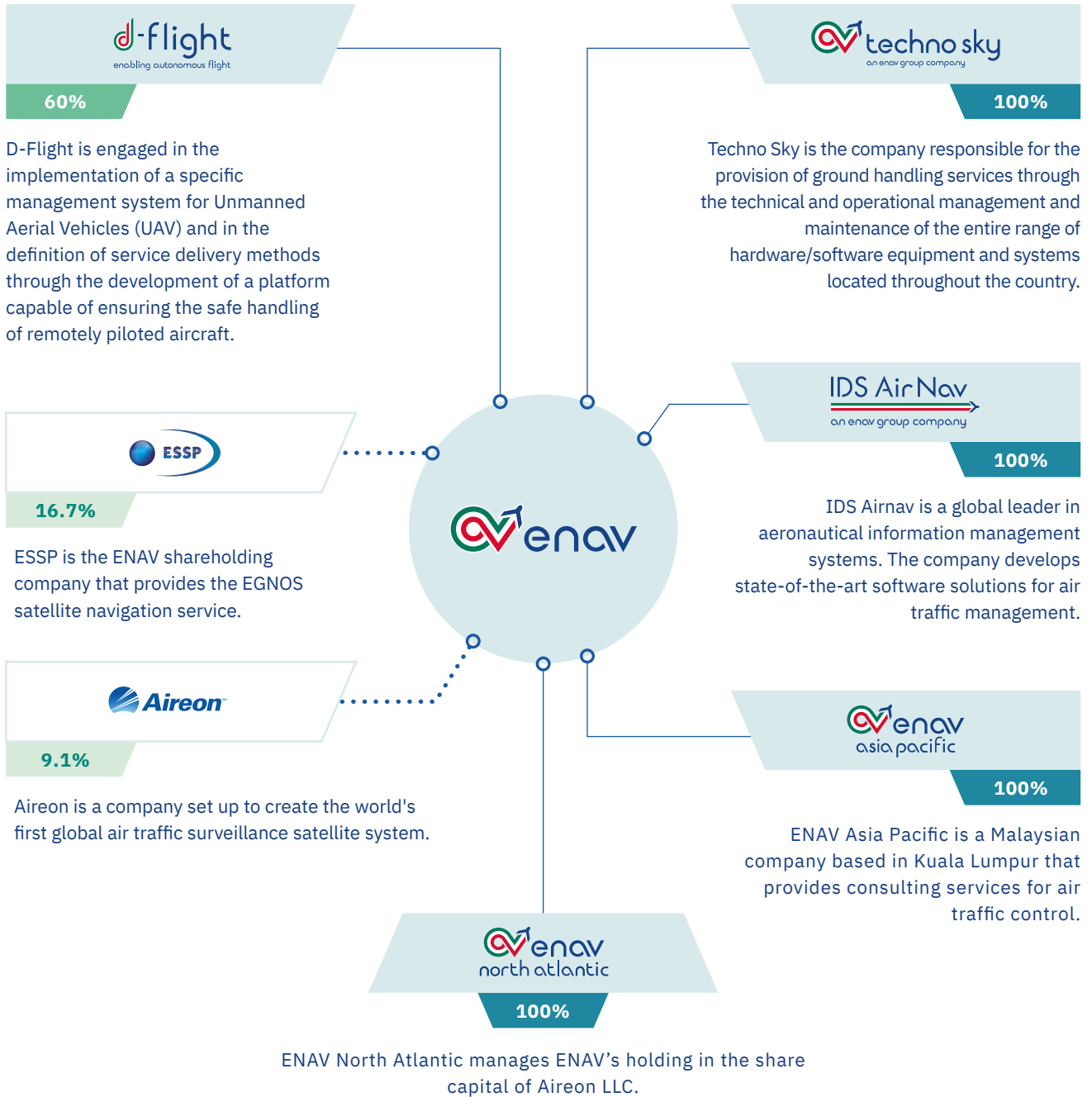






# ID card and operating model

## THE STRUCTURE OF THE GROUP



## THE GROUP'S ID CARD

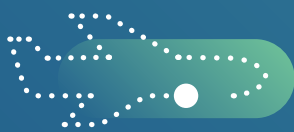
ENAV is a fundamental component of the international Air Traffic Management (ATM) system and one of the main players in the realisation of the Single European Sky, the initiative of the European Commission which aims to optimise continental airspace through an increasingly efficient standardisation of traffic flows.

We are the only Italian company authorised to select, train and update the professionals operating in civilian air traffic control services.

Despite the Covid-19 pandemic that has hit the entire world, and in particular the air traffic sector, ENAV has continued to guarantee continuity of service in maximum safety as is stated in its mission: namely, to guarantee safety and punctuality to the millions of passengers that fly in Italian airspace and to contribute to the growth of national and European air transport through ongoing efficiency, innovation and respect for the environment. All of this makes ENAV a company that places sustainability and social awareness at the heart of its business.

In 2021 more than one million planes flew over Italian airspace were and ENAV, with its 4,106 employees, guaranteed 24/24 safety and punctuality hours, providing all air navigation services to aircraft. From its air traffic Control Towers at 45 airports, ENAV manages the take-offs, landings and ground movements of aircraft, and from its 4 Area Control Centres it provides navigation assistance to all en-route traffic, whether for overflight or for landing at one of Italy's airports.

Long considered to be among the "Big Five" in Europe for operational performance and innovation, the ENAV Group is a fundamental component of the international Air Traffic Management system (hereinafter ATM). It participates in research and development in coordination with the national and international supervisory bodies in the industry. It is also one of the main players in the implementation of the Single European Sky programme, the purpose of which is to harmonise air traffic management throughout the European Union with the aim of enhancing the safety and efficiency of continental air transport. For years the ENAV Group has also been committed to protecting the environment thanks to its constant optimisation of routes (that reduces the fuel consumption of aircraft) and the use of innovative technologies that improve the efficiency of its own infrastructures.



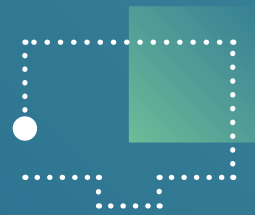
**5,574**

Peak number of flights managed in one day



**4,106**

Employees



**4**

Area Control Centres



**The ENAV Group**



**45**

Control towers



**1,180,526**

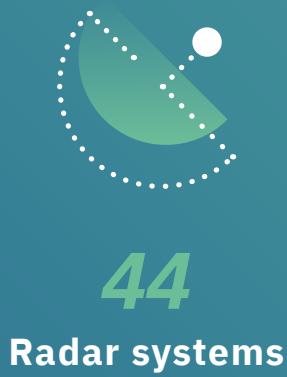
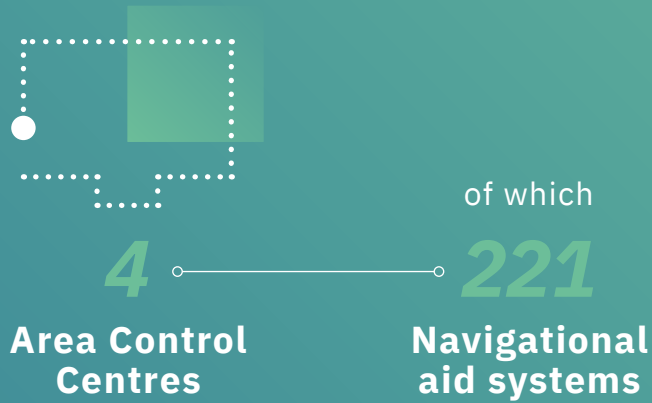
Flights controlled annually



**732,800km<sup>2</sup>**

Airspace for which ENAV is responsible

In the context of the Group, Techno Sky manages and maintains:





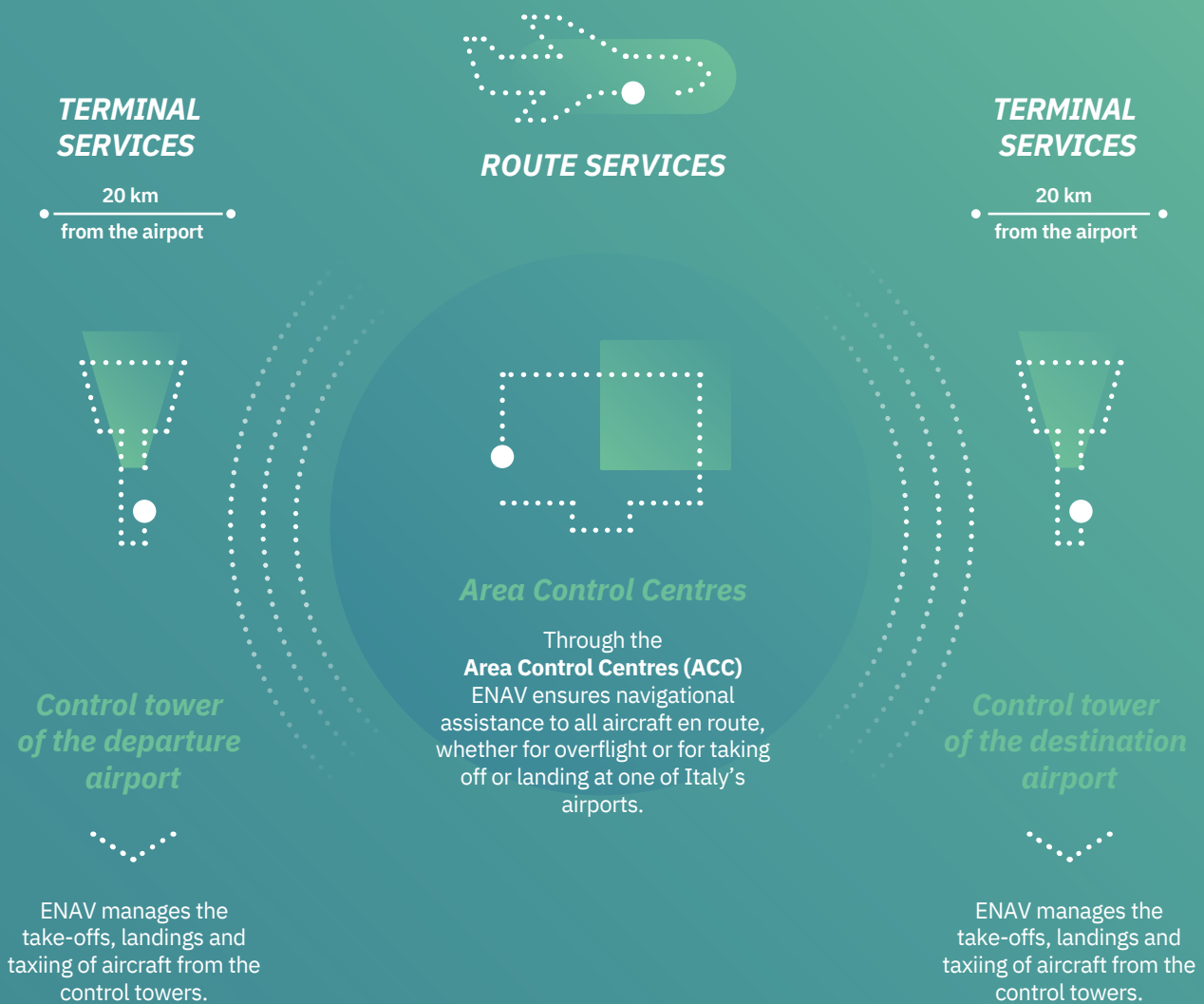
## THE OPERATING MODEL

ENAV ensures navigational assistance to all aircraft, whether for overflight or for landing at one of Italy's airports, by means of:

- the 4 area control centres (ACC) in Rome, Milan, Padua and Brindisi for the en route phase;
- the 45 air control towers at 45 civilian airports in Italy for the take-off, landing, and ground movement of aircraft: Fiumicino, Malpensa, Linate, Venice Tessera, Bari, Bologna, Catania, Ciampino, Naples, Olbia, Orio al Serio, Palermo, Turin Caselle, Verona Villafranca, Alghero, Brindisi, Cagliari, Florence, Genoa, Lamezia Terme, Rimini, Ronchi dei Legionari, Treviso, Parma, Turin Aeritalia, Albenga, Cuneo, Brescia, Bolzano, Padua, Venice Lido, Perugia, Ancona Falconara, Forlì, Rome Urbe, Pescara, Rieti, Salerno, Reggio Calabria, Comiso, Pantelleria, Lampedusa, Grottaglie, Crotona, Foggia.



Air traffic control is guaranteed seamlessly, from the moment an aircraft's engines are turned on in the apron of the airport of departure, until they are cut once it arrives at the apron assigned at the airport of destination. The task of the air traffic controller is to guarantee safe and expeditious movement of aircraft by ensuring a minimum separation between aircraft of 5 miles on the horizontal plane (reduced to 3 NM in the vicinity of the airports of Fiumicino, Ciampino, Linate, Malpensa and Bergamo) or 1,000 feet in the vertical plane. Flight efficiency objectives are met through fast movement, assigning the most direct route possible between the airport of departure and the airport of destination and ensuring the ideal climb and descent profile, i.e. the one that facilitates the lowest possible fuel consumption and the consequent reduction of the environmental footprint thanks to the lower CO<sub>2</sub> emissions.



## Note on methodology

The ENAV Group has prepared the Consolidated Non-Financial Statement (hereinafter also referred to as “Statement”, “Sustainability Report” or “Report”) in accordance with the provisions of Article 5(3)(b) of Legislative Decree No. 254, dated 30 December 2016 (hereinafter “Decree”), as amended. The document constitutes a separate report from the Report on Operations.

The Statement, prepared pursuant to articles 3 and 4 of the Decree, and in accordance with the Decree, contains information on the Company’s impact on five thematic areas, namely the environment, personnel management, social impacts, human rights and the fight against corruption and bribery. The broadness and quality of reporting reflect the principle of relevance (or “materiality”), an element provided for under the reference legislation and which characterises GRI Sustainability Reporting Standards (hereinafter “GRI Standards”). GRI Standards require the Company to carry out an analysis that identifies information relevant to the measures necessary to understand its activities, its performance, its results and the impact it produces, or which is able to substantially influence the assessments and decisions of its stakeholders (see section “2.1 Stakeholder engagement”).

The Statement was drawn up in accordance with the GRI Standards published by the Global Reporting Initiatives (“GRI Standards - GRI-core”), the independent authoritative body which defines models for non-financial reporting. The disclosures and the indicators contained in the text are given in the “GRI Content Index” (page 180).

It should be noted that where the Group considered it unnecessary to adopt policies related to the areas referred to in Legislative Decree 254/2016, this is linked to the existence of effective corporate practices which do not require it to adopt specific policies on the above-mentioned areas. For this reason it should be noted that the term “Policy” refers to documents that are formalised and approved.

Furthermore, 2020 data for operational training was restated as a result of updated data that became available after closure of the 2020 NFS. For details of the changes, see Tables 36 and 40 of Annex 1. This non-financial statement responds to the demands of EU Regulation 852/2020 and the Delegated Act relating to Article 8 of the aforementioned Regulation regarding activities, capital expenditures and operating expenses associated with eco-sustainable activities, as reported in the relative paragraph “1.4 The EU Taxonomy”.

The present document was approved by ENAV Board of Directors on 21 April 2022.

This Statement, except as noted in paragraph “1.4 The EU taxonomy”, has been subject to limited review by EY S.p.A. in accordance with the International Standard on Assurance Engagements (ISAE 3000 Revised).

The 2021 Consolidated Non-Financial Statement, as well as those for 2020, 2019, 2018 and 2017, are available on the Group’s website ([www.enav.it](http://www.enav.it)).

## SCOPE OF REPORTING

The qualitative and quantitative information contained in the Consolidated Non-Financial Statement refers to the performances of the ENAV Group (hereinafter also referred to as “the Group”) for the year ended on 31 December 2021. In addition, to help the reader better compare and contextualise the information herein, the data for the years 2020 and 2019 have been included and appropriately indicated. The quantitative data for the financial years, 2019, 2020 and 2021 are not perfectly comparable due to the changes in the scope of reporting that took place in 2020.

This non-financial statement includes data and information referring to the “the ENAV Group”, namely the set of companies composed of the Parent Company, ENAV S.p.A. and its subsidiaries, consolidated on a line-by-line basis: Techno Sky S.r.l., ENAV Asia Pacific Sdn Bhd, ENAV North Atlantic LLC, d-flight and IDS AirNav. It should be noted that the company ENAV España Control Aereo S.L.U, acquired in January 2020 in order to take part in a tender for the provision of terminal air traffic management services, has been excluded from the scope of reporting. Said company is no longer operative and was liquidated in March 2021. In addition, on 9 February 2021, the liquidation proceedings were concluded with regards to the Sicta Consortium, which is included not reported in this NFS.

Please note that the terms “ENAV” and “the Company” refer exclusively to the Parent Company ENAV S.p.A.

Any restrictions to this scope have been appropriately indicated in the table “Scope of the material issues identified” (page 44). In any case, these limitations do not impair the comprehension of the performance and representativeness of the information.



## **01 • THE ENAV GROUP IN 2021**







# 1. The ENAV Group in 2021

## 1.1 THE IMPACT OF THE COVID-19 PANDEMIC: OUR RESPONSES TO THE HEALTH EMERGENCY<sup>1</sup>

The methods for managing the impacts of the Covid-19 pandemic during 2021 have been stabilised and consolidated as an integral part of the ENAV Group's management processes. After the emergency responses prepared in 2020, the organisational action continued, aimed at identifying the best balance between the containment of health risks and the need to ensure business continuity.

The ENAV Group has pursued this balance by constantly monitoring two central elements in support of the decision-making process: the evolution of regulations according to the national health situation, and the evolution of the virus and the quarantine of our people. The company organisational units involved in various ways, starting from Integrated Compliance and Risk Management and Human Resources and Corporate Services, have constantly updated the measures for safety and prevention of infection from Covid-19, providing adequate information to all staff and constantly monitoring the effective implementation of the procedures. Close coordination with the company appointed to collaborate in risk assessment and health surveillance of workers has made it possible to manage positive cases and quarantine effectively, authorising the return to work on a case by case basis. The involvement of the company doctor has also made it possible to ensure the protection of so-called fragile workers, by providing for the possibility of a different way of performing their duties where the right circumstances are present.

During the year under review, communiqués were distributed to staff with the aim of modifying the extent of their presence in the office according to the evolution of the pandemic, limiting their presence during periods of upsurge of the virus and, conversely, facilitating their return during periods when the spread was contained. However, in-person attendance was constantly monitored in order to prevent figures that exceed those defined as the threshold in the risk assessment. In line with national legislation, all workers concerned were granted extraordinary parental leave.

In April 2021, to ensure the highest possible levels of vaccination, all workers were granted an additional two hours of paid leave, while staff on duty could alter their shift to ensure an adequate rest period after receiving the jab.

Company Regulations for the management of post-emergency agile working were issued in October 2020 and amended in April 2021 by reaching an agreement with employer and worker representatives who endorsed the implementation of several improvement measures. The Regulations, which will come into force at the end of the health emergency, provide for:

1. In compliance with the European common enforcement priorities for 2021 annual financial reports issued by the European Securities and Markets Authority on 29 October 2021.

- application to all Group personnel;
- compatibly with the workload, the number of days of agile working will be extended to two days per week for the entire workforce involved, to which a further one day per week can be added on the basis of specific evaluations;
- the flexibility of the work, which can be performed in a broader time slot compared to normal working hours;
- confirmation of recognition of the meal voucher in the days in which agile working is carried out.

In May 2021, devices were installed at the entrance to company offices as a further preventive measure, introducing the obligation for anyone wishing to access the Group's premises to undergo body temperature measurement.

In consideration of the epidemiological scenario at the beginning of the summer in 2021, which allowed passage in the so-called white zone of all Italian regions, with the consequent relaxation of restrictive measures and the gradual resumption of economic and social activities, on 6 July 2021 a communication was issued to the staff with which the minimum share of onsite presence was set at 50% of monthly working days, in compliance with the precautionary measures provided for.

Following the entry into force of the Circular of the Ministry of Health of 11 August, company provisions on return to work following quarantine and isolation were updated and communicated to staff on 2 September 2021.

In October 2021, and in compliance with the government Decree, checks were introduced throughout the country on the possession of a valid Green Pass or medical certification exempting an individual from vaccination to access all ENAV Group premises (including company catering services for indoor dining facilities pursuant to Article 3 of Decree Law no. 105 of 23 July 2021). Checks were carried out by specially appointed personnel present at the entrance to the main offices, but also remotely by a team dedicated to control via a video conferencing platform. The process of verifying the possession by ENAV Group personnel of Green Passes is regulated by a specific procedure of the Management System for Occupational Health and Safety - SGSSL-P-15.1 Management of Covid-19 Green Pass Checks. The latest version of this procedure transposes Decree Law 1/2022, the obligation to possess and display an enhanced Green Pass to access workplaces by persons aged 50 or over.

With reference to the first few months of 2022, the ENAV Group has implemented (Communication to personnel Ref. ICRM/18787 of 9 February 2022) the provisions regarding the updating of the isolation, quarantine and self-surveillance measures pursuant to Legislative Decree 05/2022 and Ministry of Health Circular 9498 of 4 February 2022. Finally, following the entry into force from 11 February 2022 of the Ordinance of the Ministry of Health of 8 February, the safety and prevention measures against infection from SARS-CoV-2/Covid-19 have been updated, providing for the obligation to wear face masks made available to the employer on company sites, with the exception of external appurtenances, in the latter case strictly observing the safety distance of at least one metre.

## 1.2 FACTORS AND EXCEPTIONAL EVENTS THAT CAN INFLUENCE THE PERFORMANCES OF THE COMPANY, THE BUSINESS MODEL AND THE CREATION OF VALUE<sup>2</sup>

In compliance with the recommendations issued by ESMA in October 2021, which confirms the 2020 recommendations recalled by CONSOB regarding the impacts deriving from the COVID-19 pandemic, this paragraph reports the effects on the Group of the pandemic still in progress including through a comparison with the corresponding period of the previous year.

In 2021, thanks to the positive trend of the vaccination campaign of the population worldwide and the consequent gradual mitigation of travel restrictions, starting from the second half of 2021 there was a recovery in the activities of the air transport sector, which since March 2020 had been significantly affected by the effects the Covid-19 pandemic. Compared to the previous year, there was an increase in revenues from operations of 43.2%, while compared to the pre-pandemic period in 2019 revenues in 2020 were down 63%. While remaining lower than in 2019, these values still show a recovery, considering that, compared with 2019, revenues from operating activities in 2021 were down 47%. The recovery in national and international movements also had a positive effect on third-country market orders, which were up 22.3% in terms of revenues compared to 2020, while the reduction in turnover was partly recovered through the recognition of balance revenues, the determination of which occurred in compliance with EU Regulation 2020/1627, Decision 2021/891 of the European Commission, and taking into account the Performance Plan last presented in November 2021. Although the balances recognised allow for a recovery on the economic side of things, they are deferred in financial terms, since it is estimated that they will be recovered by ENAV in tariffs as from 2023 and in the following five years. In order to support its financial requirements, and considering the Group's good capitalisation, which shows a ratio of net financial indebtedness to consolidated shareholders' equity of 40%, in 2021 the Parent Company subscribed to some new funding lines.

## 1.3 OUR SUSTAINABILITY STRATEGY

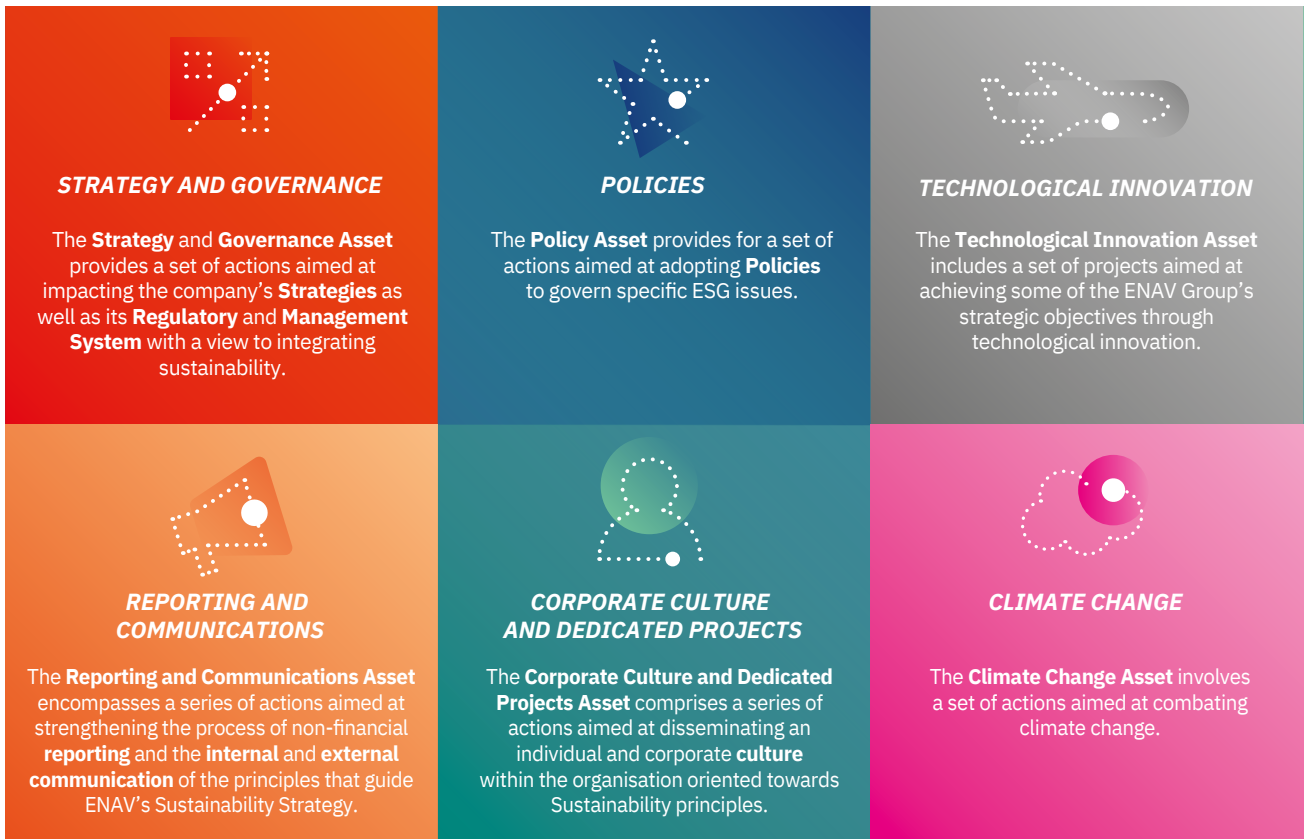
Taking up the challenge laid down by the UN 2030 Agenda for Sustainable Development, and aware of the urgency posed by the climate crises and the social consequences of the Covid-19 pandemic, for the two year period 2018-2020 the ENAV Group embarked upon a path of change management by placing sustainability at the heart of its mission and its relations with its stakeholders.

If in the 2018-2020 Sustainability Plan, indeed, the company had set itself a series of objectives aimed mainly at laying the foundations for creating a new culture of sustainability among people to consolidate sustainability governance and initiate ESG projects that can build the foundations for the future, the 2021-2023 Sustainability Plan, approved by the ENAV Board of Directors on 1 July 2021, has made it possible to consolidate the Group's sustainability strategy through the definition of a road map which aims to give ENAV a leading role in the sustainable development of the entire air transport sector.

The complete integration of sustainability into business strategies, the consolidation of governance, entry into ESG ratings, projects in diversity and inclusion and the commitment to decarbonisation with the consequent validation of our strategy on CO<sub>2</sub> emissions by the Science Based Target ini-

2. In compliance with the European common enforcement priorities for 2021 annual financial reports issued by the European Securities and Markets Authority on 29 October 2021.

tiative, are just some of the objectives achieved in 2021 which paved the way for an increasingly challenging path rich with objectives that we aim to achieve together with all ENAV people and our stakeholders. The 2021-2023 Sustainability Plan is divided into 6 assets: Strategies and governance, Policies, Technological innovation, Reporting and communications, Corporate culture and dedicated projects, and Climate change.





Starting from the SDGs, the sustainability strategy for the three-year period begins with a dialogue with our stakeholders (see the section “Stakeholder engagement”) and from analysis of some of the main ESG ratings, and is broken down into a series of objectives monitored by a system of KPIs and targets supported by the balanced scorecard model.

The **2021-2023 Sustainability Plan** sets out particularly challenging targets, which in some cases also require the activation of new processes and skills. For these reasons, in order to have a tableau de bord and a system of KPIs to facilitate proper monitoring of the achievement of targets, the Plan was structured internally using the **Sustainable Balanced Scorecard** model. The objectives, KPIs and targets of the 2021-2023 Sustainability Plan are shown below, while the breakdown according to the SBSC model is used for internal use to monitor the progress of projects.



The plan includes 33 objectives to which the company is committed over three years. The 2021 targets have almost all been met.

## STRATEGY AND GOVERNANCE

Objectives	KPI	Target	Anno	Target raggiunto nel 2021
<b>Supplier evaluation against ESG criteria</b>	Percentage of core suppliers evaluated (against ESG criteria) of total ENAV core suppliers	Platform launch date	2021	Sustainable Supply Chain activity launched
		75%	2022	
		100%	2021	
<b>To define a strategy for initiatives “for social purposes and in particular for corporate volunteering”, evaluating for each year the SDGs on which to take action</b>	Presentation of strategy and definition of the SDGs to invest in every year	Presentation date	2021	Topic Targets were identified in 2021 and related projects defined
<b>To ensure constant stakeholder engagement and attention</b>	Number of contacts made with the stakeholders	At least 3 meetings per year with each individual stakeholder	2021	In 2021 ENAV stakeholders were involved in the identification of material issues through surveys, interviews and focus groups
<b>ESG Rating (as per the 2023 LTI Plan)</b>	Rating identification	Rating solicited	2021	Solicited S&P questionnaire developed in 2021
	Assessment sul rating (Gap Analysis + Action Plan)	Assessment	2022	
	Score increase 2023 vs 2021	+ 30% on CSA score of S&P 2023 rating	2023	
<b>Increase in training delivered to ENAV Group employees on issues that include aspects related to Legislative Decree 231/2001 and Code of Ethics, Anti-Bribery and Anti-Corruption, Fraud and Whistleblowing</b>	Percentage of increase in hours of training delivered to employees compared to 2020 (hours delivered by Internal Audit in 2020 = 4 hours and 50 minutes)	+5%	2021	5% more training hours provided to employees than in 2020
		+6.5%	2022	
		+7.5%	2023	

## POLICIES

Objectives	KPI	Target	Year	Target achieved in 2021
<b>Monitoring of standards of occupational health and safety by means of retaining ISO 45001:2018 certification</b>	Retention of ISO 45001:2018 certification	Certificate obtained	2021	ISO 45001:2018 certification has been obtained by Enav, Techno Sky and IDS AirNav
<b>Anti-Corruption Management Systems (indicator as per the short-term incentive policy and MBO 2021 for the CEO and Managers with Strategic Responsibilities)</b>	ISO 37001 certification	Certificate obtained	2021	ISO 37001 certification obtained in 2021
<b>Publication of the “media” policy</b>	Publication of the policy on the company intranet	Publication date	2021	Social Media Policy published on the company intranet in December 2021
<b>Drafting of the regulations on harassment and abuse in the workplace</b>	Publication of the regulations on the company intranet	Publication date	2021	The Regulations on harassment and abuse in the workplace was published on the company intranet in December 2021

TECHNOLOGICAL INNOVATION					
Objectives	KPI	Target	Year	Target achieved in 2021	
Advanced automation of major control towers by means of a new airport ATM platform (Electronic strip)	Testing of the system at each airport involved as per the yearly schedule	Testing date	2023		
Approach sequence optimisation system (Arrival Manager – AMAN)	Testing of systems applied at Malpensa and Fiumicino airports	Testing dates	2022		
TOC-HAL: remotisation project of diagnosis on remote site equipment to enable the centralisation of control and the optimisation of maintenance interventions	Testing of systems on all 10 islands as planned	Testing dates	2023		
Implementation of the weather automation project (replacement of current weather observation stations at major airports with weather stations equipped with automated sensors)	Testing of systems in the weather stations at the 23 airports as planned	Testing dates	2023		
Integration of approaches (transfer of approaches, APP, from certain airports to their respective control centres of reference)	Testing transfers of Verona to Milan, Trieste to Padua, Bari to Brindisi, Lamezia Terme to Rome	Testing dates	2021	Technical and operational testing was carried out for the transfer of dedicated approaches from Verona to Milan, from Trieste to Padua, from Bari to Brindisi and from Lamezia Terme to Rome	

REPORTING AND COMMUNICATIONS					
Objectives	KPI	Target	Year	Target achieved in 2021	
Internal Communication Plan on the development of a sustainability culture	Number of internal communications projects to be launched over the year	3	2021	In 2021, a specific sustainability section was created on the company’s “FollowMe” portal. A call to action was also launched to recruit new Ambassadors	
	% growth in hits the FollowMe portal (1,051,578 visits as of December 2020)	+20%	2021	46% growth in the number of hits on the FollowMe portal for the period January 2021-December 2021, totalling 1,542,337	
To convey the image of ENAV as an benchmark player in the industry in the fight against climate change (zero impact) and sustainable digital innovation	Number of followers on the LinkedIn (20,300 followers on LinkedIn ENAV as of March 2021)	+10%	2021	The number of followers on LinkedIn has increased by 20%, with a total of 24,259 followers as of 17 January 2022	

**CORPORATE CULTURE AND DEDICATED PROJECTS**

Objectives	KPI	Target	Year	Target achieved in 2021
<b>Definition of the ENAV “Purpose”</b>	Publication of the purpose	Presentation date	2021	ENAV’s purpose was published online on 13 September 2021
<b>To develop initiatives aimed at promoting the inclusion of all employees, regardless of age, gender, ethnicity, religion, sexual orientation and people living with disabilities</b>	Number of people involved in the pilot project to improve the position of people living with disabilities	20	2021	On 20 October 2021, the “Improve Yourself” project was launched, targeted at the companies of the group (ENAV, IDS, TSKY). The survey ended with interesting feedback from people with disabilities who participated in the analysis project
<b>To develop further the culture of Sustainability by means of increased engagement in the in-country Group structures</b>	Engagement in focus on in-country staff	At least 3 focus groups	2021	Postponed until 2022
	Number of in-country ambassadors identified	10	2021	In 2021 a Call for Action was launched for the recruitment of new ENAV Ambassadors, thanks to which 16 new Ambassadors were identified, for a total of 47 Ambassadors distributed across the company’s various branches
<b>Improving the quality of life of employees by means of targeted welfare initiatives</b>	Development of platform to convert performance bonus into welfare instruments	Presentation date	2021	Welfare platform activated in June 2021
	Measurement of the work-life balance satisfaction index, including by means of new working arrangements (e.g. agile working)	TBD	2021	It was agreed to postpone sending the survey to 2022
<b>Bringing women closer to the core business professions, with specific reference to air traffic control and maintenance activities, by means of raising women’s awareness of operational roles</b>	Launch of the outreach project	Launch date	2022	
<b>In external selections, the proportion of women in operational roles must be at least 25% (comply or explain)</b>	Minimum participation of the female population	25%	2021	During 2021, selections were made for operational roles but there was a low percentage of female applicants so the target was not met
<b>In internal assessments aimed at filling new operational positions, the proportion of women must be at least 20% (comply or explain)</b>	Minimum participation of the female population	20%	2021	The target was partially met at 13.1% However, this figure is consistent with the gender distribution of CTA staff, where 13% are women
<b>In internal assessments aimed at filling new corporate positions, the proportion of women must be at least 50% (comply or explain)</b>	Minimum participation of the female population	50%	2021	In 2021, 18 assessments were carried out, 9 of which targeted women. The target was reached: 50%
<b>Assessment on diversity management, related gap analysis and action plan (indicator included in the short-term incentive policy and MBO 2021 for CEO and Managers with Strategic Responsibilities)</b>	Preparation of assessment, gap analysis and action plan	Work presentation	2021	A survey was launched on the company intranet, focusing on gender, age, ethnicity, religion and disability. The results of the survey, which ended on 7 December, were approved by the Board of Directors
<b>Operational training (objectives that fall within the two ESG Sustainability Linked Term Loans, taken out in October 2020)</b>	Hours of operational training (73,000 hours in 2019)	78,000	2021	The initial estimate for December 2021 is in the order of magnitude of 90kh
		82,000	2022	

CLIMATE CHANGE					
Objectives	KPI	Target	Year	Targets achieved by ENAV in 2021	
<b>Achievement of Group Carbon Neutrality by reducing emissions and the purchase of carbon credits for the proportion that cannot be reduced (encompassed in the LTI Plan cycle 2020-2022)</b>	Percentage of reduction of CO <sub>2</sub> emissions per year compared to the total emissions produced in 2019 and purchase of carbon credits	-23% CO <sub>2</sub>	2021	-24.6%	
		-70/80% CO <sub>2</sub> emissions + Carbon neutrality	2022		
<b>Abatement of electromagnetic energy transmitted by means of optimisation on navigation instruments</b>	Percentage of NDB decommissioning	50%	2023		
<b>Further development of the “Plastic-Free” project aimed at gradual reduction in single-use plastics at all company offices</b>	Tons of single-use plastics reduced at sites (total ENAV consumption in 2019: 14.2 t)	1.5 t	2021	4.6t of single-use plastics reduced at sites. Obtained Plastic Free Certificate on 29 December 2021 from the company Sfridoo	
<b>Further development of the project to replace the company car fleet with electric/hybrid/plug-in vehicles</b>	Percentage of company car fleet replaced with electric/hybrid/plug-in vehicles	31%	2021	At the end of December 2021, the percentage of hybrid cars was 26%. The target for the end of 2022 is 45%	
<b>Assessment of CO<sub>2</sub> emissions: extension to scope 3 (indicator included in the short-term incentive policy and MBO 2021 for CEO and Managers with Strategic Responsibilities)</b>	Presentation of the assessment to top management	Presentation date	2021	Assessment submitted and approved by the Board in December 2021	
<b>Preparation of the Science Based Target (indicator foreseen in the MBO 2021 short-term incentive policy for CEOs and Managers with Strategic Responsibilities)</b>	Obtained SBTi certification	Certification date	2021	The Group’s GHG reduction targets are in line with the SBTi Criteria and Recommendations: “ENAV Group commits to reduce absolute Scope 1 and 2 GHG emissions 70% by 2030 from a 2019 base year. ENAV Group commits to reduce absolute scope 3 GHG emissions from capital goods, fuel-and-energy-related activities, and employee commuting 13.5% by 2030 from a 2019 base year”	
<b>Implementation of energy efficiency projects</b>	Start-up of activities (regular certificate of execution of the DL or internal report on system commissioning) <ul style="list-style-type: none"> <li>• Installation of tri-generation plant, Rome ACC</li> <li>• LED internal lighting system – Padua ACC, Rome ACC and Headquarters</li> <li>• Air conditioning system - Rome ACC</li> <li>• Radar photovoltaic plant – MASSERIA 33 kW, Photovoltaic plants in LAMPEDUSA 37 kW, GENOA 17 kW, CATANIA 20 kW, NAPLES 75 kW.</li> </ul>	100%	2022		
	Start-up of activities (regular certificate of execution of the DL or internal report on system commissioning) <ul style="list-style-type: none"> <li>• Air conditioning system - Naples BT</li> <li>• Photovoltaic plant - Forlì Academy</li> <li>• Photovoltaic plant – Brancasi</li> </ul>	100%	2023		



## OUR PATH TO VALUE CREATION

Starting in 2017, ENAV's path towards sustainability, in addition to being in line with what is defined in Legislative Decree 254/2016 has been increasingly transformed into a process of value creation and of the integration of sustainability in business strategies. This is a process which, even in the difficult period of the pandemic, has never ceased, but has been pursued, rather, with renewed vigour.

### 2017:

- Non-Financial Statement 2016, for internal use only
- Assessment and definition of the system of non-financial reporting
- Stakeholder Engagement 2017 and Materiality Matrix

### 2018:

- Consolidated Declaration of a Non-Financial Character 2017
- Integration of ESG risks in the Enterprise Risk Management
- Constitution of the Sustainability Ambassadors group
- Networking: ENAV joins “CSR Manager Network”
- Networking: ENAV takes part in the “Salone della Sostenibilità”
- Creation of the internal Sustainability Committee
- Multi-stakeholder workshop 2018
- “Anticorruption” policy
- Sustainability Plan 2018-2020
- First Sustainability Day
- Internal ERP (Enterprise Resource Planning) system for quantitative data reporting

### 2019:

- Insertion of ESG KPIs into the MBOs of top management
- From the Consolidated Declaration of a Non-Financial Character to the Sustainability Report 2018
- Brand Identity: Sustainability logo
- Sustainability site: new web platform
- “Diversity and Inclusion” policy
- LinkedIn: creation of “Sustainability ENAV” page
- Corporate Sustainability Assessment
- Stakeholder Engagement
- University of Pavia: first prize “Best Sustainability Report”
- Italian stock exchange: first participation by ENAV in the Sustainability Week

### 2020:

- Biblioteca Bilancio Sociale (Social Responsibility Library): first prize for “The Sustainability Path”
- Networking: ENAV enters the Executive Committee of the “CSR Manager Network”
- Calculation of the Company's carbon footprint and Carbon Neutrality 2022 objective
- Integrated Governance Index 2020: ENAV is third in the special industry sector classification
- “Electric mobility” project

- ESG impact evaluation
- German Institute of Quality and Finance: prize for “Italy’s best employers for women”
- “Human Rights” policy
- “Environmental” policy
- First Sustainability Loan
- From Stakeholder Engagement to Stakeholder Management
- The “Plastic free” project
- Digital Sustainability Day

## 2021:

- Networking: ENAV joins the “United Nations Global Compact”
- Preparation of the Sustainability Plan 2021-2023
- ENAV takes part in “Sodalitas Call for Future”
- ENAV enters the “Green Star Sostenibilità” classification of the ITQF (German Institute for Quality and Finance) and of the Italian national daily La Repubblica
- ENAV enters the “Leader della Sostenibilità” classification of the Italian finance daily Sole 24 Ore
- ENAV receives the “Health Friendly Company” award from the Honda Foundation
- The “Improve Yourself” project dedicated to people with disabilities
- ENAV joins the Science Based Target initiative (SBTi)
- The “Diversity Assessment for Inclusion” project
- Expansion of the Group’s Sustainability Ambassadors throughout Italy

## *In the first months of 2022:*

- Launch of AWorld APP
- “Green Star Sostenibilità” award of the ITQF (German Institute for Quality and Finance) and of the Italian national daily *La Repubblica*

### 1.4 THE EU TAXONOMY

#### *The EU Taxonomy*<sup>3</sup>

The EU Taxonomy Regulation (Regulation EU 852/2020 of 18 June 2020) provides a unified system of classification of economic activities that can be considered eco-sustainable.

Specifically, for the purposes of this Regulation, to qualify as environmentally sustainable (or “eco-sustainable”), an economic activity must jointly meet a series of conditions:

- make a substantial contribution to one or more of the six environmental objectives<sup>4</sup> referred to in Article 9 of the Regulation;
- comply with the technical screening criteria laid down by the Commission for each individual environmental objective;

3. In compliance with the European common enforcement priorities for 2021 annual financial reports issued by the European Securities and Markets Authority on 29 October 2021.

4. a) climate change mitigation; (b) adaptation to climate change; (c) sustainable use and protection of waters and marine resources; (d) transition to a circular economy; (e) prevention and reduction of pollution; (f) prevention and reduction of pollution.

- comply with the principle of “Do Not Significant Harm” to other environmental objectives;
- be carried out in compliance with the minimum social safeguards (in line with the OECD Guidelines and the United Nations/ILO Guiding Principles on Economic Activities and Human Rights).

Pursuant to the regulatory requirements set out in the Delegated Act relating to Article 8 of EU Regulation 2020/852, the ENAV Group is required to include in its Non-Financial Statement information on how and to what extent its activities are associated with eco-sustainable economic activities pursuant to the EU Taxonomy Regulation.

For this first year of application, it is necessary to provide information that includes the economic activities that are “Taxonomy–Eligible”<sup>5</sup> and not eligible in proportion to turnover, capital expenditure and total operating expenses incurred.

The following paragraphs show how the Group assessed compliance with Regulation (EU) 852/2020 and the prospectus with the quantitative KPIs requested.

As this is the first year of application of a new regulation at international level, all the criteria and assumptions made and included in this paragraph are based on the information and requirements currently available, which could be subject to future revisions based on the evolution of current legislation.

With regard to the roadmap set by the European Commission, at the date of publication of this document only the Delegated Acts relating to the first two environmental objectives (*climate change mitigation and adaptation to climate change*) have been published, providing a description of the economic activities eligible for the EU Taxonomy Regulation and the technical screening criteria related thereto. It should therefore be noted that the scope of analysis and the data included in this disclosure refer only to these two objectives.

### **Analysis of eligible activities**

To determine the eligibility of economic activities, both the “Statistical classification of economic activities in the European Community” (Nomenclature of Economic Activities - NACE)<sup>6</sup> and the descriptions of the activities reported in Annex I and Annex II of the Climate Delegated Act were analysed. On the basis of the interpretation of the requirements applicable, the Group has assessed that its main activities are not among those identified to date by the reference legislation for the two environmental objectives mentioned above, and consequently are not considered as eligible at the date of drafting of this document.

This assessment focused on issues related to 6.17 “Low carbon airport infrastructure”, 9.1. “Close to market research, development and innovation” and 9.2 “Research, development and innovation for direct air capture of CO<sub>2</sub>”.

In light of these considerations, the KPIs provided for by the EU Taxonomy Regulation were calculated, developing a preliminary analysis that also took into account the investments and operating expenses related to the purchase of outputs from economic activities eligible for the Taxonomy and/or relating to the measures implemented that allow energy efficiency of buildings.

5. The term “Taxonomy–Eligible” denotes an economic activity described in the Delegated Acts (the Climate Delegated Act and the Complementary Climate Delegated Act).

6. The NACE code is a general classification system used to systematise and standardise the definitions of the economic and industrial activities of the Member States of the European Union. The classification was first introduced in 1970 and then revised over the years, until the most recent review with Regulation (EC) 1893/2006. Each national statistics office has formulated a conversion table to which reference is made to translate NACE codes automatically at national level. Italy’s national institute of statistics, ISTAT, translates NACE (Nomenclature of Economic Activities) codes with ATECO (Attività Economiche) classifications.

## ***Methodology for calculating the KPIS provided for by the eu Taxonomy Regulation***

To calculate the KPIs required pursuant to the Taxonomy Regulation and the additional applicable regulatory references<sup>7</sup>, as described below, the Group carried out an analysis of turnover, investments and operating expenses for the 2021 financial year.

### ***For the turnover portion<sup>8</sup>:***

For the calculation of the turnover indicator, the denominator was consolidated net sales in accordance with IAS 1.82(a). With regard to the numerator, on the basis of the considerations mentioned above and the interpretation of the EU Taxonomy Regulation, no share of turnover obtained from the sale of products or services associated with economic activities considered eligible in relation to the objectives of Climate Change Mitigation and Adaptation to Climate Change has been identified.

### ***For the portion of eligible capital expenditure<sup>9</sup>***

- Numerator: increases in fixed assets related to the purchase of outputs from Taxonomy-Aligned economic activities and/or related to the measures put in place that make possible a reduction of emissions into the atmosphere. In the case of the ENAV Group, investments related to energy efficiency were mainly considered, including the restructuring of buildings and real estate and the renovation of the new data centre. In 2021, eligible investments amounting to €1,327,892.57 were identified, resulting in a ratio of about 1.6% on CapEx as defined below.
- The denominator took into account increases in property, plant and equipment and intangible assets, gross of depreciation and any remeasurements, including those resulting from revaluations and impairments, for the year in question, and excluding changes in fair value.

7. The analysis and methodology for calculating the KPIs were carried out with particular reference to the interpretation of the information defined in Annex I of the Commission Delegated Regulation (EU) 2021/2178 of 6 July 2021 supplementing Regulation (EU) 2020/852 of the European Parliament of the Council and of the document “Draft Commission notice on the interpretation of certain legal provisions of the Disclosures Delegated Act under Article 8 of the EU Taxonomy Regulation on the reporting of eligible economic activities and assets” published on 2 February 2022.
8. The financial data included in this KPI correspond to the Group’s net revenues included in the Annual Report at 31 December 2021: Consolidated financial statements.
9. The financial data included in this KPI correspond to the increases in fixed assets included in the 2021 Annual Report: Consolidated financial statements.

### *For the portion of eligible operational expenditure<sup>10</sup>*

- With regard to the numerator, the costs included in the denominator relating to the purchase of outputs from Taxonomy-Eligible economic activities and/or relating to the measures put in place to reduce emissions into the atmosphere were considered eligible. Specifically, the costs related to energy efficiency and the reduction of energy consumption of buildings were included. However, no eligible operational costs were identified.
- At the denominator, total direct non-capitalised costs relating to research and development, building renovation measures, short term and variable rentals, maintenance and repair, and any other direct expenditure related to the day-to-day maintenance of property, plant and equipment, either by the company or by third parties to whom these tasks are outsourced, necessary to ensure the continuous and effective operation of these assets were taken into account. Expenses related to the daily operation of property, plant and machinery, such as raw materials, the cost of employees operating the machine, and electricity or fluids necessary for the operation of these assets were excluded.

### *Result of the analysis carried out*

	Taxonomy-Eligible activities	Taxonomy-Not Eligible activities
<b>Turnover portion</b>	0%	100%
<b>Portion of eligible capital expenditure</b>	1.6%	98.4%
<b>Portion of eligible operational expenditure</b>	0%	100%

Aware of the regulatory evolution on the EU Taxonomy Regulation and the probable development of implementation practices, the Group will evaluate the possibility of further refining the methodology adopted for this first year of reporting.

**10.** The financial data included in this KPI are comprised in the consolidated operating costs contained in the 2021 Annual Financial Report: Consolidated financial statements.

## 1.5 PERFORMANCE IN 2021

### BALANCE SHEET DATA 2021

**836.6** mil €  
of revenues

**78.4** mil €  
of profit pertaining to  
scope of the Group

**222.4** mil €  
of EBITDA

### ENVIRONMENT HIGHLIGHTS 2021



**152** mln kg CO<sub>2</sub>  
the reduced impact  
generated with the  
“Free Route” project

**93.74** kg of CO<sub>2</sub>  
avoided as a result of  
renewable energy  
generation in 2021

**-24.6%**  
reduction of CO<sub>2</sub>  
compared with 2019  
(Scope 1 and 2)



## COMMUNITY HIGHLIGHTS 2021



Europe's leader for punctuality with  
**0.053**<sub>min</sub>  
ATFM delay allocated en-route



**114,358** hours  
of Group in-house operational training



About **76** mil €  
of investments in infrastructures out of a total of 85.6 million



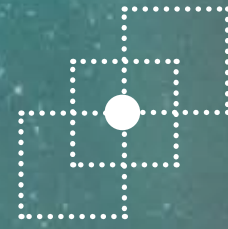
Approximate **1,400** hours  
flown by aircraft of the Flight Inspection and Validation service



**1,180,526**  
flights controlled annually



**5,574**  
peak number of flights managed in one day



**732,800** km<sup>2</sup>  
of airspace managed

## PEOPLE HIGHLIGHTS 2021



**99.9%**  
of employees on full-time permanent contracts



**6.99%**  
turnover rate



**158,255** hours  
of classroom and e-learning training



**137,174** hours  
of Ongoing Training and Operating Unit Training



## 02 • STAKEHOLDER MANAGEMENT







## 2. Stakeholder Management

<p><b>MATERIAL ISSUES</b></p>	<p>- <b>CREATION OF ECONOMIC AND FINANCIAL VALUE (NEW)</b>                  - <b>RELATIONS WITH INDUSTRY ORGANISATIONS, INSTITUTIONS AND ASSOCIATIONS (NEW)</b></p>
<p><b>SDGs AND TARGETS</b></p>	<div style="display: flex; flex-direction: column; gap: 10px;"> <div data-bbox="596 465 695 566">  </div> <div data-bbox="730 443 1444 607"> <p>8.5: Achieve full and productive employment and decent work for all women and men, including for young people and persons with disabilities, and equal pay for work of equal value                      8.8: Protect labour rights and promote a safe and protected working environment for all workers, including migrant workers, and especially migrant women, and those with precarious jobs</p> </div> <hr/> <div data-bbox="596 622 695 723">  </div> <div data-bbox="730 645 1444 701"> <p>13.1: Reinforce the resilience and the capacity for adaptation to risks linked to the climate and to natural disasters in all countries</p> </div> </div>
<p><b>ENAV GROUP TARGETS 2021-2023</b></p>	<ul style="list-style-type: none"> <li>- To ensure constant stakeholder engagement and attention.</li> <li>- To develop further the culture of sustainability by means of increased engagement in the in-country Group organisational units</li> </ul>
<p><b>ENAV GROUP PERFORMANCE 2021</b></p>	<ul style="list-style-type: none"> <li>- Engagement of external and internal stakeholders through surveys, interviews and focus groups for the identification of material issues</li> <li>- Promoted the Call to Action of the Ambassadors, recruited 16 new Ambassadors distributed over all Italian premises</li> <li>- Sharing with all stakeholders the results obtained through initiatives and projects aimed at reducing emissions in the sector (Free Route, Airport Collaborative Decision Making (ACDM) etc.)</li> </ul>

### 2.1. STAKEHOLDER ENGAGEMENT

With the awareness that relations with stakeholders are fundamental in the process of creating value for the company, in 2021 ENAV set itself the target to strengthen further the engagement process with them, as they are considered an integral part of the responsible and sustainable management of the business.

