

HUMAN RIGHTS POLICY

This policy lays down the baseline principles and the commitments that the ENAV Group has undertaken for the protection and furthering of human rights in the performance of its business and in all the scenarios in which it operates.

Through this Policy, ENAV reaffirms its commitment to respect human rights and the standards in the Universal Declaration of Human Rights, in the United Nations Guiding Principles on Business and Human Rights, in International Labour Organisation Conventions, in OECD Guidelines, in the European Union Charter of Fundamental Rights and in its own Code of Ethics.

ENAV undertakes to respect and sustain human rights both by strictly complying with the law in all the countries in which it operates and by putting in place and applying its own corporate codes of conduct.

ENAV strives to promote these standards, which are laid down in international law and its own codes, among some of the Group's main stakeholders: employees, customers, suppliers and business partners.

Accordingly, the following are the Group's key protection of human rights objectives:

- **Rejection of forced or compulsory labour and child labour**

ENAV refuses to make use of any type of forced or compulsory labour (as defined in Convention No. 29 of the International Labour Organization) and forbids recourse to child labour in compliance with the law applicable in the country in which it performs its operations.

- **Freedom of association and collective bargaining**

ENAV acknowledges its employees' right to form and/or join organisations having the purpose of defending and furthering their interests and to be represented by trade union bodies or by other forms of representation chosen in accordance with the law and the prys in force in the various countries in which they are employed.

The Group recognises collective bargaining as the primary instrument for determining