In line with this commitment, in 2021 the transition from stakeholder engagement to stakeholder management was consolidated, through the expansion of the stakeholder panel with the inclusion of the industry, and with the growth of opportunities for meeting also favoured by the possibility of using virtual rooms efficiently. The new model makes it possible to move from a reactive to a **programmatic** and **proactive** approach in the management of stakeholder requests, integrating these into strategic planning, with the aim of:

- **anticipating risks** of a different nature to reputational to operational risks
- transforming **threats into opportunities** through the joint identification of solutions that **create shared value** for the organisation and its stakeholders.

**FROM STAKEHOLDER ENGAGEMENT ...**

Involvement of specific categories of stakeholders on a one-off basis for specific purposes (e.g. updating materiality analysis)



**... TO STAKEHOLDER MANAGEMENT**

Continuously manage relations with stakeholders through different engagement tools and continuous feedback mechanisms

**Schedule**

Analysis of the territories and mapping of stakeholders (local and professional associations, institutions, media, etc.)

**Understand**

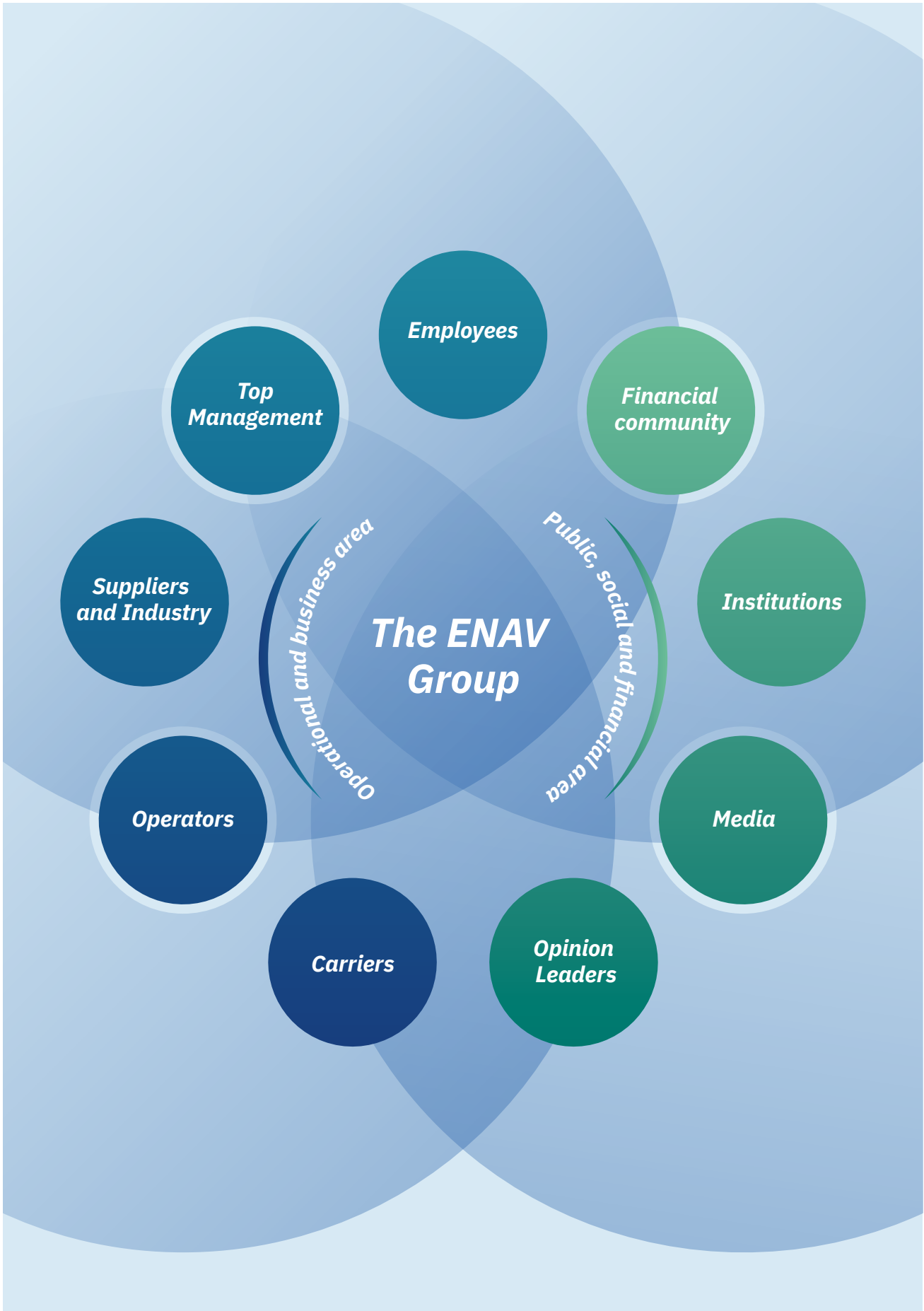
Understand the positions and needs of the various stakeholders

Launch of “value driven” projects with the participation of everyone who is directly and indirectly affected

**Act**

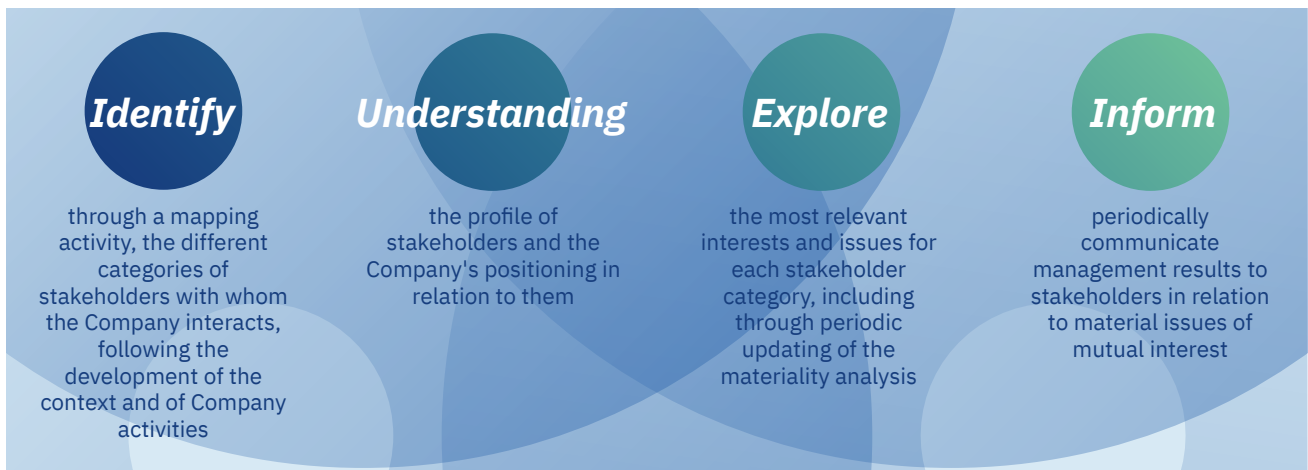
Creation of a qualitative dialogue with all stakeholders

**Continuous dialogue**





In relations with its stakeholders, ENAV pursues 4 fundamental objectives:



In 2021, through interviews and focus groups, ENAV supported its stakeholders in order to gather useful insights on the perceived control by identifying solutions that meet their expectations and create shared value in the long term.

Stakeholder listening initiatives involved all company units, each within the scope of its prerogatives, roles and responsibilities, in order to ensure a homogeneous approach to dialogue.

The stakeholder management process involved the following fundamental procedural phases:



The level of engagement perceived was collected through surveys, interviews or focus groups, from the following categories of stakeholders:

- Top Management
- Employees
- Financial community
- Airport operators
- Carriers
- Suppliers and Industry
- Opinion leaders
- Institutions
- Media

The table below shows the main qualitative findings collected during meetings and in the survey.

STAKEHOLDERS	Main stakeholder expectations
<b>Employees</b>	<ul style="list-style-type: none"> <li>- Webinars with the entire company population aimed at sharing projects within ENAV</li> <li>- Formalisation of policies on growth paths Periodic evaluation forms and rewards linked to objectives</li> <li>- Consolidation of personnel assessment activities aimed at mapping the skills and potential of the company population</li> <li>- Foster greater exchange between needs expressed locally and decisions made at headquarters</li> </ul>
<b>The financial community</b>	<ul style="list-style-type: none"> <li>- Sharing more strategic information and ongoing initiatives</li> <li>- More details on initiatives carried out</li> <li>- Updating the website with the addition of policies that can be made public</li> <li>- Increase in the number of ESG-themed communications, including through dedicated newsletters</li> </ul>
<b>Airport operators</b>	<ul style="list-style-type: none"> <li>- Six-monthly one-to-one meetings with individual EMSs</li> <li>- Annual multi-stakeholder forums</li> <li>- Collaborations on the theme of noise pollution and on issues arising from interaction with local representatives</li> <li>- Sharing of initiatives carried out</li> </ul>
<b>Carriers</b>	<ul style="list-style-type: none"> <li>- Greater involvement in the creation of economic and financial value</li> <li>- Half-yearly focus groups and annual event with the sharing of the main initiatives in progress</li> <li>- Working tables to discuss projects related to sustainability and innovation</li> <li>- Sharing of initiatives carried out</li> </ul>
<b>Suppliers and Industry</b>	<ul style="list-style-type: none"> <li>- The industries in the sector consider ENAV to be at the forefront of technological innovation and digitalisation</li> <li>- Six-monthly one-to-one interviews with strategic suppliers</li> <li>- Annual meetings for the sharing of the main initiatives in progress</li> <li>- Working tables to discuss projects on issues of environmental sustainability, safety and Urban Air Mobility</li> <li>- Initiate projects with schools in collaboration with local authorities</li> <li>- Sharing of initiatives carried out</li> </ul>
<b>Opinion leaders</b>	<ul style="list-style-type: none"> <li>- Six-monthly focus groups and participation in events with the aim of giving greater visibility to activities in place</li> <li>- Enrichment of environmental management and communication of social and governance issues</li> <li>- Establishment of the Aviation Network</li> <li>- Sharing of initiatives carried out</li> </ul>
<b>Institutions</b>	<ul style="list-style-type: none"> <li>- Six-monthly one-to-one interview with key institutions</li> <li>- Sharing of initiatives carried out</li> </ul>

## MATERIALITY ANALYSIS

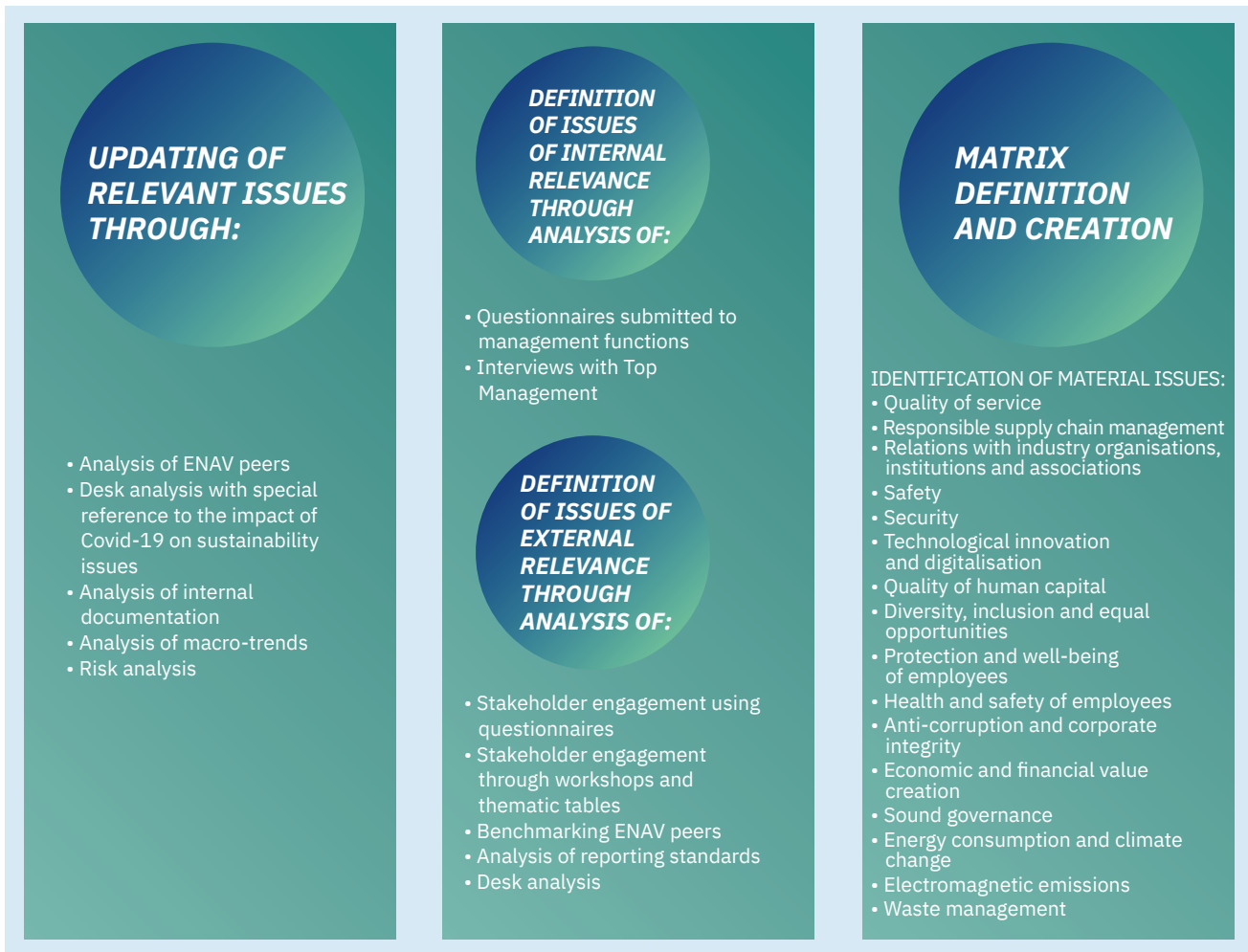
Through the stakeholder management activities carried out during the year, ENAV updated its materiality analysis in order to identify the most relevant issues (material issues) that significantly reflect the economic, environmental and social impacts of the organisation or that influence stakeholder decisions. In 2021, the materiality analysis was updated in continuity with the path undertaken in 2020. Materiality analysis is a business tool that is useful for identifying the issues with the greatest impact for the company and its stakeholders. In particular, within the Sustainability Report, the materiality analysis is used to identify the issues to be reported and those on which the company must focus with a view to future commitments, namely those that:

- reflect the organisation’s significant (positive/negative) economic, environmental and social impacts;
- influence stakeholder decisions.

In line with the provisions of Legislative Decree 254/2016 and with the methodologies and principles

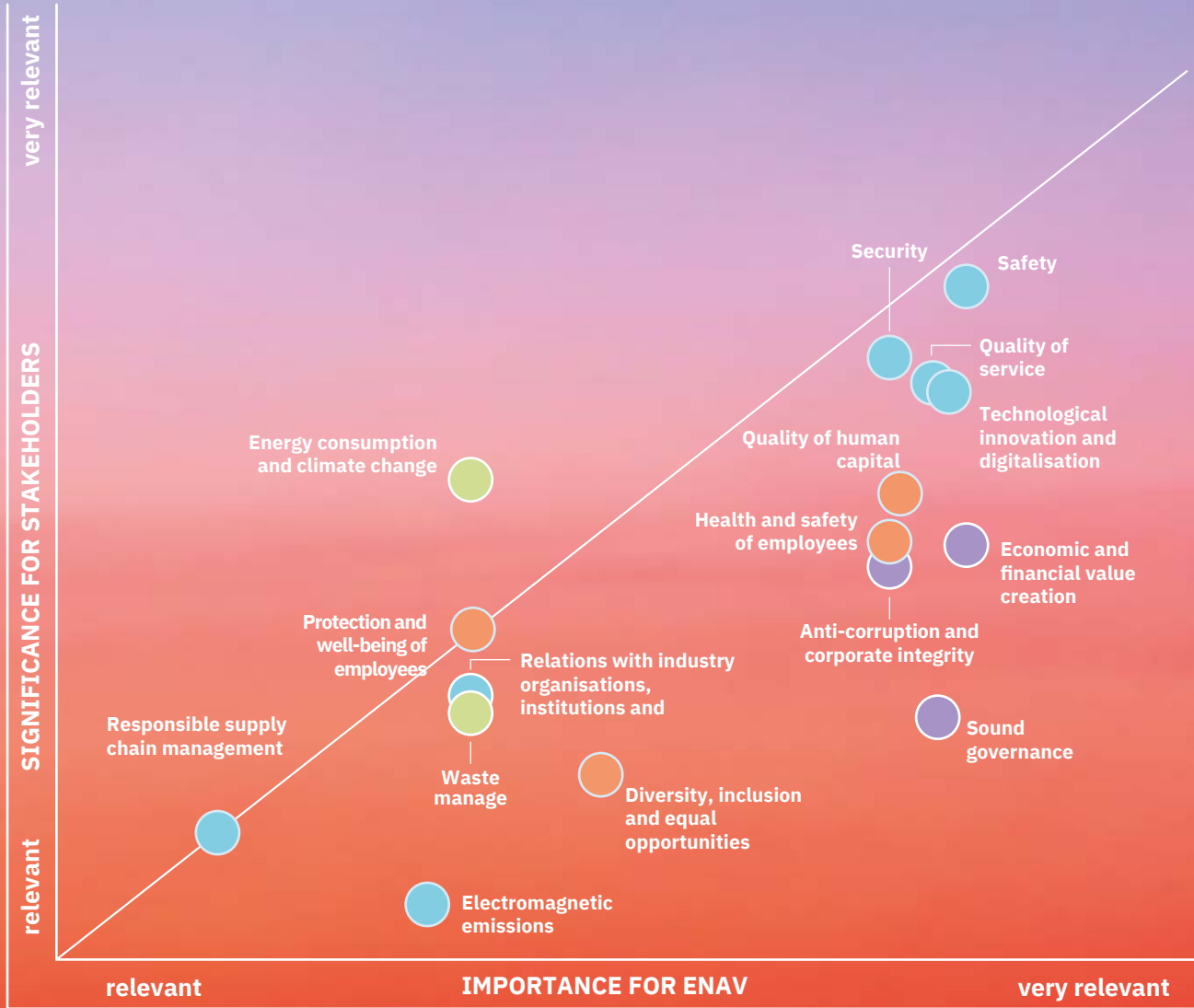
reported by the GRI standards defined by the Global Reporting Initiative, ENAV conducted the materiality analysis by updating the list of potentially relevant issues and submitting them to stakeholders by means of surveys.

Indeed, in order to define ENAV’s strategic priorities and the relevance of material issues, a questionnaire was prepared and targeted first at Top Management and then at the main categories of internal and external stakeholders, in order to obtain a shared vision of the company’s priorities. By combining the results that emerged, it was possible to develop the 2021 materiality matrix containing the main material issues around which the topics and contents of this Report unfold.



Below is the materiality matrix, obtained by crossing the scores of each issue both with regard to the Company’s ESG impact, assessed by ENAV’s top management and reported on the x-axis, and with regard to the influence they have on stakeholders, assessed by stakeholders and reported on the y-axis.

## Materiality Matrix



### Key

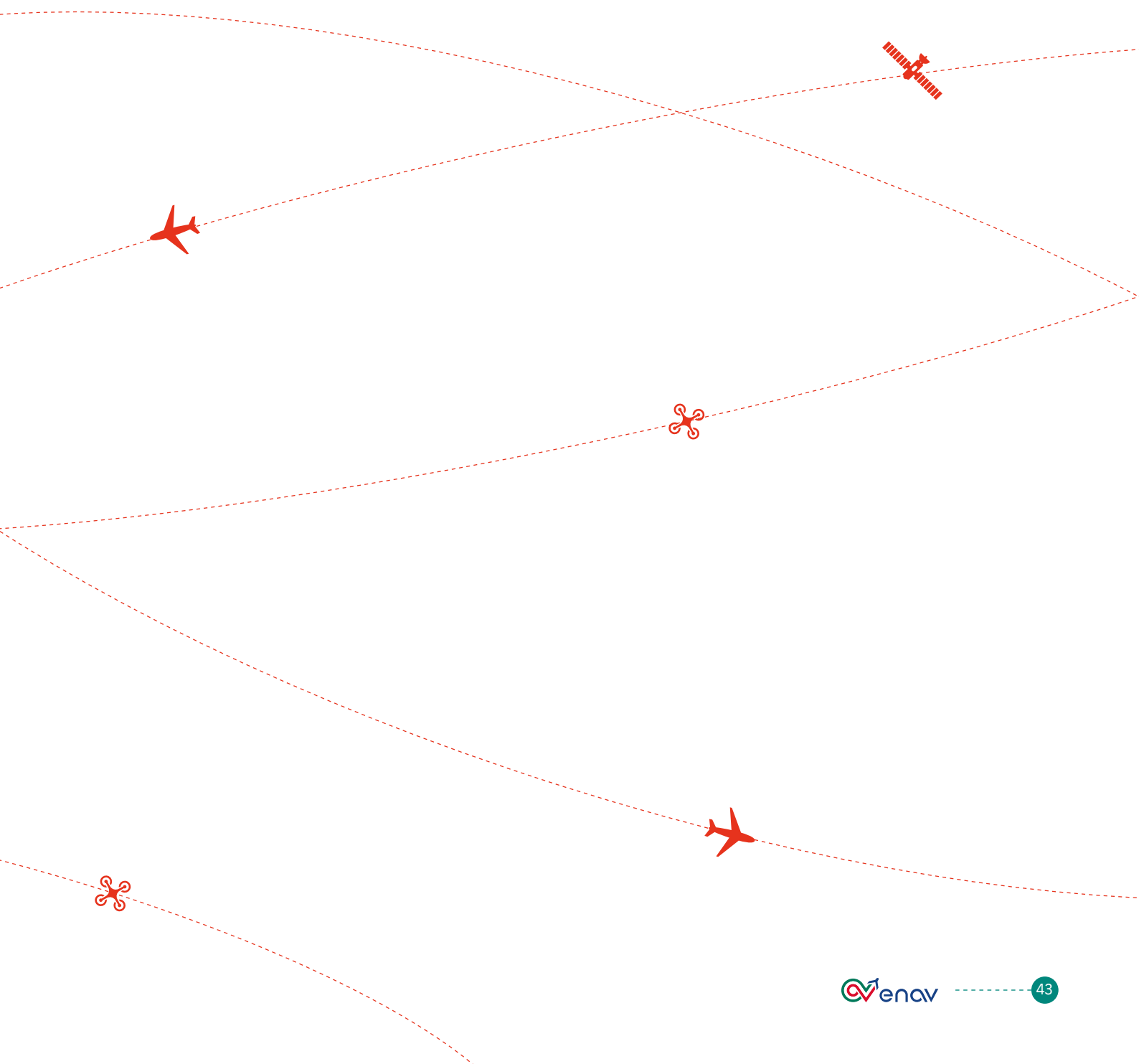
- Business & Governance
- Business operations
- Personnel
- Environment

The theme of Safety theme is confirmed as the one with the greatest relevance both for ENAV and its stakeholders. This is followed by the theme of Technological innovation and digitalisation, which shows a clear increase for ENAV compared to 2020.

With regard to the less relevant issues, it should be noted that the importance of responsible management of the supply chain has been reduced, both according to the assessment of the Top Management and according to the evaluation of stakeholders.

With the aim of highlighting its commitment to achieving the Sustainable Development Goals (SDGs) defined by the United Nations in 2015, ENAV has reconciled its material issues with the above-mentioned SDGs.

Hence, at the beginning of each chapter there is a link between the material issues identified, the SDGs linked to them, ENAV's targets and the performance in 2021.



**Table: Perimeter of the material issues identified**

Domain of Legislative Decree 254/2016	No.	Material issues	Scope	GRI aspect
<b>Company</b>	1	Quality of service	ENAV Group	
	2	Responsible supply chain management	ENAV Group	GRI 412: Human Rights Assessment
	3	Relations with industry organisations, institutions and associations	ENAV Group	GRI 413: Local communities
	4	Safety	ENAV S.p.A. Techno Sky	GRI 416: Customer Health and Safety
	5	Security	ENAV Group	
	6	Technological innovation and digitalisation	ENAV S.p.A. d-flight	
<b>Personnel<sup>11</sup></b>	7	Quality of human capital	ENAV Group	GRI 404: Training and education
	8	Diversity, inclusion and equal opportunities	ENAV Group	GRI 405: Diversity and equal opportunity GRI 401: Employment GRI 406: Non-discrimination
	9	Protection and well-being of employees	ENAV Group	GRI 401: Employment GRI 402: Labor/management relations
	10	Health and safety of employees	ENAV Group	GRI 403: Occupational Health and Safety
<b>Anti-Corruption</b>	11	Anti-corruption and corporate integrity	ENAV Group	GRI 205: Anti-corruption GRI 307: Environmental compliance GRI 419: Socioeconomic compliance
	12	Economic and financial value creation	ENAV Group	GRI 201: Economic performance GRI 207: Tax
	13	Sound governance	ENAV Group	
<b>Environment<sup>12</sup></b>	14	Energy consumption and climate change	ENAV Group	GRI 302: Energy GRI 305: Emissions
	15	Electromagnetic emissions	ENAV S.p.A. Techno Sky	GRI 413: Local communities
	16	Waste management	ENAV Group	GRI 306: Waste
<b>Human rights<sup>13</sup></b>	17	Responsible supply chain management	ENAV Group	GRI 412: Human Rights Assessment
	18	Diversity, inclusion and equal opportunities	ENAV Group	GRI 406: Non-discrimination

**11.** With regard to “Personnel”, it should be noted that the d-flight data are not detailed separately in as much as the Company has 8 seconded workers employed by ENAV, Techno Sky and IDS AirNav, to whom can be added another 3 employed by Telespazio S.p.A./Leonardo S.p.A.

**12.** With regard to the “Environment” aspect, in view of the characteristics of the Company (1 employee and 1 office), ENAV Asia Pacific is not considered material with regard to environmental impacts. It should be noted that d-flight workers on secondment operate in the head office of Techno Sky.

**13.** As concerns the “Human rights” aspect, the topic is covered transversally within the scope of other material issues.



## 2.2 INVESTOR RELATIONS AND FINANCIAL DISCLOSURE

ENAV has always placed a great deal of attention on its relations with investors, financial analysts and the financial community in general, establishing the Investor Relations unit in order to manage these relations in a continuous and effective way. The opportunities for dialogue are many: conference calls, in-person and virtual meetings, financial conferences, site visits and roadshows. In these events, the management team, typically the CEO (Chief Executive Officer) or the CFO (Chief Financial Officer), together with the head of Investor Relations, disclose to the financial community the main results for the period (quarterly, half-yearly, annual), business trends and strategy guidelines, and the team is available to answer any questions received from individual participants. All the economic and financial information related to the Company, as well as the main share performance indicators and the analysts' opinions can be found in the Investor Relations section on ENAV's website.

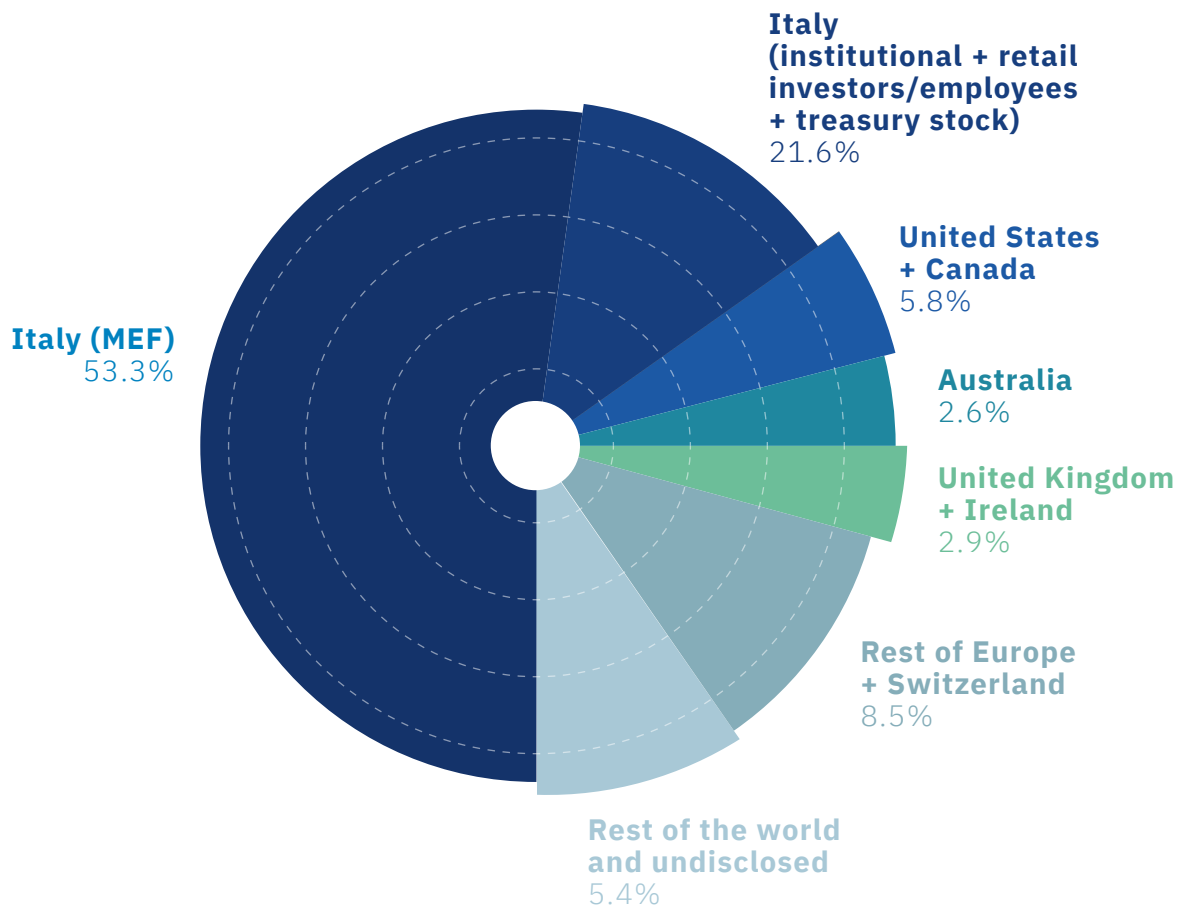
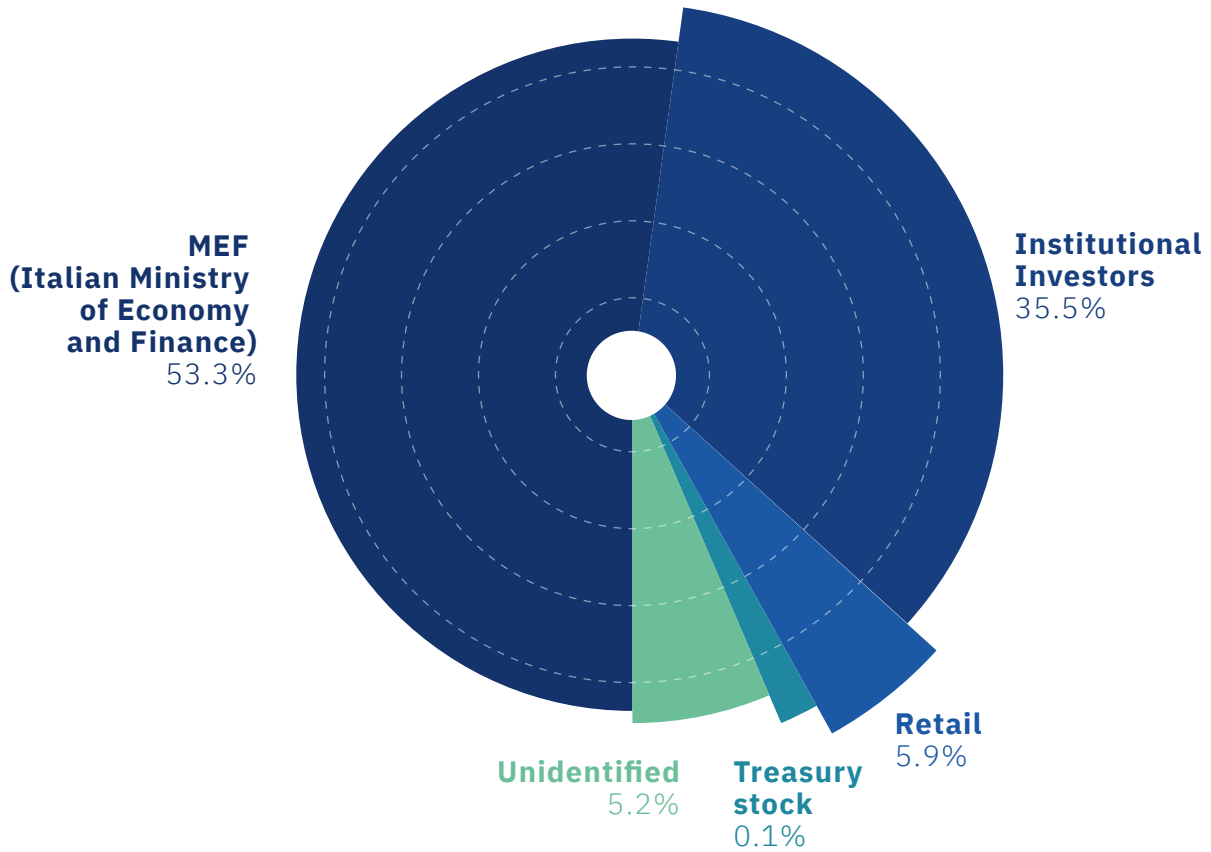
A dedicated mailing list is also available to the financial community, which the Company uses to periodically communicate information concerning ENAV, as well as an e-mail address through which Investor Relations answers questions from investors or financial analysts in the event of new business activities or particular market trends. In the period from January to December 2021, ENAV had approximately 220 interactions with institutional investors, mostly during conference calls and participation in sector conferences, almost all held remotely due to the restrictions imposed to contain the effects of the Covid-19 pandemic, which severely limited people's movements and consequently in-person meetings.

In addition to investor relations, ENAV maintains frequent contacts with financial analysts covering the stock (so-called "sell-side"). The 10 analysts who covered ENAV stock in 2021 come from major Italian and foreign brokerage firms, some of whom specialise in infrastructure firms, and periodically publish reports and updated analysis of ENAV's activities, performance and financial position. Of these ten analysts, at the end of 2021 seven had a "BUY" rating on the ENAV stock and three a "HOLD" rating.

Finally, it is important to underline that during the year the interest of the main institutional investors in Corporate Social Responsibility (CSR) issues and in the activities undertaken by ENAV on this front further increased. In order to ensure sustainability in the company's long-term business, ENAV has included a specific section on sustainability in its institutional presentations to investors, with a view to increasing transparency on its activities, involving investors in its Stakeholder Management initiatives and participating in financial conferences and events on the theme Environmental, Social and Corporate Governance (ESG).

For 2022, ENAV aims to further expand opportunities for interaction and meeting with the financial community, exploiting occasions such as roadshows, financial conferences and conference calls, both face-to-face and virtual. For 2022, the Company also aims to broaden its investor base by focusing on investors located in geographical areas not reached during the IPO as well as on investors with a medium/long-term investment perspective, focusing on SRI funds, broadening its own disclosures on ESG issues and on specialised funds in the infrastructure sector.

ENAV operates in a regulated sector and is the sole operator in Italy for civilian air traffic control. On 26 July 2016, ENAV was listed on the Borsa (Italian stock exchange), and was no longer, therefore, a company with a sole shareholder but rather an investee company. The MEF (Italian Ministry of Economy and Finance) holds a 53.3% stake in ENAV while the remaining 46.7% is floated on the Italian stock exchange. Below is given the detail of ENAV's shareholding base resulting from shareholder identification conducted in March 2022, divided by type and geographical area.



## 2.3 ECONOMIC VALUE GENERATED AND DISTRIBUTED

Through its activities, the Group generates benefits for its stakeholders.

In 2021, it generated 886.6 million euros in economic value, an increase of 9.3% compared to 2020, due to the resumption of activities in the air transport sector, after a 2020 significantly impacted by the Covid-19 pandemic.

82.6% of the economic value generated was distributed and 17.4% was retained.

With regard to the economic value distributed, it should be noted that:

- 19.1% relates to operating costs incurred for the purchase of goods and services benefiting the Group's suppliers;
- 68.2% was distributed to employees in the form of salaries, social contributions and bonuses;
- 8.9% was distributed to providers of risk capital and financing as dividends and remuneration of loan agreements entered into;
- 3.7% was distributed to government authorities for direct and indirect taxes;
- 0.1% was distributed to the community.

Economic value directly generated and distributed (in €/thousands)			
	2019	2020	2021
<b>Economic value generated</b>	<b>948,894</b>	<b>811,060</b>	<b>886,633</b>
<b>Economic value distributed</b>	<b>(799,100)</b>	<b>(607,979)</b>	<b>(732,262)</b>
Operating costs	(131,911)	(124,887)	(140,203)
Value distributed to employees	(497,118)	(460,957)	(499,241)
Value distributed to capital providers	(120,017)	(7,943)	(65,297)*
Value distributed to government authorities	(49,371)	(13,254)	(26,829)
Value distributed to the community	(683)	(938)	(692)
<b>Economic value retained</b>	<b>149,794</b>	<b>203,081</b>	<b>154,371</b>

\* The figure includes dividends proposed to the Board of Directors (amounting to €58,506) and subject to approval by the Shareholders' Meeting of 3 June 2022.

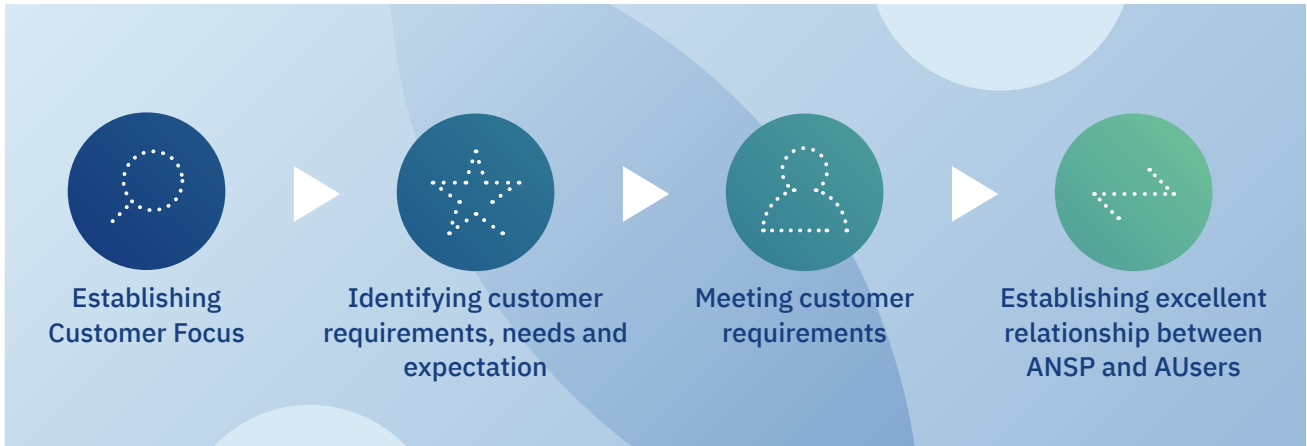
## 2.4 CUSTOMER RELATIONS MANAGEMENT

Among the stakeholders with whom the ENAV Group maintains relations, customers play a vital role. ENAV has in fact developed an efficient customer relationship management system (supported by an internal procedure) for airlines, aimed at involving customers themselves and measuring their level of satisfaction with respect to the provision of Air Traffic Services (ATS) through a Customer Survey dedicated specifically to them. In 2021, satisfaction with the services provided to airlines (CNA) scored 4 on a scale of 5, slightly down with respect to what was obtained in 2020 (4.1).

The survey completion rate was 66%, in line with 2020 (68%).

CRM activities are not limited to the customer satisfaction survey but are divided into a set of initiatives targeted at stakeholder involvement and active participation in the evolution of the various processes (often associated with the implementation of new operational processes). In 2021, CRM activity, although conditioned by the continuing situation of uncertainty linked to the Covid-19 pandemic, registered a significant increase in relations and discussions with airlines. In particular, the programme for the resumption of operations, called "Back to Normal", was disseminated and discussed through dedicated one-on-one and plenary sessions. As a rule, in carrying out its CRM activi-

ties, ENAV encourages one-on-one meetings, plenary sessions, open days, thematic workshops and webinars related to the activities of the Operations area.



Specifically, IDS AirNav has activated its own support services for all customers, by means of a team dedicated Customer Care Team, which is part of the Services area of IDS AirNav and which performs the analysis of the requests for technical support made by users of the IDS AirNav SW system. This support phase can end with instructions (or a procedure) for the removal of the problem presented and/or in direct support in the use of the system/SW, or with a workaround that can be defined as temporary or permanent.

When managing IDS AirNav customer satisfaction, the Freshdesk tool generates a series of different types of indicators that make it possible to monitor:

- the number of support requests made (open, closed, in progress, pending, etc.);
- the systems/SW for which support requests are received;
- the average resolution time (distinguishing between solutions reached in the first phase and those following timeframes linked to developments on the system/SW code);
- the reasons for requests that can be solved during the initial support phase;
- the system/SW solutions for which most requests are received.

the definition/adaptation/launching of actions and/or commercial strategies; the solicitation of greater attention and/or support in the technical management of the customer; the direction of energies/ means of the PDM/DV&V area towards those areas (or sub-areas) of the system/SW that present problems more frequently; the extrapolation of common elements for the medium-long term evolution plans of the system/SW.

Future goals	Deadline
Improve response times for support tasks that do not require development (TR/CR) or hot-fixes.	<b>Q4 2022/Q1 2023</b>
Standardise the generation of reports on the status of customer service activities both for internal purposes (e.g. product management area, project management area, commercial area) and for customers (who do not require contractually agreed special customised reports).	<b>Q4 2022/Q1 2023</b>
Carry out a “Customer Satisfaction” survey of the customer service provided.	<b>Q4 2022/Q1 2023</b>

Once the existing contract with the supplier Telespazio SpA (hereinafter “TPZ”) had terminated in April 2021, following a “beauty contest” the company d-flight entrusted management of its external user support services to the Mediatica SpA. The service supports external users using staff with many years of experience, offering assistance according to a defined calendar and schedule. By analysing

and aggregating the requests for support and assistance received, Mediatica SpA has undertaken to activate, if necessary, an escalation procedure for all the times that it is not possible to resolve the support service ticket, providing for its assignment to the support groups of competence (Level 2 (TPZ), Level 3 (Leonardo)). It also guarantees the priority of the interventions according to the type of account (pro subscriber customer, basic, accredited user, unaccredited user) and a privileged access channel if the contact comes from institutional customers or large users (e.g. based on the number of registered Unmanned Air Systems).

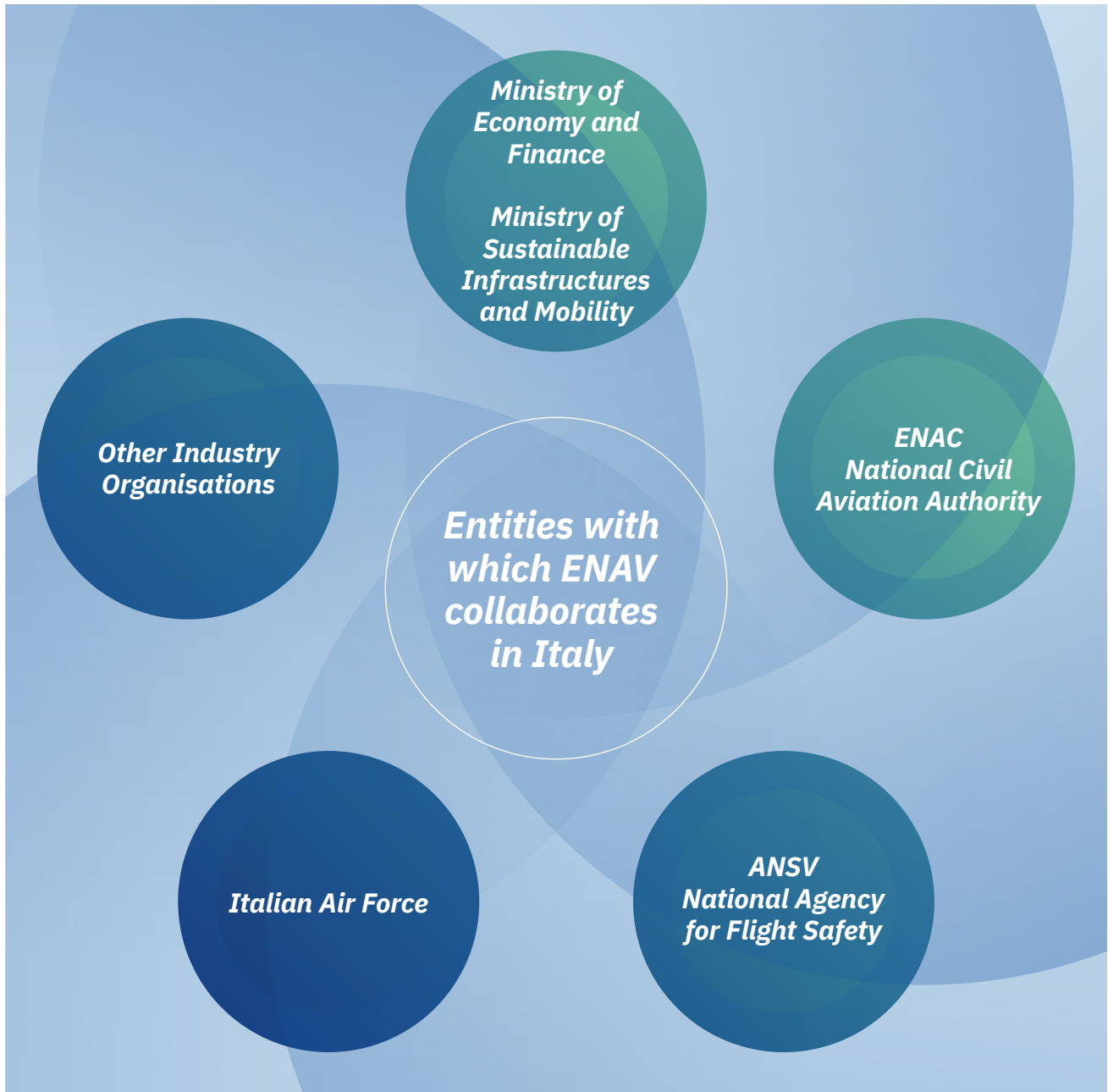
Mediatica SpA also has the task of feeding the knowledge base (inherited from TPZ) with the new frequent cases and to provide elements for improvement of the platform, where suitable, to reduce the number of tickets opened by a given category of user.

Future goals	Deadline
<p>Even before the termination of the service provided by Mediatica SpA, d-flight is already preparing a new call for tender for the provision of a Level 1 (L1) help desk service through which it intends to evaluate a number of needs that have emerged during the current year:</p> <ol style="list-style-type: none"><li>1. increase the duration of the service to at least three years to ensure continuity and therefore stability;</li><li>2. insert as an option the possibility of combining the service of a classic help desk (such as the previous ones with Telespazio and Mediatica) with telephone operator;</li><li>3. update the ranges of expected annual inbound volumes (e-mails and calls) against estimated future traffic forecasts;</li><li>4. update the minimum contacts per month values guaranteed by the service provider for both e-mail and call services.</li></ol>	<b>07/06/2022</b>



## 2.5 COOPERATION WITH ORGANISATIONS, INSTITUTIONS AND INDUSTRY ASSOCIATIONS

ENAV's attention to the civil aviation community not only takes the form of the air traffic control services it offers, but also through collaboration and participation in the activities of national and international bodies.





In **Europe**, ENAV has an active role by being party to a number of cooperation agreements, and is actively involved in partnerships and multilateral programmes; it also plays a key role in the initiatives directed towards the establishing of the Single European Sky promoted by the European Commission, through **EASA, EUROCONTROL** and other **EU and organisations**.

<p><b>EASA (European Union Aviation Safety Agency)</b></p>	<p>Watchdog for the regulation, control and definition of the highest common levels of safety in the field of civil aviation in the European Union. ENAV actively participates in some activities and groups set up by the EASA for regulatory activity on areas of interest for the Group in the field of air navigation services and ATM. Participation can take place by means of direct reporting by ENAV, by the State (in our case by ENAC) or by CANSO (the association for ANSPs - Air Navigation Service Providers).</p>
<p><b>EUROCONTROL</b></p>	<p>EUROCONTROL is an intergovernmental organisation, of which Italy is a member country, the main purpose of which is to support the development and maintenance of an efficient air traffic control system at European level. To achieve this, it supports the national civil aviation authorities, the ANSPs and civilian and military airspace users, the industrial sector, professional organisations and the relevant European institutions. It holds the important role of Network Manager, assigned to it by the European Commission for the first time in 2011 and renewed also for 2020 – 2029. ENAV participates actively and directly in technical groups as well as in the organisation’s governance groups (including to support State representatives), and is also chair of some of these groups, operating with a particular focus on activities relating to topics of corporate interest in the fields of legislation, operations, safety and security, the environment, the CNS and ATM technical systems and procedures.</p>
<p><b>EUROCAE</b></p>	<p>EUROCAE is responsible for the standardisation of highly advanced technological systems. ENAV is a member and participates in its governance through the annual general meeting as well as in technical activities. ENAV is very active in the thematic working groups that are of particular interest to the Company, such as those related to new technologies, including remote towers, drones, and airport and satellite surveillance.</p>

In view of the objectives set by the EU for the creation of the Single European Sky and the need to achieve a common vision for the modernisation of the European air traffic management system, ENAV has assumed a strategic role in the main initiatives created in Europe, such as the Functional Airspace Block BLUE MED (whose members include Cyprus, Greece and Malta, in addition to Italy), the activities of the European Network Manager as well as direct participation, as a full member, in the new SESAR 3 Joint Undertaking (formerly SESAR Joint Undertaking) and the SESAR Deployment Alliance.

<p><b>SESAR 3 Joint Undertaking (S3JU)</b></p>	<p>The S3JU is the public-private partnership established in 2008, renewed in 2016 and expanded in 2021 with the objective of conducting the SESAR European Research and Development Programme (Single European Sky ATM Research) with an activity time horizon of 2031. The entire aviation community is represented in the S3JU partnership, confirming the significant modernisation process that is under way: EUROCONTROL and the European Commission as founding members and 50 organisations (including ENAV) representing the entire European ATM industry involved in SESAR projects. ENAV has been a SESAR JU member since August 2009 and has played a leading role in all design and governance activities, contributing with its own resources to driving the change and modernisation processes of the European ATM system. For ENAV, membership in the S3JU represents a pillar for the company’s strategic positioning in the European ATM field, allowing it to participate directly in the orientation of strategic choices related to the design, development and management of new-generation ATM systems, enhancing the strategic choices and investments to guarantee a cutting-edge service for users. The active role of ENAV has allowed the company to participate in about 320 R&amp;D projects related to the European Master Plan. S3JU will publish its first call in April 2022. Participation in the S3JU also contributes to the achievement of the objectives of the European Green Deal by supporting the European ATM in the digital transition.</p>
<p><b>SESAR Deployment Alliance (SDA)</b></p>	<p>The SESAR Deployment Alliance (SDA) consists of the main stakeholders in the sector (airlines, ANSPs, airports) and was set up to meet the European Commission’s need to standardise and synchronise the implementation of systems and procedures in the field of ATM. To achieve this objective, and following a specific public selection procedure, the European Commission has given the SDA the task of coordinating the deployment of SESAR.</p> <p>ENAV also plays a leading role in the A6 Alliance. The A6 Alliance partners, united by a Memorandum of Cooperation, represent the interests of the ATM industry and play a major role in the development and implementation of technologies and concepts defined within SESAR. With its experts, ENAV participates in the activities of the A6 Alliance partners in the governance groups and the technical working groups.</p> <p>During the year under review, the A6 Alliance has started, together with the other partners of the SDA, all the activities necessary for the establishment of the new SESAR Deployment Manager by participating in the “Call for Proposal for the selection of the SESAR Deployment Manager and the awarding of a framework partnership agreement and the specific grant agreement”. In the event of an award, this will be the new entity responsible for the coordination activities of the Deployment Programme which will include the main European ANSPs, airlines and airports together with the European Network Manager. The activities are expected to commence on 1 June 2022.</p> <p>The A6 Alliance has coordinated the activities of the main European ANSPs on the key topics involving the European traffic management system. In particular, the A6 Alliance has started the revision of the SES II+ legislative proposal, in order to ensure that the text develops in line with the needs of the ANSP. The Alliance has also addressed the issue of technological innovation as well as the new challenges related to the development of regulation and services for drones (the so-called U-Space services).</p>
<p><b>SESAR DM</b></p>	<p>The project activities envisaged in the European deployment programme have been initiated and are under way. At present SDM coordinates 343 projects, of which more than 200 were completed, substantially benefiting performance. It is estimated that the 343 projects, once completed, will result in more than 7 million tonnes less CO<sub>2</sub> thanks to more efficient flights, and an improvement in network capacity with over 300 million fewer minutes of ATFM delay. In particular, ENAV is carrying out a series of implementation projects that have recently been put into operation, bringing significant benefits to the civil aviation community, in terms of punctuality, improvement of airline performance, as well as important improvements for passengers, in terms of cost reduction, environmental sustainability and safety.</p>
<p><b>FAB BLUE MED</b></p>	<p>ENAV coordinates the FAB BLUE MED project, aimed at creating a Functional Airspace Block in the centre/south-east of the Mediterranean, with the primary involvement of EU States (Cyprus, Greece and Malta as well as Italy) and non-EU countries (Israel and North Macedonia).</p>

As highlighted, ENAV plays a fundamental role in the governance of some of the most important international organisations and initiatives. Indeed, the opportunity to take part in many important decision-making bodies and working groups (especially in the context of A6, ICAO (International Civil Aviation Organisation), EUROCONTROL (European Organisation for the Safety of Air Navigation), EUROCAE (European Organisation for Civil Aviation Equipment) and CANSO (Civil Air Navigation Services Organisation)) on matters of

direct interest for air traffic control, allows ENAV to pursue those company values which, as mentioned, tend first and foremost to protect the interests of the civil aviation community.

With regard to 2021, due to continuing travel restrictions imposed as a result of the COVID-19 pandemic, most national and international activities took place remotely (teleconferences).

At international level, meaning both globally and regionally, ENAV is also engaged in a number of important activities within the ICAO and CANSO.

<b>ICAO</b>	A United Nations agency that defines principles and techniques of international air navigation, routes and airports. It promotes the design and development of air transport. In 2020 ENAV continued the technical activities within the technical committees on a global and European level. As regards significant positions, it should be mentioned that it held the vice presidency for the largest decision-making body in Europe, which encompasses 56 member states, including the Russian Federation and those located in Eurasia and in North Africa.
<b>CANSO</b>	Is the global trade organization for air navigation service providers (ANSPs) and represents their interests. CANSO members, i.e. ANSPs, of which ENAV is a part, manage 85% of the world's air traffic, and through working groups share information and develop new policies. ENAV has continued its involvement in the governance and technical groups on a global and European level. Since September 2020, ENAV has contributed to the definition of a position shared by the ANSP community related to the proposal of the European Commission concerning the Single European Sky (SESII+), which regulates the main activities carried out by ENAV and which is still being discussed by the EU institutions.

ENAV actively and directly participates (in many cases representing the Italian State and even acting on its behalf) in groups of a technical nature both at global and regional level (even holding the chair of some of these groups), operating with a particular focus on activities related to issues of corporate interest in compliance with legislation, operations, safety and security, the environment, CNS (Communication, Navigation and Surveillance) and ATM (Air Traffic Management) technical systems, as well as licensing and staff training.

### *Industrial initiatives involving ENAV*

<b>ESSP (European Satellite Service Provider)</b>	ENAV is a shareholder of ESSP, the company that manages EGNOS (European Geostationary Navigation Overlay Service) signals for satellite navigation purposes. During 2021, activities continued, in conjunction with the EUSPA (European Union Space Programme Agency), for the future contract for the provision of EGNOS services for the period 2022-2030. The contract should be awarded during 2022.
<b>AIREON</b>	Aireon is the provider of global satellite surveillance services, based on the Iridium constellation, of which ENAV is a shareholder. Aireon has received EASA certification in Europe and provides a global portfolio of services that includes satellite surveillance for the benefit of ANSPs, as well as numerous other services in the field of Air Traffic Flow Management, data analytics, and so forth.

## 2.6 OUR SUSTAINABILITY NETWORK

Active participation in a series of networks focused on sustainability is a commitment that the company has made and continues to make with determination, in the knowledge that engaging with the policies and projects developed by other companies, regardless of sector, is a valuable element of learning and growth.



### Sustainability Makers

Sustainability Makers is a reference association for professionals dealing with sustainability and corporate social responsibility in their capacity as company managers, consultants and researchers, one with over one hundred managers and professionals dedicated to issues of Corporate Social Responsibility. ENAV's commitment is also substantiated by the participation of its Head of Sustainability and CSR on the Board of Directors of Sustainability Makers.

### Fondazione Global Compact Italia

Since January 2021, ENAV has been part of the Global Compact Network Italy Foundation, which makes the Network's its own and undertakes to spread knowledge of the United Nations Global Compact (UNGC) by favouring an increase in membership in Italy and by promoting a commitment to encourage corporate sustainability on the part of participating Italian companies and organisations.



### Salone della CSR e dell'innovazione sociale

Since 2019 ENAV has taken part in the Salone della CSR e dell'Innovazione Sociale, the most eagerly awaited event for those who believe in sustainability. Recognised as the main event in Italy dedicated to CSR, the Salone has contributed to the spreading of a culture of social responsibility, provided opportunities for updating attendees and facilitated networking among the various social players.

## ASVIS

ENAV is a member of the Italian Alliance for Sustainable Development (ASviS - Alleanza italiana per lo Sviluppo Sostenibile), an association founded on 3 February 2016 on the initiative of the Fondazione Unipolis and the University of Rome "Tor Vergata". The aim is to increase knowledge in Italian society, in businesses and in institutions of the importance of Agenda 2030 for sustainable development and to drive them into achieving the Sustainable Development Goals (SDG) through:

- the development of a sustainability culture at all levels, orienting production and consumption models to that end;
- analysis of the implications and opportunities for Italy associated with the Agenda for Sustainable Development;
- a contribution towards the definition of an Italian strategy targeted at the achievement of the SDGs (including by the adoption of analytical and predictive tools that assist in the definition of sustainable development policies), and the realisation of a monitoring system of Italy's progress towards achieving SDGs.



## EticaNews

ENAV is part of the ET.group, a project developed around ETicaNews, devised by a group of journalists and professionals. The publication was founded along three guidelines:

- journalism on ethics, i.e. dealing with themes that both promote and give voice to a society that is sustainable from an economic and social perspective;
- ethical journalism, meaning that it is independent of advertising, political or relational links, placing itself under the guarantee of an ethic-scientific committee;
- wicketico journalism, i.e. a type of journalism that aims to give voice to the network of stakeholders and readers and to involve them in the project.



## CEO for Life

CEO for life awards is an initiative founded by HR Community, which brings together the CEOs of the most important companies in Italy committed to sustainable development and to which ENAV has been signed up since 2021.







## **03 • RESPONSIBLE BUSINESS MANAGEMENT**







### 3. Responsible business management

<b>MATERIAL ISSUES</b>	<ul style="list-style-type: none"> <li>- <b>Anti-corruption and corporate integrity</b></li> <li>- <b>Solid governance (new)</b></li> <li>- <b>Responsible supply chain management</b></li> <li>- <b>Energy consumption and climate change</b></li> </ul>
<b>SDGs AND TARGETS</b>	<div style="display: flex; align-items: flex-start;"> <div style="width: 15%; text-align: center;">  <p><b>8</b> DECENT WORK AND ECONOMIC GROWTH</p> </div> <div style="width: 85%;"> <p>8.5: Achieve full and productive employment and decent work for all women and men, including for young people and persons with disabilities, and equal pay for work of equal value</p> <p>8.7: Take immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour, including recruitment and use of child soldiers, and by 2025 end child labour in all its forms</p> <p>8.8: Protect labour rights and promote a safe and protected working environment for all workers, including migrant workers, and especially migrant women, and those with precarious jobs</p> </div> </div> <hr/> <div style="display: flex; align-items: flex-start;"> <div style="width: 15%; text-align: center;">  <p><b>11</b> SUSTAINABLE CITIES AND COMMUNITIES</p> </div> <div style="width: 85%;"> <p>11.2: Provide access to safe, affordable, accessible and sustainable transport systems for all</p> <p>11.6: Reduce the adverse per capita environmental impact of cities, including by paying special attention to air quality and municipal and other waste management</p> </div> </div>
<b>ENAV GROUP TARGETS 2021-2023</b>	<ul style="list-style-type: none"> <li>- Supplier evaluation against ESG criteria</li> <li>- ESG Rating</li> <li>- Anti-Corruption Management Systems</li> <li>- Assessment of CO<sub>2</sub> emissions: extension to Scope 3</li> </ul>
<b>ENAV GROUP PERFORMANCE 2021</b>	<ul style="list-style-type: none"> <li>- Risks associated with human rights were assessed in the context of a management of risks in 100% of processes</li> <li>- In 2021 launch of the platform for the supplier assessment against ESG criteria</li> <li>- Rating identification</li> <li>- Acquisition by ENAV S.p.A. of ISO 37001 certification</li> <li>- 100% investment agreements and significant contracts that include human rights clauses in 2021 for ENAV and Techno Sky</li> <li>- Assessment of Scope 3 emissions completed</li> </ul>

#### 3.1 SUSTAINABILITY GOVERNANCE

Sustainability permeates all of ENAV’s strategic management activities with a view to integrating ESG issues into the business, as expressly enshrined in the Corporate Governance Code, which gives the Board of Directors the role of guiding the company’s sustainable success.

The Board of Directors approves the Sustainability Plan, which includes the relevant projects in light of the Group’s industrial strategy, together with this document, which includes, inter alia, the contents required for the Consolidated Non-Financial Statement pursuant to Legislative Decree 254/2016. In carrying out these tasks, the Board of Directors is supported by the Sustainability Committee, which covers relevant advisory duties on sustainability issues as well as monitoring functions both on ESG reporting and related strategies. In particular, in addition to expressing opinions on specific sustainability issues, the Sustainability Committee examines the general approach of this document, proposed by the Chief Executive Officer, and the structure of its contents, as well as the completeness and transparency of the information provided through it, issuing a prior opinion to the Board of Directors.

This vision, as indicated by best practices, is obviously extended to topics of compensation. The variable compensation, for the Chief Executive Officer and management, consolidates an integration vision where business is compensated by the progressive perfection of actions that are important from a non-financial point of view. The variable incentive system, approved by the Board of Directors on the proposal of the Remuneration and Appointments Committee, is approved or rejected by a

binding vote of the Shareholders, contemplating long-term objectives together with projects of more immediate relevance.

Company governance ensures that the integration of relevant ESG issues into the business is constantly monitored also from a risk perspective, thanks to the Internal Control and Risk Management System (ICRMS) and the oversight that the Control, Risks and Related Parties Committee ensures in this area in supporting the activities of the Board of Directors. In accordance with the Corporate Governance Code, this latter Committee is in fact responsible for assessing the suitability of periodic financial and non-financial information to represent correctly the Company's business model, strategies, the impact of its activities and the performance achieved, as well as examining the content of periodic non-financial information relevant to the ICRMS. Finally, in addition to the entire ICRMS, the Board of Statutory Auditors also has the task of overseeing the non-financial disclosure.

## *The ENAV Group*

In addition to the core business of air traffic management under the responsibility of its Parent Company, the ENAV Group also guarantees the installation, maintenance and monitoring of all hardware and software systems for air navigation.

Taking into account the social relevance of the business, ENAV's corporate governance is oriented towards the pursuit of the priority objective of creating value for shareholders in the medium-long term, the sustainable success of the company and the appropriate balancing and enhancement of all the interests involved.

ENAV's governance system is divided into a series of bodies, principles, rules and procedures, in line with the Corporate Governance Code, to which the Company adheres, with regulatory indications and best practices.

Full information on the development of ENAV's Corporate Governance practices is included in the Report on Corporate Governance and Ownership Structure, published annually along with the financial statements.

## *Organisational Model*

ENAV adopts and keeps constantly updated the Group's Code of Ethics, which regulates the set of rights, duties and responsibilities that Group companies assume towards their stakeholders and applies to corporate bodies, management, employees, external collaborators, business partners, suppliers and all those who have relations with the Company.

The adoption of principles of conduct and ethical standards to be observed in relations with third parties is proof of the Company's commitment also in relation to the prevention of the offences referred to in Legislative Decree 231/2001, as well as the prevention of corruption and fraud, and in this sense the Group's Code of Ethics forms an integral part of the Organisational Model pursuant to Legislative Decree 231/2001.

## *The Board of Directors*

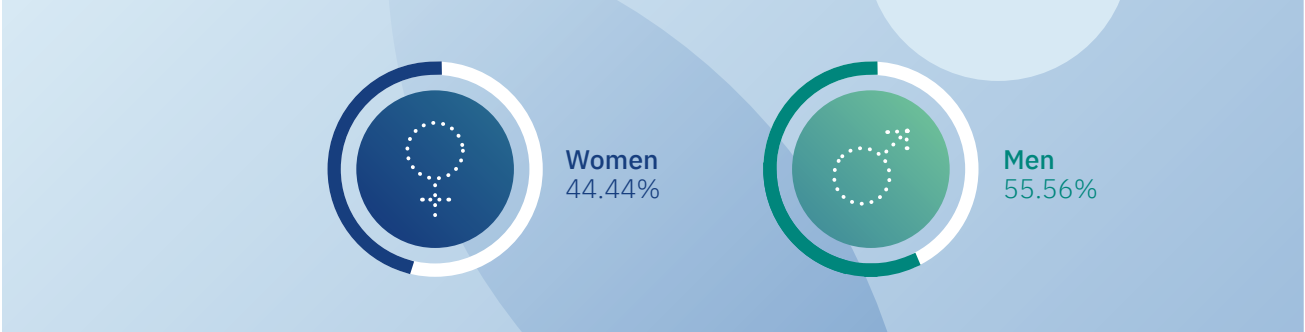
As the central body of ENAV's Corporate Governance system, the Board of Directors is vested with the widest powers for the ordinary and extraordinary management of the company in its role of guiding the pursuit of the sustainable success of ENAV and the Group it heads.

The ENAV Board of Directors is:

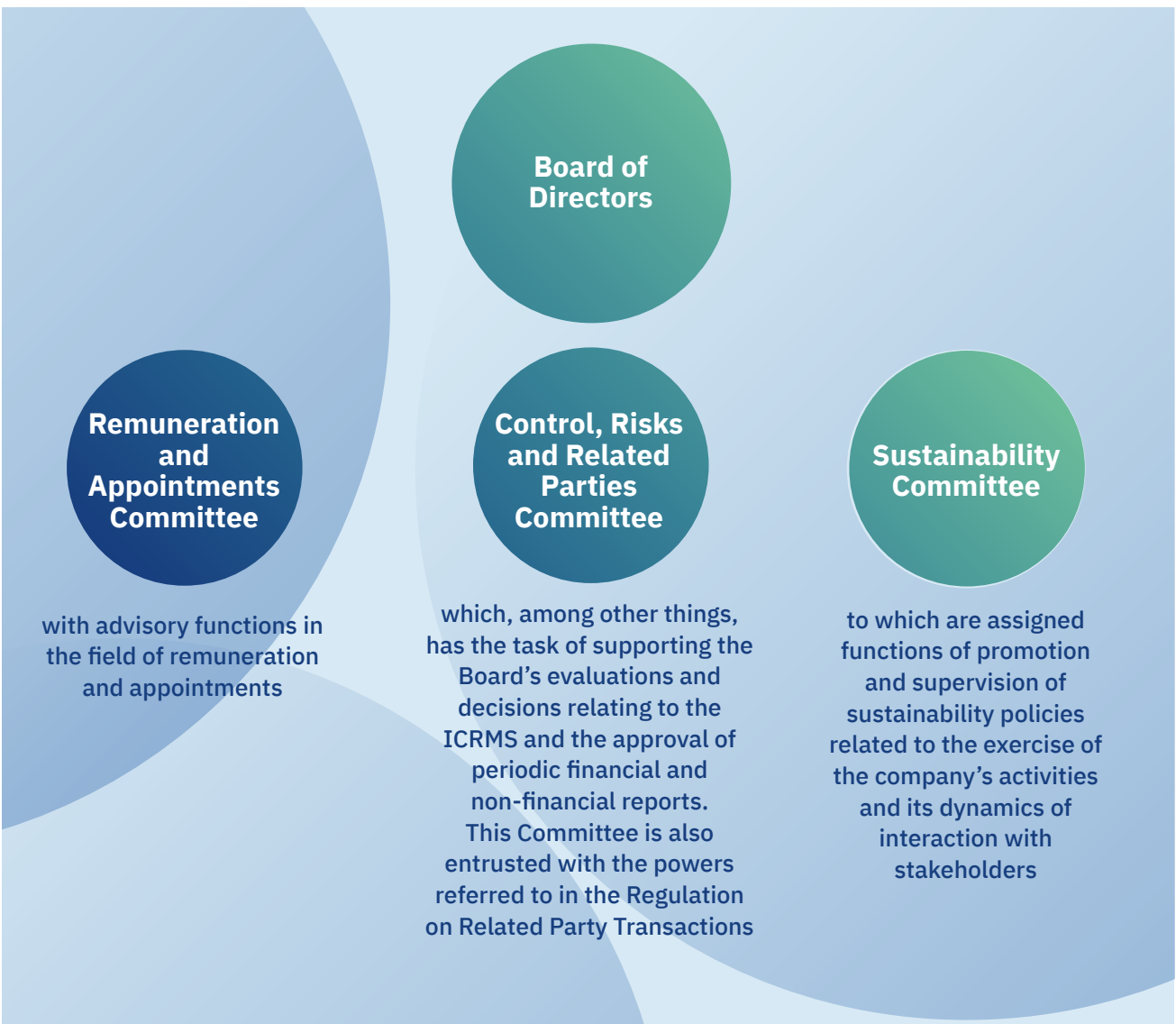
- **Independent**, with 7 Directors - including the Chairperson - qualified as independent pursuant to

the Consolidated Finance Law and the Corporate Governance Code;

- **Representative**, with one third of Directors taken from the slate presented by the minority shareholders;
- **Balanced**, with 5 Directors above and 4 Directors under fifty years of age;
- **Inclusive**, with 44.44% female Directors.



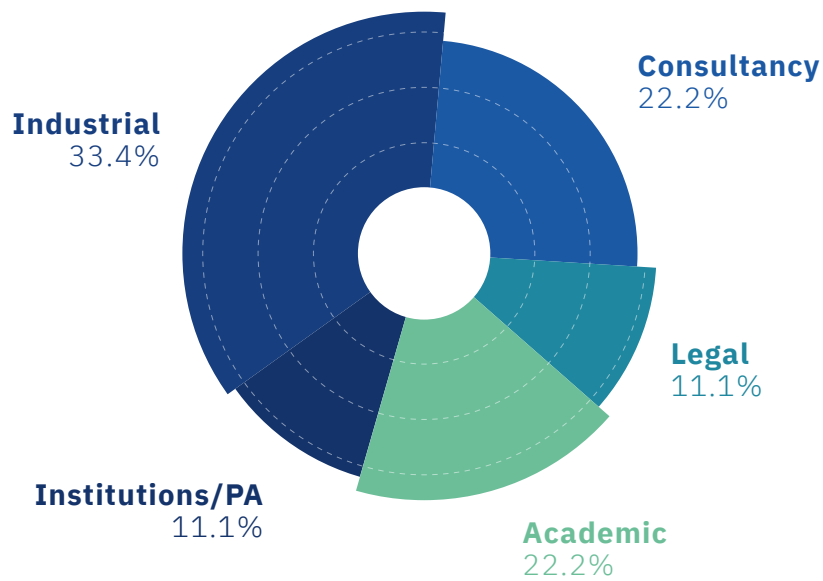
The Board of Directors has set up Board Committees with advisory functions to assist it in its activities.



The Board of Directors is entrusted with the definition of strategies and the monitoring of their implementation, as well as the definition of the most functional corporate governance system to carry out the company's business and pursue its strategies, taking into account the scope for autonomy offered by the law. On the basis of the policy on dialogue with the Company's shareholders at large, the Board directs, supervises and monitors dialogue with the most significant ones, verifying its occurrence on the basis of adequate information flows.

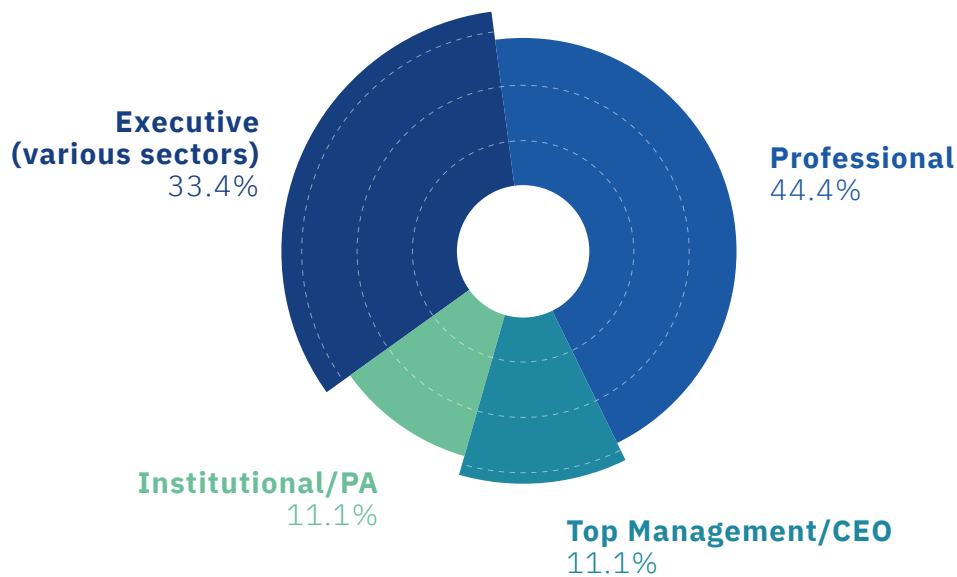
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## Sector of origin

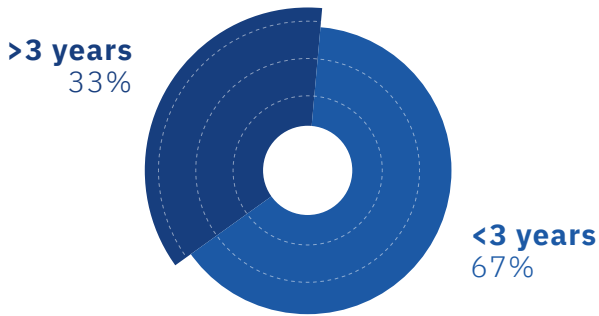


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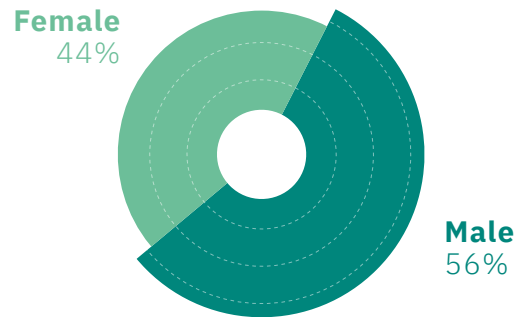
## Background



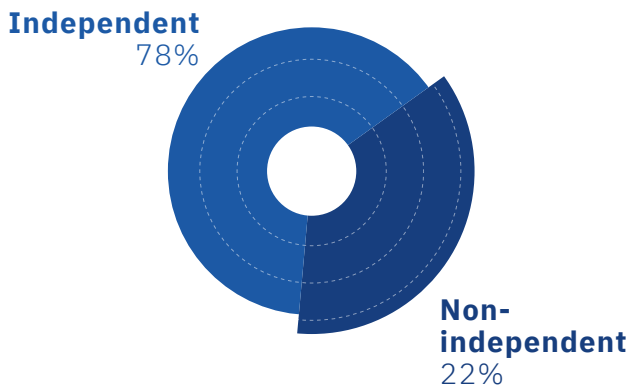
### Tenure



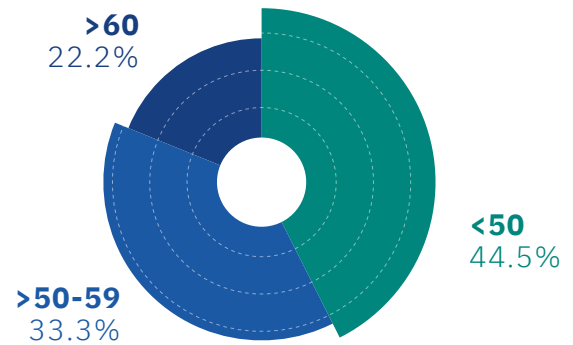
### Gender Diversity



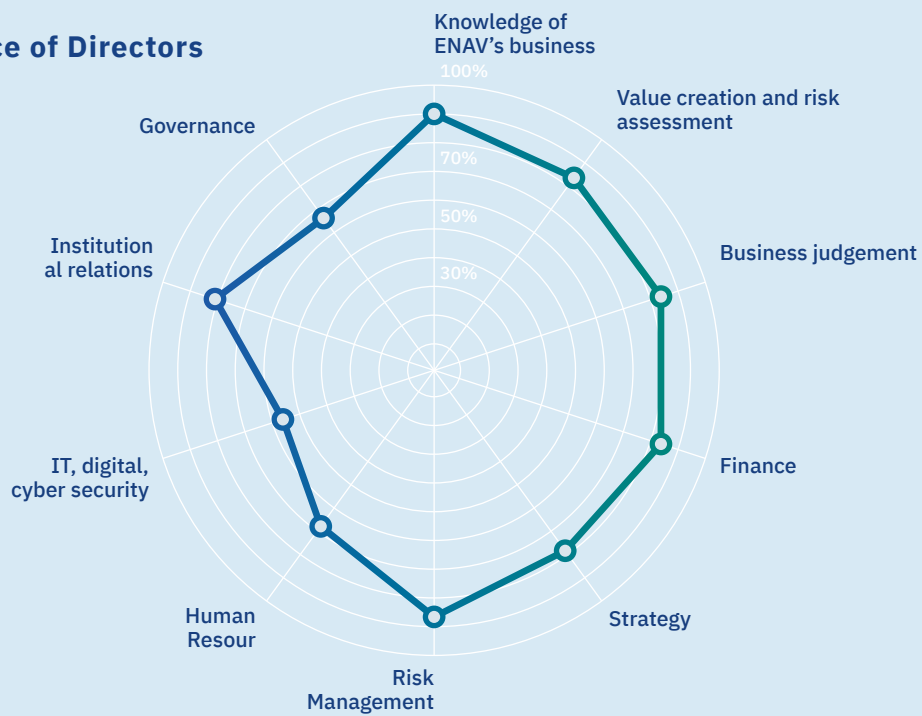
### Independence



### Age



### Competence of Directors





## **Composition and Appointment**

Pursuant to Article 11-(2)(3) of the Articles of Association, the Board of Directors is appointed by the Shareholders' Meeting based on slates presented by the shareholders in which the candidates are listed using consecutive numbers. ENAV's directors were selected according to specific criteria of professionalism and competence, with particular concern for experience of at least three years in activities involving administration or control or management within companies, professional activities or the teaching of legal, economic, financial or technical-scientific subjects at university level, or other subjects that are relevant or in any case functional to the operations of the Company, or managerial functions in public entities or public administrations, operating in sectors which are related to the Company's sector, or entities or public administrations that are not related to the aforementioned sectors provided the functions involve the management of economic and financial resources. At the time of accepting their nomination, as well as periodically during their mandate, ENAV's Directors, in addition to declaring that they possess all the requirements of integrity, professionalism and independence, as well as the non-existence of causes of ineligibility, incompatibility and incompatibility, are required to verify whether they have sufficient time to dedicate to the diligent performance of their office. This assessment is carried out on the basis of the Guidelines of the Board of Directors regarding the maximum number of offices that the Directors of ENAV S.p.A. may hold, which can be consulted in the "Governance" section of the Company's website.

ENAV's Board of Directors has an appropriate number of independent Directors, with seven out of nine meeting the independence requirement. In this regard, the Board periodically verifies the independence of its own members using suitable formal procedures and under the supervision of the Board of Statutory Auditors. The qualitative/quantitative methods and criteria for verifying the independence of ENAV's Directors are contained in the Policy regarding the criteria and procedure for the assessment of the independence of ENAV's Directors adopted by the Board of Directors in accordance with the recommendations of the Corporate Governance Code.

As regards gender diversity and balance in the composition of the Board of Directors, the Articles of Association provide for observance thereof in line with current legislation. The substitution and integration mechanisms of the Board of Directors are consistent with such criteria. Similar safeguards are in place for the composition of the corporate bodies of the Group's Italian subsidiaries, in accordance with the provisions of their respective Articles of Association.

The Company adopts a policy for diversity in management and control bodies, which is published in the "Governance" section of [www.enav.it](https://www.enav.it/governance/documenti-societari) (<https://www.enav.it/governance/documenti-societari>). In accordance with the provisions of applicable legislation and the Articles of Association on the diversity and professional qualifications of ENAV's directors, this policy offers shareholders and the Board of Directors, each within its own sphere of responsibility, a number of guidelines to ensure the broadest and most appropriate diversity of viewpoints within the governing body, especially with regard to the training and professional development of the directors, proposing processes for monitoring that development.

Further details on the composition and appointment of the Board of Directors can be found in the Report on Corporate Governance and Ownership Structure available on the Company's website.

## Governance



### 3.2 RISK MANAGEMENT AND THE ENTERPRISE RISK MANAGEMENT SYSTEM

The ENAV Group has long adopted an Enterprise Risk Management (ERM) process aimed at identifying, assessing and monitoring risks at Group level and defining and managing mitigation actions to contain the level of risks within the propensity thresholds approved by the Board of Directors (Risk Appetite).

During 2021, the Corporate Risk Profile, the Risk Appetite Statement, the Risk Treatment Plan and the Key Risk Indicators system were updated, and risk monitoring was carried out in October. These activities have made it possible to update the analysis of the impact of the Covid-19 pandemic, with particular reference to non-financial issues, mainly Occupational Health and Safety.

Enterprise Risk Management operates in accordance with the Guidelines of the internal Control and Risk Management System (ICRMS) and to support the Control and Risks and Related Parties Committee.

The various organisational, operational and internal standard safeguards are accompanied by a constant commitment to spreading the culture of risk and risk-based management at the various levels of the Company.

The manner in which they are managed will be discussed in more detail in the sections addressing those specific risks.

The following table shows, for each aspect of Legislative Decree 254/2016, the connected risk events, the impact for ENAV and for the involved categories of stakeholders and the main methods for managing the risks managed and incurred.

The classification of impacts for ENAV follows the categories used in the company's application of the ERM model.

TOPIC OF LEGISLATIVE DECREE 254/2016	RISK EVENTS
<b>Governance &amp; Compliance and fight against corruption</b>	<ul style="list-style-type: none"> <li>- Market abuse</li> <li>- Failure to comply with national cyber security legislation (Legislative Decree 105/2019)</li> <li>- Compliance of systems and infrastructure with reference legislation</li> <li>- Management of institutional relations</li> <li>- Changes to the organisational structure</li> <li>- Failure to comply with regulations for certification as a Provider of air traffic management services and air navigation services (ATM/ANS)</li> <li>- Failure to comply with environment legislation</li> <li>- Failure to comply with EU Regulation 679/2016 on privacy</li> <li>- Inadequate positioning of the Group in the international context</li> <li>- Occupational Health and Safety (ordinary activities)</li> <li>- Fraud and corruption</li> <li>- Failure to comply with Legislative Decree 50/2016 on the public contracts code</li> <li>- Failure to comply with Legislative Decree 254/2016 regarding non-financial reporting</li> <li>- Uncertain legal classification of the company (Public Contracts Code)</li> <li>- Failure to comply with applicable regulations for the certification of Training Organisations</li> </ul>
<b>Environment</b>	<ul style="list-style-type: none"> <li>- Compliance of systems and infrastructures with reference legislation</li> <li>- Failure to respect the reference legislation concerning the environment</li> <li>- Human rights and the environment in the supply chain</li> </ul>
<b>Respect for human rights</b>	<ul style="list-style-type: none"> <li>- Failure to respect Reg. EU 679/2016 General Data Protection Regulation (GDPR)</li> <li>- Human rights and the environment in the supply chain</li> <li>- Diversity and Welfare</li> </ul>
<b>Pertinent to personnel</b>	<ul style="list-style-type: none"> <li>- Risk of disputes</li> <li>- Safety of personnel working in Countries at risk (travel security)</li> <li>- Occupational Health and Safety for contract work</li> <li>- Suitability of human capital</li> <li>- Staff turnover</li> <li>- Occupational safety (H&amp;S) for ordinary activities</li> <li>- Disagreement</li> </ul>
<b>Social</b>	<ul style="list-style-type: none"> <li>- Aeronautical accident in relation to ATM contribution</li> <li>- Group reputation</li> <li>- Continuity of core services</li> <li>- Information security</li> <li>- Physical safety</li> <li>- Aeronautical accident of the air fleet owned by ENAV</li> <li>- Discontinuity of the administrative-managerial services</li> </ul>
<b>Climate change</b>	<ul style="list-style-type: none"> <li>- Climate change (emerging risk)</li> </ul>

POTENTIAL IMPACT OF THE ENAV GROUP	STAKEHOLDERS IMPACTED	POTENTIAL IMPACT ON STAKEHOLDERS	MAIN MANAGEMENT METHODS
<ul style="list-style-type: none"> <li>- Strategic</li> <li>- Operational</li> <li>- Compliance</li> <li>- Reputational</li> </ul>	<ul style="list-style-type: none"> <li>- Carriers</li> <li>- Operators</li> <li>- Suppliers</li> <li>- Employees</li> <li>- Shareholders</li> </ul>	<p><b>Carriers:</b></p> <ul style="list-style-type: none"> <li>- Economic damage</li> </ul> <p><b>Operators:</b></p> <ul style="list-style-type: none"> <li>- Economic damage</li> </ul> <p><b>Suppliers:</b></p> <ul style="list-style-type: none"> <li>- Economic damage</li> <li>- Occupational Health and Safety</li> </ul> <p><b>Employees:</b></p> <ul style="list-style-type: none"> <li>- Occupational Health and Safety</li> </ul> <p><b>Shareholders:</b></p> <ul style="list-style-type: none"> <li>- Economic damage</li> </ul>	<ul style="list-style-type: none"> <li>- Management system for preventing and combating corruption</li> <li>- Occupational quality, health and safety management systems</li> <li>- Company policies</li> <li>- System for the delegation of functions</li> <li>- Dedicated organisational structures</li> <li>- Specific mitigation measures of a design nature</li> </ul>
<ul style="list-style-type: none"> <li>- Operational</li> <li>- Compliance</li> <li>- Reputational</li> </ul>	<ul style="list-style-type: none"> <li>- Operators</li> <li>- Suppliers</li> <li>- Employees</li> <li>- Shareholders</li> </ul>	<p><b>Operators:</b></p> <ul style="list-style-type: none"> <li>- Economic damage</li> </ul> <p><b>Suppliers:</b></p> <ul style="list-style-type: none"> <li>- Occupational Health and Safety</li> </ul> <p><b>Employees:</b></p> <ul style="list-style-type: none"> <li>- Occupational Health and Safety</li> </ul> <p><b>Shareholders:</b></p> <ul style="list-style-type: none"> <li>- Economic damage</li> </ul>	<ul style="list-style-type: none"> <li>- Environmental management system compliant with ISO 14001</li> <li>- Occupational quality, health and safety management systems</li> <li>- Company policies</li> <li>- System for the delegation of functions</li> <li>- Dedicated organisational structures</li> <li>- Specific mitigation measures of a design nature</li> </ul>
<ul style="list-style-type: none"> <li>- Compliance</li> <li>- Reputational</li> </ul>	<ul style="list-style-type: none"> <li>- Suppliers</li> <li>- Employees</li> <li>- Shareholders</li> </ul>	<p><b>Suppliers:</b></p> <ul style="list-style-type: none"> <li>- Occupational Health and Safety</li> </ul> <p><b>Employees:</b></p> <ul style="list-style-type: none"> <li>- Occupational Health and Safety</li> </ul> <p><b>Shareholders:</b></p> <ul style="list-style-type: none"> <li>- Economic damage</li> </ul>	<ul style="list-style-type: none"> <li>- Quality management systems</li> <li>- Company policies</li> <li>- Dedicated organisational structures</li> <li>- Specific mitigation measures of a design nature</li> </ul>
<ul style="list-style-type: none"> <li>- Operational</li> <li>- Compliance</li> <li>- Reputational</li> </ul>	<ul style="list-style-type: none"> <li>- Carriers</li> <li>- Operators</li> <li>- Suppliers</li> <li>- Employees</li> <li>- Shareholders</li> </ul>	<p><b>Carriers:</b></p> <ul style="list-style-type: none"> <li>- Economic damage</li> </ul> <p><b>Operators:</b></p> <ul style="list-style-type: none"> <li>- Economic damage</li> </ul> <p><b>Suppliers:</b></p> <ul style="list-style-type: none"> <li>- Economic damage</li> <li>- Occupational Health and Safety</li> </ul> <p><b>Employees:</b></p> <ul style="list-style-type: none"> <li>- Occupational Health and Safety</li> </ul> <p><b>Shareholders:</b></p> <ul style="list-style-type: none"> <li>- Economic damage</li> </ul>	<ul style="list-style-type: none"> <li>- Occupational quality, health and safety management systems</li> <li>- Company policies</li> <li>- System for the delegation of functions</li> <li>- Dedicated organisational structures</li> <li>- Specific mitigation measures of a design nature</li> </ul>
<ul style="list-style-type: none"> <li>- Operational</li> <li>- Reputational</li> <li>- Compliance</li> </ul>	<ul style="list-style-type: none"> <li>- Carriers</li> <li>- Operators</li> <li>- Institutions</li> <li>- Employees</li> <li>- Shareholders</li> </ul>	<p><b>Carriers:</b></p> <ul style="list-style-type: none"> <li>- Economic damage</li> </ul> <p><b>Operators:</b></p> <ul style="list-style-type: none"> <li>- Economic damage</li> </ul> <p><b>Institutions:</b></p> <ul style="list-style-type: none"> <li>- Reputational damage</li> </ul> <p><b>Employees:</b></p> <ul style="list-style-type: none"> <li>- Occupational Health and Safety</li> </ul> <p><b>Shareholders:</b></p> <ul style="list-style-type: none"> <li>- Economic damage</li> </ul>	<ul style="list-style-type: none"> <li>- Occupational quality, health and safety management systems</li> <li>- Company policies</li> <li>- Dedicated organisational structures</li> <li>- Specific mitigation measures of a design nature</li> </ul>
<ul style="list-style-type: none"> <li>- Operational</li> <li>- Strategic</li> </ul>	<ul style="list-style-type: none"> <li>- Carriers</li> <li>- Operators</li> <li>- Shareholders</li> </ul>	<p><b>Carriers:</b></p> <ul style="list-style-type: none"> <li>- Economic damage</li> </ul> <p><b>Operators:</b></p> <ul style="list-style-type: none"> <li>- Economic damage</li> </ul> <p><b>Shareholders:</b></p> <ul style="list-style-type: none"> <li>- Economic damage</li> </ul>	<ul style="list-style-type: none"> <li>- Specific mitigation measures of a design nature</li> <li>- Operating procedures</li> </ul>

### 3.3 POSSIBLE IMPACTS OF CLIMATE CHANGE ON CORE BUSINESS<sup>14</sup>

#### *Risks associated with climate change*

<p><b>TYPES OF RISK</b></p>	<p>The impacts of the phenomena determined by climate change on air traffic stakeholders have been identified and studied over the years on an international level. In particular, the document EUROCONTROL “European Aviation in 2040 - Challenges of growth - Adapting aviation to a changing climate” (June 2018) identifies five main types of weather phenomena that could potentially have an impact on the aviation industry:</p> <ol style="list-style-type: none"> <li>1. Precipitation (e.g. rain, snow, hail);</li> <li>2. Temperature (e.g. average increase);</li> <li>3. Rising sea levels (e.g. submergence and flooding of coastal land);</li> <li>4. Wind (e.g. changes in direction and intensity);</li> <li>5. Extreme events (e.g. storms, hurricanes).</li> </ol>
<p><b>DESCRIPTION OF RISKS</b></p>	<p>The assessments related to these phenomena are listed below, referring to the aspects of greatest significance for providers of air navigation services and therefore for ENAV.</p> <p><b>1. Precipitation.</b> Within the scope of air transport, and more in particular in the air navigation services field, the events connected to intense precipitation can require greater separation distances between aircraft, resulting in a direct impact on airport capacity. In fact, the drainage capacity of the airport surface may not be sufficient for facing more frequent and/or intense situations of precipitation, resulting in the increased risk of flooding of runways and taxiways. Furthermore, airport infrastructures, as well as electrical equipment, can be exposed to a risk of flooding.</p> <p><b>2. Temperature.</b> Increasing temperatures can cause an impact on infrastructures. For example, high temperatures may make it necessary to increase the cooling in airport buildings, in particular for the more exposed ones such as control towers, which have large glass surfaces, resulting in increased costs.</p> <p><b>3. Rising sea levels and bursting river banks.</b> The progressive melting of the ice caps following the increase in the earth’s temperature could generate a rising sea level that would have serious impacts on national coastal areas. In particular, for air transport, airports located in the coastal zone could be at risk, as they are exposed to the risk of flooding and, similarly, there can also airports located near rivers could be at risk.</p> <p><b>4. Wind.</b> Changes in wind characteristics could cause considerable problems. For airports, as runways are built along the direction of the prevailing wind on a local level, there may be events connected to the presence of strong transverse components, with impacts on the safety of flight behaviour. This could make it necessary to change the flight procedures and redesign the air space, with the possible additional environmental risk due to the redistribution of the acoustic impact around airports.</p> <p><b>5. Extreme events.</b> Convective weather phenomenon (e.g. storms, hurricanes) can have strong impacts on flight delays, in particular during periods with high levels of seasonal traffic.</p> <p>Furthermore, European continental areas could experience larger convective systems that could potentially involve multiple major airports in the same region. This could reduce the selection of alternative airports if the airport of destination is not accessible, and the available airports may not have sufficient capacity to satisfy the traffic demand. Consequently, dynamic planning of the flight based on capacity may be necessary in order to avoid possible impacts on safety in the event of an emergency.</p>

<sup>14</sup>. In compliance with the European common enforcement priorities for 2021 annual financial reports issued by the European Securities and Markets Authority on 29 October 2021.



<b>IMPACTS</b>	All the possible direct effects for ENAV connected to the effects of climate change are ultimately translated into possible lost revenues and/or increase in operating costs, and in particular this refers to: interruptions in the supply of services due to damage to infrastructure or technological assets, reduction in traffic flow and/or airport capacity.
<b>ADAPTATION AND MANAGEMENT METHOD</b>	<p>ENAV is constantly engaged in guaranteeing the safety and punctuality of millions of passengers who fly in Italian airspace, ensuring the continuous provision of air navigation services. The operational safety level of the air navigation services is in fact an essential priority for ENAV that, in pursuing its institutional and strategic objectives, favours the achievement of the paramount objectives of safety.</p> <p>ENAV has defined specific Business Continuity plans, defining the appropriate procedures to apply in the case of events involving a deterioration or interruption in services, in order to preserve continuity in various possible emergency scenarios. ENAV guarantees the necessary levels of the continuous availability of operational personnel. Personnel periodically receive training and instruction to maintain their required professional qualifications. The necessary levels of availability of the technological component are also guaranteed through specific functional redundancies and by means of an extended maintenance plan to which all the systems and equipment that support the air navigation services are subjected. The service level of the technological component is also supported by specific investment plans that aim to increase the performance of systems and equipment in terms of reliability, availability, safety and efficiency.</p> <p>Therefore, by the end of 2022, ENAV intends to prepare a detailed assessment of the impacts on its business deriving from climate change, analysing the effects on the management of airspace and on the supply of services at the airports where it operates.</p> <p>However, it needs to be stressed that ENAV's ability to guarantee the pursuit of its business objectives, primarily by ensuring the continuity of the provision of its services, is strongly interdependent in the medium/long term on the resilience of the entire air transport industry to the effects of climate change. In particular, the airport system involves complex interaction between the various actors (airport operators, carriers, ground transport and road infrastructure operators, utilities, etc.), therefore long-term mitigation could in some cases require a coordinated and shared approach among all the involved actors in order to reduce the overall impact on sector business activities.</p>

### 3.4 PROTECTION OF LEGALITY AND ANTI-CORRUPTION

In compliance with the principle of the Global Compact, according to which “companies undertake to combat corruption in all its forms, including extortion and bribery”, the ENAV Group pursues its commitment to fight corruption, in all its forms, direct and indirect, applying the principles set out in the pillars of its Anti-Corruption Management System.

Therefore, in countering and not tolerating in any way acts of corruption, fraudulent behavior and more generally unlawful or irregular conduct, committed in any form, either active or passive, by its own employees or by third parties, beyond the obligation referred to in national legislation, since 2018 the ENAV Group has been implementing a management system for the prevention of corruption which draws inspiration from the parameters indicated in the international standard ISO 37001.

It is therefore of vital importance to point out how, thanks to the implementation of the measures indicated below, on 10 December 2021 ENAV, with the participation of the Internal Audit, Integrated Compliance and Risk Management, and Compliance and Corruption Prevention Functions, together with all the corporate structures acting as process owners of sensitive processes from a corruption perspective which actively collaborated in carrying out numerous interviews to identify risks of corruption, reached the important goal of attaining ISO 37001:2016 certification for its Anti-Corruption Management System. The certificate was issued at the end of an independent audit process carried out by a leading accredited certification body. It took place in two distinct phases, with the aim of ascertaining, firstly, the adequacy of the design of ENAV’s Anti-Corruption Management System in terms of governance, roles and responsibilities, control procedures, etc., and, secondly, to evaluate the degree of concrete application and effectiveness.

The establishment of the Management System for preventing and combating bribery is the result of a combination of elements such as:



The ENAV Group's Anti-Corruption Management System is composed of a structured body of regulations divided into rules, procedures, policies, organisational provisions, proxies, the Code of Ethics and the Organisation, Management and Control Model pursuant to Legislative Decree 231/2001.



*The risks related to corruption were assessed in the context of the risk assessment process in 100% of processes.*

The elements listed above, together with the formalisation of the additional documentation indicated below, allowed ENAV in 2021 to define a valid and effective Anti-Corruption Management System through:

- periodic updating of the Risk Assessment in relation to the theme of corruption;
- adoption of the “Policy for the Prevention of Corruption” pursuant to the international standard ISO 37001:2016<sup>15</sup> by resolution of the Board of Directors of ENAV at the meeting of 27 September 2021 and subsequently by the Boards of Directors of all subsidiaries;
- Formalisation of the “Guidelines for Combating Corruption” with the aim of: indicating the activities most susceptible to acts of corruption identified by ENAV on the basis of an assessment of the risk associated with the activity carried out by the Company and its subsidiaries; identifying the principles required to pinpoint and prevent potential acts of corruption while protecting the integrity and reputation of the Group; providing general information to employees on prohibited behaviour; identifying the duties of employees; imposing the penalties applicable in the event of breaches of the relevant precepts;
- drafting of the procedures required by ISO 37001 necessary for the implementation and maintenance of the Anti-Corruption Management System;
- updating of: the Whistleblowing Regulation, taking into account the Confindustria Guidelines for the establishment of Organisation, Management and Control Models pursuant to Legislative Decree 231/2001 (updated in June 2021); the technical standard ISO 37002:2021(E); guidelines for the activation, implementation, management, evaluation, maintenance and improvement of a robust and effective whistleblowing management system within an organisation; Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons reporting on breaches of EU law, of the ANAC Guidelines on the protection of the authors of reports of crimes or irregularities of which they have become aware due to an employment relationship, pursuant to Article 54-(2), of Legislative Decree 165/2001 (whistleblowing), approved by ANAC Resolution No. 469 of 9 June 2021 approved by ANAC (National Anti-Corruption Authority) Resolution No. 469 of 9 June 2021.

**15.** The only company that falls within the perimeter of ISO37001:2016 certification is ENAV S.p.A. It should be noted, however, that both the assessment of the risk of corruption and the system of controls refer to the broader perimeter of the ENAV Group.

- On 13 December 2021, ENAV’s Board of Directors approved the update of the Group’s Code of Ethics (including topics related to human rights) and, on the same date, approved the update to ENAV’s Organisation, Management and Control Model.

In order to ensure maximum transparency of its business processes and reduce as much as possible the risk of corruption, during 2021 ENAV set up the Compliance and Corruption Prevention Function. The Compliance and Corruption Prevention Function manager has the responsibility and authority to:

- supervise the design and implementation by the organisation of the Anti-Corruption Management System;
- provide advice and become a focal point for staff regarding the Anti-Corruption Management System as well as for all issues related to corrupt conduct;
- ensure the Anti-Corruption Management System adopted by ENAV is compliant with the UNI ISO 37001 standard;
- report on the performance of the Anti-Corruption Management System to the Board of Directors, the Control, Risks and Related Parties Committee and the Supervisory Body;
- assess continuously and verify that the Anti-Corruption Management System is implemented effectively and is up to the task of preventing and addressing the risks of corruption to which the Company may be subject.

The owners of the processes at risk of corruption were identified in advance, and due diligence was carried out on them to ascertain the regularity of their ethical aspects.

With reference to the process of reporting alleged wrongdoing suitable for guaranteeing the protection of the whistleblower, pursuant to the reference legislation of Law 179/2017, it should be noted that the ENAV Group’s Whistleblowing System ensures that analysis of the facts reported is conducted in compliance with the principles on confidentiality and anonymity prescribed by the above legislation and within a reasonable time frame.

All reports received through the various channels available (IT platform, certified e-mail, e-mail, oral reports) were evaluated by the competent structure, established for this purpose within Internal Audit and, if deemed relevant, were the subject matter of further examination through the initiation of an investigation coordinated by Internal Audit, possibly in collaboration with the competent organisational units.

The Group has issued and made public on its website, in both Italian and English, the “Whistleblowing Regulation”, which identifies:

- the purposes and subject matter of the reports are described;
- the parties involved (whistleblowers, the persons reported and the recipients of the report);
- the boundaries of the conduct and the minimum contents of the reports;
- time frames, processing methods and definition of the investigation;
- the general principles and rules governing the whistleblowing process, including the protection of the whistleblower and the person reported;
- the applicable penalties.

In addition, in the last months of 2021, Internal Audit and its internal Whistleblowing Focal Point put forward a project for the establishment of a Whistleblowing Collegial Committee.

Specific periodic information flows to the Board of Directors, the Control, Risks and Related Parties Committee and the Board of Statutory Auditors are also in place, integrated with the safeguards guaranteed by the Supervisory Body and Internal Audit. These flows, defined on a periodic basis, include the work plans of the Supervisory Body and Internal Audit, as well as a summary of the results of

the activities carried out, and a detailed summary of the reports received and the remedial actions undertaken.

Precisely at the behest of the Board of Directors, in April 2021 Transparency International Italia accepted ENAV's application to join the Business Integrity Forum.

Adequate control of the prevention of corruption and the fight against fraud was also guaranteed by the activities of Internal Audit, which carried out specific audits scheduled in its own plan approved annually by the Board of Directors of ENAV, as well as through the monitoring of the reports received and verification of the facts contained therein.

Furthermore, Internal Audit carried out the second-level checks referred to in the plans of the Supervisory Bodies of ENAV, Techno Sky, IDS AirNav and d-flight).

In terms of training and information, in 2021 the following was made available to the company population:

- a training session on Legislative Decree 231/01 and the Code of Ethics of the ENAV Group, with a specific focus on risk assessment for the purposes of Legislative Decree 231 and the role of the Control, Risks and Related Parties Committee, cyber crimes and critical infrastructure of the State, and tax related offences;
- a training course in e-learning mode targeted at the entire company population with a specific focus on anti-corruption and whistleblowing issues;
- a face-to-face training course delivered through Teams to all Group entities whose activity presents a higher than low corruption risk;
- induction on anti-corruption issues to all the members of the ENAV Board of Directors.

During 2021, Internal Audit detected no cases of fraud or corruption in the Group.

From the analyses and investigations conducted, no acts of corruption (active or passive) were discovered during the 2019-2021 period.

Future goals	Deadline
<ul style="list-style-type: none"> <li>• Update of the Risk Assessment on the theme of anti-corruption, with a further definition of processes and sub-processes</li> </ul>	<b>Second half year 2022</b>
<ul style="list-style-type: none"> <li>• Risk Assessment on anti-corruption, including for the purpose of alignment with best practices and international standards</li> </ul>	<b>Second half year 2022</b>
<ul style="list-style-type: none"> <li>• Commencement of the activities of sharing with internal stakeholders the results of the anti-corruption Risk Assessment and the risk and gap analysis (also concerning topics related to the predicate offence of corruption)</li> </ul>	<b>Second half year 2022</b>
<ul style="list-style-type: none"> <li>• Initiation of activities for a Risk Assessment related to corporate fraud with reference to asset misappropriation and financial statements with the identification of:               <ul style="list-style-type: none"> <li>• a list of offences</li> <li>• a process list</li> <li>• a list of sub-processes</li> <li>• the integration between processes/sub-processes and offences</li> <li>• measuring elements</li> <li>• measurements of inherent risks</li> <li>• controls already in place</li> <li>• residual risk measurements</li> </ul> </li> </ul>	<b>Second half year 2022</b>
<ul style="list-style-type: none"> <li>• Establishment of a Whistleblowing Collegial Committee</li> </ul>	<b>Second half year 2022</b>
<ul style="list-style-type: none"> <li>• The ENAV Group has planned to continue and increase the information and training campaign provided to its employees on issues related to Legislative Decree 231/2001 and the Code of Ethics, Anti-Bribery and Anti-Corruption, Fraud and Whistleblowing (with an increase in 2022 of 6.5% and in 2023 of 7.5%)</li> </ul>	<b>Throughout 2022</b>

### 3.5 HUMAN RIGHTS

The ENAV Group focuses constantly on respect for human rights. The Company also pursues its objective through the Internal Audit department, which, in coordination with the Supervisory Bodies, carries out checks and other activities on the ENAV Group relating to respect for human rights in the performance of its mandate and assigned activities, and/or on the basis of any reports received, overseeing, within its remit, the correct application of internal procedures as well as compliance with the Group's Code of Ethics and Organisational, Management and Control Models pursuant to Legislative Decree 231/2001. This also serves the purpose to detect and report any infringements of protected human rights by the various means envisaged and implementing any corrective measures.



#### **Human Rights Policy**

The new Human Rights policy, as set forth in the 2018-2020 Sustainability Plan, was approved in 2020. With this policy, the company aims to protect and promote human rights in the performance of its business and in every context in which it operates, through strict compliance with the law in all countries of operations and also by adopting and applying its own internal codes of conduct. The policy sets out the principles contained in the Universal Declaration of the United Nations, in the United Nations Guiding Principles on Business and Human Rights, in the Conventions of the International Labour Organisation, in the OCSE Guidelines, in the Charter of Fundamental Rights of the European Union and in the Group's Code of Ethics. The main principles of the policy concern:

- rejection of forced or obligatory labour or child labour;
- freedom of association and collective bargaining;
- relationships with local communities.

Precisely in order to also take into account the new policy on human rights, in December 2020 ENAV supplemented the new Group Code of Ethics by including human rights issues. Subsequently, in May 2021, inter alia and specifically on the protection of human rights, the document was supplemented to specify more clearly the protection of the whistleblower as well as the confidentiality of the contents of whistleblower reports, so as to define in an even more precise way the commitment of the ENAV Group on these objectives, which are part of the ENAV Sustainability Report. During the first half of 2021, an awareness-raising initiative was commenced for all ENAV Group employees concerning the changes and additions made, an activity which is also an integral part of ENAV's Sustainability Report.



### 3.6 RESPONSIBLE SUPPLY CHAIN MANAGEMENT

For the ENAV Group, sustainability also means creating a relationship with its suppliers based on collaboration and complete transparency of information and also due to the fact that a company's relationship is also linked to all its collaborations along the value chain.

For these reasons, considering that ENAV and Techno Sky's procedures for awarding are subjected to the Public Contracts Code<sup>16</sup>, over the past two-year period, in compliance with the regulatory requirements of Legislative Decree no. 50 of 18 April 2016, the companies have initiated a process of analysis of their core suppliers in order to assess their social, environmental and governance performance. For this purpose, an IT platform dedicated to collecting qualitative and quantitative data and information on sustainability in order to obtain an ESG evaluation.

By using this platform, ENAV and Techno Sky are able to analyse a series of ESG information concerning some core suppliers, i.e. suppliers that constitute the Group's strategic supply line, and those that may be deemed as most at risk, identified according to their own ATECO (ATTività ECONomiche - economic activity) category.

Following the processing of the data for this assessment, the core suppliers belonging to the SME category can receive an analytical report that also includes a notification of any problems that came to light as well as proposals for improvement as regards possible corrective actions. Every six months, a reassessment campaign will be started to check the effective improvements achieved by the suppliers.

This campaign was launched in December 2021. It should be noted that participation in the project is entirely voluntary and does not involve any charge or cost for suppliers.

In the first months of 2022 there was good feedback from the identified sample of core suppliers, and the overall results will be processed.

ENAV's ERP Oracle Application system also includes a supplier assessment process, which is regulated by a procedure<sup>17</sup>. The supplier is evaluated based on the following criteria:

- the level of compliance of their performance;
- their promptness in satisfying ENAV's requirements within the scope of the contracts assigned to them.

The individual performance indicators of the supplier make it possible to obtain, using the ERP system, an overall vendor rating index (VRI). The problems identified and serious breaches (including violation by the contractor concerning the fight against Mafia-type crime, regulations on occupational health and safety pursuant to Legislative Decree 81/2008 or environmental regulations pursuant to Legislative Decree 152/06) must be communicated by sending the "Critical/Blocking Events Sheet" to the Enterprise Resource Planning (ERP)<sup>18</sup>.

The procedure<sup>19</sup> for the assessment of Techno Sky suppliers (SAP System) requires, in line with ENAV's process, a supplier rating that, if negative after the detection of critical issues, is communicated to ENAV in order to adopt the measures described in the above procedure.

Parallel to the development of these assessment systems, a "Code of Conduct for Suppliers" has been drafted, acceptance of which is mandatory for all ENAV and Techno Sky suppliers. This document will be subject to the authorisation process in accordance with the provisions of 37001 certification obtained by ENAV during 2021.

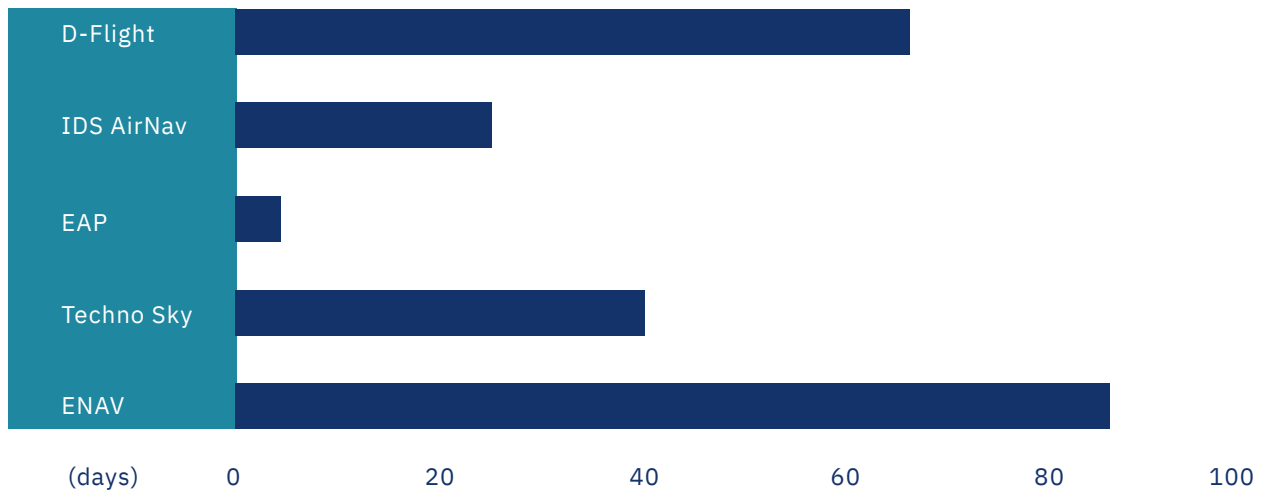
**16.** It should be noted that for the subsidiary d-flight, the Public Contracts Code is applied to the contract awarding procedures.

**17.** QMS-P-PROC.2.1 ENAV supplier assessment, emissions associated with business travel.

**18.** QM-P-PROC.2.1/D02 Critical\_Blocking\_\_Events\_Sheet.

**19.** QMS-P-PROC.2.2 Techno Sky supplier assessment.

### Average payment times



It is important to note that in 2021 the “Procurement”<sup>20</sup> procedure was issued, which concerns both ENAV and the subsidiaries Techno SKY and D-Flight, thus streamlining the procurement procedures for the Group.

Following the introduction of clauses into ENAV and Techno Sky’s procurement contracts to encourage suppliers to comply with the principles and values contained in the Code of Ethics and the provisions of the Organisation, Management and Control Model adopted by the Companies, suppliers are also required to consent to being audited, in part to verify, where necessary, compliance with the environmental and social requirements associated with the specific performance obligations under each contract. In addition to requiring that suppliers comply with the principles and values contained in the Code of Ethics and in the code of conduct for combating corruption, and that they act in accordance with the Organisation, Management and Control Model, 100% of contracts contain an additional clause to ensure the respect for human rights. Moreover, depending on the type of contract, references have been prepared for some tender documents, for example in the Specifications and in the Declaration of participation in the procedure, which refer to specific regulations concerning the observance of Human Rights, with particular reference to the prohibition of exploiting child labour and the respect for every other similar applicable regulation.

In line with what has been implemented by the Parent Company, in the majority of its orders and contracts with Italian suppliers IDS AirNav includes clauses regarding the principles contained in the Code of Ethics and in Legislative Decree 231/2001. The company is also implementing procedures regarding the Parent Company’s Procurement policy.

During 2022, some clauses relating to compliance with the principles of the Code of Ethics will be inserted in orders from foreign suppliers, consistent with the regulations in force in the geographical area of reference.

20. QMS-P-PROC.1.1 vers.8.0 Procurement.

In the Framework Agreements with Italian suppliers, these clauses have already been implemented and this has led to a significant increase in the percentage, compared to 2020, of contracts that include clauses on compliance with the Code of Ethics and Model 231 (from 40 to 60%).

It should be noted that the company D-flight uses the ENAV contract formats containing a specific clause that refers to respect for human rights in addition to the principles of the Group's Code of Ethics and Legislative Decree 231/2001.

As regards the scope of supply, over recent years ENAV has paid increasing attention to the environmental sustainability of provisioning through the implementation of actions focused on ESG sustainability. This choice was made based on the desire of ENAV to reduce the environmental impact of the goods and services that its purchases and of the works that are carried out in accordance with Article 34 of Legislative Decree 18 April 2016 no. 50, as amended by Legislative Decree 19 April 2017 no. 56.

Future goals	Deadline
In December 2021, the first ESG evaluation of a sample of core suppliers was launched. The results will be analysed progressively over the course of 2022.	<b>2022</b>
Code of Conduct for Suppliers (in the authorisation process downstream of actions relating to ISO 37001 certification).	<b>2022</b>
IDS: During 2022, a note will be included in orders and contracts with foreign suppliers referring to the Group policy - Code of Ethics - on the corporate website.	<b>2022</b>

### 3.7 FISCAL MANAGEMENT

In the ENAV Group, fiscal governance is based on the principles contained in the Code of Ethics. Even if it has not formalised its strategic fiscal policy in a document, the ENAV Group, whose activities are mainly based in Italy, correctly fulfils its tax obligations also through a well-defined organisation and procedures that define activities, roles and responsibilities.

The Group is committed to complying with tax regulations by means of:

- appropriately managing the tax burden related to Group activities;
- staying up-to-date with the national and international regulations concerning its own area of activity;
- maintaining good relations with tax authorities based on absolute transparency and collaboration;
- studying transfer pricing is necessary for the definition of intercompany contracts with companies present in countries other than Italy.

The tax returns are controlled by tax consultants and external auditors. The Financial Reporting Officer in charge of preparing the Company's documents participates in tax-related decisions both on a strategic level as well as on an operational level, and is responsible for monitoring the tax risk management activities and assesses the suitability of the organisational structure dedicated to tax issues.





## 04 • ENVIRONMENT









# 4. Environment

<b>MATERIAL ISSUES</b>	<ul style="list-style-type: none"> <li>- Energy consumption and climate change</li> <li>- Waste management</li> <li>- Electromagnetic emissions</li> </ul>
<b>SDGs AND TARGETS</b>	<div style="display: flex; align-items: flex-start;"> <div style="width: 100px;">  <p>7 AFFORDABLE AND CLEAN ENERGY</p> </div> <div style="flex-grow: 1;"> <p>7.2: Increase substantially the share of renewable energy in the global energy mix 7.3: Double the global rate of improvement in energy efficiency</p> <hr/> <div style="display: flex; align-items: flex-start;"> <div style="width: 100px;">  <p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> </div> <div style="flex-grow: 1;"> <p>11.2: Provide access to safe, affordable, accessible and sustainable transport systems for all 11.6: Reduce the adverse per capita environmental impact of cities, including by paying special attention to air quality and municipal and other waste management</p> <hr/> <div style="display: flex; align-items: flex-start;"> <div style="width: 100px;">  <p>12 RESPONSIBLE CONSUMPTION AND PRODUCTION</p> </div> <div style="flex-grow: 1;"> <p>12.5: By 2030, substantially reduce waste generation through prevention, reduction, recycling and reuse</p> <hr/> <div style="display: flex; align-items: flex-start;"> <div style="width: 100px;">  <p>13 CLIMATE ACTION</p> </div> <div style="flex-grow: 1;"> <p>13.1: Strengthen resilience and adaptive capacity to climate related hazards and natural disasters in all countries</p> </div> </div> </div> </div> </div> </div></div></div>
<b>ENAV GROUP TARGETS 2021-2023</b>	<p>Convey the image of ENAV as a benchmark player in the industry in the fight against climate change (zero impact) and sustainable digital innovation</p> <hr/> <p>Achieve Group Carbon Neutrality by reducing emissions and the purchase of carbon credits for the proportion that cannot be reduced. (Encompassed in the LTI plan cycle 2020-2022)</p> <hr/> <p>Further develop the “Plastic-Free” project aimed at gradual reduction in single-use plastics at all company offices</p> <hr/> <p>Further develop the project to replace the company car fleet with electric/hybrid/plug-in vehicles</p> <hr/> <p>Assess CO<sub>2</sub> emissions: extension to Scope 3 (indicator included in the short-term incentive policy and MBO 2021 for CEO and Managers with Strategic Responsibilities)</p> <hr/> <p>Prepare the Science Based Target initiative (indicator encompassed in the MBO 2021 short-term incentive policy for CEOs and Managers with Strategic Responsibilities)</p>
<b>ENAV GROUP PERFORMANCE 2021</b>	<ul style="list-style-type: none"> <li>- 24.6% reduction of CO<sub>2</sub> emissions per year compared to the total emissions produced in 2019 (38,816.33 t – market-based) and purchase of carbon credits</li> </ul> <hr/> <ul style="list-style-type: none"> <li>- Reduction of 4.6 tonnes of single-use plastics at sites (total ENAV consumption in 2019: 14.2 t).</li> <li>- Plastic Free Certificate received on 29 December by Sfridoo</li> </ul> <hr/> <ul style="list-style-type: none"> <li>- 26% of cars now hybrid</li> </ul> <hr/> <ul style="list-style-type: none"> <li>- Presentation of the CO<sub>2</sub> emissions assessment to Top Management</li> </ul> <hr/> <ul style="list-style-type: none"> <li>- Obtained SBTi certification</li> </ul>



## 4.1 ENAV'S ENVIRONMENTAL STRATEGY

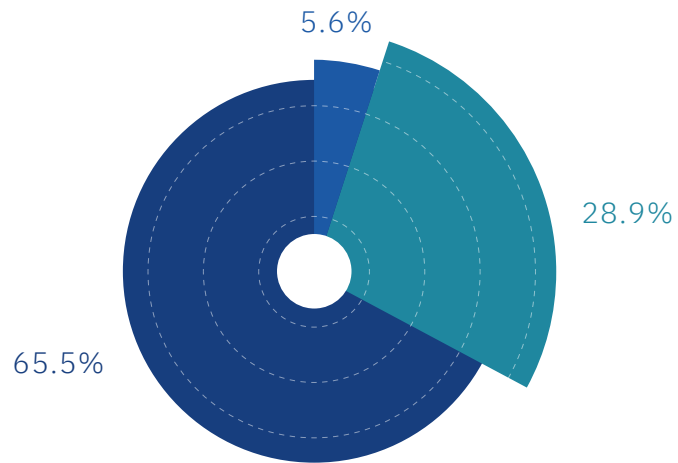
ENAV's commitment to the environment and to combat climate change is based on a strategy aimed not only at reducing its direct and indirect CO<sub>2</sub> emissions, but at analysing and intervening in all those areas of the business that can generate a negative impact on the environment and on people's lives.



## 4.2 ENAV'S CARBON FOOTPRINT AND STRATEGY TO REDUCE DIRECT AND INDIRECT EMISSIONS

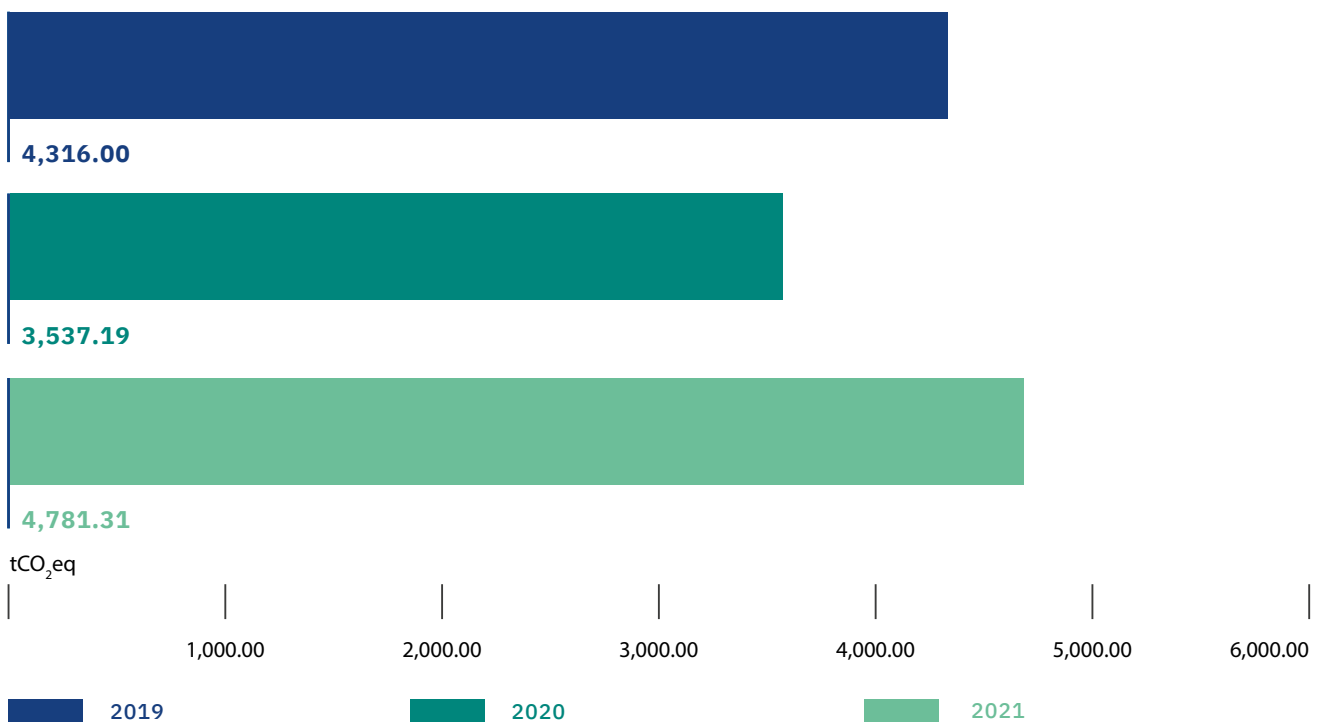


## Carbon footprint

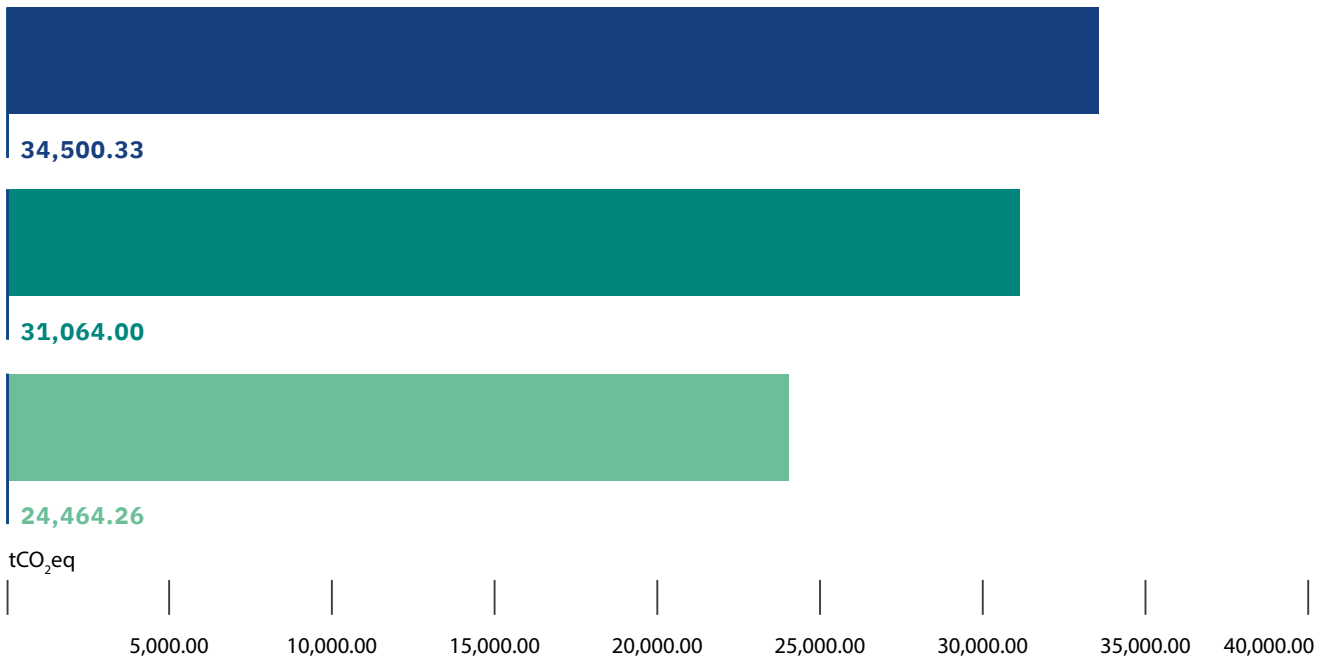


- Scope 1 - Direct emissions
- Scope 2 - Indirect energy emissions
- Scope 3 - Other indirect emissions

## The trend of Scope 1 emissions

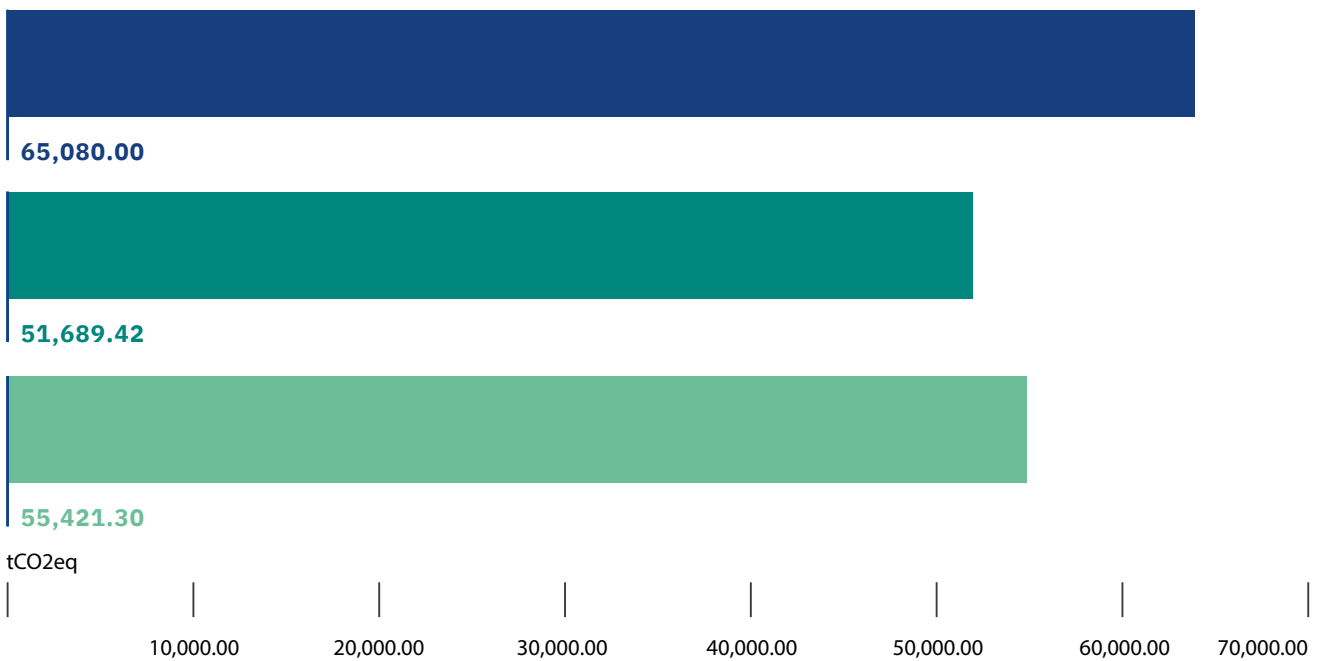


### The trend of Scope 2\* emissions



\* For the calculation of Scope 2, emissions from the use of electricity generated from renewable sources with a Guarantee of Origin (GO), amounting to 0.03732 CO<sub>2</sub>/kWh, were also taken into account. Energy from renewable sources with a GO was purchased only in 2021.

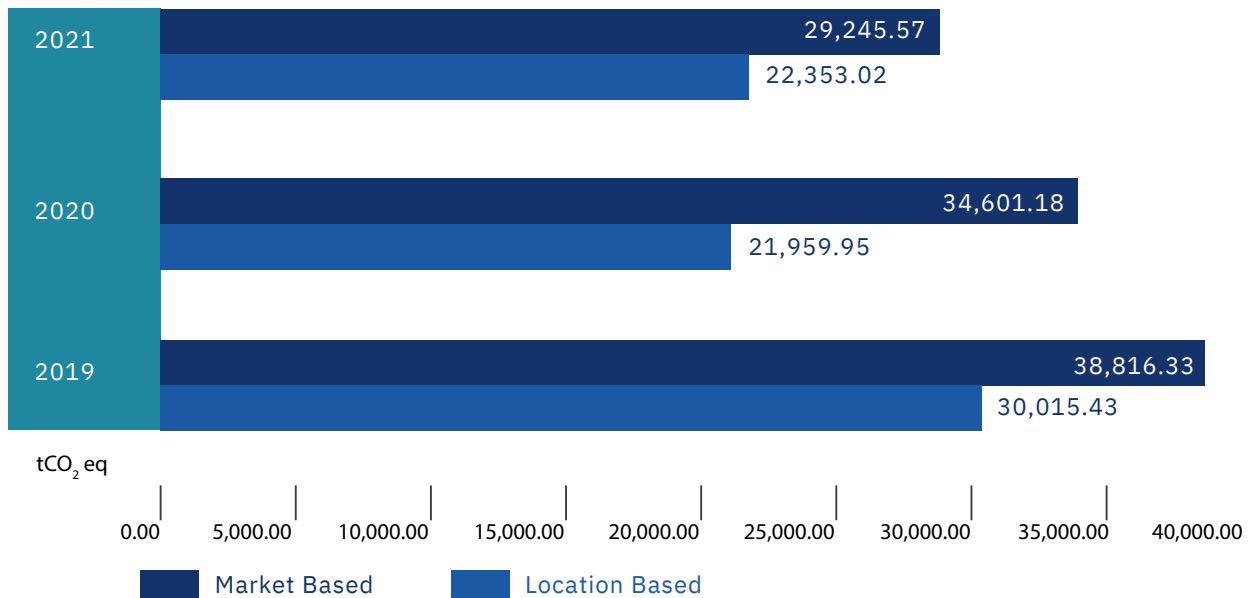
### The trend of Scope 3 emissions



## Direct (Scope 1) and indirect (Scope 2) emissions according to the market based and location based calculation methods

As required by GRI Sustainability Reporting Standards, Scope 2 emissions shall be calculated according to two distinct methodologies: the “location-based method” and the “market-based method”. The location-based method is based on the average emission factors related to regional, sub-national or national power generation. The market-based method, on the other hand, is based on the CO<sub>2</sub> emitted by the energy suppliers from whom the organisation purchases electricity under contract or on factors relating to the relevant market. The graph below shows the total Scope 1 and 2 emissions according to the two calculation methods.

### Scope 1 and Scope 2 emissions



### ENAV's strategy for reducing CO<sub>2</sub> emissions

The road map defined by ENAV for reducing emissions is substantiated through the achievement of two ambitious objectives:

#### 2022: ENAV Carbon Neutral

The achievement of carbon neutrality by 2022 passes through the reduction of Scope 1 and 2 emissions by 70%-80% and the offsetting, through the use of carbon credits, of emissions not currently reducible. The reduction of Scope 1 and 2 emissions, already 24.6% in 2021 compared to 2019, will take place along a path already laid in previous years and which consists in the replacement of the car fleet with electric-hybrid-plug-in vehicles, in the self-production of energy from renewable sources and in the purchase of green energy with guarantees of origin (GO).

The carbon credits already purchased by the company will be used to offset the percentage of emissions not currently reducible and consist of two environmental protection projects: the "Renewable energy hydro India" project and the "Efficiency improved cookstoves" project.

#### The "Renewable energy hydro India" project

The project involves the construction of a 300 MW flowing water hydroelectric power plant. The main objective of the project is to provide renewable and sustainable energy to the local communities of Kuppa, in Kinnaur District Himachal Pradesh, India. The project generates important environmental benefits thanks to the reduction of emissions and a reduction of about 1 million tonnes of CO<sub>2</sub> per year is estimated. The project contributes concretely to the sustainable development of the region through social and economic benefits in addition to environmental ones.

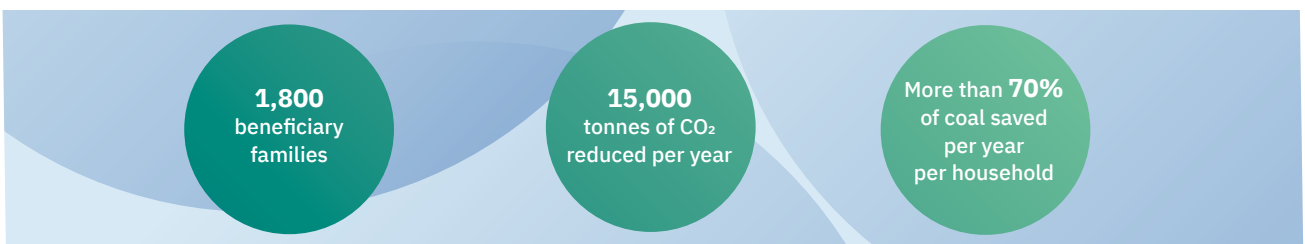
#### Project figures:



#### The "Efficiency improved cookstoves" project

The project was developed in the districts of Chamanculo C and Xipamamine in Maputo, Mozambique. The districts are made up of rural and extremely poor settlements where, thanks to the project, new stoves will be provided, replacing the traditional polluting ones, thus improving energy efficiency, reducing the use of fossil fuels and improving the living conditions of the local population.

#### Project figures:





### 2030: Science Based Target initiative

In 2021, ENAV defined a strategy for its direct and indirect emissions by 2030 in which, alongside the reduction of at least 70% of direct Scope 1 and indirect Scope 2 emissions, it undertook to reduce its own Scope 3 indirect emissions by at least 13.5%. The Scope 3 emissions on which ENAV has made the 13.5% reduction commitment belong to the following categories: Capital Goods, Fuel and Energy Related Activities and Employee Commuting which, on the 2019 baseline, represent 68% of the total Scope 3 emissions.

The strategy has been validated by the Science Based Target initiative (SBTi), which aims to guide the private sector to act against climate change through science-based emission reduction targets. SBTi emerged from a partnership between CDP (ex-Carbon Disclosure Project), the United Nations Global Compact, WRI (World Resources Institute) and the WWF. The objectives validated by SBTi define the commitments of those companies that are in line with the level of decarbonisation necessary to contain the increase in global temperature below 1.5°C compared to pre-industrial temperatures.

By virtue of the improvement in the data collection and calculation process, in 2021 all Scope 3 categories falling within the ENAV Group's activities are reported for the first time (for which see Table 24 of Annex 1).

### 4.3 REDUCING SINGLE-USE PLASTICS

Plastic pollution, which consists of the dispersion and accumulation of plastics in the environment, is causing problems for the habitat of wild fauna and flora, as well as for humans. It is a type of pollution that can affect the air, soil, rivers, lakes and oceans. Although ENAV has a negligible consumption and impact with regard to single-use plastics, it has decided to initiate a project to eliminate them completely from its sites. Through the “**plastic free reduction**” project, water dispensers have been installed in many ENAV offices, and at the end of 2021 a contract for the supply of water in non-disposable bottles - replacing plastic bottle dispensers - was activated in all remaining premises. In addition, replacements have been made of plastic materials connected with the use of automatic dispensers nationwide, leading to a **reduction in plastic consumption of about 4.6 tonnes<sup>21</sup> in 2021 compared to estimated 2019 consumption** against a target of 1.5 tonnes.

14.2 t	1.7 t	4.6 t
Estimated annual consumption for 2019	Reduction of plastic consumption for 2020	Reduction of plastic consumption for 2021

21. Target linked to the Sustainability Loan.

## 4.4 ENVIRONMENTAL POLICY AND THE ENVIRONMENTAL MANAGEMENT SYSTEM

### *Environmental Policy*

We have prepared an Environmental Policy for Group Companies, available on the corporate website, in line with the corporate aims and designed to consider the environmental risks and opportunities connected to our operating activities, in compliance with international, Community, and national legislation, in order to pursue our primary objective of creating sustainable value while respecting our stakeholders. In particular, the Policy's main strategic objectives include: CO<sub>2</sub> emissions reduction, rational use of energy, correct management of waste, monitoring of wastewater discharges.

### *Environmental Management System*

To analyse, monitor and improve the environmental performance of its activities and services, the ENAV Group<sup>22</sup> has implemented and adopted an Environmental Management System that meets ISO14001 standards<sup>23</sup>.

The decision to adopt an Environmental Management System reflects the Group's commitment to guaranteeing environmental protection beyond mere compliance with regulations, in a framework of transparency with regard to the Group's stakeholders.

There follows a brief description of the main processes that make up the Environmental Management System:

**22.** With the exclusion of ENAV Asia Pacific.

**23.** The Group Environmental Management System is based on ISO 14001 but is not currently certified. Only the IDS has an ISO 14001 certified Environmental Management System.

<b>Initial Environmental Analysis</b>	The aim of this process is to perform overall assessment of environmental issues, their effects, and the environmental performances related to the activities and services carried out in the sites where Group companies conduct their operations. The process is designed to assist the definition of the characteristics of the environmental management system.
<b>Identification and Assessment of Environmental Aspects</b>	The aim of this process is to identify the environmental aspects and impacts associated with Group companies' activities and services, that the companies themselves can control (direct aspects) or merely influence (indirect aspects), in order to evaluate their significance in normal, abnormal, and emergency operating conditions. Environmental aspects can result in risks and opportunities associated with negative or positive environmental impacts.
<b>Management of Conformity Obligations</b>	The process defines the methods to be used by Group companies in relation to: <ul style="list-style-type: none"> <li>• identification, access, applicability verification, preservation, and updating of conformity obligations;</li> <li>• the diffusion of environmental conformity obligations applicable to all the activities carried out by the Group companies.</li> </ul>
<b>Training and skills management</b>	The process is aimed at establishing training requirements in relation to the environmental aspects associated with the activities/services provided by Group companies and at guaranteeing adequate skills of the people responsible for work activities that can affect environmental performance, and the ability to comply with the applicable conformity obligations.
<b>Monitoring of environmental performance and reporting to senior management</b>	The process defines the methods adopted by the Group to manage the following activities: <ul style="list-style-type: none"> <li>• monitoring of environmental performance and the state of conformity in context of the EMS;</li> <li>• communication, reporting to senior management and Governing Bodies.</li> </ul>
<b>Management of discharges and wastewater storage tanks</b>	The process is aimed at managing environmental compliance in the planning and operational phases, in relation to the wastewater and stormwater discharges, including the related purification treatments, and plants with "sealed collection tanks", associated with ENAV's own infrastructure or third party infrastructure leased by ENAV, and also wastewater discharges to third party sewer networks and the associated purification treatments.
<b>Special Waste Management</b>	The process is aimed at managing hazardous and non-hazardous special waste produced by ENAV Group companies in all their facilities and sites; specifically, waste produced: <ul style="list-style-type: none"> <li>• in the context of their operating activities or provision of services;</li> <li>• by equipment/systems installation activities, or by works or services outsourced to third parties;</li> <li>• in the context of maintenance and/or installation of systems/equipment by Techno Sky, e.g. for the air traffic control service.</li> </ul>
<b>Management of fluorinated greenhouse gas emissions</b>	The process of identifying compliance and the necessary prescriptions in order to reduce fluorinated greenhouse gas emissions, in the context of activities of installation, operation and maintenance, dismantling, etc. carried out by Techno Sky, either directly or using technical personnel of external companies, on equipment containing fluorinated greenhouse gases (F-gas).

## 4.5 THE REDUCTION OF ELECTROMAGNETIC EMISSIONS

The provision of Navigation, Communications and Surveillance services by ENAV is based on the use of systems that generate electromagnetic fields of different magnitudes. The Group's Environmental Policy establishes the principle of ensuring compliance with the emission limits envisaged for non-ionizing radiation through the conduct of appropriate electromagnetic impact assessments. ENAV guarantees the achievement of this objective, both in the design phase and in the installation phase, through the assessment of the electromagnetic field values of new systems.

ENAV's commitment, however, is not only to ensure compliance with the limits set, but also to endeavour to reduce electromagnetic emissions where possible, in compliance with the highest levels of safety and quality of service. In this context, in line with the objective stated in the 2021-2023 Sustainability Plan to reduce electromagnetic emissions generated by NDB (Non Directional Beacon) radio assistance systems by 50% by 2023, in 2021 16 NDBs and 2 VORs (Very High Frequency Omnidirectional Range) were already switched off, with the result of reducing not only the electromagnetic impact generated by decommissioned radio equipment but also the consumption involved in its ordinary and extraordinary maintenance, including the costs and fuel consumption of the vehicles used to reach the remote sites where the equipment was located.

## 4.6 MORE EFFICIENT AND SUSTAINABLE AIRSPACE USERS: FLIGHT EFFICIENCY PLAN AND FREE ROUTE

As part of the initiatives aimed at developing a sustainable business, the ENAV Group aims to reduce and improve efficiency in the consumption associated with the provision of its operational services and to contribute to the reduction of the environmental impact deriving from air operations.

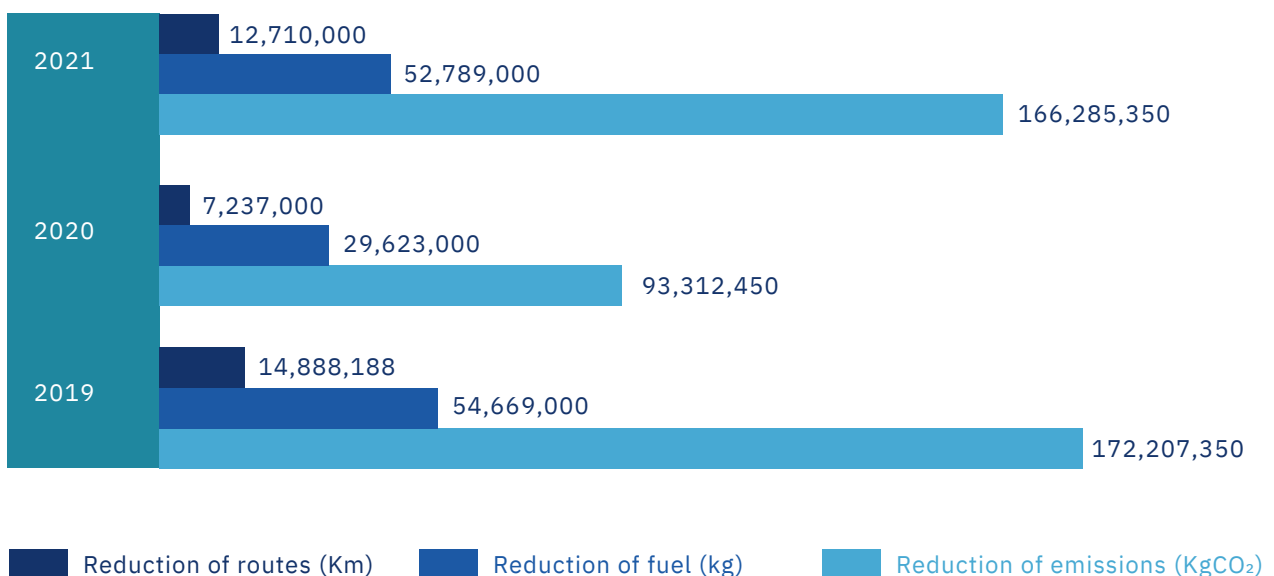
For these reasons, the Group aims both to reduce emissions related to its production activities and to modernise and optimise the infrastructure and network of air traffic services (ATS) so as to contribute to the reduction of carbon dioxide (CO<sub>2</sub>) associated with the activities of Airspace Users (AU).

### *Actions related to the provision of air navigation services*

In order to promote the sustainable development of air transport, the Parent Company provides for the continuous review and constant modernisation of the infrastructures and the ATS network, optimising the performance of services and, last but not least, by making available instrumental procedures and flight routes that are increasingly efficient and useful as a contribution to the reduction of fuel consumption and, consequently, to the reduction of the related impact on the environment. Guaranteeing at all times the highest levels of operational safety, ENAV plans and implements the upgrading of its assets which, including through cooperation and synchronisation of collaborative initiatives with stakeholders, aim to achieve the continuous improvement of the ATS network, making available to Air Operators increasingly environmentally friendly flight trajectories characterised by shorter travel times and reduced constraints on flight planning and operations.

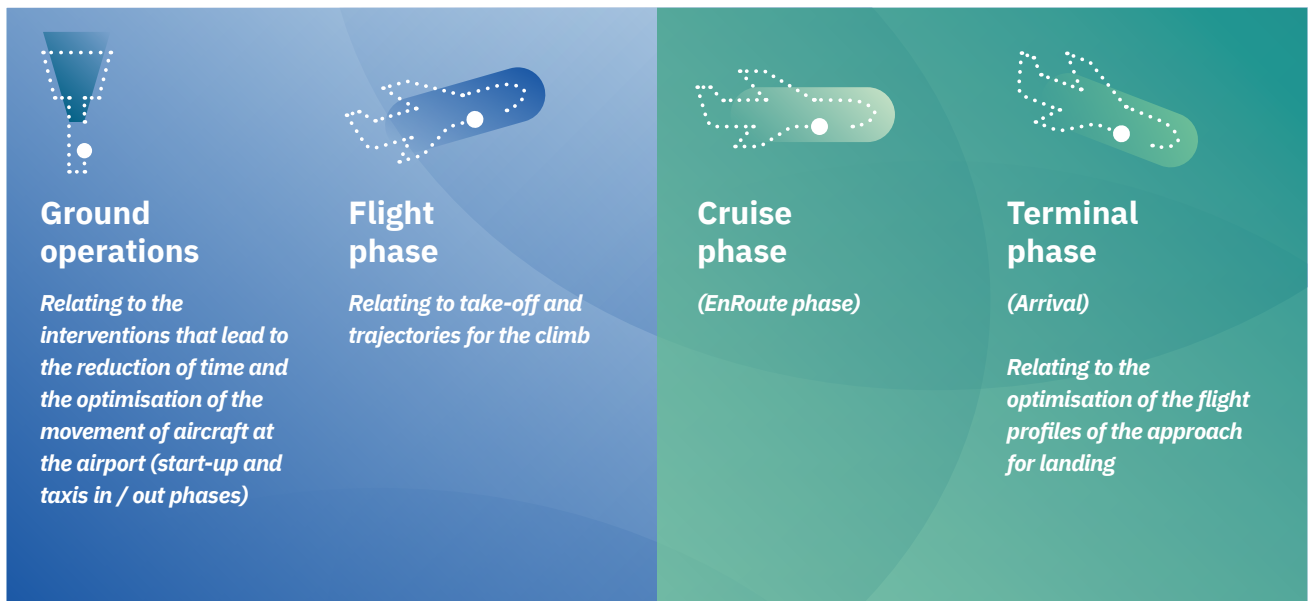
All actions planned and implemented to provide air navigation services in a manner that contributes to the reduction of fuel consumption and, consequently, reduces the related impact on the environment of Airspace Users, are catalogued and monitored periodically in the **Flight Efficiency Plan (FEP)**.

### Flight Efficiency Plan (FEP)



The state of progress and effectiveness of the actions implemented and useful for the achievement of the objectives and performance required of Air Navigation Service Providers (ANSP) in the environmental sector (Environmental Key Performance Area/Indicators) and subject to verification and control by ENAC are reported and optimised in the FEP.

In the annual update of the FEP, the implementation of **operational efficiency** measures carried out by the Parent Company in the reporting period and in the different business segments are reported and assessed:



Since 2012, the results of the actions reported in the FEP have also been considered and enhanced in the national plan for the reduction of carbon dioxide emissions, the Action Plan on CO<sub>2</sub> Emissions Reduction which Italy has committed to implement as a contribution to the broader programme for combating climate change adopted in the aviation sector within ECAC (European Civil Aviation Conference)/ICAO (International Civil Aviation Organisation).

The extraordinary situation caused by the Covid-19 pandemic resulted in a global contraction in air connections that was significant in 2020 and, albeit with a less marked incidence from the second half of the year, also characterised 2021. After the reduction in traffic volumes recorded in the first half of 2021 (estimated at around 60-70% of the air traffic recorded in 2019 in national airspace), in fact, thanks to the easing of national and international restrictions on the mobility of people and goods, made possible by the vaccination campaign, since July 2021 there has been a significant recovery in overflights, but also in air traffic arriving and departing from/to the main European countries and national airports, bringing the final balance for 2021 to 60.3% of en route service units managed compared to the volumes recorded pre-pandemic (i.e. in 2019).

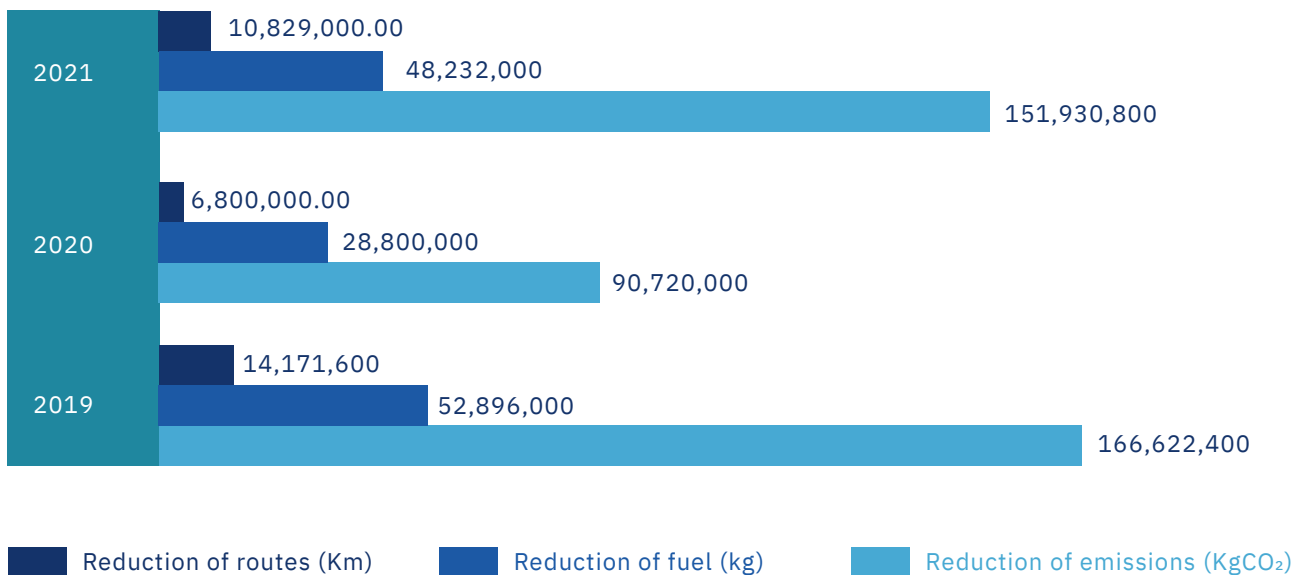
In 2021, for the benefit of the reduced number of movements operated and, in perspective, to support the planning of Airspace Users, the European Air Navigation Service Providers, in coordination with the Network Manager, have maintained the vast majority of flight efficiency measures introduced in 2020, confirming the suspension of many of the planning constraints.

Also in 2021, the level of traffic managed in Italy made it possible to maintain and activate ad hoc operational measures that further optimised the planning of flight routes, eliminating or reducing

restrictions on the use of the ATS Network, suspending constraints on horizontal trajectories, removing level capping for vertical flight profiles (normally introduced so as to order and maintain a fluid management of traffic flows en-route, in terminal areas and near airports of departure and/or destination), rather than reducing restrictions on the permeability of military areas.

In continuity with what has been implemented in previous years and in addition to what has been achieved with the implementation of the Free Route Airspace Italy (FRAIT) (with free planning of trajectories in the airspace above 30,500 ft/approximately 9,000 meters), in 2021, thanks to coordination with the Italian Air Force, the Parent Company maximised airspace availability, further optimising and modernising the ATS Network of the airspace below the FRAIT and in the terminal areas and carried out interventions that have made it possible to achieve improvements in the performance related to operations in ground movement areas.

### Free Route

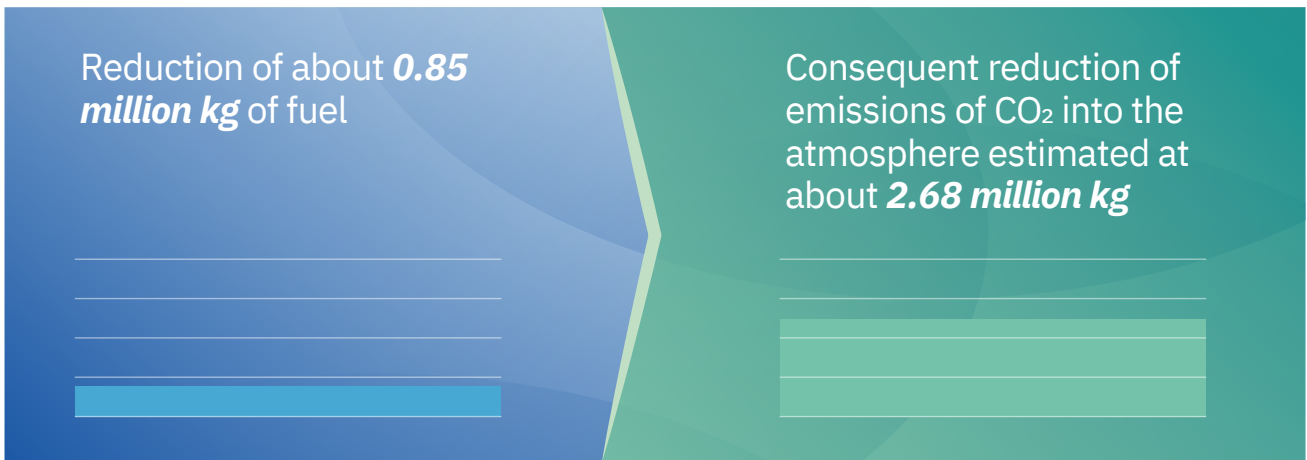


In particular, with regard to the FRAIT airspace alone, it should be noted that almost 45% of the assisted air traffic in 2021 was able to benefit from a reduction in the total distance (from the airport of departure to the airport of destination), with an overall gate-to-gate reduction estimated at about 10.8 million planned kilometres (31.0 km per assisted aircraft), and a consequent reduction in CO<sub>2</sub> emissions of about 152 million kg, with fuel savings for the en route phase estimated at around 48.2 million kg overall.

If in the FRAIT Airspace the constraints that characterised the previous ATS Network had already been completely removed, allowing airspace users to plan/fly direct trajectories from a defined entry point to an exit point from the national airspace, in 2021 additional measures were implemented to ensure further standardisation of flight profiles of national and international air traffic flows involving military areas. In close collaboration with the Italian Air Force, and in application of the Flexible Use



of Airspace (FUA) concept, the measures implemented made possible a further reduction in planned/ flown distances, with results that can be quantified as follows:



Also in 2021, with reference to terminal areas, the Parent Company continued to implement two multi-year programmes:

- ▼ *The plan for the transition to Performance Based Navigation(PBN), which was implemented by designing and publishing satellite-based instrument procedures (RNP APPCH and SID/STAR RNAV) in preparation for the gradual phasing out of obsolete ground-based radio assistance, such as Non-Directional Beacons(NDB) and/or Locators.*
- ▼  
▼ *The transit programme for the provision of approach control services at area control centres.*

The two programmes make it possible to optimise the ATS network in the terminal and the related air traffic management, which, by balancing flight efficiency and capacity and predictability performance, should lead to further reductions estimated at about 3.7 million kg in fuel consumption and 11.6 million kg in CO<sub>2</sub> emissions.

Finally, follow-up and improvement activities continued on the **Airport Collaborative Decision Making (A-CDM)** processes, an operating procedure developed and implemented with airport managers aimed at reducing aircraft taxiing times before the flight take-off phase as well as congestion of aprons and taxiways at the airports of Rome Fiumicino, Milan Malpensa, Milan Linate, Venice Tesserà, Naples Capodichino and Bergamo Orio al Serio.

### *Interventions related to the development of Advanced Air Mobility*

The future of sustainable mobility also passes through the development of Advanced Air Mobility and its urban component.

In accordance with the “National Plan for Advanced Air Mobility”, prepared by ENAC, the Group and, in particular, the Parent Company are collaborating with government and private Stakeholders in defining the proposed regulatory framework that will enable the development of Advanced Air Mobility in Italy.

Following Memorandums of Understanding and Cooperation Agreements with ENAC and other Stakeholders in the sector, on the strength of the experience gained in the realisation of the ATS network, ENAV is proactively contributing to defining the development of a network of air connections between nodes of a future general mobility system (airports, stations, ports, interchange centres and nodes, logistics hubs, etc.) that can support the effective use of innovative electrically-powered aircraft (drones, but also electric vertical take-off and landing - eVTOLs), thus helping to create the conditions to replace or at least reduce the use of less environmentally friendly modes of transport.

Under the stimulus of ENAC and in synergy with the other players in the sector, the Group Companies are providing their technical and operational contribution to define:

1. the regulatory framework, both national and supranational, necessary to develop the aerial operations of Unmanned Air Systems (UAS), with remote pilot and/or for automated/autonomous operations, to be conducted in VLOS, EVLOS and BVLOS, within the national U-Space;
2. the criteria for the design, interference assessment and implementation of the network of connecting, arrival and departure routes between advanced mobility nodes (airports/heliports and vertiports and the so-called “regulatory sandboxes”);
3. the methods for managing interference between Air Traffic Management (ATM) and Unmanned Traffic Management (UTM), in order to develop services for airspace users, from the logic of segregation to the logic of integration and dynamic reconfiguration of U-Space;
4. of basic and supplementary services for the new aircraft and the conditions for certifying U-Space Service Providers (USSPs).

The development of new operating concepts, new infrastructures and networks, new services and air operations will increase the range of services available to citizens and businesses and will make it possible, albeit gradually, to develop a new segment of air transport that will make it possible to reduce and, in some cases, replace modes of air transport that produce harmful atmospheric emissions with innovative, electrically-powered and therefore environmentally friendly means.

**Future goals**

**Deadline**

The measures collected in the Flight Efficiency Plan 2021 in the process of completion.

**2022-2024**

**Projects**

**Description**

**ENAV's PBN Transition Plan**

The Instrumental Flight Procedures (IFP) of the Performance Based Navigation (PBN) type are a priority for ENAV since, on the one hand, they make possible more efficient design and utilisation in the terminal area, enabling the rationalisation of airspace use and, on the other, they reduce environmental pollution and energy and maintenance costs connected to conventional ground navigation infrastructures. The design of PBN-type IFPs makes it possible to create a terminal ATS network that is more functional to flight operations and flight control, and facilitates enhancement of the balance between performance levels of flight efficiency, capacity and predictability, with the consequent possibility of optimising airspace user planning and potential improvements in planning/fuel consumption and related CO<sub>2</sub> emissions. In 2020, by way of application of EU regulation 2018/1048 (PBN IR), following the high-level principles developed by the Italian government and in coordination with the stakeholders involved, ENAV developed its own transition plan, from a conventional ground-based navigation network to the innovative PBN network (ENAV's PBN Transition Plan) which, as an improvement, and in conjunction with Italy's PBN Implementation Plan (adopted jointly with ENAC in 2012 in implementing ICAO Assembly Resolution A37-11), constitute an element in support of the National Airspace Strategy and a useful way to achieve the objectives defined therein. The first edition of ENAV's PBN Transition Plan focuses on the measures to be carried out in the short to medium term (2020-2024), such as the implementation of RNP-type instrument approach flight procedures and the gradual and incremental decommissioning of ground-based navigation infrastructures based on the now obsolete NDB (Non Directional Beacon) radio assistance. The plan encompasses a periodic update in order to consider the evolution of the Global Navigation Satellite System (GNSS), the performance level of the system itself, the rate of implementation of on-board avionics and the progress of programmes to rationalise conventional radio navigation aids (Nav aids) (NDB and VOR). Periodic monitoring of the interventions set out in ENAV's PBN Transition Plan, as well as those in Italy's PBN Implementation Plan, are included in ENAV's FEP.



## 4.7 ENERGY CONSUMPTION

The ENAV Group is a service provider with no particular direct impact on the environment. However, it has launched several initiatives aimed at reducing consumption levels with the subsequent impact in terms of greenhouse gas emissions in order to contribute to Sustainable Development Goals No. 7 (Ensure access to affordable, reliable, sustainable and modern energy for all) and No. 13 (Take urgent action to combat climate change and its impacts).

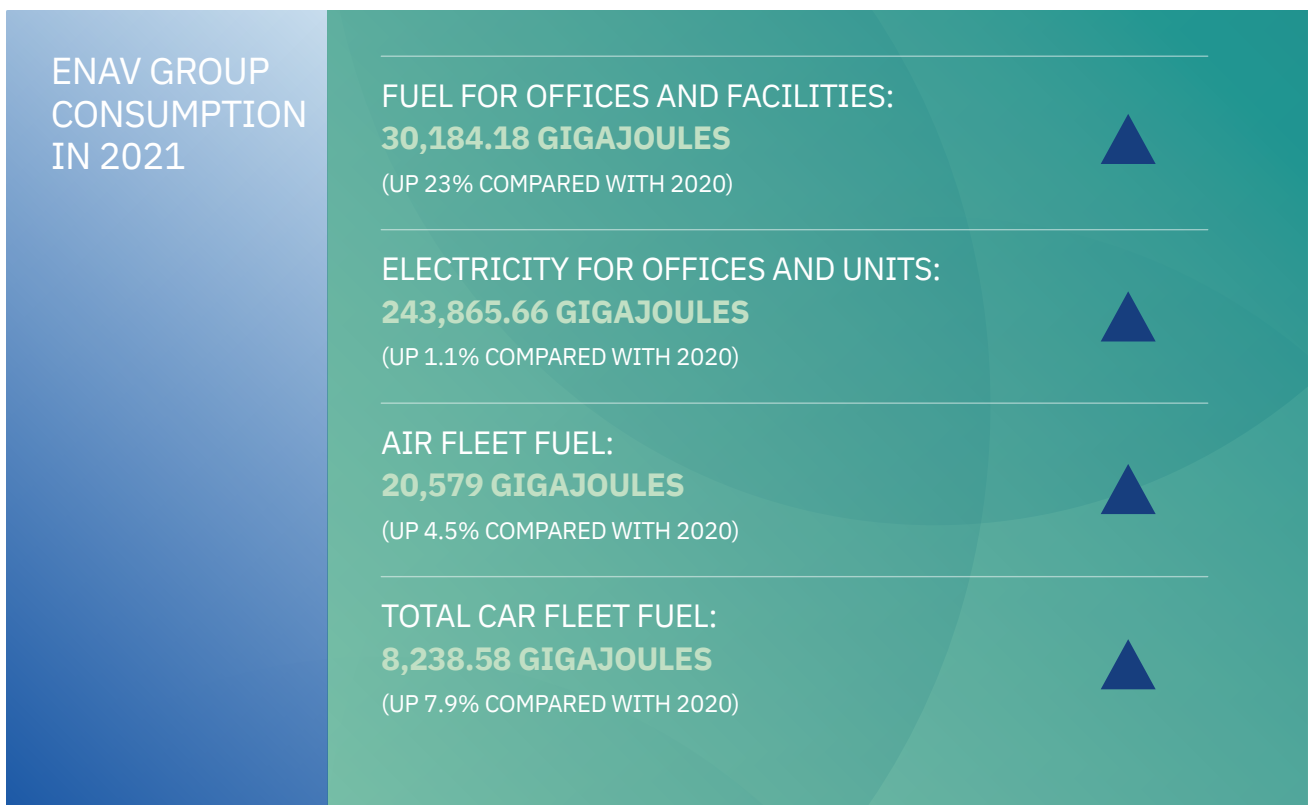
However, apart from actions aimed at consumption reduction, the governance initiatives are particularly significant because they make it possible to develop behaviours, strategies and monitoring systems that define the framework within which the Company must move.

For example, the aim of the Environmental Policy is to establish an approach that considers all forms of pollution that directly or indirectly concern the Company, in order to develop an overall action strategy documented also by a system of quantitative and qualitative indicators to measure its performance.

In addition, the Code of Ethics explicitly states that the Group, in full compliance with the current environmental regulations, must pay careful attention promoting the most environmentally-friendly activities and processes, through the use of advanced criteria and technologies concerning environmental protection and the sustainable use of resources”.

The Group thus undertakes, within the scope of operations and business initiatives, to consider essential environmental needs and to minimise any potential negative environmental impact associated with its operating activities.

Finally, in order to guarantee increasingly precise and efficient control over energy consumption and its impact on the environment, the company’s Energy Manager is in charge of identifying the actions, interventions and procedures necessary to promote the rational use of energy and fuels.





## ENAV GROUP EMISSIONS IN 2021

RELATED TO FUEL FOR OFFICES AND FACILITIES:

**1,621.95 tCO<sub>2</sub>e**

(UP 24% COMPARED WITH 2020)



RELATED TO ELECTRICITY FOR OFFICES AND OTHER FACILITIES:

**17,572 tCO<sub>2</sub>e**

(DOWN -4.6% COMPARED WITH 2020)



RELATED TO AIR FLEET FUEL:

**1,416.65 tCO<sub>2</sub>e**

(UP 4.5% COMPARED WITH 2020)



RELATED TO TOTAL CAR FLEET FUEL:

**537.83 tCO<sub>2</sub>e**

(UP 6.8% COMPARED WITH 2020)



It must be remembered that ENAV Group sites, the Control Towers (TWR) and Area Control Centres (ACC), the radar sites, the TBT radio centres, the runway lighting systems (Aeronautical Ground Lighting), the radio-navigation aids, Techno Sky and IDS are all powered by primary energy with a total annual consumption (by PODs and third parties) of approximately 67,740,460 kWh/year in 2021.

To meet any blackouts in the aforementioned primary power supply, diesel-fuelled backup generators have been installed at these sites. Because the thermal generation capacity at nearly all ENAV facilities is below 1 MW, they fall within the scope of assets of insignificant pollution (Annex I of Presidential Decree 25/07/91).

During 2021, ENAV, following the results of the II Energy Audit (pursuant to Article 8 of Legislative Decree 102/2014), planned new projects and interventions to improve energy efficiency with the consequent reduction of CO<sub>2</sub> emissions at the airports of Bari, Brindisi, Catania, Lampedusa, Milan Malpensa, Venice, Naples and Genoa, the Rome headquarters, the four ACCs of Rome, Milan, Padua and Brindisi, the Radar/TBT Centre of Masseria Orimini and TBT Brancasi.

In 2021 the 2020-2030 consumption efficiency plan was updated, defining two macro-areas of intervention:

### Autonomous generation interventions

- *photovoltaic plants*
- *tri-generation plants*
- *geothermal systems for air conditioning*
- *wind farm*
- *hydrogen-powered fuel cell system*

### Interventions to improve consumption efficiency

- *new interior and exterior LED lighting systems*
- *automated systems to control lighting and detect the presence of workers*
- *monitoring and remote-metering systems at sites that consume the most energy in order to respond to any anomalies*
- *heat-pump and free-cooling based climate-control systems (with decommissioning of oil and gas fired boilers)*
- *external insulation*
- *upgraded ATM technologies*

These initiatives form part of the ENAV strategy as a direct contribution to SDG 7, and to increase the percentage of renewable energy in the global energy mix (target 7.2), and to increase the global rate of improvement in energy efficiency (target 7.3), with the aim of achieving a reduction of primary energy consumption of around 30% by 2030 compared to 2019.

In 2021, ENAV moved ahead with the design for the modernisation of the now obsolete air conditioning systems of the Bari, Albenga, Malpensa and Olbia ACs and the Rome and Padua ACCs, and will replace the refrigerant gas R410A with R32 for all air conditioning systems. This gas has a 75% lower impact on global warming, bringing emissions of fluorinated gases from the 3,000 air conditioning systems in its operational sites and offices to almost zero (0.25%). Moreover, new primary air treatment plants are planned for all these sites, with free-cooling air handling units that make direct use of suitably filtered ambient air to regulate the interior temperature of building spaces.

In addition, experimentation has begun at the VOR centre in Campagnano for power supply, replacing ENAV's automatic intervention generator sets with hydrogen combustion cells which will serve both to transform ENAV's peripheral facilities into near-zero electricity consumption sites and reduce CO<sub>2</sub> emissions.



## Current and future status of ENAV photovoltaic plants

### ENAV plants currently operational

Ancona Falconara control tower - 45kWp – production in 2021 was 35,270 kWh/y

Bari Palese control tower - 100kWp - production in 2021 of 74,368 kWh/y

Radiofaro NDB Bitonto - 100kWp – production in 2021 of 75,538 kWh/y

Brindisi Area Control Centre - 63kWp - 2021 production of 85,280 kWh/y

ENAV Headquarters - 80kWp - production in 2021 of 89,400 kWh/y

### Plants soon to be operational

Naples Capodichino Control Tower 75kWp 2022

Genoa Control Tower 25kWp 2022

Catania Control Tower 20kWp 2022

### Forthcoming plants already included in the Investment Plan

Brindisi Control Tower 95.4kWp 2023

Palermo Control Tower 50kWp 2024

Lampedusa Control Tower 30kWp 2022

Brancasi Brindisi TBT Radio Centre 45.12kWp 2023

Masseria Orimini (TA) RADAR/TBT centre 33 kWp 2022

Forli Training Centre 70kWp 2023

New ACC Milan 2024

New control tower Milan 2024

### Forthcoming plants Pantelleria 2024

Ustica 2024

Pantelleria 2024

Radar Centre Poggio Lecceta 2024

Radar Centre Ravenna 2024

Radar Centre Maccarese 2024

Radar Centre Monte Codi 2024

Radar Centre Olbia 2024

Foggia 2024

Lamezia Terme 2024

VOR Centre Campagnano 2024

In addition, after the installation of electric vehicle charging points at the Rome ACC, other points were installed in 2021 at ENAV headquarters, at the airports of Bari, Naples, Fiumicino, Palermo, Catania and Alghero, at the Brindisi ACC, the Padua ACC and the Techno Sky headquarters in Via dei Cavallari. New charging points are planned for the next few years at other ENAV centres.

Also of note was the start of the programme to construct the 500 kWp trigeneration combined cooling, heat and power (CCHP) plant for the climate-control systems at the Rome ACC, which, once operational (in 2022), will reduce primary energy drawn from the grid by about 34% compared with current consumption levels at the ACC, equal to a reduction of 577 tonnes of CO<sub>2</sub> per year.

Although a snapshot of all fuel consumption is provided below by means of a list of the GRI Standard indicators, the policies and initiatives concerning the impact of the ENAV Group’s air fleet deserve special attention here. In recent years in fact, a major process of fleet renewal and an adjustment of operating procedures were completed with an investment of approximately EUR 35 million.

Finally, it should be pointed out that, in October 2021 the ENAV Group signed a contract with Consip for the purchase of all the primary electricity of its PODs from renewable and certified sources (90% of the total electricity consumed by ENAV).

The additional 10% of non-green electricity is consumed on the islands of Lampedusa, Pantelleria and Ustica, and the power supplied by third parties (AMI and airport companies), the origin of which is unknown.

However, ENAV has planned to build photovoltaic plants also in Ustica and Pantelleria (Lampedusa has already been completed) and, through the construction of new power plants, to free itself from third-party power supply.

Future goals	Deadline
In order to reduce electricity consumption, new photovoltaic plants will be built on some radar/TBT and RRAA sites over the next few years. On these sites, in central and southern Italy, areas are available for the construction of plants with a capacity of around 100 kWp.	<b>From 2024 to 2030</b>
Feasibility study for a wind farm at the Monte Codi radar site in Sardinia	<b>2024</b>

## 4.8 WASTE MANAGEMENT

The ENAV Group's Environmental Policy defines as one of its strategic objectives the guarantee of compliance with the regulations in force concerning waste management, as well as the management of waste disposal activities through the traceability of the entire process, giving the maximum possible implementation to the hierarchical criterion of prevention, reuse, recycling, recovery and disposal, also in order to mitigate the environmental impact on the cities and communities in which ENAV operates.

The Environmental Management System of the ENAV Group includes procedures for the management of environmental aspects of interest in compliance with the relevant legislation. In particular, specific procedures and operating instructions have been drawn up for the management of waste produced by Group companies.

The set of documents was supplemented with guidelines for the compilation and presentation of the *Modello Unico di Dichiarazione ambientale* (MUD) (environmental declaration form) using the waste management software application *PrometeoRifiuti*.

ENAV and its subsidiaries Techno Sky and IDS AirNav use the aforementioned software application for the management of special waste. It provides support both for the registration of special waste generation and disposal and for the implementation of regulatory requirements, making possible the precise tracking of the waste cycle and the drawing up of the relative reports.

This application therefore allows the companies of the ENAV Group to collect, manage and monitor the data relating to waste produced.

The main types of waste produced during 2021 were as follows:

For ENAV	For TECHNO SKY	For IDS AirNav
<ul style="list-style-type: none"><li>• <i>Septic tank sludge</i></li><li>• <i>End-of-life equipment</i></li><li>• <i>Packaging</i></li><li>• <i>Bulky waste</i></li><li>• <i>Iron and steel</i></li><li>• <i>Batteries</i></li><li>• <i>Mixed waste from construction activities</i></li><li>• <i>Paper and cardboard</i></li></ul>	<ul style="list-style-type: none"><li>• <i>Batteries</i></li><li>• <i>Septic tank sludge</i></li><li>• <i>End-of-life equipment</i></li><li>• <i>Packaging</i></li><li>• <i>Iron and steel</i></li><li>• <i>Motor oils</i></li><li>• <i>Absorbents-filtering materials</i></li></ul>	<ul style="list-style-type: none"><li>• <i>Bulky waste</i></li></ul>

The potential impacts related to the waste produced by the ENAV Group concern the risk of spillage or dispersion of waste into the environment with a consequent risk of soil, subsoil and/or aquifer contamination.

The documentation for the tender for the assignment of the service for the collection and disposal of waste produced by the ENAV Group companies has also been fully defined. For the purpose of selecting the best bid, the commitment by the supplier to maximise the percentage of waste sent for recovery compared to the total of waste acquired will be considered.

With regard to waste generated by the activities of the companies of the ENAV Group and managed by third parties, a process of monitoring the correct fulfilment of regulatory and contractual obligations is carried out, generally through the provision of documentation for waste disposal carried (fourth copy of the form).

During 2021, moreover, specific training courses were prepared and delivered on several environmental issues of interest to the ENAV Group, including the management of waste through the software application in use, while and specific training courses for environmental auditors have been launched.

We continued to support the various Group organisational units concerning all problems connected with the management of special, hazardous and non-hazardous waste.

Future goals	Deadline
<p>The European tender for the management of hazardous waste (collection-transport, recovery/disposal and acquisition of specific containers) will be published in the first months of 2022. The award of this tender, divided into 8 lots relating to adjacent geographical areas, will allow even more precise control over the companies providing the services and the achievement of a greater percentage of waste destined for recovery compared to the current level.</p> <p>The awarding of the tender will also make it possible to use means of transporting waste that are less polluting in terms of emissions into the atmosphere and to coordinate the collection of special waste by the companies in the ENAV Group, leading to economic savings in terms of fewer trips to be made.</p>	<p><b>2022</b></p>





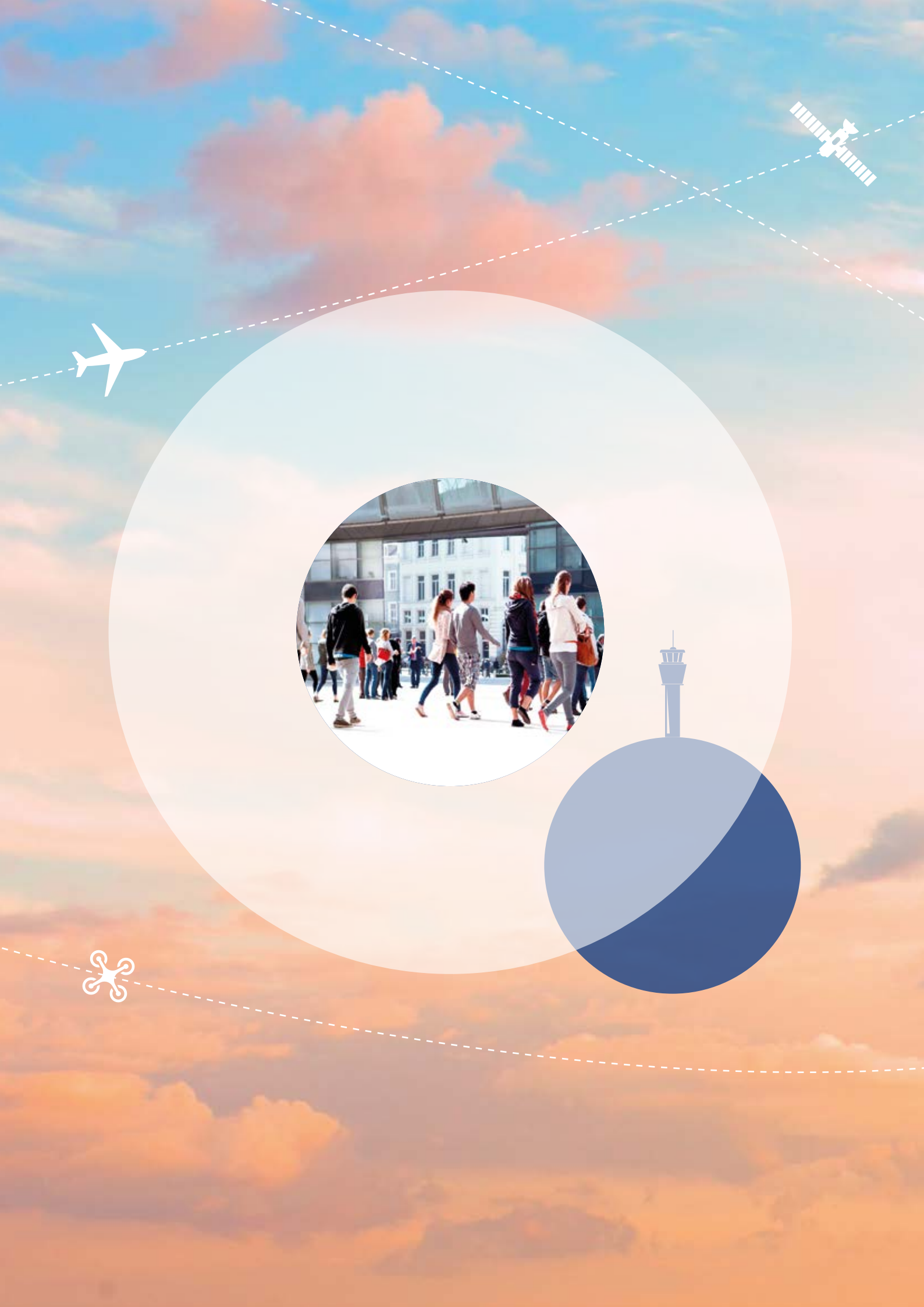




## 05 • THE PEOPLE







## 5. The people

<p><b>MATERIAL ISSUES</b></p>	<ul style="list-style-type: none"> <li>- Protection and well-being of employees</li> <li>- Health and safety of employees</li> <li>- Quality of human capital</li> <li>- Diversity, inclusion and equal opportunities</li> <li>- Safety</li> <li>- Security</li> <li>- Quality of service</li> <li>- Technological innovation and digitalisation</li> </ul>
<p><b>SDGs AND TARGETS</b></p>	<div style="display: flex; align-items: flex-start;"> <div style="width: 15%; text-align: center;">  <p>5 GENDER EQUALITY</p> </div> <div style="width: 85%;"> <p>5.5: Ensure that women enjoy full and effective participation as well as equal leadership opportunities at all levels of the decision-making process</p> </div> </div> <hr/> <div style="display: flex; align-items: flex-start;"> <div style="width: 15%; text-align: center;">  <p>8 DECENT WORK AND ECONOMIC GROWTH</p> </div> <div style="width: 85%;"> <p>8.2: Reach higher levels of economic productivity through diversification, technological updating and innovation, also by focusing on sectors with high added value as well as sectors with high labour intensity</p> <p>8.5: Achieve full and productive employment and decent work for all women and men, including for young people and persons with disabilities, and equal pay for work of equal value</p> <p>8.7: Take immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour, including recruitment and use of child soldiers, and by 2025 end child labour in all its forms</p> <p>8.8: Protect labour rights and promote a safe and protected working environment for all workers, including migrant workers, and especially migrant women, and those with precarious jobs</p> </div> </div> <hr/> <div style="display: flex; align-items: flex-start;"> <div style="width: 15%; text-align: center;">  <p>9 INDUSTRY, INNOVATION AND INFRASTRUCTURE</p> </div> <div style="width: 85%;"> <p>9.1: Develop quality, reliable, sustainable and resilient infrastructures, including regional and cross-border infrastructures, to sustain economic development and human wellbeing, with a special focus on the possibility of equitable access for everyone</p> </div> </div> <hr/> <div style="display: flex; align-items: flex-start;"> <div style="width: 15%; text-align: center;">  <p>10 REDUCED INEQUALITIES</p> </div> <div style="width: 85%;"> <p>10.3: Ensure equal opportunities for all and reduce inequalities in outcomes, including through the elimination of discriminatory laws, policies and practices, and the promotion of suitable laws, policies and actions in this sense</p> </div> </div>
<p><b>ENAV GROUP TARGETS 2021-2023</b></p>	<p>Recognition of parental leave</p> <p>Increase in training delivered to ENAV Group employees on issues that include aspects related to Legislative Decree 231/01 and Code of Ethics</p> <p>Increase in operational training delivered to employees of the ENAV Group</p> <p>Monitoring of standards regarding health and safety in the workplace by means of retaining ISO 45001:2018 certifications</p> <p>Drafting of the regulations on harassment and abuse in the workplace</p> <p>Integration of approaches (transfer of approaches, APP, from certain airports to their respective control centres of reference)</p> <p>Internal Communication Plan on the development of sustainability culture</p> <p>Develop initiatives aimed at promoting the inclusion of all employees, regardless of age, gender, ethnicity, religion, sexual orientation and people living with disabilities</p> <p>Improving the quality of life of employees by means of targeted welfare initiatives</p> <p>Bringing women closer to the core business professions, with specific reference to air traffic control and maintenance activities, by means of raising women's awareness of operational roles</p> <p>In internal assessments aimed at filling new corporate positions, the proportion of women must be at least 50% (comply or explain)</p> <p>Assessment on diversity management, gap analysis and action plan</p>

- Maternity-paternity leave: ENAV gives full pay to its new parent employees;
  - Parental leave: ENAV also allows employees to take up to 6 months of additional leave for children up to the age of three, receiving 80% of their salary for the first two months and 40% for the remaining four months;
  - ENAV offers 50% paid leave for the illness of a child or for specialist medical examinations
- 
- Increase in hours of training delivered to employees compared to 2020 (hours delivered by Internal Audit in 2020 equal to 4 hours 50 minutes)
- 
- 78,000 hours of technical-operational training
- 
- Retention of ISO 45001:2018 certification
- 
- Publication on the company internet of the regulations on harassment and abuse in the workplace
- 
- Testing Transfers of Verona to Milan, Trieste to Padua, Bari to Brindisi, Lamezia Terme to Rome
- 
- 3 internal communication projects started in 2021
- 
- Involvement of personnel in the pilot project to improve the position of people living with disabilities
- 
- Welfare platform activated in June 2021. The Welfare platform will be activated for ENAV until November and for IDS until May of 2022
- 
- Start of the awareness project concerning bringing women closer to the core business professions
- 
- In 2021, 18 assessments were carried out, 9 of which were directed towards women
- 
- A questionnaire published on the company intranet with a focus on social topics such as racism and the gender gap

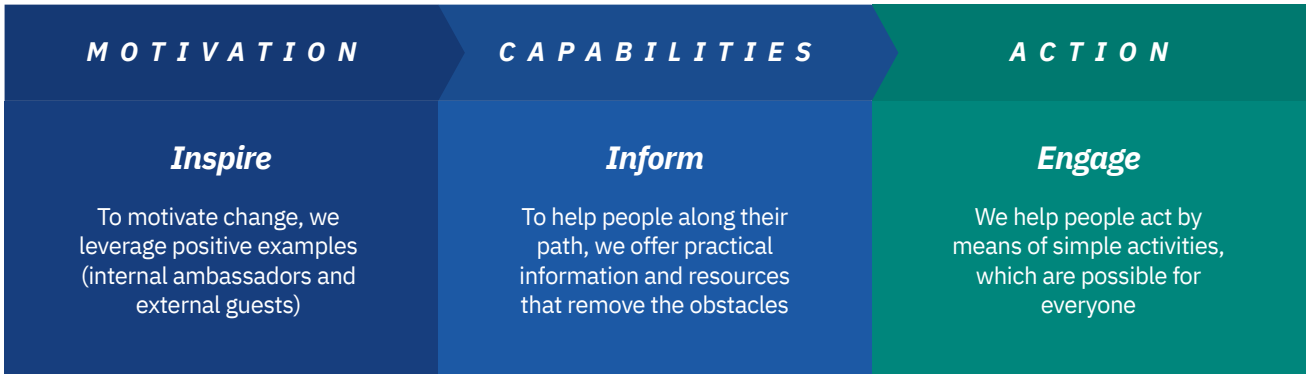
## **5.1 ENAV STRATEGY FOR DEVELOPING A NEW SUSTAINABILITY CULTURE**

Ever since the Company decided to invest heavily in sustainable development, one aspect became immediately clear above all others: to reach any goal we needed to start from people.

It seems obvious, but especially in a company like ENAV, where the human factor is always decisive and where people are at the centre of the business model, all goals to be reached must necessarily be shared at all levels.

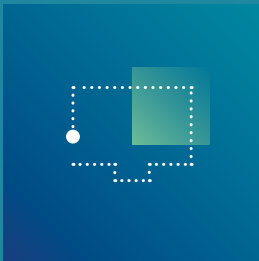
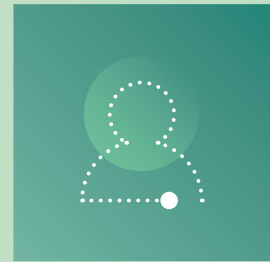
In the case of sustainability however, there is an additional difficulty because it is not merely a project to be developed or a simple goal to reach, but a full scale cultural change. In a company like ENAV, this process may appear even more complex than elsewhere, both because the business is spread across 52 sites, and also because air traffic controllers and administrative personnel have very different aptitudes, skills, and work hours.

By virtue of these aspects, ENAV's strategy for developing a "sustainability culture" is developed with 3 directives: inspire, inform, involve.



**The sustainability ambassadors**

Sustainability ambassadors are ENAV people coming from different Company functions and offices and act as a “megaphone” for all the activities connected to ESG topics; they are people with considerable interest in the topic who are assigned to spreading the culture of sustainability within the Group. In 2021, the group of ambassadors has expanded and is now comprised of more than 50 people

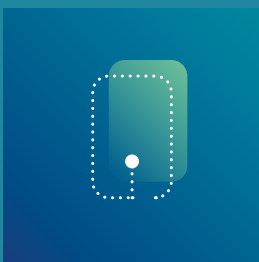


**The portal of sustainability in the new intranet**

The initiative, called “Portale Sustainability”, is included within a wider initiative called “JO.DI.E. – JOurney for DIgital ENAV”, which has the objective of the digitalization of the majority of company processes and opening of new digital channels and modern and innovative technologies. The new sustainability area dedicated to ENAV people is updated continuously and organised in 3 areas: the Sustainability ENAV News, the Sustainability World News and the Library of sustainability documents

**Sustainability focus group**

In order to involve employees also in the phase of defining and planning new initiatives, focus groups are created in order to present the training requirements and define with them the most suitable initiatives for creating a new sustainability culture. The purpose of all of this is to promote the sharing of and engagement in the new sustainability initiatives



**The sustainability APP for ENAV people: AWorld**

AWorld is the app for living sustainably in the modern world. Created to support ActNow, the United Nations campaign for promoting individual actions on climate change, the Aworld app was customised for ENAV and made available to all people of the Group in order to create, through educational games and pills greater awareness of the ability of every one of us, in our small and simple gestures, to save the planet.

The AWorld APP was launched in ENAV with 3 videos by the comedian Claudio Morici

In 2022, in line with the Sustainability culture development plan approved by the Board of Directors of ENAV, additional initiatives will be launched, such as:

Future projects	Deadline
The training course on sustainability and SDGs of ASVIS	<b>2022</b>
Stories and testimony on sustainability through podcasts	<b>2022</b>
Live sustainability events: virtual events that involve people from the world of culture, sports, etc., through which we will discuss topics of sustainability from a different point of view	<b>2022</b>

## 5.2 PROTECTION OF WORKER HEALTH AND SAFETY

As outlined in the Code of Ethics, the ENAV Group awards a high level of importance to the physical and moral integrity of its employees and collaborators, to the diffusion of working conditions that are respectful of individual dignity, and to the provision of safe and healthy workplaces. The companies take care, therefore, to disseminate and consolidate a culture of health and safety in the workplace, while developing risk awareness and promoting responsible conduct by all personnel.

Group companies have adopted the ENAV Occupational Health and Safety Management System (OHSMS) in compliance with widely recognised international standards. All the Company activities are covered by the OHSMS, which are extended to include not just employees but also seconded workers and the personnel of contractor companies.

In 2021, the DNV GL – Business Assurance certification organisation carried out a series of formal audits nationwide in Italy, aimed at:

- the certification for the new ISO 45001:2018 standard, for ENAV, Techno Sky and D-Flight;
- maintenance of ISO 45001:2018 certification for IDS AirNav.

The Group<sup>24</sup> implemented an internal procedure (OHSMS-P3.1 Hazardous events management), forming part of the procedural body of the Health and Safety Management System. The new procedure describes the process of reporting, recording and analysis of hazardous events in order to check for possible areas of improvement in relation to occupational health and safety, identify the need for corrective actions or opportunities for preventive actions, communicate the results of surveys, and prevent undesirable events, in the drive to ensure ongoing improvement.

In addition, in relation to the many activities and works it carries out as a contractor, in consideration of the specific matters linked to tenders within the sphere of application of Title IV of Legislative Decree 81/08 as amended, Techno Sky draws up Operational Safety Plans (OSPs) and carries out accurate monitoring of the documentation produced by contractor companies in order to assess compliance with the applicable on workplace health and safety legislation (WHS).

Health surveillance service is guaranteed within the Group<sup>25</sup> as required by Legislative Decree 81/08, as amended. The health surveillance activity in ENAV and Techno Sky, considering the nationwide distribution of the sites where our people are employed, is performed by a staff of medical officers (MO), under the direction of a health coordinator (HC).

24. With the exclusion of ENAV Asia Pacific.

25. With the exclusion of ENAV Asia Pacific.

In October 2021, ENAV Asia Pacific, in collaboration with a local consultant, updated its hazard identification and risk assessment process (Hazard Identification, Risk Assessment and Risk Control – HIRARC). Risks directly connected to the operating activities were found to be minimal.

A section dedicated to “OCCUPATIONAL HEALTH AND SAFETY” is available on the in-house portal FollowMe in order to provide access and communicate information related to occupational health and safety to Group personnel.

In the context of ISO 45001:2018 certification, which calls for greater engagement of workers above the level already constantly provided by the health and safety representatives (HSR), the Group has implemented the following actions: extension of the debriefing already in place at the end of emergency drills to include the workers who took part in the drill; interviews during internal audits, with several of the workers present (not in HSR positions) in relation to the OHSMS.

In their commercial relations the ENAV Group’s Italian companies assure health and safety impact prevention and mitigation through the consistent application of their Health and Safety Management Systems. The Group has also set up the Group Travel Security procedure, which is to be applied when travelling abroad.

In organisational terms, the Group Prevention and Protection Service performs a monitoring, guidance, and coordination role for all the Italian Group Companies, coordinated by HSE. There is a system of responsibilities and delegations for the employer regarding WHS.

### *Training in relation to workplace Health and Safety*

As regards training, ENAV manages the provision of WHS training courses for all employees of the Group’s Italian companies, via classroom/video conference sessions, especially with regard to people acting as emergency management officers, elected/appointed worker safety representatives and people identified as Managers, Supervisors and Workers.

The courses provided via the TOTARA e-learning platform concern:

- General worker training
- Specific worker risk training
- Worker update
- Travel safety

The first two e-learning courses concerned all newly hired non-management personnel at ENAV and IDS AirNav, while for Techno Sky, the specific risk course (12 hours) is held in person/via video conference. Also, worker training update courses are held at the frequencies prescribed by law (five yearly). The “Travel safety” course is given to all Group employees who work outside Italy, regardless of their contractual position.

In addition to the aforementioned training, also the following courses can be given to Techno Sky employees in compliance with needs:

- Standard CEI 11/27 concerning electrical works and qualification for the related jobs;
- Category III Personal Protective Equipment (PPE);
- Users of Elevating Work Platforms (MEWP/EWP).



## Policy in relation to workplace Health and Safety

In compliance with statutory legislation, the ENAV Group pursues the key objective of ensuring continuous improvement of its performance in relation to occupational health and safety and the elimination or reduction of risks affecting all Group personnel and any other stakeholders who may be exposed to occupational health and safety hazards associated with their work activities. During 2021, a Group Workplace Health and Safety Policy was defined and communicated to all company levels by means of publication on the corporate website.

## Workplace Health and Safety management system

The ENAV Group's<sup>26</sup> Workplace Health And Safety Management System complies with the requirements of ISO 45001:2018 and it sets out the general guidelines, prescriptions and reference documentation required to assure the ongoing improvement of performance and improved protection of the needs and expectations of stakeholders in relation to occupational health and safety. The main processes that make up the Workplace Health and Safety Management System can be briefly described as follows:

<b>Risk management</b>	The process is aimed at the continuous identification of occupational health and safety hazards, assessment of the level of the related risks, definition of the control measures needed to reduce the risks and update the risk level assessment further to the implementation of control measures.
<b>Hazardous events management</b>	The process is intended to describe the methods of reporting, managing and analysing accidents, near misses, and situations of danger in relation to the WHS context and in the context of work activities performed by Group personnel and third parties (suppliers, visitors). Near miss reports can be made by any member of staff.
<b>Emergency management</b>	The process is designed to regulate the identification of possible emergency situations, define emergency management rules and responsibilities and describe the methods adopted for periodic auditing of emergency preparedness in order to improve response actions, by drafting and updating emergency plans and by performing the associated periodic tests (fire drills).
<b>Health surveillance management</b>	The purpose of the process is to define the planning, programming, and execution of health surveillance activities and the associated monitoring in order to issue a certificate of fitness of workers performing the duties set down in the health protocol (art. 41 Legislative Decree 81/08, as amended).
<b>Training management</b>	The aim of the process is to regulate management of training, information, and coaching of workers and health and safety officers and to perform the associated monitoring (articles 36 and 37 of Legislative Decree 81/08, as amended).
<b>Communication, participation and consultation</b>	The aim of the activity is to describe communication, participation and consultation processes in the WHS context through the definition of methods of external communication (with customers, Supervisory Authorities, visitors, and any other stakeholders), in compliance with the roles and responsibilities involved.
<b>Management of legal prescriptions</b>	The purpose of the process is the identification, selection, collection, preservation, and updating of the legal prescriptions and any other prescriptions concerning workplace health and safety (WHS) of relevance for any Group activity, and the methods of monitoring compliance with the applicable regulations.
<b>Performance measurement</b>	The process is aimed at describing the methods adopted by the Group to manage OHSMS performance measurement and monitoring activities and reporting to senior management.

ISO 45001:2018 certification calls for greater engagement of employees above the level already constantly provided by the health and safety representatives (HSR). Therefore, the Group has implemented the following actions: extension of the debriefing already in place at the end of emergency drills to include the workers

26. With the exclusion of ENAV Asia Pacific.

who took part in the drill; interviews during internal audits, with several of the workers present (not in HSR positions) in relation to the OHSMS.

### Main actions performed for Health and Safety in the workplace

Following the pandemic emergency (COVID-19), in 2021 the Group Prevention and Protection Service continued its proactive participation in managing the contingent issues as they occurred.

The main activities concerned:

- continuous monitoring and analysis of the Group impact of international, national and regional anti COVID-19 guidelines;
- definition, in compliance with statutory legislation, of risk mitigation measures designed to prevent the virus from spreading, including supplying all personnel with the necessary Personal Protective Equipment (PPE) (e.g. surgical or FFP2 face mask, where necessary, disinfectant wipes to sanitise workstations and instruments, and disposable gloves), checking of spaces and, where necessary, reorganisation in order to guarantee maintenance of recommended safety distances;
- drafting and subsequent updating of the documentation produced for all Group companies (COVID-19 biological risk assessment, “Useful information and COVID-19 risk mitigation measures” manual, bulletins and various notices addressed to personnel, to the functional Delegates and external suppliers to comply with legal requirements);
- participation in local Committees for checking of the application of the *Shared Protocol regulating measures to combat and contain the spread of the SARS-CoV-2/COVID-19 virus in the workplace (6 April 2021)*;
- the engagement of the medical officer<sup>27</sup> in identifying “fragile” employees and in assessing the health/biological risk for all travel.

Future goals	Deadline
Start of the process for assessing the risk of work-related stress following the update of the preliminary in-depth assessment related to ENAV, IDS AirNav and Techno Sky	<b>2022</b>
Maintenance of OHSMS certification pursuant to standard ISO 45001:2018 for the companies in the ENAV Group (ENAV, IDS AirNav, Techno Sky)	<b>2022</b>
Organisational integration in reference to the SPPG structure of personnel working in territorial structures and attribution of responsibilities regarding WHS for the subsidiary Techno Sky as well as for environmental topics	<b>2022</b>

## 5.3 HIRING AND DEVELOPMENT OF PERSONNEL

### Personnel selection

The ENAV Group has defined a structured process for personnel selection based on the principles of transparency and equal opportunity. This makes it possible to fully appreciate, without any discrimination, the skills and values of every candidate, and identify those who fully satisfy the needs expressed by the various corporate structures to face the Group’s present and future challenges.

<sup>27</sup>. Health Coordinator for ENAV and Techno Sky.

In particular, the selection process is governed by an ISO 9001 certified Quality Procedure, which ensures candidates are treated with maximum transparency, equal opportunity, uniformity and objectivity in the assessment criteria, and confidentiality in any personal information provided to the Company.

The ENAV Group also uses an internal selection process whereby employees can apply for positions that are more in line with their areas of expertise and experience.

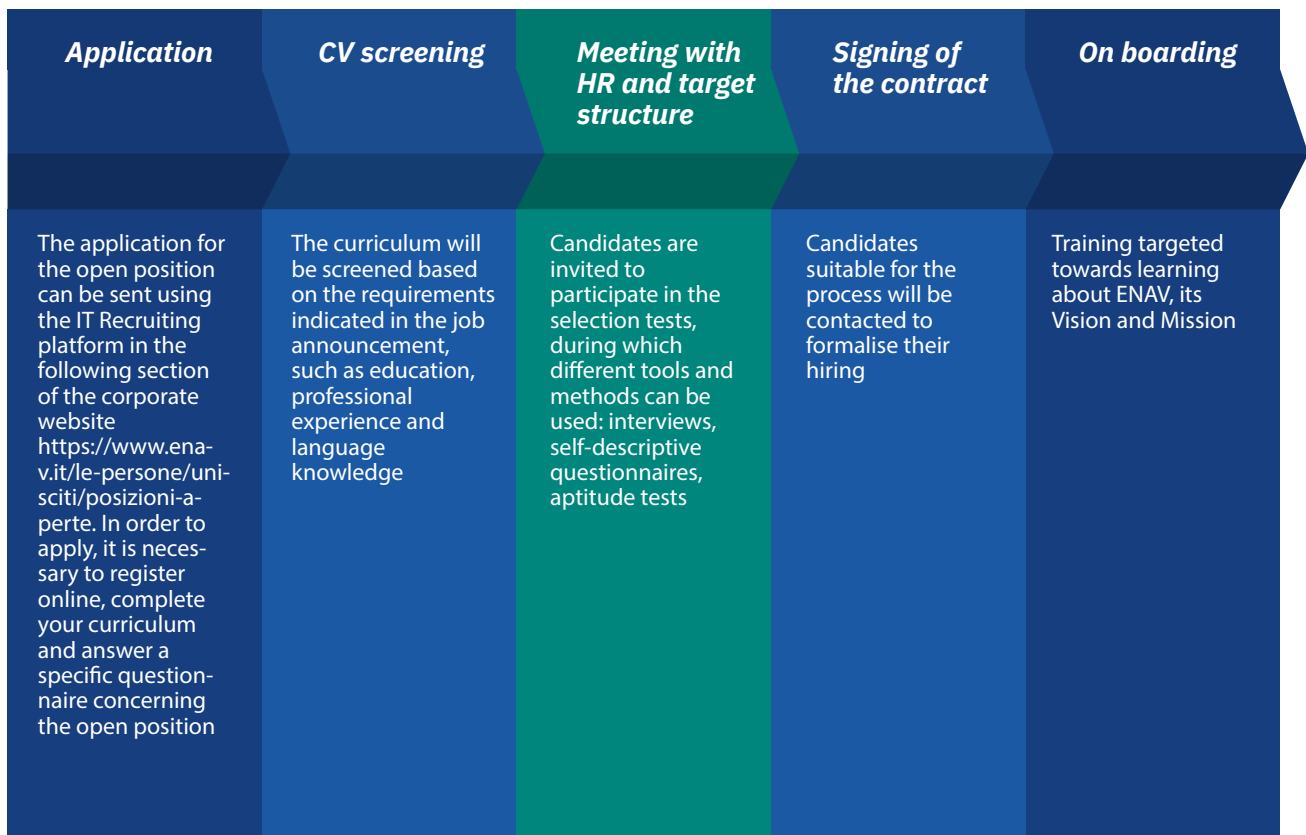
In order to ensure that the hiring process is impartial and objective, both in-house audits and audits by the certification company DNV are periodically conducted, and actions for improvement in the management and execution of the process are taken based on the results of these audits.

The Recruiting and Assessment Centre uses a dedicated e-mail address (recruiting@enav.it) to manage requests for more information and feedback from in-house and external individuals interested in joining the Group.

### **The selection process**

The purpose of the selection activities is for the ENAV Group and potential new resources get to know each other. This knowledge makes it possible to understand in advance the type of integration or fit there can be between the candidate and the company.

Our selection process is divided into various steps that include the assessment of the application as well as psycho-behavioural and technical-professional activities and meetings. The process can be divided into additional steps depending on the transversal skills required for the job.



Initiatives aimed at supporting the employee attraction strategy included:

- partnerships with Master courses, Business Schools, and Universities designed to help students and young professionals orient their career choices;
- forging relationships with employment centres and recruitment agencies;
- collaboration with disability specialist employment agencies;
- participation in career days that offer the opportunity for the Company to meet talented young people at their first approach to the job market, with the ultimate aim of promoting the ENAV Group brand and attracting new staff. Thanks to digital technologies, it was possible to provide information about the company and its culture, as well as meet target candidates and interact with them virtually:
  - *Inclusion Job day*: an event dedicated to people with disabilities;
  - *Stem Girls*: an event dedicated to young female students, graduates and professionals with an education in STEM courses (Science, Technology, Engineering and Mathematics) looking for employment;
  - *Virtual Job Meeting Engineering*: an event dedicated to young talented engineers. Curricular internships for university students and extracurricular internships for recent graduates.

The LinkedIn Talent Solutions platform was used for external selections and helped recruiters reach a larger pool of candidates.

Future goals	Deadline
Identification of 250 resources to integrate within Group companies.	<b>2022</b>
Activation of the LinkedIn “Job slot” function in order to widen the search for personnel among users with specific expertise of interest for the Group.	<b>2022</b>
Participation in recruiting events: <ul style="list-style-type: none"> <li>• 17 February 2022, Inclusion Job Day;</li> <li>• 28 April 2022, Job Meeting Rome: an in-person event targeted towards students and graduates of all universities in the region of Lazio;</li> <li>• 15 September 2022, Virtual Job Meeting STEM Girls: opportunity for meeting young female graduates and professionals with an education in STEM courses (Science, Technology, Engineering and Mathematics);</li> <li>• 17 November 2022, Virtual Job Meeting Engineering: virtual event dedicated to young talented engineers.</li> </ul>	<b>2022</b>
Creation of the “2022 Recruiting Events” page on the corporate website in order to inform candidates about opportunities for meeting with the Group and learn about its values, vision and hiring opportunities.	<b>2022</b>
Activation of additional internships and partnerships.	<b>2022</b>

Projects	Description
<b>Video “Women in ENAV”</b>	Creation of a video that depicts female professionals in ENAV, engaged in STEM activities, who talk about their work experiences to promote the company culture, inclusion and the role of women in non-traditional areas.
<b>Interscholastic project for spreading the STEM culture in middle schools</b>	A project for involving schools in the Lazio region in a virtual event in order to meet ENAV women who work in technological areas to help change cultural stereotypes and learn about the area in which the sciences are applied.
<b>University of Cambridge Digital Twin Bootcamp project</b>	Project in support of a scholarship for young engineering graduates.

## *Personnel development*

### *Training*

In a context of constant change and evolution prompted by technological innovations, it is of fundamental importance to offer our people updated growth and development paths that are coherent with their needs.

To pursue this aim, every year the Group defines a Training Plan, which is designed to start with input such as:

- organisational changes and the need for change management;
- company training policies;
- requirements deriving from the performance management process;
- requirements deriving from processes of recruiting and assessment during the personnel development cycle;
- requirements expressed by the single Group units based on needs for development, know-how, and skills of specialised domains of assigned personnel.

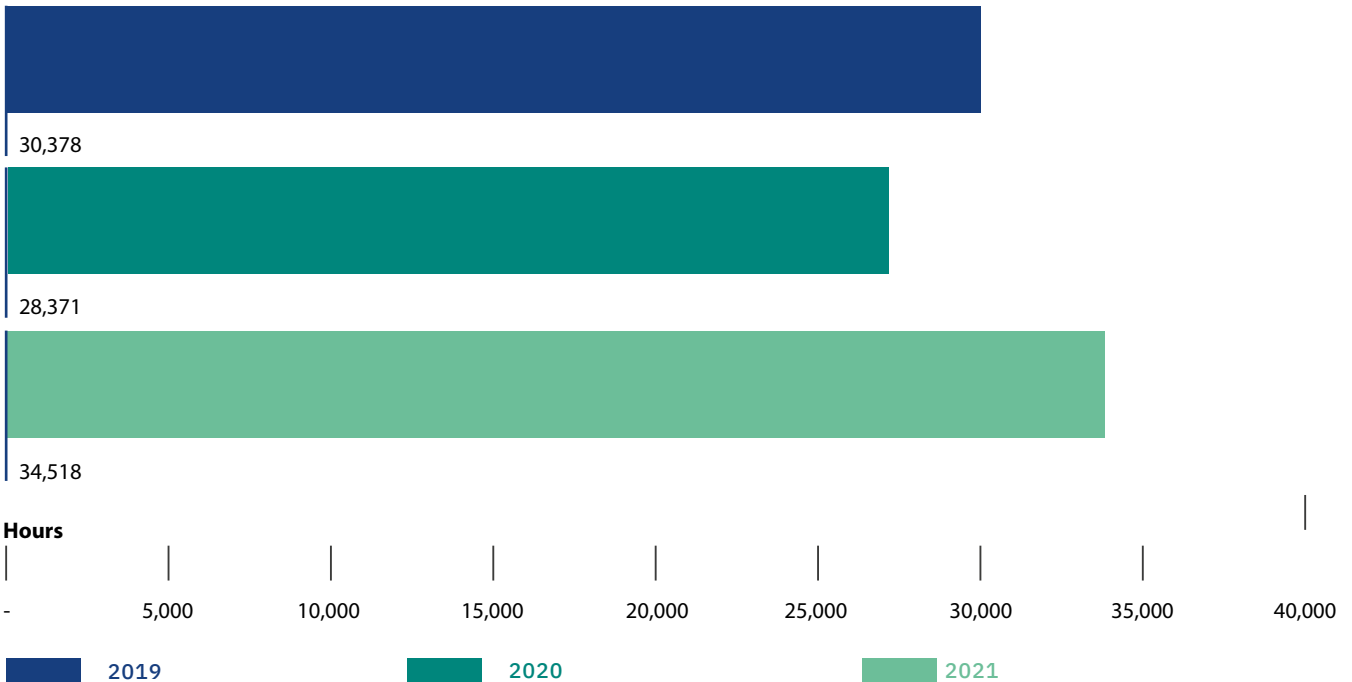
In defining the annual training plan we therefore paid special attention not merely to strategic drivers and the needs emerging from the organizational units, but also to the integration of training plans with the wider human resources management system, pursuing a consistent approach to managing the professional cycle of people in the Company, especially in relation to career development needs. Managerial and specialist training activities are run by the Career, Learning and Development unit, which is an organisational choice that ensures a more solid link between training and development, within the wider perimeter of activities carried out to enhance human capital and manage change processes.

Training activities are conducted in accordance with the procedure defined in the corporate Quality Management System, which describes the process and also provides for specific checks to assess the quality of the initiatives in terms of the level of satisfaction and effectiveness of the training process. All outsourced activities are carried out in compliance with the standards set down in the procurement procedures.

starting in 2020, training activities were impacted by the health emergency, which led to the need to rethink projects in order to assure ongoing training while also guaranteeing compliance with the social distancing measures imposed by the pandemic. Hence in 2021, training was again largely configured in remote mode, and despite the constraints dictated by the health emergency, around 35,000 hours of training were provided to the Group's people during the year (about 28,000 in 2020 and 30,000 in 2019).



### Classroom/e-learning training hours during the 3-years period\* (ENAV Group)



\* The total hours of training provided include specialist management, legal and language training (environmental, WHS and operational training hours are excluded).

The training activities are divided into 5 areas.

#### **MANDATORY** *indispensable for working*

**17,887 hours**  
**3,923 people**

- Mandatory training courses that fulfil regulatory obligations, in areas such as Occupational Health and Safety, Legislative Decree 231/01, GDPR 679/2016, Information Security, Airport Security and Travel Security. They were held asynchronously via the Learning Management System with automatic registration processes or defined by procedures, in order to reach all those concerned in the company.
- **Updates related to Legislative Decree 231/01.**
- **General and specific training dedicated to Occupational Health and Safety and as updated.**
- **Security Awareness and Airport Security.**

#### **STAY ON BUSINESS** *efficiency prerequisites*

**2,208 hours**  
**194 people**

- Projects directed towards the development and consolidation of fundamental work skills, such as IT and language skills. They are carried out synchronously and asynchronously and, as regards language training, differentiated courses are offered based on individual needs: from e-learning to one-to-one and thematic workshops in the foreign language.
- **Synchronous and asynchronous training on the Office suite.**
- **Language training in e-learning mode, mixed (e-learning and live conversations), one-to-one and thematic workshops in English.**

## **STAY UP TO DATE**

*continuation training of individual roles*

**13,605 hours**  
**1,169 people**

- These courses provide the answer to specific individual needs with the goal of keeping professional skills aligned with the evolution of the organisation and the context. They are held synchronously and asynchronously, with the use of external suppliers or expertise available within the ENAV Group.
- **Corporate Storytelling**, directed towards the structures engaged in updating the enav.it website and the corporate intranet.
- **Community PM**, an initiative dedicated to Group Project Managers within the scope of an professional online community.
- **eProcurement**, a professional update for colleagues involved in procurement activities.
- **Data Driven Organisation**, a cycle of seminars to spread the culture of data in the ENAV Group.
- **Learning Square**, initiatives created by the HRCommunity for the professional update on topics relevant for the organisations.
- **Courses on Audit techniques** directed towards personnel in various organisational structures, in order to uniform the methods for managing the quality processes.
- **HAL training**, an asynchronous training path developed in-house to guarantee the updating of all TechnoSky personnel involved in the introduction of the new method of managing maintenance operations (TOC).

## **SUPPORT CHANGE**

*a plethora of opportunities for individuals and groups*

**738 hours**  
**179 people**

- Projects and paths developed with the aim of accompanying the processes of organisational change that range from self-education through paths of “training pills” targeted towards the creation and consolidation of work groups, to individual and Group coaching
- **A cycle of seminars regarding the management of the “new normal”**, directed towards middle managers.
- **The continuation of the “training pills” being renewed for 2022.**
- **Individual coaching for high potential staff**, resources on growth paths and those facing particular professional challenges.
- **Start of specific training for the use of the SharePoint application**, for the purpose of preventing IT security incidents.

## **GROWTH**

*strategic training*

**861 hours**  
**87 people**

- Programmes and initiatives dedicated to groups of people – such as new hires and newly promoted managers - in order to promote individual and organisational development.
- **The course for Newly promoted managers**, which is a path that alternates classroom instruction with individual coaching, has the goal of developing the leadership skills of middle management in the Group
- **The induction path dedicated to new hires in the Group offers:** a cycle of meetings with company top management to learn about the Group's main strategic lines; the “A noi la cuffia!” path, which provides information about the air traffic control processes, also through the use of simulators; team coaching sessions, in which new hires who are divided into small groups and supported by a certified coach take stock of the experience at the company and improve their ability to understand the organisational context.

Future goals	Deadline
Integrate the training activities with what is specified in the three-year action plan defined as a result of the Diversity and Inclusion survey	<b>2022</b>
Increase the use of framework agreements with suppliers of specific training activities (e.g. Project Management, Team Building and experiential training) in order to acquire greater flexibility in the design and provision of managerial and specialist training initiatives	<b>2022</b>

Projects	Description
<b>Diversity and Inclusion</b>	<p>In 2021, two activities were started, which are directed towards enhancing human capital and the inclusion of everyone. In particular:</p> <ul style="list-style-type: none"> <li>• “ImproveYourself” directed towards colleagues with disabilities who can, on a voluntary basis, participate in a path to have a skill assessment carried out in order to orient their professional path towards the recognition and enhancement of their skills and personal aspirations. After the skill assessment, it is possible to start a life coaching pathway with a certified coach.</li> <li>• “Diversity Assessment for Inclusion”, a survey carried out in collaboration with the La Sapienza University of Rome which investigates the perceptions of all people in the Group regarding topics such as gender, generation, sexual orientation as well as disabilities/ableism, ethnic origin, religion, level of education, geographical origin, gender identity. The results of the survey were used to create an action plan that aims to develop an inclusive culture oriented towards enhancing diversity.</li> </ul>

## Operational training

### In-house training of ENAV Operative personnel

Air traffic controller (ATC) is not a typical job: it calls for a highly developed sense of responsibility, the ability to keep a cool head in stressful situations, and a strong aptitude for teamwork. Whether seated in front of a monitor crammed with indicator lights or in an airport control tower, air traffic controllers must in fact constantly show their skills in guiding and managing the many pilots with whom they are in constant radio contact.

The air traffic controller performs a series of on-the-spot assessments related to the safety and efficiency of the assisted aircraft to ensure the continuous maintenance of separation (minimum vertical and horizontal distances) between aircraft in flight.

For these reasons, ENAV pays special attention to the development of skills through classroom and on-the-job training, which are decisive factors for reaching the goals and carrying out the delicate role that the Company is called to play.

The preparation of air traffic controllers is guaranteed by the ENAV Operational & Technical Training unit, whose mission is to oversee the training needed for Company and Group staff, as well as those of external customers, to enable them to provide air navigation services. The training programmes are modulated in response to the educational standards required by national and international industry regulations, especially those relating to the Single European Sky. Because of this, certified and uncertified training design activities must meet certain general requirements in order to achieve the highest quality levels. ENAV therefore defines specific targets to achieve in developing its training, such as:

- to clearly define the general goals and specific objectives that the training aims to achieve;
- to break down the objectives of skills development in terms of knowledge, ability and behaviour;
- to define the process conditions and the teaching methods necessary to conduct the training and the system of verification of the objectives.

Each training programme must therefore always provide information on the structure and duration of the training, the methods of delivery, the characteristics and needs of the target population, the teaching objectives and the applicable reference legislation.

During 2021, in the months not affected by the lockdown measures from March to May, initial training was characterised by the provision of four ATCO-integrated courses, three ACS courses (Area Control Surveillance), one APS course (Approach Control Surveillance), and one TCL course (Terminal Control), characterised by their extended duration and large number of hours/student. Certain activities, following procedures shared with the Regulator and in compliance with the Alternative Means of Compliance (AMC) applicable on the Community level, were conducted remotely; others, however, in which physical presence was essential, were organised as soon as it was possible to restart physical courses, always acting in compliance with the rules imposed to prevent the spread of COVID-19.

During the year, the training provided by the ENAV Training Centre covered various environments, managed by the following structures:

- **En Route Training:** guarantees the process of designing and delivering training for operational personnel responsible for providing route and approach services;
- **Airport Training:** guarantees processes of designing and delivering training for operations personnel employed to provide airport services;
- **ATSEP Training:** guarantees the processes of designing and delivering training for ATSEP involved in the functioning, maintenance and installation of communications, navigation, surveillance, and air traffic management systems;
- **Human Factor Training:** oversees the processes of designing and delivering human factor training and ensures that human factor principles are integrated in operational technical and training processes to improve performance and awareness of safety among line staff.

The activities carried out reflect an unfailing commitment to pursue the highest quality training output, and meticulous alignment with the reference national and international legislation.

*Ab initio training*

**Plans and manages the provision of the basic ANS training courses for operational personnel**

*Advanced training*

**Plans and manages the provision of the advanced ANS training courses for operational personnel**



## Continuation training

Guarantees the professional updating of tutors, instructors and evaluators. Provides support for the local structures to align on-the-job training activities (UTP) with the programmes and courses provided by the Training Centre. Coordinates the verification of proficiency in English for aviation

## External projects

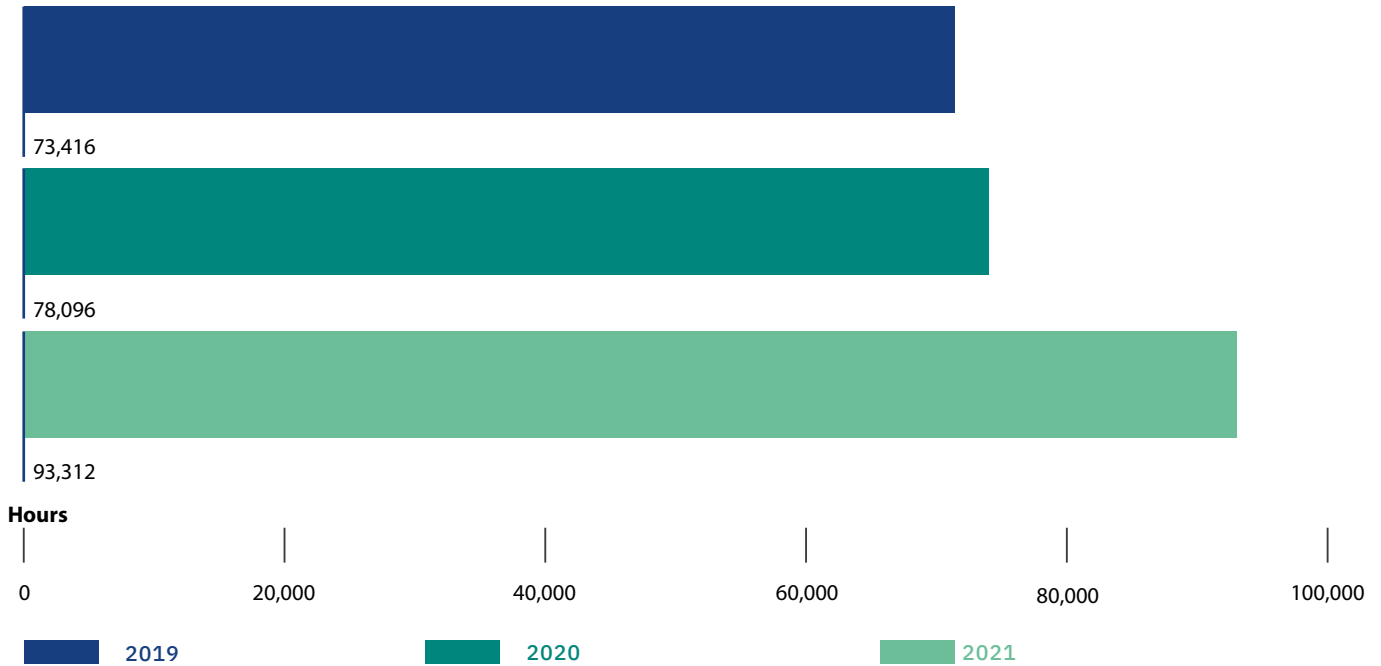
Arranges, in collaboration with the Strategic Marketing structure, the training programme projects for third parties, contributing to the needs analysis and planning of courses, guaranteeing that they are carried out

## Human Factor

Arranges the integration and standardisation of the human factor principles relating to non-technical skills in the training processes (Training Plan and UTP)

## Hours of in-house operational training<sup>28</sup>

### ENAV internal operational training



### In-house training of TECHNO SKY Operative personnel

Techno Sky also provides technical operational training through specific courses for air traffic safety engineering personnel (ATSEP) responsible for operating, servicing and installing communications, navigation, surveillance, and air traffic control systems.

In 2021 Techno Sky carried out the following training activities:

- ATSEP Type Rating Training, to develop and maintain the skills needed to operate the systems used by ENAV for air traffic control;
- training courses for technical and engineering staff in order to develop the skills of personnel working in Operations and Technology units;
- ATSEP qualification training, to understand the various domains in the CNS/ATM environment.

In relation to the COVID-19 pandemic emergency, for the entire twelve months of 2021 operational training was conducted in online mode, providing the practical component of courses directly on the Site concerned and ensuring participants were equipped with the necessary PPE.

<sup>28</sup>. The data concerning ENAV operational training in 2020 changed as compared to the data reported in the 2020 financial statements.

## ***In-house training of IDS AirNav Operative personnel***

The 2021 training programme for Engineering was targeted towards increasing the methodological and technological skills used for improving operational efficiency and the quality of the developed products and systems. A part of the programme was dedicated to language training, which is an important aspect for improving and acquiring mastery of the languages used when interacting with foreign customers. More specifically, the goals of the training projects were:

- updating the main technologies used for developing IDS AirNav systems;
- acquiring skills related to some technologies that can be used in the future to improve the systems;
- improving operational efficiency when developing products and systems, increasing methodological skills in the areas of Project Management, SW design and development;
- acquiring cyber-security skills to improve the security of information related to products and systems;
- increasing knowledge of foreign languages used in relations with foreign customers (product demonstrations to potential customers, relations with customers already acquired for the management of products, customer assistance, etc.).

The following groups were involved in this training programme:

- “SW Development” Group, mainly involved in training on technologies and SW design and development methodologies;
- “PDM AIM Data Management”, “PDM Design & Validation”, “ATM & Airport Systems” Groups, mainly involved in training on Project Management and Product Management;
- Suite Management Group, mainly involved in training on technology and methodology related to SW development;
- “System Infrastructure, Deployment and Configuration Management” Group, mainly involved in training on the technologies used for system IT structures;
- Staff in the “Senior Technical Support” Function, mainly involved in training on technologies and SW development methodologies.

Future goals of IDS-AirNav	Deadline
Continue strengthening the skills related to cyber-security and start a continuation training path in this area	<b>Q4 2022 and continuous updates in following years</b>
Continue updating skills related to new technologies	<b>Q4 2022 and continuous updates in following years</b>
Continue language training, to enlarge the base of people able to interact with customers, for various reasons	<b>Q4 2022 and following</b>

## ***External operational training***

The training delivered to third parties is targeted towards professional positions closely related to air traffic control and people working in various areas of the aviation sector who require special training courses in flight navigation (e.g. airlines, airport operators, air traffic management services, aeronautical industries, and government bodies in the air transport sector).

Thanks to its ability to develop scenarios and operational specifications that are adaptable according to the course objectives, even building airport scenarios and personalised service areas, the ENAV Operational and Technical Training unit can tailor training courses to match the customer’s specific logistical and organisational needs.

In developing training programmes for third parties, the unit has the same objectives of excellence that characterise internal training for Group staff, with the addition of the great care taken in handling the relationship with the customer.

2021 figures indicate a recovery in comparison to the negative peak of 2020, but have not yet reached 2019 levels (6,664 hours in 2021 compared to 4,380 in 2020 and 19,040 in 2019). The effects of the pandemic considerably limited activities targeting third parties. From this point of view, 2022 is presenting itself as the year of return to normal.

The ENAV Training Centre works with local institutions, particularly with those engaged in the training system: the Francesco Baracca Aviation School, the Faculty of Engineering of the University of Bologna, and ISAERS (a consortium that promotes and develops training and research activities in aeronautics and aerospace within the Forlì Aviation Technology Hub).

The presence of the **Training Centre** has had a significant impact on local development over the years, also through:

- improvement in education levels owing to the presence of new training opportunities;
- cooperation with local businesses and support for innovation processes;
- contribution to the development of the Aerospace Technological Centre, which has had a positive effect in making the area more attractive;
- greater visibility of the territory in the media.

Specific programmes were defined in the year for the training activities delivered, which respond to a broad range of needs, namely:

- **ATC Training** (ADI TWR APS ACS, TCL): training for obtaining or refreshing Air Traffic Control qualifications;
- **OJTI training**: training to secure OJTI (On The Job Training) specialisation;
- **Operational Supervisor's Course**: Training course for personnel selected for Control Room Supervisor duties;
- **FISO/TM1 Course**: training to secure the FIS (Flight Information Services) Operator licence and TM1 (Meteorological Technician) qualification;
- **Course for FISO-TM-MA Instructors**: training to secure a specialisation as Instructors for FISO, Aeronautical Meteorologist, and Meteorological Technician roles;
- **ATM seminars** (ITAER students): familiarisation with ATM and meteorological topics for students of technical institutes studying Transport and Logistics (formerly ITAER); in 2021 these activities were still influenced by the pandemic. With respect to 2020, however, recovery was noted in the direction of normal that, hopefully, will be recovered during 2022;
- **Apron management**: training on apron management for airport operator personnel;
- **Meteo**: training on meteorological observation and/or forecasting techniques.

In addition, despite the critical context of the SARS-COV2 pandemic, collaboration proceeded with the University of Bologna for the 2020/2021 academic year, with Training Centre personnel providing air traffic control instruction, two training modules included in the Study Programme of students attending the Aerospace Engineering faculty and with the award of 6 university credits on passing the exam.

Lastly, it should be noted that the ENAV Training Centre's actions in relation to the Forlì area do not end with its contribution to the world of education. In terms of relations with institutional stakeholders, the Training Centre cooperates with the Unindustria association and Fondazione Cassa di Risparmio di Forlì.

The Training Centre will also provide support in the area of sales activities, both with national aeronautical stakeholders (airport operators, airlines, etc.) as well as international parties who provide support for air navigation.

Future goals	Deadline
Operational training of ATCO personnel	<b>12-2022</b>
Operational training of ATSEP personnel	<b>12-2022</b>
Operational training of Meteo personnel	<b>12-2022</b>

## 5.4 DIVERSITY, INCLUSION AND EQUAL OPPORTUNITIES

Even though the pandemic period has not yet loosened its grip, activities and projects continued in 2021 in areas that have become even more important in terms of inclusion and the protection of more fragile individuals. In line with these topics, ENAV has implemented the following regulation and protection tools.



These represent important pillars that allow the entire Group to grow together with its human resources and have a positive impact in the national and international context.

Pursuing these goals requires training and information activities that can increase awareness of all regarding these topics, as these tools are targeted towards reinforcing change in social-cultural behaviours, both in men and women, in order to eliminate prejudices, customs and practices based on stereotypical models of gender, orientation, age, disability and cultural condition.

In December 2021, the Regulations on abuse and harassment at the workplace was published and the trusted advisor was appointed, which is a protective tool for the Group's human resources which serves the purpose of uncovering harassment or discriminatory behaviours targeted towards women and men in a work context. To manage these reports, the Regulation specifies the support of a trusted figure, external of the company and independent of the company dynamics (trusted advisor) who is



assigned to receive and listen to everyone’s problems from the point of view of support, and to possibly find a solution for the tranquillity of people and their work environment, which are elements that have an impact also on personal life, which will therefore also be improved.

To be able to report episodes of harassment also indirectly and also for those who are afraid of exposing themselves, the Whistleblowing platform and the relative Regulation are provided in order to receive also these types of reports that will be managed with absolute confidentiality and when justified, can permit the company, through the HR structure, to acquire information about the various working contexts.

The need to feel supported by the company during difficult moments and to share experiences with the company context was also indicated by the survey connected to the “Diversity Assessment for Inclusion” project, which was given to the entire Group in order to receive information for the implementation of guidelines and good practices for improving and developing not only the inclusion of all employees, but also their personal well-being, motivation and the sense of belonging to their work context. The survey also made it possible to identify the percentage of persons belonging to minority identity areas and thus potentially more exposed to episodes of discrimination.

Additional useful elements were taken from the assessment carried out with the foundation Sodalitas, D&ISelf Assessment, carried out in collaboration with Bureau Veritas Italia using an online tool that permits signature organisations to assess their current D&I activities and therefore define their internal priorities, as well as to provide benchmarking with similar organisations.

In June 2021, always from the point of view of inclusion, the “kids at work” initiative was offered again in an agile version as for their parents. Specific activities were created for the kids according to their age group on the Group’s training platform, Totara, with the possibility to do them together with their parents at any time. The activity involved completing a final questionnaire with the possibility to make suggestions.

Future goals	Deadline
Specific training activities whose detailed elements derive from real company needs (survey)	<b>2022</b>
Counselling service	<b>2022</b>
Communication strategy	<b>2022</b>
Group Equal Opportunities Committee	<b>2023</b>
Gender certification for the company	<b>2024</b>

Projects	Description
<b>ISO 30415:2021 certification: dedicated to “Human Resource Management, Diversity and Inclusion”</b>	The standard issued in May 2021 by the International Standard Organization (ISO) makes it possible for companies, by means of concrete tools, to demonstrate their commitment to the enhancement of diversity in the work environment, promoting inclusion and a welcoming corporate culture. Furthermore, it has the goal of monitoring and encouraging companies with a continuous improvement plan. The project was not yet submitted for a feasibility study.

## 5.5 SOCIAL POLICIES AND CORPORATE WELFARE

Welfare, in its meaning as the continuous improvement of organisational well-being and engagement, is one of the pillars of corporate social responsibility at ENAV, based on which the unit known as Welfare and People Care was created. This unit is dedicated to the design and planning of projects aimed at improving the work-life balance, also through a careful policy of listening to internal stakeholders by way of targeted surveys.

AREA	PROJECT	ACTIVITIES
<b>Social policies</b>	<b>Prevaer Supplemental Pension Fund</b>	This fund provides for a company contribution equal to 3% of the salary of participating employees (in addition to the 2% paid by the employee).
<b>Insurance policies</b>	<b>Supplementary Health Insurance</b>	This policy insures the employee and their nuclear family in case of illness or accident and covers medical and health-care expenses both for hospitalisation as well as non-hospital expenses (specialist examinations and diagnostic exams), with a premium paid fully by the company. The employee is only responsible for paying the premium of non-dependent family members.
	<b>Preventive care packages</b>	Medical and dentist checks are also provided for employees, with general and specific packages depending on gender and age.
	<b>Policy for problems in the nuclear family</b>	This includes expenses paid by employees for therapies for children with learning disabilities, behavioural problems, development issues and autistic spectrum disorders (e.g. speech therapy, neurological and psychomotor therapies). Furthermore, as this policy does not exclude the pandemic, also provides coverage in the case of illness due to Covid-19.
	<b>Accident insurance</b>	Compensates employees in the case of permanent invalidity caused by accidents that occurred during work or non-work activities.
<b>Health</b>	<b>Project Yes We Care</b>	With this project, which was launched in 2019, ENAV is seeking to increase awareness among Group employees of the importance of prevention and a healthy lifestyle by organising health-related events with physicians and other experts. For this purpose, in 2021, an initiative was launched that is aimed at increasing the awareness of Group personnel regarding the importance of the Covid-19 vaccination, which was carried out in collaboration with the Red Cross, Aifa and the Ministry of Health, who made their experts available for a webinar that was attended by approx. 200 people. Also the collaboration with the Onda Foundation - National observatory for women and gender's health – promoter of the project <b>HFC (Health Friendly Company)</b> , placed greater attention on employee health through quality information tools targeted towards acquiring greater awareness about the main gender-specific diseases, mental health and the importance of prevention and the adoption of correct life styles.
	<b>HealthyFood@desk</b>	In addition, employees of the Rome office were also given the opportunity to order fresh, local Km0 produce and have it delivered to them at work.
<b>Family</b>	<b>Parental leave</b>	ENAV gives its new parent employees their fully pay (as compared with 80% from INPS) as well as the possibility to stay at home for 6 months up to the third birthday of the child, receiving 80 % of their salary for the first two months and 40% for the remaining four months (current legislation provides for 30% of one's salary for the entire period of additional parental leave). Important support mechanisms for parents also concern paid leave in the event of illness of their children (specifically, the company pays 50% of salary for the first 30 days, as compared with no salary from INPS) and for the performance of specialist medical services.
<b>Work-life balance</b>	<b>"Solidarity holidays"</b>	All employees can assign a portion of their holidays to the benefit of co-workers experiencing particularly challenging family situations. ENAV has also extended this in favour of those employees who, within their own families, need to assist a parent, spouse, companion or adult child. During 2021 requests for a total of 30 days of solidarity holidays were received, for which 124 co-workers provided 177 days of holidays and RFS. During 2021, in order to promote the participation of employees in the vaccination campaign, 2 additional hours of leave were granted for specialised services.

AREA	PROJECT	ACTIVITIES
Money savings, target: supporting the purchasing power of salaries	<b>Platform for the provision of corporate welfare services</b>	This allows ENAV employees to convert PdR into benefits through the purchase of goods in kind (food, shopping, fuel, etc.) and services (sports & wellness, travel, education, etc.). 14.4% of ENAV employees selected welfare. This platform was also activated for IDS AirNav employees for the use of the corporate welfare bonus provided by the CCNL Metalworking contract.
	<b>“Corporate Benefit” discount portal</b>	This provides ENAV employees with a range of discounts for banking services, insurance, recreation, culture, mobility and fitness. Moreover, other agreements have been entered into directly with companies and organisations that offer particularly favourable discounts for ENAV Group Personnel, with a special focus on those offering products and services with an ethical-environmental vocation (e.g. purchase of electric vehicles, sales of products to reduce food waste).
Combating food waste	<b>Agreement with ThinkAbout</b>	An innovative socially oriented start-up whose NO.W@ (NO Waste) project is designed to assist the drive to reduce food waste, allowing consumers to take advantage of discounted prices to purchase very high quality products that would otherwise be destined for disposal since they are not marketable.
Support for education	<b>Project Open</b>	The children of employees of the ENAV Group who are in their final year of secondary school are given the opportunity to be assisted in the delicate process of choosing a university or beginning their careers in the workforce. An initial phase aimed at exploring and measuring the student’s potential, interests and other personal characteristics is followed by an individual meeting with an expert (psychologist), who provides the student with an orientation report based on the information gathered.
	<b>Project Intercultura</b>	This is a project provided in collaboration with the Intercultura Foundation for the children of ENAV and Techno Sky employees, giving them the opportunity to receive scholarships for studies abroad with a duration of one year, three months or two months. The Intercultura project and the project for didactic visits to ENAV plants were temporarily suspended during the health emergency. Only the activities connected to didactic visits to the plants were restarted at the end of 2021.
Welfare	<b>Shuttle service and parking</b>	Synergies were forged with nearby companies. Notably, the provision of shared services with Istituto Poligrafico and Zecca dello Stato, including parking, and shuttle services, has been particularly well received by the employees of both organisations. Also, an agreement is currently being planned for the use of a company shuttle service (organised and managed by IPZS) providing links to the main Local Public Transport hubs.
Improvement of the Company’s carbon footprint	<b>Project SustainMobility</b>	It is designed to develop electric mobility in the Company by means of the progressive installation of charging infrastructure and electric vehicles nationwide, with rentals available of 10 electric cars in the Company fleet (in addition to 10 in 2020) for a total of 20.

## 5.6 LABOUR RELATIONS

In 2021, discussions with trade unions were substantially focused on topics regarding the possible use by the Company of FIS (Supplementary Wage Fund) in order to mitigate the economic effects deriving from the substantial decrease in assisted traffic as a result of the pandemic crisis. On the same topic, an agreement was signed with trade unions on 10 February that explicitly defines that ENAV may not make use of welfare tools for all of 2021, with instead a substantial use of residual holidays and RFS as well as the calendarised and certain scheduling of 2021 holidays and RFS.

Discussions with trade unions continued on topics concerning COVID-19 and agile working.

For the period under examination, numerous meetings were held with Trade Unions on various operating topics, such as the transfer of APP (transfer of approaches) from radar towers to Area Control Centres (ACC), the possible cases of implementing digital towers in addition to the numerous investigations in various areas following the temporary secondment of CED-ENAV personnel at the Techno Sky subsidiary. With regard to the latter topic, the Trade Unions held three strikes.

As regards strikes, in 2021 Enav Trade Unions held five on a national level with an average participa-

tion rate of 20.84% and seven local strikes with an average participation rate of 71.18%.

In August 2021, a memorandum of understanding was signed in order to define a shared path on the methods of managing the social repercussions resulting from the Industrial Plan, with particular reference to the geographic mobility of operative personnel and course scheduling.

Additional topics addressed with the trade unions during the period under consideration led to the signing of three important agreements regarding the distribution of 2020 PdR (payment in 2021), corporate welfare and agile work, which extends the validity of the Agile Work Regulation to the duration of the current contract.

66 meetings were held with trade unions nationwide and 100 meetings on the local level.

The total number of union members was 2,370 employees, representing 72.92% of the total workforce. The number of registered employees is determined on 31 December each year. Employee requests to join or leave the union, which are made in writing, are collected monthly then processed and transmitted to the competent office that records the request. The data are stored in digital format.

It should also be noted that the collective bargaining agreement applies to 100% of ENAV employees.

With regard to Techno Sky, the general goals pursued refer mainly to maintenance of a positive company climate by means of dialogue and meetings with the trade unions and improvement of management and productivity of the workforce, especially during 2021, which had a gradual, although very slow, recovery of gross passenger revenue and as a result of the entire air transport sector.

The actions put in place to achieve these goals were achieved by developing collaborative and ongoing relationships, composed mainly of meetings that were almost entirely held online.

As a result of the continuous, factual and constructive conversation with the trade unions, in 2021, optimal results were achieved regarding trade union and industrial relations, which led to the signing of various trade union agreements aimed both at containing corporate costs, such as the agreement on the use of holidays, PAR (annual paid leave) and time bank as well as improving safety conditions at work, such as the agreement on work carried out alone at unmanned sites and the geolocalisation of operating personnel.

Particular attention was also paid to the area of technology, monitoring it and informing, in coordination with the company's Technical line, the national and regional trade unions regarding the experimental phase of the new model of technical equipment maintenance (Technical Operation Centre).

The basis was also created for the future project on the harmonisation of the work schedule between Techno Sky and ENAV, with the signature of a memorandum of understanding that defines the objective, times and main operating methods of the trade union council, which will be launched during 2022.

In 2021, there were a total of 313 Techno Sky employees registered with the union, equal to 47.5% of the workforce, in line with the figure for 2020. The number of registered employees is determined on 31 December each year.

In 2021, there was an increase in the number of national strikes concerning the entire air transport industry, for a total of 11 days of strikes, compared with 5 in 2020. As a result, during the year the number of hours of strike came to 192, for a worker participation level of 2.4%, up compared with 2020.

The number of employees covered by collective bargaining agreements of various levels is 658, equal to 100% of non-executive employees.

For Techno Sky, significant organisational changes are notified with appropriate notice, as provided for in the national collective bargaining agreement.

Concerning IDS AirNav, the general objectives pursued refer mainly to the continued integration of the company in the Group's Industrial Relations system, with IDS AirNav now becoming part of the ENAV

Group. Integration is pursued by maintaining a positive climate in the company, with open dialogue and discussions with the Unitary Representative Body for the Trade Unions present (Metalworking and Mechanical Engineering Sector), aimed at improving the management and productivity of the workforce. The actions taken to reach these objectives consist in the development of continuous and collaborative relations, which resulted in agreements that led to signing various agreements, such as the significant use of 2021 holidays and PAR (annual paid leave) and all the residual days from previous years, the extension over the health care coverage already present in other Group companies and finally a supplementary agreement that provides rules for improving the work-life balance as already defined in the Group Regulations on agile work.

In 2021, IDS AirNav had 43 union member employees, equal to 28.3% of the workforce, in line with the figure for 2020. The number of registered employees is determined on 31 December each year. No strikes were called in 2021.

The number of employees covered by collective bargaining agreements of various levels is 152, equal to 100% of non-executive employees.

For IDS AirNav, significant organisational changes are notified with appropriate notice, as provided for in the national collective bargaining agreement.

Future goals	Deadline
(TS) Creation of a trade union council for the harmonisation of the work schedule between Techno Sky and ENAV.	<b>30/04/2022</b>
(TS) Creation of a work group for the update of second level legislation	<b>31/12/2022</b>
(IDS AirNav) Adjustment of Group policies	<b>31/12/2022</b>

## 5.7 REMUNERATION POLICIES

The variable incentive remuneration policy of the ENAV Group differs based on the position held in the organisation, without any discrimination on the grounds of age, gender, disability, race, ethnicity, origin, religion or other.

In relation to the Chief Executive Officer and Managers with Strategic Responsibilities the variable remuneration policy, as defined in the Report on the remuneration policy and on the compensation paid (approved with the binding vote of the Shareholders’ Meeting on 28 March 2021), envisages recognition of both a short-term variable remuneration components and a long-term component, both tied to economic-financial goals and ESG related goals, in the drive to assist the achievement of the results of the corporate strategy and pursue long-term interests in a logic of corporate sustainability. The long-term variable incentives system is based on a Performance Share Plan approved by the 2020 Shareholders’ Meeting, based on three cycles of rolling assignment with a three-year vesting period and annual assignment:

## FOR 2021 THE FOLLOWING GROUP OBJECTIVES WERE ASSIGNED TO THE CEO AND MANAGERS WITH STRATEGIC RESPONSIBILITIES

### SHORT-TERM:

	Weighting
<b>EBITDA</b>	<b>35%</b>
<b>Net profit</b>	<b>15%</b>
<b>Operating performance</b>	<b>20%</b>
<b>Revenue from non-regulated activities</b>	<b>15%</b>
<b>Sustainability indicator*</b>	<b>15%</b>

\* Consisting of 4 independent project objectives with on/off type achievement criterion.

### LONG-TERM:

	Weighting
<b>EBIT</b>	<b>30%</b>
<b>FCF</b>	<b>30%</b>
<b>Relative TSR</b>	<b>40%</b>

A sustainability objective with negative/positive corrective effects and with a maximum impact of 10% on the bonus: For the 2021-2023 vesting period, this objective is related to obtaining the “solicited” ESG rating by 31 December 2023 and the methods for measuring performance will depend on the deviation of the rating scope during the last three-year period.

With regard to the sustainability indicator used for the short-term variable incentives system, the individual project objectives with their respective targets and performance achieved are shown below:

PROJECT OBJECTIVES	TARGET 2021	2021 RESULT
Presentation of an assessment of the Group’s current positioning in terms of diversity and inclusion, both in terms of gender diversity and other forms of diversity, including a gap analysis and action plan to bridge any gaps	Date of presentation of document to the Board of Directors: by 31/12/2021	Document presented to the Board of Directors on 21 December 2021
Extension of the assessment (currently carried out for Scope 1 and 2 emissions) to Scope 3 emissions (indirect emissions along the value chain), by identifying and quantifying the relevant indirect emission categories	Date of presentation of document to the Board of Directors: by 31/12/2021	Document presented to the Board of Directors on 21 December 2021
Participation in the “Science-based target initiative” by requesting validation from the SBTi organisation of the emission reduction target <sup>29</sup>	Date of presentation of document to the Board of Directors: by 31/12/2021	Document presented to the Board of Directors on 21 December 2021
Obtain the ISO 37001 certification	Date of presentation of document to the Board of Directors: by 31/12/2021	Document presented to the Board of Directors on 21 December 2021

In relation to Group management and supervisory personnel, the remuneration policy, which has been consolidated over the years, provides for payment of a short-term variable component anchored to a top-down Management By Objectives (MBO) system: objectives are established in accordance with the strategic guidelines and expressed in terms of activities/pillars based on the various responsibility levels, according to a cascade approach from senior management down to the lower hierarchical levels. The individual objectives are connected to economic factors and specific project areas for the individual positions in the organisation.

**29.** The reduction target approved by SBTi is related to: -70% Scope 1 and 2 emissions, -13.5% Scope 3 emissions.



A selected number of management roles, chosen by the CEO, are also assigned long-term targets in line with the Share Performance Plan created for top management.

In relation to Middle managers, the variable remuneration policy provides for the allocation of individual targets only to a small sample of the population in accordance with the position held and the responsibilities assigned, these objectives are connected to the projects assigned to the responsible management population, with the indicated top-down logic.

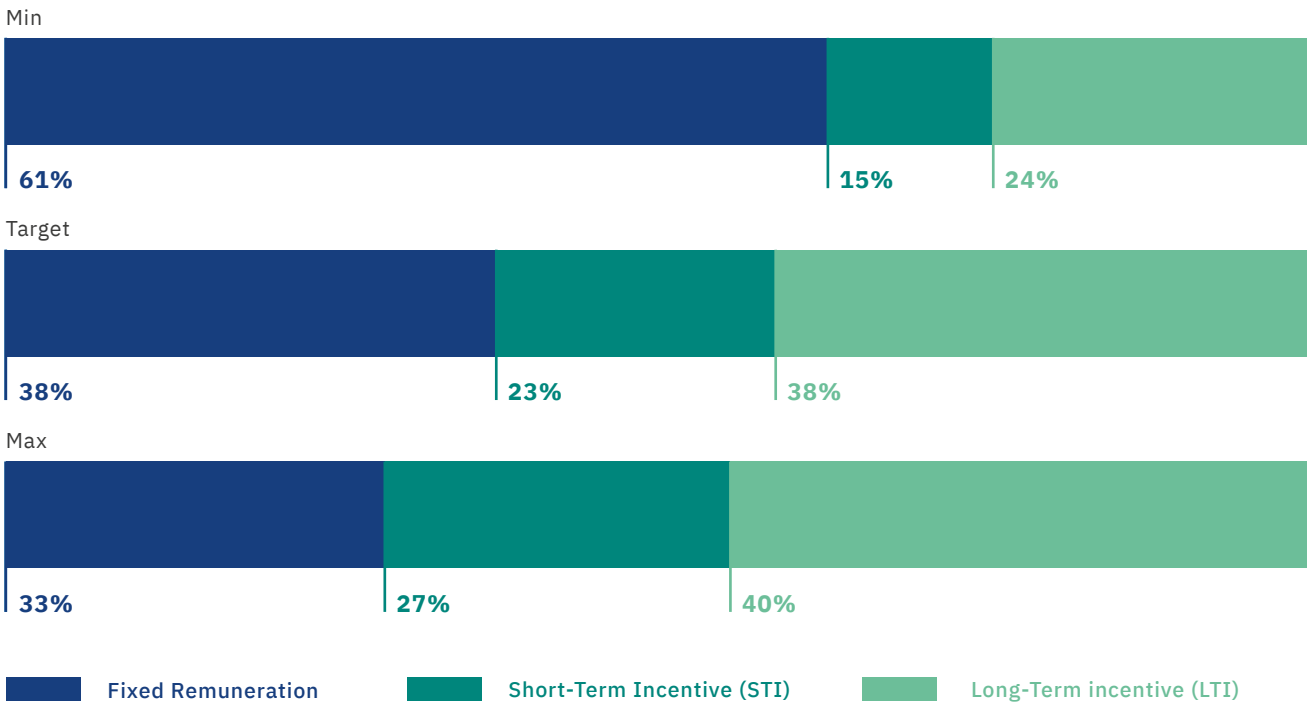
The related awards are correlated with the reference organisational cluster, with a logic of increasing complexity of the office held.

With regard to “non-executive” personnel, the performance assessment process is launched annually in order to acquire information concerning the performance and competences of the personnel who have worked with the Company for more than 6 months in the year.

The process involves the definition, by the *Compensation and Performance Management* unit, in collaboration with the *Labour Cost, Labour Law and Payroll and People Business Partners* units, with lists of all the Group resources (ENAV, Techno Sky and IDS), that offer the necessary requirements to enter and become part of the scope of people to be assessed. The employees concerned and their evaluators are selected in accordance with their possession of specific individual qualities.

Subsequently, the technical skills and performance evaluation and validation process is launched and managed by means of a specific tool. Following the evaluation process, the *Compensation & Performance Management and Careers, Learning & Development* units, with the support of the *HR managers*, promote “calibration” sessions with the first and second-level supervisors in order to make the evaluation metrics as consistent and objective as possible and to identify potential areas of action for individual employees in terms of management (e.g. training, job rotation, or assessment) or salary.

### Chief Executive Officer



## Manager with Strategic Responsibilities

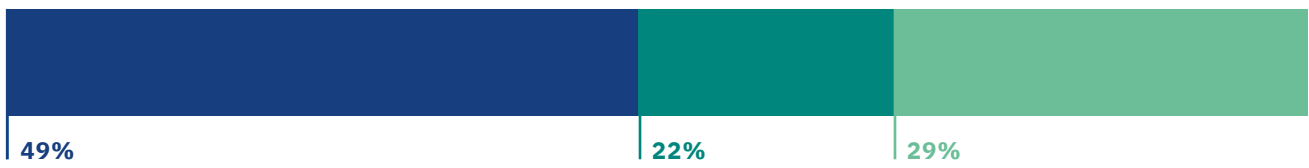
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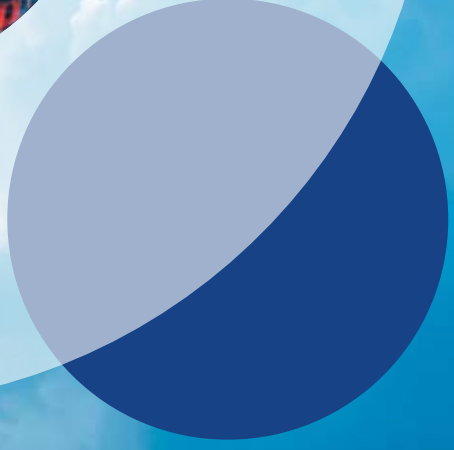


 Fixed Remuneration       Short-Term Incentive (STI)       Long-Term Incentive (LTI)



## **06 • SAFETY, INNOVATION AND DIGITALISATION**







## 6. Safety, innovation and digitalisation

### 6.1 TECHNOLOGICAL INNOVATION AND DIGITALISATION

The ENAV Group is a strategic resource for Italy, one in which innovation, technological development and professional growth are the drivers used to make the most out of all assets.

The development of the operating model, the digitalisation of the Company, the development of new abilities and new business lines, such as drones and new services for the foreign market, create the conditions for relaunching the Group towards increasingly ambitious results compared to those achieved thus far.

The most important projects related to the topic of environment, and above all the *Free Route*<sup>30</sup> (a flight infrastructure digital innovation project that allows airlines to select the shortest flight trajectory and that has produced and produces every day significant advantages for the airlines and the environment), the implementation of the systems for Satellite Navigation and ACDM (for the reduction in harmful emissions when taxiing aircraft on the ground) are the result of investments that have made ENAV a leader in the international field.

In particular, these investments were dedicated to:

#### INNOVATION OF INFRASTRUCTURES

*Participation in experimental programmes for the implementation of new Satellite Navigation systems, which are programmes that permit free route navigation and that together with new operating procedure design techniques (PBN), are already making it possible for ENAV to decommission obsolete ground infrastructures whose performance has been widely surpassed by the resulting innovations.*

#### DIGITALISATION OF COMMUNICATION

*Replacement of printed communications between controllers who work in the same control tower with information displayed in real time on the radar screen in their work station (EFS – Electronic Flight Strips).*

*With the new Datalink system, the digital and traditional communication - ground-air-ground radio - are integrated, which makes it possible to reduce the risk of misunderstanding radio communications between controllers and pilots.*

#### INTEROPERABILITY OF THE PLATFORM

*The management of air traffic needs to be fluid and efficient, also on a supranational level. For this reason, different entities (service providers, airlines, airports, military) must be able to coordinate their data in real time in order to easily cooperate for flight management.*

*COFLIGHT: a system developed with the French DSNA that makes it possible to further improve the system for the automation of operations, and can be virtualised to provide the service remotely.*

30. The Free Route project is described in detail in the paragraph “We support our customers in becoming more efficient and sustainable: Flight Efficiency Plan and Free Route” in this document.

Thanks to the innovation and constant professionalisation of resources, the ENAV Group, the first among European Service Providers, has revolutionised the methods for crossing Italy’s air space. In addition to the described activities (in particular, the Free Route), the ENAV Group is working on other innovative projects that will revolutionise our sector.

<p><b>REMOTE TOWER</b></p> <p><i>Air traffic at low density airports will be managed by remote control towers that will be concentrated in two control centres at a national level. In this way, the airports will be able to operate 24/7, with a lower use of resources and energy, opening up to the needs of the airlines for flexibility, thereby making Italy’s national economic system more attractive</i></p>	<p><b>ARRIVAL MANAGEMENT SYSTEM</b></p> <p><i>This system will indicate to the controller the optimum sequence calculated for separating incoming aircraft at congested airports, thus enabling an important recovery of consumption and a further reduction in delays</i></p>
<p><b>SATELLITE SURVEILLANCE - AIREON</b></p> <p><i>AIREON, of which ENAV is a shareholder, provides satellite surveillance services that make it possible for airlines to optimise their flight profiles in areas that are not covered by traditional surveillance, enabling an optimisation of consumptions</i></p>	<p><b>CONSOLIDATION OF APPS (APPROACHES)</b></p> <p><i>The consolidation of the approaches into Area Control Centres will optimise the approach procedures</i></p>

From the point of view of technologies, the ENAV Group is concentrating its efforts on the use of the most advanced techniques for the analysis and management of flight data, to examine the possible passage from the level of predictive capacity to the higher prescriptive one. An example of this is the CORA project (Conflict Resolution Advisory) project, which is one of the cutting edge functionalities of en route air traffic control systems. With the present-day capability to report possible conflicts in the trajectories indicated by the aircraft, this system will add the level of “suggestion” with respect to the better and more efficient trajectory to follow in order to avoid conflict.

Speaking of innovation and a sustainable future for the Aviation sector, the development of drones is the last frontier in the development of air traffic.

These vehicles will be increasingly used for the transport and delivery of goods, emergency medical assistance, environmental monitoring, mapping of territory, precision agriculture, inspection of critical infrastructures, and much more still, and all will have to be managed in maximum safety conditions.

For these reasons, in partnership with Leonardo S.p.A. and Telespazio S.p.A., ENAV has launched D-flight, the only platform in Italy and one of the first in Europe for the provision of services to remotely piloted aircraft and to all other types of aircraft that fall into the category of unmanned aerial vehicles (UAV).

Considering the importance of these instruments and considering the amount ENAV is investing, the chapter “A new sustainable challenge: drones” is dedicated to this argument.

Innovation, digitalisation and technological evolution are therefore the means that ENAV has to create an infrastructure that generates safe, sustainable and high-quality solutions in the area of UAVs. This is the objective: to enable the use of drones for business and socially relevant activities, ensuring the integration and coexistence of this new form of transport with the needs and safety of traditional air traffic.



## 6.2 SAFETY AND SECURITY

Safety and Security play a strategic role for the company, not only as cornerstones of the core business of ENAV, but also for the stakeholders with which it interfaces. The continuous control of both aspects is guaranteed thanks to the constant commitment of professionals who keep safety and security levels high. It is our people, in fact, who make the difference, working towards a common goal: the safety and security of passengers, infrastructures, information and all company employees. The concept of protection is applied, in all of its facets, both inside as well as outside the company and is an intrinsic value of our strategies and reflects the *modus operandi* of the organisation. Continuous investment in skills, innovation and emerging technologies makes it possible for us to understand and respond to the complexity of the context in which we operate and to engage with our stakeholders in a structured and constant manner.

There is a strong interdependence between the concepts of Safety and Security relating to the risk of an aeronautical accident and aspects of continuity.

In the traditional conceptual model, Safety deals with the measures to be taken to mitigate the risk of an aeronautical accident due to unintentional acts, while Security deals with the measures to be taken to mitigate the risk of an aeronautical accident due to intentional acts.

This model is progressively evolving with the recognition that user's unintentional negligence, imprudence (such as an involuntary failure to implement a precautionary Security measure) or inexperience (incorrect configuration of systems, a deficiency in the Security measures) are elements that fall under Security, as they can result in vulnerabilities in the ATM system that can be exploited by third parties, generating a potential impact on Safety.

### Security

Fundamental attention to people and the service of public value are essential terms of reference for Group Security, which is focused on the *duty of care* from an ethical point of view, more so than regulatory, as its aspiration. From this point of view, respect for human rights, the promotion of the value of service and protection of operational continuity are the drivers of our security initiatives for the management of potential risks regarding physical safety, personality of individuals and their basic freedoms, as well as the protection of information linked to Company operations.

The above is part of the Group's sustainable development strategy. In order to contribute even more effectively to the targets of the 2030 Agenda, the ENAV Group has declared the priority of the goals of **protection of personnel, infrastructures and information** from acts or events that risk being adverse for:

- the primary interests in the Italian constitutional order;
- the safeguarding of the public interest entrusted by law to the corporate structure (also due to the nature of the Parent Company as a "critical infrastructure"<sup>31</sup> and "essential service operator"<sup>32</sup>);
- the protection of the country, the entire collectivity and the community that make use of the Group's services, thereby contributing towards the defence of public safety and security of civil aviation.

31. Legislative Decree No. 61 dated 11 April 2011, "Implementation of Directive 2008/114/EC on the identification and designation of critical European infrastructures and the assessment of the need to improve their protection"

32. Legislative Decree No. 65 dated 18 May 2018 "Implementation of Directive (EU) 2016/1148 of the European Parliament and of the Council of 6 July 2016 concerning measures for a high common level of security of network and information systems across the Union", including with reference to art. 4 of law No. 242 dated 23 May 1980.

## THE ENAV GROUP SECURITY POLICY

This policy expresses the Group's commitment to ensure the security of the Group's systems, personnel and systems, as well as the data and information they contain

Its objective is to prevent any undue interference in the provision of air navigation services, and, the violation of the availability, integrity and confidentiality of corporate information

The Security Policy recognises the central value of the duty to protect as a reflection of the corporate social function (art. 41 of the Italian Constitution) and to enhance the human factor and the protection of labour and of workers

In 2021, activities continued for the supervision of security, which the development of logic that is strongly anchored in the *duty of care*, not only internally – towards personnel, infrastructures, information, network systems - but also externally to protect the public interest as assigned by law to the Group and, in particular, to ENAV S.p.A.

Security management is in fact based on risk management, which is carried out by means of an iterative process that is defined methodologically through the implementation of international standards, and which involves the entire organisation, as well as the entire *supply chain*, through the implementation of a principle of partnership and the sharing of objectives also with suppliers. Suppliers are therefore required to comply with the security measures that distinguish the “duty of protection” that has been entrusted to ENAV.

### **Security Management System**

Security activity is based on a risk management analysis process built using the ISO 31000 standard that, on an annual basis, covers the three security domains (physical, personnel and information) from a Group perspective, using a process inspired by the principle of continuous improvement.

The Group Security Management System which, as regards the security of the information and data of ENAV and IDS AirNav, is certified by a Certification Body pursuant to UNI ISO/IEC 27001:2014 standard, was developed further.

The Group's Security Management System confirms, in general, the goals of:

- increasing the overall ability to prevent and mitigate, first of all, the negative effects generated by acts of illicit interference in the supply of air navigation services;
- protecting ENAV's employees and information assets;
- participating in the goals of security, resilience and national defence, especially from a historical and geopolitical framework of considerable tension and potential uncertainty in which the demand for the security of citizens is intense and legitimate.

## The main processes of the Security Management System

The operative component is supported further by the two Security Operation Centres – for the security of information and physical security - which were enriched further by functions to better express the potentials in the entire life cycle of the security process.

<b>RISK MANAGEMENT</b>	This is a process that identifies risks i) for the Security of the ENAV Group, ii) for the security of the systems, personnel and information that the Company receives, produces and uses. The process plans and implements the countermeasures for reducing Group risks to an acceptable level.
<b>INFORMATION CLASSIFICATION</b>	It supports the correct application, within the context of the business as a whole, of the rules and principles pertaining to the confidentiality of information by means of defining the confidentiality classification level and determining the persons authorised to process information, both within the organisation and on the outside.
<b>PHYSICAL SECURITY MANAGEMENT</b>	This process aims at avoiding unauthorised access, damage and interference to Group’s staff, technological infrastructures and property by means of protective measures that are commensurate with the nature of the structures, the type of services performed, its personnel and, more generally, the risk analyses carried out on the specific installation.
<b>MANAGEMENT OF LOGICAL ACESSES AND DATA BACKUP AND RECOVERY</b>	The purpose of the management of logical accesses is to prevent unauthorised accesses to the IT resources of the ENAV Group. The backup and restore activities – operational continuity measures – guarantee the availability and integrity of the information for the pursuit of the Group’s mission.
<b>SECURITY EVENT MONITORING AND ICT SECURITY AUDITS</b>	The activities for monitoring the level of security of the ICT infrastructures aim to identify any abnormal behaviour and, in the event of an attack or threat, to activate the security incident management process. Conversely, the ICT security audits verify whether ICT assets comply with the mandatory rules, the “ICT Security Policy”, the Rules of the Security Management System and the applicable security standards.
<b>REPORTING AND MANAGING SECURITY INCIDENTS</b>	The main objectives of the incident reporting and handling process, which are common to the entire Group, are the timely identification of security incidents, the provision of what is necessary to prevent Security-related incidents from causing greater effects in terms of extent and/or intensity of damage, the elimination of the causes of the original incident. The <i>Security Operation Centre</i> is responsible for this.
<b>THREAT INTELLIGENCE</b>	This activity seeks to identify potential threat vectors in advance and to adopt technical, organisational and process countermeasures in real time.
<b>MANAGEMENT OF THE SECURITY OF PERSONNEL WORKING ABROAD</b>	A process has been defined and formalised that, during the activities carried out by the Group abroad, accounts for the short-term and environmental condition in which work will be carried out, preparing specific protective measures and planning of emergency and crisis measures.

## SECURITY OPERATION CENTER

The functions of the ENAV Group's Security Operation Centre were extended and integrated with those of the *Computer Emergency Response Team* (CERT), thereby increasing the capacity for anticipated detection of monitoring and response. The choral effort of the technological and supervisory components of the Group have facilitated the ability to meet the Security challenges set by the massive recourse to agile working, by developing strong initiatives in terms of growth in awareness and in the Group community culture, and by carrying out strong supervisory action, in particular in the context of the ongoing pandemic.

In this context, specific initiatives were launched, including ones with a non-conventional nature – such as surprise drills and on the job training – with the declared objective of enhancing the critical spirit of the users, soliciting their attention and stimulating the processing of reporting security events, with very satisfactory results indeed.

The *Security Operation Centre* for physical security and the *Information Security Operation Centre* cooperate actively to be able to effectively understand the overall situation by collecting and analysing the “faint signals”, indicators of potential attack vectors, which are fully integrated into the national security strategy, and which has been recently reinforced by the creation of the National Agency for Cybersecurity

The protection of employees is also expressed by protecting them actively when working abroad, with monitoring and response activities as well as specific training and information activities, which also cover the aspects of understanding cultural diversity and imprinting with respect to the host territories and population.

### ***Policies and initiatives concerning the protection of human rights in the activities carried out***

By protecting its personnel, infrastructures and enabling technologies, the ENAV Group defines the clear objectives of prevention, containment and response to those events that could negatively impact the physical persons as well as the continuity of the service provided. This remains an expression of the public value entrusted by the national and European legislator, working for the purpose of responding to the legitimate expectation of the service community, citizens and companies for the prevention of security risks and the effective containment of any negative consequences, with the responsible awareness that it is not possible to obtain 100% security.

The process of creating investment plans and the annual budget fully takes into account the needs for security. Furthermore participation in relevant security processes and the concrete expression of risk management is present transversally and involves every organisational component of the Group. The Security management system is periodically reviewed by high management, who directly participate in supporting the operative initiatives, and is subjected to periodic, independent examination by certifying bodies and public authorities, who are required by law to use factual elements to measure the effective and efficacy of the management system.

### ***Degree of involvement of Security in company processes***

Today, security represent a domain of advanced maturity and actively cooperates with the other areas of risk - in particular with Safety - to reach the objectives of overall security, in the provision of services provided by the Group and for the protection of people and assets, both tangible and intangible, which make up overall the Company's assets.

Due to the effect of the Security Policy and the body of rules and procedures, but especially due to the effect of the greater awareness of the organisation, Security is decisively integrated in all corporate processes, and by design is included in all investment actions, including the provision phases as well as company and institutional relations

The indicators of efficacy of the security management system in place also guarantee the possibility to measure this involvement, which today is also part of a specific regulatory obligation.

Future goals	Deadline
Reinforcement of the security culture, as a constant, iterative process	<b>Annual measure on 31.12</b>
Integrated management of supply chain security processes, which particular concern for critical suppliers or supplies with an impact on the objectives of security and operational continuity	<b>31.12.2022</b>
Implementation of the technological and process security measures defined in the national cyber security safety strategy	<b>31.12.2023</b>
Review of the operating model for the travel security processes	<b>31.12.2022</b>

## Safety

ENAV considers the operational safety level of air traffic control and air navigation services an essential priority. The same applies to operating efficiency and the seamless availability of installations, systems and software used to that end.

Through specific processes, ENAV prevents air accidents and incidents in relation to direct/indirect ATM, correcting and controlling the conditions and precursor behaviours, assessing risks and possible mitigation interventions so that an acceptable level of exposure is achieved and maintained. ENAV also monitors its own performances, verifying the efficiency of Safety processes adopted and ensuring, together with specific activities, the maintenance of personnel skills and the sharing of information relevant to Safety inside and outside the organisation, at the same time reconciling the interdependence of the various performance areas with as many specific performance targets identified at European level for each ANSP/Member State.

### SAFETY POLICY

*The Safety Policy is the formal statement in which the Company ensures the clear definition of the responsibilities of Safety and makes sure that the personnel involved in carrying out Safety-related activities have the necessary skills, the required training and a full awareness of their role*

### JUST CULTURE POLICY

*The Just Culture Policy is a vital and enabling element of the Safety occurrence reporting system: by adopting a “No blame” approach, i.e. by accepting the honest mistake without in any way sanctioning it, ENAV ensures that human resources can work in a climate of trust and free circulation of information useful for the prevention of air incidents and accidents*

## Safety Management System

In compliance with the requirements of Regulation (EU) No. 373/2017, ENAV has adopted a Safety Management System (SMS) with which it ensures a formal, explicit and proactive approach in the systematic management of Safety organised on the basis of the following main processes:

<b>Planning of Safety improvement</b>	This is an activity through which management sets targets and monitors the process of continuous improvement of Safety.
<b>Verification in the context of the Safety Management System</b>	This is an internal verification system for monitoring the level of application of SMS procedures in the various Company structures. The objective of this activity is also to verify the suitability of the processes established and propose changes, where deemed necessary.
<b>Reporting and analysis of Safety-related events</b>	This is an activity through which the reporting and investigation of Safety-related events is implemented. The investigation must be completed within 90 days with the issuing, where necessary, of Safety recommendations for the competent organisational units.
<b>Safety assessments of the changes to the ATM functional system</b>	This process assigns the task of carrying out a preventive analysis of the risks connected with the introduction of changes in the ATM system. Each proposal for change is analysed to evaluate the impact of Safety and to define possible mitigations.
<b>Safety training</b>	With this process, the training needs of Safety actors (the people that have a role in the management of Safety activities) are defined and the training is provided.
<b>Safety monitoring</b>	With this activity, the indicators and targets needed to measure the organisation's Safety performance are defined. Said parameters are monitored during the year through the production of a report for management.
<b>Safety promotion</b>	Continuous improvement in Safety is not possible if a suitable Safety culture is not present in the organisation. This process assesses, also with periodical surveys, the level of Safety culture at organisational level and proposes initiatives to reinforce it.

ENAV's Safety Management System is constantly updated and practised by each Company component with the purpose of:

- ensuring that risk of a possible contribution by the ANS (Air Navigation Services) to an air incident or accident is minimised, as far as is reasonably possible;
- guaranteeing air traffic management that is functional to the long-term needs of Clients, Stakeholders and the system of European and national Air Transport;
- increasing the efficiency of investments and, in general, of design activities, identifying, in good time, the safety requirements (safety by design) that enable the achievement of Company targets.

### Continuous monitoring of Safety

Safety monitoring occurs by measuring specific indicators and makes it possible to have updated information on the status of safety and to identify promptly any measures that might be needed to ensure the Safety of services supplied.



## Key Performance Indicators (KPI)

As regards the third Reference Period RP3 (2020–2024), Reg. EU 317/2019 has defined as the single Safety Key Performance Indicator (S-KPI) the *EoSM: Effectiveness of Safety Management*, that is the level of effectiveness of the Safety Management System.

It is divided into the following 5 Management Objectives, which in turn are measured on an increasing scale from A to D:

-  **Safety Culture**
-  **Safety Policy and Objectives**
-  **Safety Risk Management**
-  **Safety Assurance**
-  **Safety Promotion**

the EoSM score must reach the following minimum targets to be considered suitable for the requirements of Reg. EU 317/2019 by 2024:



## The main Safety activities

The restructuring that ENAV has implemented regarding its services in order to face the slow, but gradual increase in air traffic in 2021, was evaluated and updated over time based on the connected change in the associated Safety risks.

Actions involving the ATM functional system (people, procedure and equipment), specific risk assessment activities that are closely correlated to the performance areas of Capacity, Environment and Cost Efficiency, guaranteed the anticipated and expected positive results for the Safety performance area.

Other specific activities made it possible to:

- analyse 4187 Safety occurrences in 2021;
- finalise the Safety Risk Management process that involves the development of Unit Safety Cases

for 40 entities(4 Regional Control Centres and 36 Control Towers) that provide the Air Traffic Control service. The Unit Safety Cases provide capillary monitoring of the state of health, in terms of Safety, of the services provide to the user by the individual territorial units;

- analyse, thanks to the methodology based on the use of quantitative Risk Models, the changes to the ATM functional system;
- start, in December 2021, the second phase of the NOSS project - Normal Operations Safety Survey at the Padua area control centre. The NOSS is a methodology that analyses performance in terms of Safety, using observations in “normal operations” mode to identify the strengths and weaknesses of the air traffic management system. Specifically, the programme involves the performance of approx. 120 observations that each last an hour on average in all operating sectors of the Centre;
- prepare the new ENAV Safety Plan for 2022 – 2026. The document indicates the strategic objectives the ENAV Group must pursue to ensure reaching the Safety performance levels set forth in Reporting Period 3 (RP3).

Future goals	Deadline
Realisation of a new Safety Culture Survey	<b>2022</b>
Extension of the NOSS process to other Organisational Units	<b>2022</b>
Implementation of a Safety Dashboard, which allows the operating managers to monitor the Safety performance in real time and not by means of periodic reports	<b>2022</b>

### ***Degree of involvement of Safety in company processes***

Safety is completely integrated in corporate processes.

As regards proactive Safety, for example, ENAV started using a quantitative risk assessment system in 2020. This approach, which complies with the new regulation on the certification of ATM/ANS services (Regulation EU 2017/373), is based on the definition of risk models (prepared with the contribution of Eurcontrol and the FAA) that make it possible to not only evaluate the impact of the changes, but also to identify and monitor the risks of each individual Territorial Unit. This latter activity is carried out through the definition of appropriate Unit Safety Cases. Each of them includes the analysis of around 120 elements that constitute the ATM Functional System, which integrates the Human, Equipment and Procedure components, the analysis of ATC barriers that conserve the Safety of the services provided and the analysis of the residual risk with the possible identification of additional mitigation measures, where relevant.

As regards reactive Safety, each occurrence reported in accordance with Reg. EU 276/2014 is properly investigated and all safety recommendations are addressed to the pertinent ENAV organisational structures.

The monitoring of Safety performance and the planning of the actions necessary to strengthen it is carried out, on a strategic level, by the Safety Review Board comprised of top management and chaired by the Chief Operating Officer.

## 6.3 INVESTMENTS

ENAV invests heavily to ensure that assets supporting air traffic management services in Italy are consistent with the objectives of technical, financial and performance requirements, and that they comply with quality and performance standards established at national and international levels.

In line with technological changes that are occurring internationally in the sector, ENAV has crafted a technical operations development plan with the aim of remaining competitive on an international stage and maintaining its leadership in technological innovation, in keeping with the Single European Sky requirements.

The Business Plan envisages investment in innovative technological platforms and systems for air traffic control for the 2020-2024 period in order to maintain high levels of performance and to ensure maximum safety.

The international situation ensuing from the pandemic has conditioned the plan, diluting its effects for 2020 and 2021, yet maintaining important objectives for some initiatives, including:

- the consolidation of the APP in ACC, a project that entails a shift of the management of approach procedures in several airports towards the competent ACCs, thus obtaining an optimisation of resources;
- the new 4flight system, a new-generation operational platform that will be implemented following a new approach to development and maintenance;
- the upgrading of the airport weather observation systems to align it with the new regulations and to gradually implement the automation of producing weather reports;
- the building of a Technical Operation Centre (TOC) to support changes to ENAV's maintenance processes, which goes beyond the current peripheral maintenance model in favour of a new centralised model that fully exploits all the new virtualisation, remotization and communication technologies by fully integrating information, resources and processes;
- the realisation of Remote Towers, which make it possible to manage the traffic of a certain airport from a remote management centre;
- implementation of new management systems for the Airport Towers of strategic airports;
- implementation on the current air traffic management system (SATCAS) of interventions to improve performance and safety;
- the new E-NET 2 network with multiprotocol label switching technology, capable of making data transmissions faster and more secure. This infrastructure forms part of the foundation for the establishment of remote control towers.

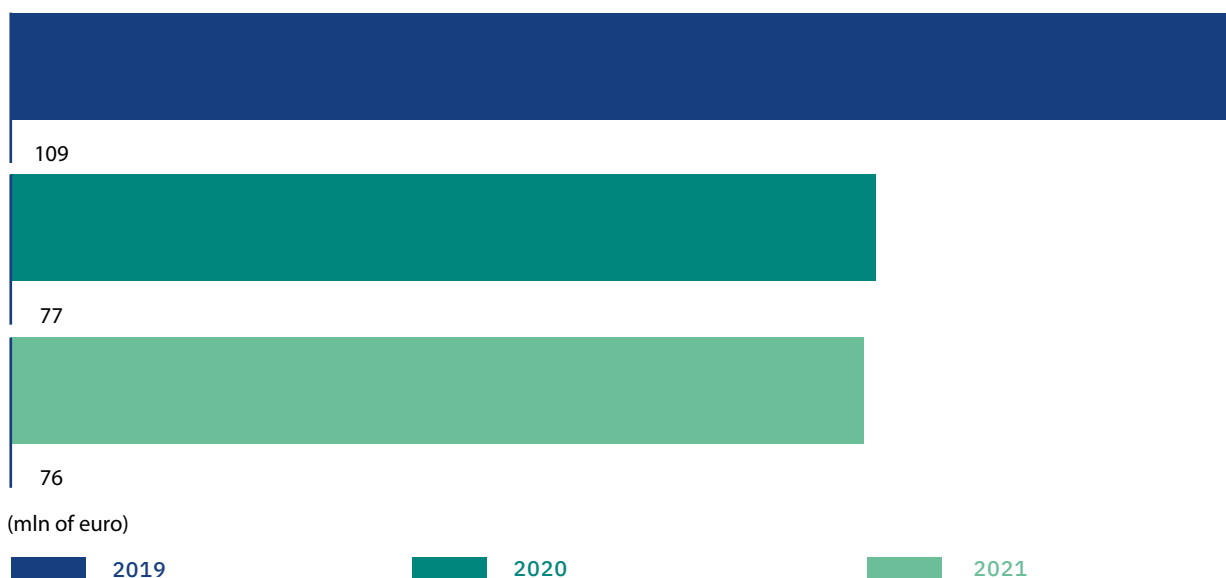
On the basis of the development strategies, having as their primary objective the support of air traffic management services in the national territory, in 2021 the ENAV Group invested overall approx. € 76 million through implementation and maintenance projects for operational technological infrastructures, evolution of the ATM technology platform with new operational concepts, infrastructure, equipment and management information systems, with total investments that amount to approximately € 85.6 million.

During the year investments were made to carry out numerous projects, including:

- progress in the development of the new ATM (4Flight) platform, with testing of version B2+;
- progress in the development of the new Flight Data Processor Coflight, with testing of version V3.5.1;

- absorption of the APPs of Ronchi dei Legionari, Lamezia Terme, Verona and Bari into the ACCs of Padua, Rome, Milan and Brindisi respectively;
- activation of the first islands of the Technical Operation Centre (TOC): ticketing island, ATM island, Datalink island, ENET island;
- activation of the new logistics management system (HAL);
- activation of the new MFU room;
- upgrading of weather observation systems with alignment of the SW version with regulation 373, with the possibility of issuing METAR Auto weather reports in 10 airports;
- testing of the Local Digital Tower system at the airport of Brindisi, with identification of the requirements for operations;
- activation of the virtualised DataCenters of SIO and DC-OPS;
- progress in the development of the AMAN system (Arrivals sequencer) for the ACCs of Rome;
- activation of new routing equipment and multifrequency sites of the Datalink network;
- upgrading of airport and en route radio-navigation aids (Ancona, Olbia, Cagliari), upgrading of the former military airport in Brindisi (TBT activation, new VCS, ILS, restructuring of the radar building) and Treviso (new CWP radar).

## Investments in infrastructures



Main projects realised divided by objective:	Business	Safety	Security	Quality of service
Consolidation of APPs (Approaches) into ACCs <sup>33</sup> : • Implementation of the SW infrastructure and of the communications components for the absorption of the APPs of Ronchi dei Legionari, Lamezia Terme, Verona and Bari into the ACCs of Padua, Rome, Milan and Brindisi respectively	X			X
4-Flight system <sup>34</sup> : • Progress in the development of the new ATM (4-Flight) platform, with testing of version B2*	X			
Upgrading of airport weather observation systems <sup>35</sup> : • Upgrading of weather observation systems with alignment of the SW version with regulation 373, with the possibility of issuing METAR Auto weather reports in 10 airports		X		
Realisation of the Technical Operation Centre (TOC) <sup>36</sup> : • Activation of the first islands of the Technical Operation Centre (TOC): ticketing island, ATM island, Datalink island, ENET island (HAL)		X	X	X
Realisation of remote towers <sup>37</sup> : • Testing of the Local Digital Tower system at the airport of Brindisi, with identification of the requirements for operations	X			X
Activation of the virtualised DataCenters of SIO and DC-OPS <sup>38</sup>	X		X	X
Implementation of new management systems for the Airport Towers of strategic airports: • Progress in the development of the AMAN system(Arrivals sequencer) for the ACCs of Rome	X	X		X
Implementation of the current air traffic management system (SATCAS) for interventions to improve performances and safety	X	X	X	
Activation of new routing equipment and multifrequency sites of the Datalink network		X		X

- 33.** a project that entails a shift in the management of approach procedures in several airports towards the competent ACCs, thus obtaining an optimisation of resources.
- 34.** A new-generation operational platform that will be implemented following a new approach to development and maintenance.
- 35.** The goal is to align the airport weather system to the new regulations and gradually implement the automation of producing weather reports.
- 36.** The goal is also to support changes to ENAV's maintenance processes, which goes beyond the current peripheral maintenance model in favour of a new centralised model that fully exploits all the new virtualisation, remotisation and communication technologies through the complete integration of information, resources and processes.
- 37.** This goal will also make it possible to manage the traffic of a certain airport from a remote management centre and will also have long-term environmental impacts, with a reduction in consumption and as a result in emissions.
- 38.** This goal is part of the upgrading of the basic infrastructures in order to improve business continuity.

## 6.4 THE FLIGHT INSPECTION SERVICE FOR SAFETY IN THE SKY

In line with the objective of putting airlines in the condition of flying in compliance with the highest levels of safety, ENAV, through its own fleet of aircraft, carries out a detailed check of the quality and accuracy of radio-electric radio aid signals both at national and international level (Radar, VOR, DME, VDF, ILS, GNSS, etc.). It also validates flight instrument procedures, thus providing pilots with the assurance of having safe and efficient navigation thanks to ENAV's Flight Inspection and Validation Service.

The mission of the Flight Inspection and Validation unit is to ensure the maximum reliability of air navigation aids and enable carriers to operate safely and efficiently.

General objectives:

- to fulfil the obligations of diligence and the guarantees imposed by international, European and national regulations in order to safeguard the assets and interests of primary rank involved in the provision of air navigation services;
- to protect personnel, infrastructures, and technological systems from acts of illicit interference and actions or events, whether or not deliberate, that may interfere with the availability and integrity of information.

The control activity is carried out by 14 pilots and 7 technicians on board (FIO) through a fleet of 4 Piaggio Aero P180 Avanti II aircraft owned by ENAV. The crew is usually composed of 2 pilots and 1 FIO, averaging more than 1,300 flight hours per year. These specially equipped aircraft can perform in-flight checks without the need for ground-based apparatus, obtaining results in real time and at all times in observance of international regulations.

ENAV's Flight Inspection and Validation Service is also involved in research: the aircraft in the fleet are used as technologically innovative laboratories where tests are carried out for the experimentation and validation of new ATM projects.

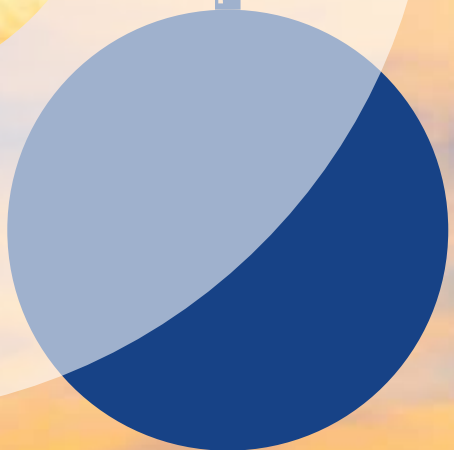
The high level of performance achieved by the Flight Inspection and Validation unit is also testimony to the fact that, in 2021, a year still characterised by the health care crisis deriving from COVID-19, flight activity produced increased 8.4% on a national level and 6.5% overall compared to the previous year, of which approximately 35% was sold to external clients and of this approximately 85% to foreign clients, thus managing to ensure the provision of the service for all of our clients abroad.





## **07 • A NEW SUSTAINABLE CHALLENGE: DRONES**





## 7. A new sustainable challenge: drones

Climate change, pollution and the intensive exploitation of natural resources are threatening the health of the planet. Given this situation, an increasing amount of attention is being placed on the impact that human activities have on the environment and the territory and, as a result, the requirement for innovative systems is being increasingly urgent in order to limit waste, reduce pollution, avoid diseconomies connected to rapid and disorderly growth, create new sustainable development models to the benefit of today's generations and, above all, future generations.

This is where the development of drones comes in, considering that various services can be created, modulated or redesigned through the use of remotely piloted aircraft. Applications are possible in numerous sectors and areas of action: the management of public order, urban safety, logistics activities, agricultural innovation, monitoring of weather conditions, infrastructures, networks and all those territories that are very large or complex to reach.

All these applications make it possible to save a considerable amount of time and resources, and will provide various advantages in the transport sector, which is very carbon-intensive.

For all these reasons, ENAV has decided to invest in the creation of a new group company, **D-Flight S.p.A.**, which pursues the development and provision of services for air traffic management for low-flying remotely piloted aircraft (RPA), for all the other types of aircraft that are considered *unmanned aerial vehicles* (UAV) and all the actives connected with them. Through the development of the U-space platform, which allows for drones to be safely integrated into the civil air space, and based on the provision of various services dedicated to its operators, such as the registration, authentication, identification and management of flight applications and support for mission planning, flight monitoring, emergency management and the recording of flight data, ENAV intends to provide its essential contribution to the development of this innovative form of mobility, guaranteeing above all, as it is in its DNA, the safety of flight operations.

U-Space is the air space below 150 metres, considered as the key element for the safe use of drones in every context and for all types of missions. U-space services evolve in parallel to the level of drone automation and guarantee advanced forms of interaction with the environment (including aircraft with and without a crew), through the exchange of information and digital data.

A continuously increasing number of drones are expected to be used (by 2050 it is expected that about 7.4 million drones will fly in the European skies) in a growing number of industrial and civil areas.

The objective of D-Flight is therefore to integrate and make these new needs coexist with traditional aircraft, while keeping the entire air space safe. Our *Vision* is a world in which drones are common objects that are fully accepted in the daily life of all citizens, which are safely used in urban environments and offer services that are increasingly efficient, innovative, economic and above all sustainable.

For these reasons, we are working with national authorities to accelerate the development and implementation of technologies, infrastructures and services able to make the autonomous flight of drones possible in any permitted operational scenario, with complete safety and efficiency.

Therefore, D-Flight wants to actively contribute to the realisation of this vision by supplying enabling technologies that permit the progressive performance of the operations in increasingly complex and challenging operational scenarios.



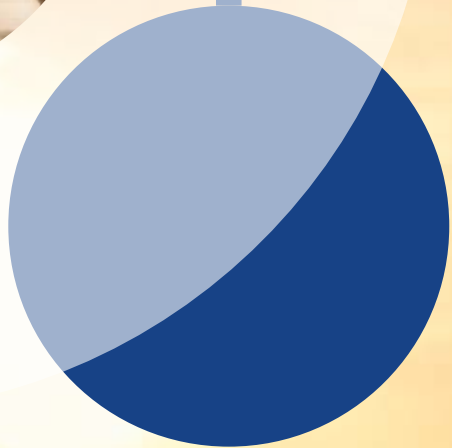






# ANNEX







## Annex 1 – Non-financial indicators

### THE ENAV GROUP

**Table 1. Group size. [GRI 102-7]**

Organisation size	u.m.	2021	2020	2019
Reclassified Group revenues	€000	836,579	771,295	902,891
Total liabilities and equity		<b>2,356,115</b>	<b>2,191,412</b>	<b>2,111,129</b>
Liabilities		1,193,034	1,105,945	955,086
Equity		1,163,081	1,085,467	1,156,043

**Table 2. Total number of individuals within the governing bodies<sup>39</sup> of the companies by age group and gender. [GRI 405-1]**

Members of the governing bodies (headcount)	2021						2020						2019						
	Male		Female		Total		Male		Female		Total		Male		Female		Total		
	no.	%	no.	%	no.	%	no.	%	no.	%	no.	%	no.	%	no.	%	no.	%	
less than 30 years old	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
between 30 and 50	5	25	3	15	8	40	3	15	5	25	8	40	4	33.3	0	0	4	33.3	
over 50	8	40	4	20	12	60	9	45	3	15	12	60	4	33.3	4	33.3	8	66.7	
<b>Total</b>	<b>13</b>	<b>65</b>	<b>7</b>	<b>35</b>	<b>20</b>	<b>100</b>	<b>12</b>	<b>60</b>	<b>8</b>	<b>40</b>	<b>20</b>	<b>100</b>	<b>8</b>	<b>66.7</b>	<b>4</b>	<b>33.3</b>	<b>12</b>	<b>100</b>	

**Note:** The subsidiary D-Flight SpA was managed by a Sole Director since its establishment until the acquisition of a minority share of the company on 28 February 2019. There were then some changes to the Board first in 2020 and then during 2021.

39. Board of Directors as at 31.12.2021 of ENAV, Techno Sky, IDS AirNav and D-Flight.

**Table 3. Total number of individuals within the governing bodies<sup>40</sup> of the companies by age group and gender. [GRI 405-1]**

Members of the governing bodies (headcount)	2021						2020						2019							
	Male		Female		Total		Male		Female		Total		Male		Female		Total			
	no.	%	no.	%	no.	%	no.	%	no.	%	no.	%	no.	%	no.	%	no.	%		
less than 30 years old	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
between 30 and 50	0	0	2	16.5	2	16.7	0	0	3	25	3	25	0	0	2	33.3	2	33.3	2	33.3
over 50	8	67	2	16.5	10	83.3	8	67	1	8	9	75	4	66.7	0	0	4	66.7	4	66.7
<b>Total</b>	<b>8</b>	<b>67</b>	<b>4</b>	<b>33</b>	<b>12</b>	<b>100</b>	<b>8</b>	<b>67</b>	<b>4</b>	<b>33</b>	<b>12</b>	<b>100</b>	<b>4</b>	<b>66.7</b>	<b>2</b>	<b>33.3</b>	<b>6</b>	<b>100</b>	<b>6</b>	<b>100</b>

**Table 4. Sanctions assessed for the violation of laws and regulations regarding environmental, social and economic issues and personnel management. [GRI 307-1 and 419-1]**

In 2019, 2020 and 2021 there were not any significant monetary or non-monetary sanctions received due to the violation of laws and regulations regarding environmental issues.

In 2019, 2020 there were not any significant monetary or non-monetary sanctions received due to the violation of laws and regulations regarding social and economic issues, whereas in 2021 there was a monetary sanction for a labour law aspect equal to € 146,095.00.

**Note:** Significant monetary sanction means a sanction of more than € 20,000.

40. Board of Statutory Auditors as at 31.12.2021 of ENAV, Techno Sky, IDS AirNav and D-Flight.

**COMMUNITY**

**Table 5. Number of flight hours carried out by the air fleet broken down by domestic and foreign contracts.**

Flight hours	u.m.	2021	2020	2019
<b>Domestic hours</b>		<b>1,048.93</b>	<b>967.30</b>	<b>1,014.64</b>
<b>Abroad</b>		<b>321.60</b>	<b>368.84</b>	<b>766.18</b>
Saudi Arabia		0	0	75.67
Kenya		0	0	0
Eritrea		0	0	0
Uganda		14.58	28.75	30.50
BLUE GNSS		0	0	0
Albania		13.67	4.58	17.33
Lithuania	Ore	20.75	9.17	22.41
United Arab Emirates		0	0	36.17
ONDA (Morocco)		0	0	160.50
Qatar		33.25	0	0
Phoenic (Romania)		157.34	216.50	212.84
INEA		0	0	0
Cyprus		0	0	0
Croatia		115.26	110.84	210.76
<b>Total</b>		<b>1,370.53</b>	<b>1,337.14</b>	<b>1,780.82</b>

**Table 6. Average response time for extraordinary interventions thanks to the Flight Inspection and Validation service.**

Average response time for extraordinary interventions	u.m.	2021	2020	2019
Average response time	Hours	24	24	24

**Table 7. Number of hours of outside training in the classroom by category of recipient.**

Training hours by category	u.m.	2021	2020	2019
Private Customer	Hours	6,664	4,380	5,040
Business Customer		0	0	14,000
<b>Total</b>		<b>6,664</b>	<b>4,380</b>	<b>19,040</b>

**Table 8. Number of external participants involved in external classroom training by category of recipient.**

Number of third parties involved by category	u.m.	2021	2020	2019
Private Customer	No.	145	55	14
Business Customer		0	0	277
<b>Total</b>		<b>145</b>	<b>55</b>	<b>291</b>

**Table 9. Results of training carried out in 2021 to promote local development.**

Activities carried out	2021		2020		2019	
	Days	Attendees	Days	Attendees	Days	Attendees
Flight simulation for students of the University of Bologna	0	0	0	0	2	36
Instruction at the University of Bologna in the field of Air Traffic Control	0	0	24	40	24	36
<b>Total</b>	<b>0</b>	<b>0</b>	<b>24</b>	<b>40</b>	<b>26</b>	<b>72</b>

**Note:** The experience using flight simulators for the students of the University of Bologna has been temporarily suspended due to the health emergency.

**Table 10. Results of training for local development carried out in 2021.**

Activities carried out	2021		2020		2019	
	Days attended	Attendees	Days attended	Attendees	Days attended	Attendees
Apprenticeship Training	1,818	25	171	42	1,181	122
Teaching visits	0	0	0	0	984	984
Intercultura (initiative for the benefit of the children of employees)	0	0	0	0	2,940	12
<b>Total</b>	<b>1,818</b>	<b>25</b>	<b>171</b>	<b>42</b>	<b>5,105</b>	<b>1,118</b>

**Note:** The teaching visits and the intercultura project have been temporarily suspended due to the health emergency.

**Table 11. Internal cost to conduct the training for local development.**

Training costs	u.m.	2021	2020	2019
Cost for apprenticeship training	€000	0	0	340
Cost for teaching visits		0	0	36
Intercultural		0	0	98
<b>Total</b>		<b>0</b>	<b>0</b>	<b>474</b>

**Note:** The teaching visits and the intercultural project have been temporarily suspended due to the health emergency. Furthermore, the cost for carrying out the apprenticeship training was 0, as this activity was provided by internal staff.

**Table 12. Investments in infrastructures.**

Investment	u.m.	2021	2020	2019
<b>Infrastructures</b>	€000	<b>76,068</b>	<b>77,493</b>	<b>109,700</b>
a) Implementation and maintenance of operational technology infrastructures		44,418	39,760	71,700
b) Upgrading the ATM platform with new operational concepts		14,075	24,566	23,300
c) Infrastructures and systems		12,333	7,639	8,400
d) Management information systems		5,242	5,528	6,300

**Note:** 2020 CAPEX of € 91.5 million.

**Table 13. Customer relations: Average system availability. (Scope: Techno Sky).**

Average system availability	u.m.	2021	2020	2019
Percentage of average system availability	%	99.98	99.97	99.98

**Table 14. Customer relations: Percentage of anomaly resolution on first attempt. (Scope: Techno Sky).**

Resolution of anomalies on first attempt	u.m.	2021	2020	2019
Percentage of anomaly resolution on first attempt	%	90.00	91.00	92.00



**Table 15. Customer relations: Hours for repair and restoration. (Scope: Techno Sky).**

Repair and restoration	u.m.	2021	2020	2019
Average repair and restoration times	Minutes	33.20	33.57	34.60

**Table 16. Processing days for measurement confirmation. (Scope: Techno Sky).**

Processing for measurement confirmation	u.m.	2021	2020	2019
Average processing time for measurement confirmation of weather sensors	Days	14.58	14.87	12.54

**Table 17. Degree of stakeholder involvement. [GRI 102-43]**

Degree of stakeholder involvement	u.m.	2021	2020	2019
Stakeholder Engagement initiatives		12 meetings (10 web and 2 in person) for the updates	Web meeting for updates. Cooperation agreements for structure in relationships and advanced involvement	14 meetings with CNA (external customer) + 5 internal conferences to improve service quality involving the heads of the local operational units
Number of stakeholders involved	no.	A variable number depending on the initiatives. In the case of ramp-up meetings, numerous groups of pilots and airlines	A variable number depending on the initiative with information forwarded to the majority of the AUs	More than 40 contacted through various types of communication
Other		All the activities specified in the cooperation agreements for relations with customers of ATS services. Direct dialogue with the operational line in the case of ramp-ups	Participation in the initiatives defined in the cooperation agreements. Sharing of feedback to improve the service	Information and prior involvement in certain activities and operational projects: PRNAV, restructuring of Milan TMA, CARA procedure, familiarisation of flight crews and ATC teams with their respective environments

**Table 18. Average payment period for suppliers.**

Number of days for payment of suppliers (ENAV)		u.m.	2021	2020	2019
Average payment period for suppliers			84.47	70.7	19.7
Average advance (delay) in relation to contractual conditions		Days	-93.73	51.6	20.6
Number of days for payment of suppliers (Techno Sky)		u.m.	2021	2020	2019
Average payment period for suppliers			40	40	45
Average advance (delay) in relation to contractual conditions		Days	40.44	23.4	33
Number of days for payment of suppliers (ENAV Asia Pacific)		u.m.	2021	2020	2019
Average payment period for suppliers			5	5	5
Average advance (delay) in relation to contractual conditions		Days	0	0	0
Number of days for payment of suppliers (IDS AirNav)		u.m.	2021	2020	2019
Average payment period for suppliers			23.6	27.3	n/a
Average advance (delay) in relation to contractual conditions		Days	- 22	34.9	n/a
Number of days for payment of suppliers (D-Flight)		u.m.	2021	2020	2019
Average payment period for suppliers			60	60	n/a
Average advance (delay) in relation to contractual conditions		Days	40	24	n/a

**Note:** in 2019 IDS AirNav and D-flight were not part of the scope of reporting.

**Table 19. Investment agreements and significant contracts that include clauses regarding human rights and that were subjected to an assessment regarding human rights. [GRI 412-3]**

Investment agreements and significant contracts that include clauses regarding human rights and that were subjected to an assessment regarding human rights (ENAV)	u.m.	2021	2020	2019
Number of investment agreements and significant contracts	no.	1,172	1,117	1,142
Percentage of investment agreements and significant contracts	%	100	100	100
Investment agreements and significant contracts that include clauses regarding human rights and that were subjected to an assessment regarding human rights (Techno Sky)	u.m.	2021	2020	2019
Number of investment agreements and significant contracts	no.	39	50	25
Percentage of investment agreements and significant contracts	%	100	100	100
Investment agreements and significant contracts that include clauses regarding human rights and that were subjected to an assessment regarding human rights (ENAV Asia Pacific)	u.m.	2021	2020	2019
Number of investment agreements and significant contracts	no.	9	14	10
Percentage of investment agreements and significant contracts	%	0	0	0
Investment agreements and significant contracts that include clauses regarding human rights and that were subjected to an assessment regarding human rights (IDS AirNav)	u.m.	2021	2020	2019
Number of investment agreements and significant contracts	no.	213	155	n/a
Percentage of investment agreements and significant contracts	%	60	44	n/a
Investment agreements and significant contracts that include clauses regarding human rights and that were subjected to an assessment regarding human rights (D-Flight)	u.m.	2021	2020	2019
Number of investment agreements and significant contracts	no.	6	5	n/a
Percentage of investment agreements and significant contracts	%	100	100	n/a

**Notes:**

Investment agreements and significant contracts are understood as supply contracts:

For ENAV, of any amount. In any case the clauses apply to 100% of the contracts.

For Techno Sky greater than € 40,000, in any case the clauses apply to 100% of the contracts.

For ENAV Asia Pacific greater than 15,000.

For IDS AirNav greater than € 15,000.

D-Flight greater than € 20,000.

**Table 20. Reporting of tax information [GRI 207-4]**

Tax jurisdiction **Italy**, with data relative to the following ENAV S.p.A. entities - Techno Sky S.r.l. - IDS AirNav S.r.l. and D-Flight S.r.l. whose main activities concern “Air traffic control/regulated market, ATC system maintenance, sale on non-regulated markets and UAV traffic control”.

Dimensions	u.m.	2021	2020	2019
Number of employees	N	4,105	4,145	4,193
<b>Tax-related data</b>	<b>u.m.</b>	<b>2021</b>	<b>2020</b>	<b>2019</b>
revenue from sales to third parties		844,051,944	778,224,700	908,920,254
revenue from inter-company transactions with other tax jurisdictions		306,418	459,163	647,972
profit/loss before taxes		104,697,323	79,011,601	175,885,214
tangible assets other than liquid assets and cash equivalents	€	2,306,012,830	2,031,761,584	1,804,797,653
income tax defined based on a cash basis		15,253,362	37,195,978	35,159,491
income tax for companies accrued on profits/losses		29,130,169	22,226,547	47,754,169

Tax jurisdiction **Malaysia**, with data related to the following entity ENAV Asia Pacific Sdn Bhd, whose main activities concern “sale on non-regulated markets”.

Dimensions	u.m.	2021	2020	2019
Number of employees	N	1	2	2
<b>Tax-related data</b>	<b>u.m.</b>	<b>2021</b>	<b>2020</b>	<b>2019</b>
revenue from sales to third parties		1,071,745	2,690,778	2,992,354
revenue from inter-company transactions with other tax jurisdictions		0	0	0
profit/loss before taxes		198,662	991,945	1,205,386
tangible assets other than liquid assets and cash equivalents	€	685,409	890,751	1,054,258
income tax defined based on a cash basis		97,616	192,542	332,949
income tax for companies accrued on profits/losses		58,880	275,906	299,215

Tax jurisdiction **USA**, with data related to the following entity ENAV North Atlantic LLC, whose main activities concern “holding”.

Dimensions	u.m.	2021	2020	2019
Number of employees	N	0	0	0

Tax-related data	u.m.	2021	2020	2019
revenue from sales to third parties		0	845	0
revenue from inter-company transactions with other tax jurisdictions		0	0	0
profit/loss before taxes		-56,006	-78,788	-80,316
tangible assets other than liquid assets and cash equivalents	€	61,856,054	54,623,408	54,976,379
income tax defined based on a cash basis		0	0	0
income tax for companies accrued on profits/losses		0	0	-31,247

## ENVIRONMENT

**Table 21. Consumption of electricity and fuels for the operation of offices and other facilities (e.g. control towers) and of the car and aircraft fleets (by renewable/non-renewable). [GRI 302-1]**

Supplies	u.m.	2021	2020	2019
<b>Electricity</b>		<b>243,865.66</b>	<b>241,131.29</b>	<b>258,057.98</b>
<i>from renewable sources</i>		1,031.71	1,095.28	1,067.00
<i>from non-renewable sources</i>		242,833.95	240,036.00	256,990.98
<i>Of which from non-renewable sources</i>		187,557.92	n/a	n/a
<i>Of which from GO sources</i>		55,276.93	n/a	n/a
<b>Fuels for offices and other facilities</b>		<b>30,184.18</b>	<b>24,509.94</b>	<b>27,896.58</b>
<i>Diesel</i>		5,751.02	3,787.48	4,117.51
<i>Natural gas</i>		24,433.16	20,722.46	23,779.07
<b>Fuels for car fleet – company cars</b>		<b>4,119.33</b>	<b>3,743.45</b>	<b>4,673.57</b>
<i>Diesel</i>		3,019.84	3,046.88	3,668.50
<i>Petrol</i>	GJ	1,099.49	696.57	808.22
<i>CNG</i>		0	0	172.28
<i>LPG</i>		0	0	24.56
<b>Fuels for car fleet – mixed-use cars*</b>		<b>4,119.25</b>	<b>3,891.36</b>	<b>3,920.34</b>
<i>Diesel</i>		3,136.96	2,842.35	2,747.94
<i>Petrol</i>		971.42	954.70	1,166.03
<i>CNG</i>		10.87	90.36	0
<i>LPG</i>		0	3.94	6.36
<b>Fuels for air fleet</b>		<b>20,578.98</b>	<b>19,691.80</b>	<b>26,146.78</b>
<i>Jet fuel</i>		20,578.98	19,691.80	26,146.78
<b>Total</b>		<b>302,867.40</b>	<b>292,967.84</b>	<b>320,695.24</b>

\* In accordance with the provisions of Article 51, paragraph 4(a), of the Consolidated Income Tax Law, fuel consumption relating to company cars for mixed business and personal use is measured at 70% of the total. Furthermore, please note that 2019 data were subject to a restatement as a result of updated data that became available after closure of the 2019 non-financial statement. This restatement also has an impact on the total values of energy consumed in 2019 and on the CO<sub>2</sub> emissions reported in the table for GRI 305-1 and 305-2. The items impacted by this adjustment concern, specifically, the consumption of electricity from renewable sources and those of diesel and petrol by the car fleet.

**Table 22. Emissions from the consumption of electricity, fuel for the operation of offices and facilities (e.g. control towers), the car and aircraft fleet and emissions from the use of refrigerant gases. [GRI 305-1 and 305-2]**

Emissions	u.m.	2021	2020	2019
Location based electricity*		17,572	18,422	25,699
Market based electricity*		24,464	31,064	34,500
Fuel for offices and other facilities		1,621.95	1,309.52	1,492.55
<i>Diesel</i>		378.38	253.10	280.02
<i>Natural gas</i>		1,243.56	1,056.42	1,212.54
Fuel for car fleet – company cars		268.87	247.96	312.3
<i>Diesel</i>		198.69	203.61	249.48
<i>Petrol</i>		70.19	44.35	52.56
<i>CNG</i>		0	0	8.80
<i>LPG</i>		0	0	1.46
Fuels for car fleet – mixed-use cars**		268.96	255.57	263.09
<i>Diesel</i>		206.39	189.94	186.88
<i>Petrol</i>		62.01	60.78	75.83
<i>CNG</i>		0.55	4.62	0
<i>LPG</i>		0	0.23	0.38
Fuels for air fleet		1,416.65	1,355.57	1,799.44
<i>Jet fuel</i>		1,416.65	1,355.57	1,799.44
Total emissions (location based)		21,148.13	21,591.39	29,566.47
Total emissions (market based)***		28,040.43	34,232.62	38,367.38
Refrigerant gases		1,204.89	368.56	448.96
Total emissions (location based)****		22,353.02	21,959.95	30,015.43
Total emissions (market based)****		29,245.32	34,601.18	38,816.33

- \* In 2020 and 2021 the Scope 2 emissions inherent to the consumption of electricity are calculated according to the Location Based methodology, using the emission factors published by Ispra and according to the market-based approach using the emission factors published in 2020 by AIB – European Residual Mixes. The Scope 2 Location Based emissions for 2019 inherent to the consumption of electricity were calculated using the emission factors published by Terna.
- \*\* In accordance with the provisions of Article 51, paragraph 4(a), of the Consolidated Income Tax Law, emissions relating to company cars for mixed business and personal use is measured at 70% of the total. The method used to calculate emissions from fuels uses the emission factors published in 2021 by the Department for Environment Food & Rural Affairs.
- \*\*\* In 2021, for the market-based methodology, the emissions factor published by AIB 2020 -European Residual Mixes was used for energy from the grid, whereas for the electric energy covered by a guarantee of origin (GO), a specific factor modelled in Ecoinvent 3.7.1 was used, (amounting to 0.03732 kg CO<sub>2</sub>/kWh) was adopted, taking into account 33.3% of electricity generation from photovoltaics, 33.3% from hydroelectric power and the remaining 33.3% from wind farms.
- \*\*\*\* Refrigerant gas data are reported for the first time in this NFS. In 2019-2020 this calculation was based on an estimate of gas leakages (assumed fixed leakages 2%). In 2021, however, actual data were used due to refinements in the data collection and calculation process. For 2019, 2020 and 2021, 100% of the perimeter was covered.



**Table 23. Emissions avoided thanks to the production of electricity by current photovoltaic systems. [GRI 305-5]**

Reduction of emissions	u.m.	2021	2020	2019
Reduction of CO <sub>2</sub> e (Scope2)	t CO <sub>2</sub> e	94	113	141

**Note:** In 2021 approximately 74.66 tCO<sub>2</sub>e were avoided thanks to the consumption of self-produced energy from renewable sources (in 2020 they equalled 84.06 tCO<sub>2</sub>e, in 2019 106.70 tCO<sub>2</sub>e). In the 2022 Sustainability Report, the calculation of the reduction of emissions deriving from improvements in energy efficiency also includes the projects for the installation of LEDs and the improvement in climate control systems.

**Table 24. Scope 3 emissions generated. [GRI 305-3]**

Emissions	u.m.	2021	2020	2019
Fuel and Energy	t CO <sub>2</sub> e	6,994.05	4,483.57	6,748.00
Employee commuting		7,086.22	6,489.77	6,290.00
Capital goods		28,601.97	29,601.13	31,446.00
Purchased goods and services		12,134.49	10,665.64	18,928.00
Others		161.39	116.73	408.00
Business Travel		443.19	332.57	1,260.00
<b>Scope 3 total</b>			<b>55,421.30</b>	<b>51,689.42</b>

**Note:** For the calculation of the Group's Scope 3 emissions for 2020 and 2021, emissions factors became available that are considered to be more representative for the reported categories as compared to the calculation made for 2019. This change concerns the specific emission factors and therefore is not a methodological change, as the approach used for the entire three-year period remains "spend-based" (emissions factors based on economical expense) for the "Capital Goods" and "Purchased goods and services" categories, and "physical-based" for the remaining categories. The updating of the emissions factors made it possible to better represent the specific characteristics of the reference sector, including greater geographic detail relating to Group expense and more precise product details, based on the purchases in the sector in which the company operates.

In particular, as concerns "Business Travel", the only Scope 3 category reported in the previous editions of the NFS, the new emission factors used (source: Defra), and applied also to 2020, do not distinguish between short-haul and long-haul flights. The values reported in the previous NFS in reference to this category are a total of 265 tCO<sub>2</sub>e for 2020, of which referring to air travel equal to 264 tCO<sub>2</sub>e (data calculated using the emission factors of both short and long-haul flights).

It is also worth mentioning that the "Waste" and "Upstream transportation and distribution" categories falling under the item "Others" have been merged, as they each account for 0.1% of total Scope 3 emissions.

**Table 25. Reductions in routes and related impact the Italian Flight Efficiency Plan (FEP) project, highlighting the result since the beginning of the FEP project.**

Main results achieved	u.m.	2021	2020	2019	Total 2016-2020
Reduction of routes	km	-12,710,000	-7,237,000	-14,888,188	<b>-56,116,835</b>
Reduction of fuel used	kg	-52,789,000	-29,623,000	-54,669,000	<b>-215,468,500</b>
Reduction of CO <sub>2</sub> emissions	kg CO <sub>2</sub>	-166,285,350	-93,312,450	-172,207,350	<b>-678,725,775</b>

**Table 26 Waste generated [GRI 306-3]**

Type of hazardous waste	u.m.	Waste recycled 2021	Waste disposed of 2021	Waste generated 2021
Batteries from accumulators	t	52.35	0	52.35
Waste engine oil, gear oil and lubricating oils		5.00	0	5.00
Waste from electrical and electronic equipment		7.10	0	7.10
Other waste		4.82	1.65	6.47
<b>Total</b>		<b>69.27</b>	<b>1.65</b>	<b>70.92</b>

Type of non-hazardous waste	u.m.	Waste recycled 2021	Waste disposed of 2021	Waste generated 2021
Other municipal waste (septic tank sludge, bulky waste)	t	18.77	111.11	129.88
Packaging (including separately collected municipal packaging waste)		29.20	0	29.20
Metals (including their alloys)		24.26	0	24.26
Waste from electrical and electronic equipment		96.68	0	96.68
Other waste		16.21	1.29	17.50
<b>Total</b>		<b>185.12</b>	<b>112.40</b>	<b>297.52</b>

**Table 27 Total weight of waste diverted from disposal and waste directed to disposal. [GRI 306-4; 306-5]**

Hazardous waste	u.m.	2021	2020	2019
<b>Total hazardous waste</b>		<b>70.92</b>	<b>55.64</b>	<b>96.59</b>
Landfill disposal	t	1.65	1.17	4.43
Sent for recycling		69.27	54.47	92.16
Non-hazardous waste	u.m.	2021	2020	2019
<b>Total</b>		<b>297.52</b>	<b>196.55</b>	<b>219.21</b>
Landfill disposal	t	112.40	66.61	106.72
Sent for recycling		185.12	129.94	112.49

**Note:** All waste is managed at external sites.

## PEOPLE

**Table 28. Total number of employees by Group company. [GRI 102-8]**

Total number of employees in the Group	u.m.	2021	2020	2019
ENAV		3,295	3,330	3,317
Techno SKY		658	665	730
IDS AirNav		152	150	0
ENAV Asia Pacific	no.	1	2	2
ENAV North Atlantic		0	0	0
<b>Total</b>		<b>4,106</b>	<b>4,147</b>	<b>4,049</b>

**Note:** please note that D-Flight has 7 seconded employees (of which 5 ENAV, 1 IDS AirNav and 1 Techno Sky), and 4 seconded from Leonardo and Telespazio.

**Table 29. Employees by age, gender and level. [GRI 405-1]**

Employees (headcount)	2021						2020						2019					
	Male		Female		Total		Male		Female		Total		Male		Female		Total	
	no.	%	no.	%	no.	%	no.	%	no.	%	no.	%	no.	%	no.	%	no.	%
<b>Senior management</b>	<b>46</b>	<b>1.1</b>	<b>4</b>	<b>0.1</b>	<b>50</b>	<b>1.2</b>	<b>51</b>	<b>1.2</b>	<b>5</b>	<b>0.1</b>	<b>56</b>	<b>1.4</b>	<b>48</b>	<b>1.2</b>	<b>4</b>	<b>0.1</b>	<b>52</b>	<b>1.3</b>
less than 30 years old	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
between 30 and 50	7	0.2	1.0	0.0	8	0.2	9	0.2	4	0.1	13	0.3	10	0.2	3	0.1	13	0.3
over 50	39	0.9	3.0	0.1	42	1.0	42	1.0	1	0.0	43	1.0	38	0.9	1	0.1	39	1.0
<b>Middle management</b>	<b>351</b>	<b>8.5</b>	<b>61</b>	<b>1.5</b>	<b>412</b>	<b>10.0</b>	<b>355</b>	<b>8.6</b>	<b>62</b>	<b>1.5</b>	<b>417</b>	<b>10.1</b>	<b>343</b>	<b>8.5</b>	<b>55</b>	<b>1.4</b>	<b>398</b>	<b>9.8</b>
less than 30 years old	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
between 30 and 50	99	2.4	25	0.6	124	3.0	109	2.6	26	0.6	135	3.3	104	2.6	22	0.5	126	3.1
over 50	252	6.1	36	0.9	288	7.0	246	5.9	36	0.9	282	6.8	239	5.9	33	0.8	272	6.7
<b>Office staff</b>	<b>2,842</b>	<b>69.2</b>	<b>767</b>	<b>18.7</b>	<b>3,609</b>	<b>87.9</b>	<b>2,853</b>	<b>68.8</b>	<b>780</b>	<b>18.8</b>	<b>3,633</b>	<b>87.6</b>	<b>2,789</b>	<b>68.9</b>	<b>769</b>	<b>19.0</b>	<b>3,558</b>	<b>87.9</b>
less than 30 years old	162	3.9	23	0.6	185	4.5	165	4.0	28	0.7	193	4.7	148	3.7	30	0.7	178	4.4
between 30 and 50	1,631	39.7	433	10.5	2,064	50.3	1,667	40.2	446	10.8	2,113	51.0	1,693	41.8	440	10.9	2,133	52.7
over 50	1,049	25.5	311	7.6	1,360	33.1	1,021	24.4	306	7.4	1,327	32.0	948	23.4	299	7.4	1,247	30.8
<b>Blue collar</b>	<b>35</b>	<b>0.9</b>	<b>0</b>	<b>0</b>	<b>35</b>	<b>0.9</b>	<b>41</b>	<b>1.0</b>	<b>0</b>	<b>0</b>	<b>41</b>	<b>1.0</b>	<b>41</b>	<b>1.0</b>	<b>0</b>	<b>0</b>	<b>41</b>	<b>1.0</b>
less than 30 years old	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
between 30 and 50	18	0.4	0	0	18	0.4	23	0.6	0	0	23	0.6	24	0.6	0	0	24	0.6
over 50	17	0.4	0	0	17	0.4	18	0.4	0	0	18	0.4	17	0.4	0	0	17	0.4
<b>Total</b>	<b>3,274</b>	<b>79.7</b>	<b>832</b>	<b>20.3</b>	<b>4,106</b>	<b>100</b>	<b>3,300</b>	<b>79.6</b>	<b>847</b>	<b>20.4</b>	<b>4,147</b>	<b>100</b>	<b>3,221</b>	<b>79.6</b>	<b>828</b>	<b>20.4</b>	<b>4,049</b>	<b>100</b>

**Table 30. Total number of employees by contract type, geographical area (where they are employed), and gender. [GRI 102-8]**

Employees (headcount)	u.m.	2021			2020			2019		
		Uomo	Donna	Totale	Uomo	Donna	Totale	Uomo	Donna	Totale
Fixed-term contract		<b>1</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
Italy		1	0	<b>1</b>	0	0	<b>0</b>	0	0	<b>0</b>
Americas		0	0	<b>0</b>	0	0	<b>0</b>	0	0	<b>0</b>
Asia		0	0	<b>0</b>	0	0	<b>0</b>	0	0	<b>0</b>
Other - Europe		0	0	<b>0</b>	0	0	<b>0</b>	0	0	<b>0</b>
Open-ended contract	no.	<b>3,273</b>	<b>832</b>	<b>4,105</b>	<b>3,300</b>	<b>847</b>	<b>4,147</b>	<b>3,221</b>	<b>828</b>	<b>4,049</b>
Italy		3,273	831	<b>4,104</b>	3,300	845	<b>4,145</b>	3,221	826	<b>4,047</b>
Americas		0	0	<b>0</b>	0	0	<b>0</b>	0	0	<b>0</b>
Asia		0	1	<b>1</b>	0	2	<b>2</b>	0	2	<b>2</b>
Other - Europe		0	0	<b>0</b>	0	0	<b>0</b>	0	0	<b>0</b>
<b>Total</b>		<b>3,274</b>	<b>832</b>	<b>4,106</b>	<b>3,300</b>	<b>847</b>	<b>4,147</b>	<b>3,221</b>	<b>828</b>	<b>4,049</b>

**Table 31. Total number of employees by type of employment and gender. [GRI 102-8]**

Employees (headcount)	u.m.	2021			2020			2019		
		Uomo	Donna	Totale	Uomo	Donna	Totale	Uomo	Donna	Totale
Full-time employees		3,264	807	<b>4,071</b>	3,282	814	<b>4,096</b>	3,211	803	<b>4,014</b>
Part-time employees	no.	10	25	<b>35</b>	18	33	<b>51</b>	10	25	<b>35</b>
<b>Total</b>		<b>3,274</b>	<b>832</b>	<b>4,106</b>	<b>3,300</b>	<b>847</b>	<b>4,147</b>	<b>3,221</b>	<b>828</b>	<b>4,049</b>

**Table 32. Number of new hires by age group, gender, and geographical area. [GRI 401-1]**

Number of new hires	u.m.	2021			2020			2019		
		Male	Female	Total	Male	Female	Total	Male	Female	Total
<b>Italy</b>		<b>226</b>	<b>20</b>	<b>246</b>	<b>138</b>	<b>11</b>	<b>149</b>	<b>154</b>	<b>19</b>	<b>173</b>
less than 30 years old		176	16	<b>192</b>	116	8	<b>124</b>	141	18	<b>159</b>
between 30 and 50		48	4	<b>52</b>	21	2	<b>23</b>	12	1	<b>13</b>
over 50		2	0	<b>2</b>	1	1	<b>2</b>	1	0	<b>1</b>
<b>Americas</b>		<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
less than 30 years old		0	0	<b>0</b>	0	0	<b>0</b>	0	0	<b>0</b>
between 30 and 50		0	0	<b>0</b>	0	0	<b>0</b>	0	0	<b>0</b>
over 50		0	0	<b>0</b>	0	0	<b>0</b>	0	0	<b>0</b>
<b>Asia</b>		<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
less than 30 years old		0	0	<b>0</b>	0	0	<b>0</b>	0	0	<b>0</b>
between 30 and 50	no.	0	0	<b>0</b>	0	0	<b>0</b>	0	0	<b>0</b>
over 50		0	0	<b>0</b>	0	0	<b>0</b>	0	0	<b>0</b>
<b>Other - Europe</b>		<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
less than 30 years old		0	0	<b>0</b>	0	0	<b>0</b>	0	0	<b>0</b>
between 30 and 50		0	0	<b>0</b>	0	0	<b>0</b>	0	0	<b>0</b>
over 50		0	0	<b>0</b>	0	0	<b>0</b>	0	0	<b>0</b>
<b>Total</b>		<b>226</b>	<b>20</b>	<b>246</b>	<b>138</b>	<b>11</b>	<b>149</b>	<b>154</b>	<b>19</b>	<b>173</b>
less than 30 years old		176	16	<b>192</b>	116	8	<b>124</b>	141	18	<b>159</b>
between 30 and 50		48	4	<b>52</b>	21	2	<b>23</b>	12	1	<b>13</b>
over 50		2	0	<b>2</b>	1	1	<b>2</b>	1	0	<b>1</b>

**Note:** the calculation of the number of new hires also includes employees with a fixed-term pseudo pilot contract (167 for 2021, 97 for 2020; 105 for 2019).

Inter-company transfers for 2021 included:

- ENAV hired 8 IDS AirNav employees, comprising: 1 woman between the ages of 30 and 50, and 7 men, of which 3 between the ages of 30 and 50 and 4 above the age of 50;

- ENAV hired 1 employee from Techno Sky: 1 man above the age of 50.

Finally, among the new hires and employees who left the Group, there were no employees who changed their professional category.

As can be seen in the tables below, the increase in the number of hire is mainly due to fixed-term recruitments. In 2021, 167 technical operators (pseudo pilots) were hired, which are used in training activities for air traffic controllers. Specifically, in comparison to the previous year, the training calendar was intensified due to needs resulting from the back to normal state following the pandemic emergency. These contracts were concluded during the same year.



**Table 33. Number of employees who left the Group, by age, gender, and geographical area. [GRI 401-1]**

Employees who left the Group	u.m.	2021			2020			2019		
		Male	Female	Total	Male	Female	Total	Male	Female	Total
<b>Italy</b>		<b>252</b>	<b>34</b>	<b>286</b>	<b>172</b>	<b>25</b>	<b>197</b>	<b>215</b>	<b>26</b>	<b>241</b>
less than 30 years old		155	13	<b>168</b>	93	8	<b>101</b>	99	9	<b>108</b>
between 30 and 50		15	0	<b>15</b>	12	1	<b>13</b>	26	1	<b>27</b>
over 50		82	21	<b>103</b>	67	16	<b>83</b>	90	16	<b>106</b>
<b>Americas</b>		<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
less than 30 years old		0	0	<b>0</b>	0	0	<b>0</b>	0	0	<b>0</b>
between 30 and 50		0	0	<b>0</b>	0	0	<b>0</b>	0	0	<b>0</b>
over 50		0	0	<b>0</b>	0	0	<b>0</b>	0	0	<b>0</b>
<b>Asia</b>		<b>0</b>	<b>1</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
less than 30 years old		0	0	<b>0</b>	0	0	<b>0</b>	0	0	<b>0</b>
between 30 and 50	N°	0	0	<b>0</b>	0	0	<b>0</b>	0	0	<b>0</b>
over 50		0	1	<b>1</b>	0	0	<b>0</b>	0	0	<b>0</b>
<b>Other - Europe</b>		<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
less than 30 years old		0	0	<b>0</b>	0	0	<b>0</b>	0	0	<b>0</b>
between 30 and 50		0	0	<b>0</b>	0	0	<b>0</b>	0	0	<b>0</b>
over 50		0	0	<b>0</b>	0	0	<b>0</b>	0	0	<b>0</b>
<b>Total</b>		<b>252</b>	<b>35</b>	<b>287</b>	<b>172</b>	<b>25</b>	<b>197</b>	<b>215</b>	<b>26</b>	<b>241</b>
less than 30 years old		155	13	<b>168</b>	93	8	<b>101</b>	99	9	<b>108</b>
between 30 and 50		15	0	<b>15</b>	12	1	<b>13</b>	26	1	<b>27</b>
over 50		82	22	<b>104</b>	67	16	<b>83</b>	90	16	<b>106</b>

**Note:** the calculation of the number of employees who left the Group also includes employees with a fixed-term pseudo pilot contract (167 for 2021, 97 for 2020, 105 for 2019; 126 for 2018). The number of employees who left the group includes an employee who ended the work relationship on 31.12.2019 (last day of work). The number of employees who left the group does not include those who ended the work relationship on 31.12.2020.

Furthermore, during 2020, 70 inter-group transfers were recorded, as follows:

for Techno Sky, 69 employees left to be hired by ENAV, comprising:

- 28 women, of whom: 0 employees <30 years old; 5 employees between 30 and 50; 23 employees >50.

- 41 men, of whom: 0 employees <30 years old; 10 employees between 30 and 50 years old; 31 employees >50.

for IDS AirNav, 1 employee left to be hired by ENAV, specifically:

- 1 woman, of whom: 0 employees <30 years old; 1 employee between 30 and 50; 0 employees >50.

**Table 34. Turnover rate. [GRI 401-1]**

Turnover rate	u.m.	2021			2020			2019		
		Male	Female	Total	Male	Female	Total	Male	Female	Total
Italy	%	7.7	4.09	<b>7.0</b>	5.2	3.0	<b>4.8</b>	6.7	3.1	<b>6.0</b>
Americas		0	0	<b>0</b>	0	0	<b>0</b>	0	0	<b>0</b>
Asia		0	100	<b>100</b>	0	0	<b>0</b>	0	0	<b>0</b>
Other - Europe		0	0	<b>0</b>	0	0	<b>0</b>	0	0	<b>0</b>
<b>Total</b>		<b>7.7</b>	<b>4.21</b>	<b>7.0</b>	<b>5.2</b>	<b>3.0</b>	<b>4.8</b>	<b>6.7</b>	<b>3.1</b>	<b>6.0</b>

**Table 35. Rate of new hires. [GRI 401-1]**

Rate of new hires	u.m.	2021			2020			2019		
		Male	Female	Total	Male	Female	Total	Male	Female	Total
Italy	%	6.9	2.4	<b>6.0</b>	4.2	1.3	<b>3.6</b>	4.8	2.3	<b>4.3</b>
Americas		0	0	<b>0</b>	0	0	<b>0</b>	0	0	<b>0</b>
Asia		0	0	<b>0</b>	0	0	<b>0</b>	0	0	<b>0</b>
Other - Europe		0	0	<b>0</b>	0	0	<b>0</b>	0	0	<b>0</b>
<b>Total</b>		<b>6.9</b>	<b>2.4</b>	<b>6.0</b>	<b>4.2</b>	<b>1.3</b>	<b>3.6</b>	<b>4.8</b>	<b>2.3</b>	<b>4.3</b>

**Table 36. Number of hours of classroom and e-learning training in operational issues by gender and category.**

Training hours by gender and level	u.m.	2021			2020			2019		
		Male	Female	Total	Male	Female	Total	Male	Female	Total
Senior management	Hours	3	0	<b>3</b>	0	0	<b>0</b>	26	0	<b>26</b>
Middle management		354	0	<b>354</b>	112	32	<b>144</b>	426	85	<b>511</b>
Office staff		105,577	8,224	<b>113,801</b>	96,586	3,092	<b>99,678</b>	83,690	8,054	<b>91,744</b>
Blue collar		200	0	<b>200</b>	363	0	<b>363</b>	32	0	<b>32</b>
<b>Total</b>		<b>105,660</b>	<b>8,224</b>	<b>114,358</b>	<b>97,061</b>	<b>3,124</b>	<b>100,185</b>	<b>84,174</b>	<b>8,139</b>	<b>99,313</b>

**Note:** Furthermore, 2020 data for operational training was restated as a result of updated data that became available after closure of the 2020 NFS.

**Table 37. Number of hours of classroom and e-learning training by gender and category, including anti-corruption training.**

Training hours by gender and level	u.m.	2021			2020			2019		
		Male	Women	Total	Male	Female	Total	Male	Female	Total
Senior management	Hours	772	16	<b>788</b>	995	38	<b>1,033</b>	1,564.5	59	<b>1,623</b>
Middle management		3,941	1,080	<b>5,021</b>	4,465	1,190	<b>5,655</b>	3,639	989,5	<b>4,682.5</b>
Office staff		22,522	5,888	<b>28,410</b>	15,306	6,231	<b>21,537</b>	17,244	6,599	<b>23,843</b>
Blue collar		299	0	<b>299</b>	146	0	<b>146</b>	283	0	<b>283</b>
<b>Total</b>		<b>27,534</b>	<b>6,984</b>	<b>34,518</b>	<b>20,912</b>	<b>7,459</b>	<b>28,371</b>	<b>22,730.5</b>	<b>7,647.5</b>	<b>30,378</b>

**Note:** training refers to specialist managerial, legal and language training.

**Table 38. Number of hours of classroom and e-learning training on occupational health and safety issues by gender and category.**

Training hours by gender and level	u.m.	2021			2020			2019		
		Male	Female	Total	Male	Female	Total	Male	Female	Total
Senior management	Hours	132	0	<b>132</b>	32	0	<b>32</b>	68	0	<b>68</b>
Middle management		670	46	<b>716</b>	448	52	<b>500</b>	761	47	<b>808</b>
Office staff		7,587	574	<b>8,161</b>	7,256	493	<b>7,749</b>	12,892	1,543	<b>14,537</b>
Blue collar		96	0	<b>96</b>	356	0	<b>356</b>	736	0	<b>736</b>
<b>Total</b>		<b>8,485</b>	<b>620</b>	<b>9,105</b>	<b>8,092</b>	<b>545</b>	<b>8,637</b>	<b>14,457</b>	<b>1,590</b>	<b>16,047</b>

**Table 39. Number of hours of classroom and e-learning training on environmental issues.**

Training hours by gender and level	u.m.	2021			2020			2019		
		Male	Female	Total	Male	Female	Total	Male	Female	Total
Senior management	Hours	0	0	<b>0</b>	45	8	<b>53</b>	0	0	<b>0</b>
Middle management		34	49	<b>83</b>	186	30	<b>216</b>	0	0	<b>0</b>
Office staff		169	27	<b>197</b>	928	108	<b>1,036</b>	0	0	<b>0</b>
Blue collar		0	0	<b>0</b>	10	0	<b>10</b>	0	0	<b>0</b>
<b>Total</b>		<b>203</b>	<b>77</b>	<b>280</b>	<b>1,169</b>	<b>146</b>	<b>1,315</b>	<b>0</b>	<b>0</b>	<b>0</b>

**Note:** no courses in this area were held in 2019.

**Table 40. Average hours of training. [GRI 404-1]**

Hours of training (classroom and e-learning)	u.m.	2021			2020			2019		
		Male	Female	Total	Male	Female	Total	Male	Female	Total
Total number of training hours provided to employees	Hours	142,351	15,904	<b>158,255</b>	127,234	11,274	<b>138,508</b>	121,362	17,376	<b>138,738</b>
Total number of employees	No.	3,274	832	<b>4,106</b>	3,300	847	<b>4,147</b>	3,221	828	<b>4,049</b>
<b>Average employee training hours</b>	Hours/ no.	<b>43</b>	<b>19</b>	<b>39</b>	<b>39</b>	<b>13</b>	<b>33</b>	<b>38</b>	<b>21</b>	<b>34</b>
Total number of training hours provided to senior management	Hours	908	17	<b>925</b>	1,072	46	<b>1,118</b>	1,659	59	<b>1,718</b>
Total number of senior managers	No.	46	4	<b>50</b>	51	5	<b>56</b>	48	4	<b>52</b>
<b>Average training hours provided to senior management</b>	Hours/ no.	<b>20</b>	<b>4</b>	<b>19</b>	<b>21</b>	<b>9</b>	<b>20</b>	<b>35</b>	<b>15</b>	<b>33</b>
Total number of training hours provided to middle management	Hours	5,001	1,175	<b>6,176</b>	5,211	1,304	<b>6,515</b>	4,826	1,121	<b>5,947</b>
Total number of middle managers	No.	351	61	<b>412</b>	355	62	<b>417</b>	343	55	<b>398</b>
<b>Average training hours provided to middle management</b>	Hours/ no.	<b>14</b>	<b>19</b>	<b>15</b>	<b>15</b>	<b>21</b>	<b>16</b>	<b>14</b>	<b>20</b>	<b>15</b>
Total number of training hours provided to office staff	Hours	135,847	14,712	<b>150,559</b>	120,076	9,924	<b>130,000</b>	113,826	16,196	<b>130,022</b>
Total number of office workers	No.	2,842	767	<b>3,609</b>	2,853	780	<b>3,633</b>	2,789	769	<b>3,558</b>
<b>Average training hours provided to office staff</b>	Hours/ no.	<b>48</b>	<b>19</b>	<b>42</b>	<b>42</b>	<b>13</b>	<b>36</b>	<b>41</b>	<b>21</b>	<b>37</b>
Total number of training hours provided to blue collar workers	Hours	595	0	<b>595</b>	875	0	<b>875</b>	1,051	0	<b>1,051</b>
Total number of blue collar workers	No.	35	0	<b>35</b>	41	0	<b>41</b>	41	0	<b>41</b>
<b>Average training hours provided to blue collar workers</b>	Hours/ no.	<b>17</b>	<b>0</b>	<b>17</b>	<b>21</b>	<b>0</b>	<b>21</b>	<b>26</b>	<b>0</b>	<b>26</b>

**Note:** Refer to the note in table 36.

**Table 41. Number of ongoing training hours by gender.**

Ongoing training hours by gender and category	u.m.	2021			2020			2019		
		Male	Female	Total	Male	Female	Total	Male	Female	Total
Employees	Hours	53,172	6,572	<b>59,744</b>	67,618	8,358	<b>75,976</b>	56,208	6,310	<b>62,518</b>

**Table 42. Number of employees involved in ongoing training by gender.**

Number of employees involved by gender	u.m.	2021			2020			2019		
		Male	Female	Total	Male	Female	Total	Male	Female	Total
Employees	No.	1,769	241	<b>2,010</b>	1,854	261	<b>2,115</b>	1,828	203	<b>2,031</b>

**Table 43. Number of ongoing operating unit training hours by gender**

Ongoing operating unit training hours by gender and category	u.m.	2021			2020			2019		
		Male	Female	Total	Male	Female	Total	Male	Female	Total
Employees	Hours	65,041	12,389	<b>77,430</b>	19,591	3,621	<b>23,212</b>	43,729	2,300	<b>46,029</b>

**Table 44. Number of employees involved in ongoing operating unit training by gender.**

Number of employees involved by gender and category	u.m.	2021			2020			2019		
		Male	Female	Total	Male	Female	Total	Male	Female	Total
Employees	No.	440	65	<b>505</b>	307	48	<b>355</b>	335	18	<b>353</b>

**Table 45. Number of incidents of discrimination and actions taken. [GRI 406-1]**

Incidents of discrimination	u.m.	2021	2020	2019
Number of incidents of discrimination reported	no.	0	0	0
Number of incidents examined by the company		0	0	0
Number of remediation plans defined		0	0	0
Number of remediation plans implemented		0	0	0
Number of incidents no longer subject to remediation		0	0	0

**Table 46. Number of new grievances with employees.**

Number of pending grievances with employees	u.m.	2021	2020	2019
Number of new grievances with employees	no.	48	51	43

**Table 47. Number of new grievances with employees.**

Number of new grievances with employees	u.m.	2021	2020	2019
Number of new grievances with employees	no.	11	13	26

**Table 48. Percentage of employees covered by collective bargaining agreements. [GRI 102-41]**

Percentage of employees covered by collective bargaining agreements	u.m.	2021	2020	2019
Percentage of employees covered by collective bargaining agreements	%	100	99.95	100

**Note:** Senior management is excluded from the calculation.

**Table 49. Percentage of employees registered with a union.**

Percentage of employees registered with a union	u.m.	2021	2020	2019
Percentage of employees registered with a union	%	67	68	66

**Note:** Senior management is excluded from the calculation.

**Table 50. Number of strikes.**

Number of strikes	u.m.	2021	2020	2019
Number of strikes	no.	16	6	9

**Table 51. Number of strike hours.**

Number of strike hours	u.m.	2021	2020	2019
Number of strike hours	no.	240	84	116



**Table 52. Number of recordable work injuries, injury rate and number of hours worked by employees. [GRI 403-9]**

Employees	u.m.	2021			2020			2019		
		Male	Female	Total	Male	Female	Total	Male	Female	Total
<b>Total recordable injuries at work</b>		<b>6</b>	<b>1</b>	<b>7</b>	<b>10</b>	<b>2</b>	<b>12</b>	<b>11</b>	<b>2</b>	<b>13</b>
<b>Recordable injuries at work (with the exclusion of injuries with serious consequences)</b>		6	1	7	8	2	<b>10</b>	11	2	<b>13</b>
<b>Number of injuries at work with serious consequences (with the exclusion of deaths)</b>	no.	0	0	0	2	0	<b>2</b>	0	0	<b>0</b>
<b>Deaths following injuries at work</b>		0	0	0	0	0	<b>0</b>	0	0	<b>0</b>
<b>Number of hours worked</b>	no.	<b>4,752,198</b>	<b>1,158,156</b>	<b>5,910,354</b>	<b>4,321,669</b>	<b>1,091,212</b>	<b>5,412,881</b>	<b>4,613,816</b>	<b>1,082,311</b>	<b>5,696,127</b>
<b>death rate resulting from injuries at work</b>		0	0	0	0	0	<b>0</b>	0	0	<b>0</b>
<b>death rate at work with serious consequences</b>	no.	0	0	0	0.46	0	<b>0.37</b>	0	0	<b>0</b>
<b>rate of recordable injuries at work</b>		1.26	0.86	1.18	2.31	1.83	<b>2.22</b>	2.38	1.85	<b>2.28</b>

**Note:** The indices are calculated as follows: Death rate resulting from injuries at work (no. deaths/no. of hours worked) x 1,000,000; Injury rate at work with serious consequences: (No. of injuries with serious consequences/no. of hours worked) x 1,000,000; Rate of recordable injuries at work: (No. of recordable injuries at work/No. of hours worked) x 1,000,000. Commuting accidents are included among recordable and reported workplace accidents only if the transport was organised by the company. The total number of hours worked by non-employees of the ENAV Group in 2021 was estimated at 208,970 hours. The categories taken into consideration for the calculation of the estimated hours were as follows: maintenance and certification services, cleaning services and the canteen service, postal services and transport services, as they are considered significant based on the exposure to risk of injury at work and the categories included consistently every year. Currently, data for hours worked by non-employees broken down by gender and type of accident are not available. The ENAV Group undertakes to collect such data for all of Italy starting from the 2022 financial year. It should be noted that in February 2021, the Group's Prevention and Protection unit recorded an accident involving a non-employee blue collar worker, who was engaged in a worksite activity for the supply and installation of the new TWR cabin for the Alghero airport. The rate of recordable injuries at work is equal to 4.8.

Injury by type	u.m.	2021			2020			2019		
		Male	Female	Total	Male	Female	Total	Male	Female	Total
<b>Injury with a company vehicle</b>		1	0	1	0	0	<b>0</b>	1	0	<b>0</b>
<b>Struck by a car</b>		0	0	0	0	0	<b>0</b>	0	0	<b>0</b>
<b>Injury with a private vehicle</b>		0	0	0	0	0	<b>0</b>	0	0	<b>0</b>
<b>Fall and/or unsuitable movement</b>	no.	1	1	2	6	1	<b>7</b>	5	2	<b>7</b>
<b>Manual handling of loads</b>		1	0	1	0	0	<b>0</b>	0	0	<b>0</b>
<b>Crushing and/or contusion</b>		1	0	1	2	0	<b>2</b>	0	0	<b>0</b>
<b>Other causes of injury</b>		2	0	1	2	1	<b>2</b>	5	0	<b>5</b>
<b>Total</b>		<b>6</b>	<b>1</b>	<b>7</b>	<b>10</b>	<b>2</b>	<b>12</b>	<b>11</b>	<b>2</b>	<b>13</b>

## Annex 2 - Table: GRI Content Index

GRI STANDARDS	Disclosure	Reference page	Omission
<b>General Disclosure</b>			
GRI 102: General Disclosures 2016	102-1 Name of the organisation	14-15	
	102-2 Activities, brands, products and services	8-13	
	102-3 Location of the main office	ENAV's registered office is in Rome, in Via Salaria 716	
	102-4 Location of the activities	8-13	
	102-5 Ownership and legal status	14-15; 45-46; 58-64	
	102-6 Markets served	8-13	
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	102-10 Significant changes to the organisation and its supply chain	8-13; 75-77	
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	102-15 Key impacts, risks and opportunities	64-67	
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	102-24 Appointment and selection of the highest governing body	ENAV's registered office is in Rome, in Via Salaria 716; 58-64; 156-157	
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	102-51 Date of the most recent report	14-15	
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102-53 Contacts for requesting information concerning the report	"For information or comments on this document, submit a request to <a href="mailto:sostenibilita@enav.it">sostenibilita@enav.it</a> "		
102-54 Declaration on reporting in compliance with GRI Standards	14-15		
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GRI STANDARDS	Disclosure	Reference page	Omission
<b>Economic performance</b>			
GRI 103: Management method 2016	103-1 Explanation of the material issues and the relative scope	40-44	
	103-2 The management method and its components	45-47	
	103-3 Assessment of management methods	45-47	
GRI 201: Economic performance 2016	201-1 Directly generated and distributed economic value	45-47	
<b>Anti-corruption</b>			
GRI 103: Management method 2016	103-1 Explanation of the material issues and the relative scope	40-44	
	103-2 The management method and its components	65-67; 70-73	
	103-3 Assessment of management methods	65-67; 70-73	
GRI 205: Anti-corruption 2016	205-1 Options evaluated for risks related to corruption	70-73	
	205-3 Verified episodes of corruption and actions taken		From the analyses and investigations conducted, no acts of corruption (active or passive) were discovered during the 2019-2021 period
<b>Tax</b>			
GRI 103: Management method 2016	103-1 Explanation of the material issues and the relative scope	40-44	
	103-2 The management method and its components	65-67; 77	
	103-3 Assessment of management methods	65-67; 77	
GRI 207: Tax 2019	207-1 Approach to taxes	77	
	207-2 Fiscal governance, control and risk management	65-67; 77	
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	305-2 Indirect emissions of GHG from energy consumption (Scope 2)	96-100; 166-168	
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GRI STANDARDS	Disclosure	Reference page	Omission
<b>Waste discharge</b>			
GRI 103: Management method 2016	103-1 Explanation of the material issues and the relative scope	40-44	
	103-2 The management method and its components	65-67; 80-81; 101-102	
	103-3 Assessment of management methods	65-67; 80-81; 101-102	
GRI 306: 2020 waste	306-1 Waste generation and significant waste-related impacts	101-102; 168-169	
	306-2 Management of significant waste-related impacts	101-102; 168-169	
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<b>Environmental compliance</b>			
GRI 103: Management method 2016	103-1 Explanation of the material issues and the relative scope	40-44	
	103-2 The management method and its components	58; 65-67; 80-81	
	103-3 Assessment of management methods	58; 65-67; 80-81	
GRI 307: Environmental compliance 2016	307-1 Non-compliance with environmental laws and regulations	58-59; 157	
<b>Employment</b>			
GRI 103: Management method 2016	103-1 Explanation of the material issues and the relative scope	40-44	
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GRI 401: Employment 2016	401-1 New hires and turnover	172-174	
<b>Labor/Management relation</b>			
GRI 103: Management method 2016	103-1 Explanation of the material issues and the relative scope	40-44	
	103-2 The management method and its components	65-67; 106-107; 127-130	
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GRI 402: Labor/ Management relation	402-1 Minimum notice period for operating changes		<p><i>"With reference to organisational changes and the relative minimum notification period, each country of the Group respects the local regulations of reference in that area. More specifically:</i></p> <ul style="list-style-type: none"> <li><i>- for ENAV, the significant organisational changes are notified in compliance with the autonomy and liability of the Company as disciplined by art.7 "rights to information" of CCNL. These notifications are made with appropriate notice;</i></li> <li><i>- for Techno Sky and IDS, notifications regarding organisational changes are made according to provisions of law and/or collective contracts and/or union agreements. The notice period for the notifications are specified according to provisions of law and/or collective contracts and/or union agreements."</i></li> </ul>

GRI STANDARDS	Disclosure	Reference page	Omission
<b>Occupational health and safety</b>			
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	103-2 The management method and its components	65-67; 106-107; 109-112	
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GRI 403: Occupational health and safety 2018	403-1 Health and safety at work management system	109-112	
	403-2 Identification of hazards, risk assessment and surveys on incidents	109-112 "Group personnel is exposed to the occupational health and safety risks that are reported in the section "ESG risk management and the Enterprise Risk Management system". There are, however, no work activities which expose the worker to risks for specific diseases, or which have a high incidence of exposure to risk."	
	403-3 Occupational medicine services	109-112	
	403-4 Participation and consultation of workers and notification concerning occupational health and safety	109-112	
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	403-6 Promotion of worker health	109-112; 127-128	
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GRI 404: Training and education 2016	404-1 Average hours of annual training per employee	174-177	
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<b>Diversity and equal opportunities</b>			
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<b>Non-discrimination</b>			
GRI 103: Management method 2016	103-1 Explanation of the material issues and the relative scope	40-44	
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GRI 406: Non-discrimination 2016	406-1 Episodes of discrimination and corrective measures adopted	177	

GRI STANDARDS	Disclosure	Reference page	Omission
<b>Human rights assessment</b>			
GRI 103: Management method 2016	103-1 Explanation of the material issues and the relative scope	40-44	
	103-2 The management method and its components	65-67; 74-77	
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GRI 412: human rights assessment	412-1 Activities that were subject to checks regarding respect for human rights or impact assessments	74-77	
	412-3 Investment agreements and significant contracts that include clauses regarding human rights and that were subjected to an assessment regarding human rights	163	
<b>Local communities</b>			
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GRI 413: Local communities 2016	413-2 Activities with significant negative impacts, potential and current, on local communities	89	
<b>Customer health and safety</b>			
GRI 103: Management method 2016	103-1 Explanation of the material issues and the relative scope	40-44	
	103-2 The management method and its components	65-67; 138-145	
	103-3 Assessment of management methods	65-67; 138-145	
GRI 416: Customer health and safety	416-1 Assessment of the impacts on the health and safety by product and service categories		“All activities of ENAV and Techno Sky. This indicator does not apply to IDS AirNav and D-Flight as the characteristics of the product and services offered by nature do not have an impact on the Health and Safety of customers.”
<b>Socioeconomic compliance</b>			
GRI 103: Management method 2016	103-1 Explanation of the material issues and the relative scope	40-44	
	103-2 The management method and its components	58; 65-67; 157	
	103-3 Assessment of management methods	58; 65-67; 157	
GRI 419: Socioeconomic compliance 2016	419-1 Non-compliance with social and economic laws and regulations	58; 157	
<b>Sound governance</b>			
GRI 103: Management method 2016	103-1 Explanation of the material issues and the relative scope	40-44	
	103-2 The management method and its components	58-67	
	103-3 Assessment of management methods	58-67	
<b>Security</b>			
GRI 103: Management method 2016	103-1 Explanation of the material issues and the relative scope	40-44	
	103-2 The management method and its components	65-67; 138-142	
	103-3 Assessment of management methods	65-67; 138-142	



GRI STANDARDS	Disclosure	Reference page	Omission
<b>Technological innovation</b>			
GRI 103: Management method 2016	103-1 Explanation of the material issues and the relative scope	40-44	
	103-2 The management method and its components	136-137; 152	
	103-3 Assessment of management methods	136-137; 152	
<b>Quality of service</b>			
GRI 103: Management method 2016	103-1 Explanation of the material issues and the relative scope	40-44	
	103-2 The management method and its components	136-137; 152	
	103-3 Assessment of management methods	136-137; 152	

## Annex 3 – The management systems and certifications of the Group

Below is a list of the management systems adopted by the Group in 2021:

- ENAV Quality Management System (203 documents, including procedures, guidelines and operating instructions)
- Techno Sky Quality Management System (125 documents, including procedures, guidelines and operating instructions)
- ENAV Group Occupational Health and Safety Management System (18 documents, including procedures and operating instructions)
- ENAV Management System for the Prevention of Corruption (7 procedures)
- IDS AirNav Quality Management System (36 documents, including procedures and operating instructions)
- ENAV Group Security Management System (42 documents, including procedures, guidelines and operating instructions)
- ENAV Safety Management System (18 documents, including procedures and guidelines)
- ENAV Asia Pacific Quality Management System (3 procedures)
- ENAV Group Environmental management system (15 procedures).

### ENAV CERTIFICATIONS:

- ISO 9001:2015 certification for the Quality Management System issued by an accredited certification body
- ISO/IEC 27001:2013 certification for the IDS AirNav Safety Management System, issued by an accredited certification body for the part relating to information security
- ISO 37001:2016 certification of the ENAV Anticorruption Management System
- ISO 45001:2018 certification for the Occupational Health and Safety Management System issued by an accredited certification body
- Certification as a provider of air traffic management services and air navigation services (“Service Provider Certification”), issued by ENAC pursuant to Regulation (EU) No. 373/2017 for ATS, ATFM, ASM, AIS, MET, CNS and FPD services
- Certification as a training organisation for air traffic controllers, issued by ENAC pursuant to Commission Regulation (EU) 2015/340
- Certification as a training organisation for flight information service operators, issued by ENAC under ENAC Regulation “Flight Information Service Operator License (FIS)”
- Certification as a training organisation for personnel providing meteorological services for air navigation, issued by ENAC under ENAC Regulation “Requirements for personnel in the provision of meteorological services for air navigation”
- Certification as an organisation for the planning of instrumental flight procedures, issued by the General Civil Aviation Authority (GCAA) of the United Arab Emirates (UAE) pursuant to Civil Aviation Advisory Publication CAAP 68 Instrument Flight Procedure Design Requirements
- Certificate of Approval for the company for the management of continuous airworthiness and the maintenance company pursuant to EU Regulation 1321/2014 (air fleet).

## TECHNO SKY CERTIFICATIONS:

- ISO 9001:2015 certification for the Techno Sky Quality Management System issued by an accredited certification body
- ISO 45001:2018 certification for the Occupational Health and Safety Management System issued by an accredited certification body
- AQAP 2110/160 certification for the Quality Management System, issued by the Ministry of Defence
- Certification of qualification to perform Public works pursuant to DPR 207/2010
- Accreditation of LAT Centre No. 15 as calibration laboratory pursuant to the international standard UNI CEI EN ISO/IEC 17025:2018, issued by Accredia.
- Certificate of Conformity with Regulation (EU) 2015/2067 (F-GAS) for the installation, maintenance, or repair of fixed equipment for refrigeration, air-conditioning and heat pumps containing fluorinated gases with greenhouse effects
- Certification in Capability Maturity Model Integration for Development (CMMI-DEV) for the development of products and services that certifies the degree of maturity reached in software development (maturity level 2).

## IDS AIRNAV CERTIFICATIONS:

- ISO 9001:2015 certification for the Quality Management System issued by an accredited certification body
- ISO/IEC 27001:2013 certification for the Safety Management System, issued by an accredited certification body for the part relating to information security
- ISO 45001:2018 certification for the Occupational Health and Safety Management System issued by an accredited certification body
- ISO 14001:2015 certification for the Environmental Management System issued by an accredited certification body
- Certification in Capability Maturity Model Integration for Development (CMMI-DEV) for the development of products and services that certifies the degree of maturity reached in software development (maturity level 3)
- Certification of IDS AirNav as an organisation for the planning of instrumental flight procedures, issued by the General Civil Aviation Authority (GCAA) of the United Arab Emirates (UAE) pursuant to Civil Aviation Advisory Publication CAAP 68 Instrument Flight Procedure Design Requirements.

## D-FLIGHT CERTIFICATIONS:

- ISO 45001:2018 certification for the Occupational Health and Safety Management System issued by an accredited certification body.

Future goals	Deadline
Implementation of a Quality Management System for D-Flight in compliance with ISO 9001 and issue of certification by an accredited certification body	<b>End of 2022</b>
Extension of the ENAV Security Management System to D-Flight and certification of D-Flight in compliance with ISO 27001 by an accredited certification body	<b>End of 2022</b>
Extension of the ENAV Security Management System to Techno Sky and certification of Techno Sky in compliance with ISO 27001 by an accredited certification body	<b>End of 2022</b>

# ***AUDIT COMPANY REPORT***

## Enav S.p.A.

**Independent auditor's report on the consolidated disclosure of non-financial information in accordance with article 3, par. 10, of Legislative Decree December 30, 2016 n. 254 and with article 5 of Consob Regulation adopted with Resolution n. 20267 of January 18, 2018**

## Independent auditor's report on the consolidated disclosure of non-financial information in accordance with article 3, par. 10, of Legislative Decree December 30, 2016, n. 254 and with article 5 of Consob Regulation adopted with Resolution n. 20267 of January 18, 2018

*(Translation from the original Italian text)*

To the Board of Directors of  
Enav S.p.A.

We have been appointed to perform a limited assurance engagement pursuant to article 3, paragraph 10, of Legislative Decree December 30, 2016, n. 254 (hereinafter "Decree") and article 5 of Consob Regulation adopted with Resolution n. 20267 of January 18, 2018, on the consolidated disclosure of non-financial information of Enav S.p.A. and its subsidiaries (hereinafter "Enav Group" or "Group") for the year ended on December 31, 2021 in accordance with article 4 of the Decree and approved by the Board of Directors on April 21, 2022 (hereinafter "DNF").

Our limited assurance engagement does not cover the information included in the paragraph "The EU Taxonomy" of the DNF, that are required by art.8 of the European Regulation 2020/852.

### Responsibilities of Directors and Board of Statutory Auditors for the DNF

The Directors are responsible for the preparation of the DNF in accordance with the requirements of articles 3 and 4 of the Decree and the "Global Reporting Initiative Sustainability Reporting Standards" defined by GRI - Global Reporting Initiative (hereinafter "GRI Standards"), identified by them as a reporting standard.

The Directors are also responsible, within the terms provided by law, for that part of internal control that they consider necessary in order to allow the preparation of the DNF that is free from material misstatements caused by fraud or not intentional behaviors or events.

The Directors are also responsible for identifying the contents of the DNF within the matters mentioned in article 3, par. 1, of the Decree, considering the business and the characteristics of the Group and to the extent deemed necessary to ensure the understanding of the Group's business, its performance, its results and its impact.

The Directors are also responsible for defining the Group's management and organization business model, as well as with reference to the matters identified and reported in the DNF, for the policies applied by the Group and for identifying and managing the risks generated or incurred by the Group.

The Board of Statutory Auditors is responsible, within the terms provided by the law, for overseeing the compliance with the requirements of the Decree.



## Auditor's independence and quality control

We are independent in accordance with the ethics and independence principles of the International Code of Ethics for Professional Accountants (*including International Independence Standards*) (IESBA Code) issued by the International Ethics Standards Board for Accountants, based on fundamental principles of integrity, objectivity, professional competence and diligence, confidentiality and professional behavior. Our audit firm applies the International Standard on Quality Control 1 (ISQC Italia 1) and, as a result, maintains a quality control system that includes documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable laws and regulations.

## Auditor's responsibility

It is our responsibility to express, on the basis of the procedures performed, a conclusion about the compliance of the DNF with the requirements of the Decree and of the GRI Standards. Our work has been performed in accordance with the principle of "International Standard on Assurance Engagements ISAE 3000 (Revised) - Assurance Engagements Other than Audits or Reviews of Historical Financial Information" (hereinafter "ISAE 3000 Revised"), issued by the International Auditing and Assurance Standards Board (IAASB) for limited assurance engagements. This principle requires the planning and execution of work in order to obtain a limited assurance that the DNF is free from material misstatements. Therefore, the extent of work performed in our examination was lower than that required for a full examination according to the ISAE 3000 Revised ("reasonable assurance engagement") and, hence, it does not provide assurance that we have become aware of all significant matters and events that would be identified during a reasonable assurance engagement.

The procedures performed on the DNF were based on our professional judgment and included inquiries, primarily with company's personnel responsible for the preparation of the information included in the DNF, documents analysis, recalculations and other procedures in order to obtain evidences considered appropriate.

In particular, we have performed the following procedures:

1. analysis of the relevant matters in relation to the activities and characteristics of the Group reported in the DNF, in order to assess the reasonableness of the selection process applied in accordance with the provisions of article 3 of the Decree and considering the reporting standard applied;
2. analysis and evaluation of the criteria for identifying the consolidation area, in order to evaluate its compliance with the provisions of the Decree;
3. comparison of the economic and financial data and information included in the DNF with those included in the Group's consolidated financial statements;
4. understanding of the following aspects:
  - o Group's management and organization business model, with reference to the management of the matters indicated in the article 3 of the Decree;
  - o policies adopted by the Group related to the matters indicated in the article 3 of the Decree, results achieved and related key performance indicators;
  - o main risks, generated or suffered, related to the matters indicated in the article 3 of the Decree.

With regard to these aspects, we obtained the documentation supporting the information contained in the DNF and performed the procedures described in item 5. a) below

5. understanding of the processes that lead to the generation, detection and management of significant qualitative and quantitative information included in the DNF.  
In particular, we have conducted interviews and discussions with the management of Enav S.p.A. and with the personnel of Techno Sky S.r.l. and we have performed limited documentary evidence procedures, in order to collect information about the processes and procedures that support the collection, aggregation, processing and transmission of non-financial data and information to the management responsible for the preparation of the DNF.

Furthermore, for significant information, considering the Group activities and characteristics:

- at group level
  - a) with reference to the qualitative information included in the DNF, and in particular to the business model, policies implemented and main risks, we carried out inquiries and acquired supporting documentation to verify its consistency with the available evidence;
  - b) with reference to quantitative information, we have performed both analytical procedures and limited assurance procedures to ascertain on a sample basis the correct aggregation of data.
- for Enav S.p.A. and Techno Sky S.r.l., that we have selected based on their activities and relevance to the consolidated performance indicators, we have carried out remote interviews during which we have had discussions with management and have obtained evidence about the appropriate application of the procedures and the calculation methods used to determine the indicators.

## Conclusion

Based on the procedures performed, nothing has come to our attention that causes us to believe that the DNF of the Enav Group for the year ended on December 31, 2021 has not been prepared, in all material aspects, in accordance with the requirements of articles 3 and 4 of the Decree and the GRI Standards.

Our conclusions on the DNF of the Group do not refer to the information included in the paragraph "The EU Taxonomy" of the DNF itself, that are required by art.8 of the European Regulation 2020/852.

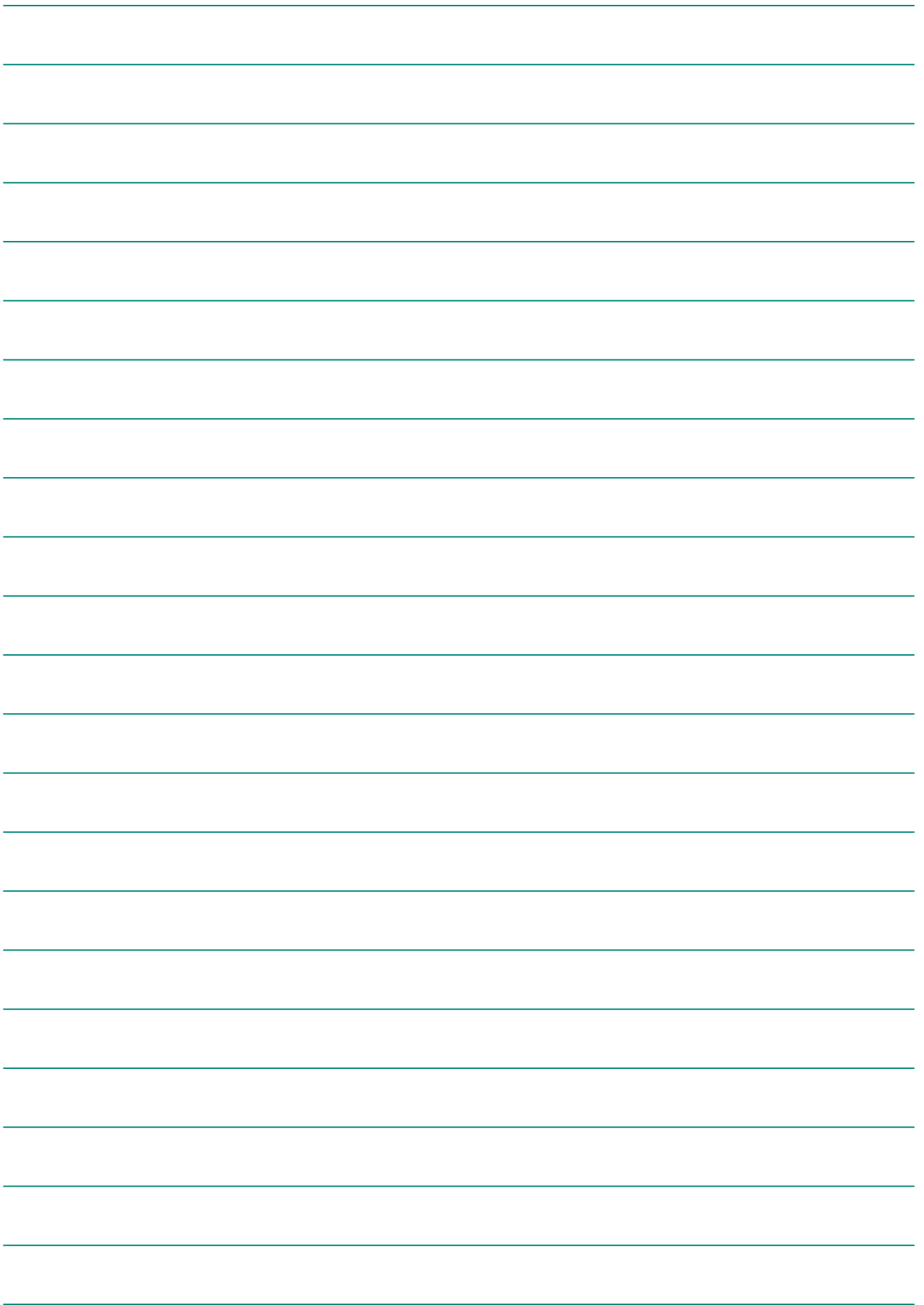
Rome, April 28, 2022

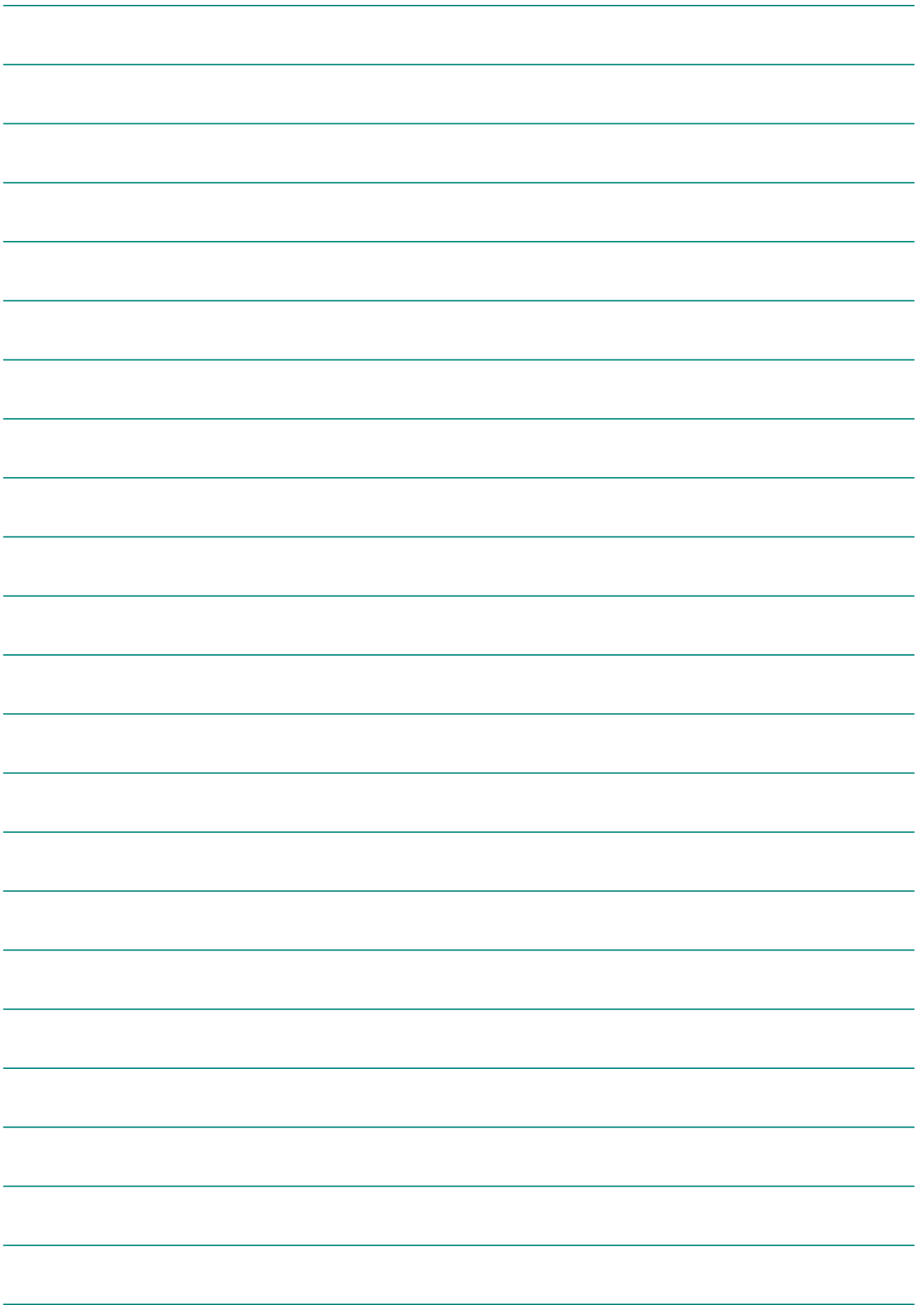
EY S.p.A.

Riccardo Rossi  
(Auditor)

*This report has been translated into the English language solely for the convenience of international readers.*

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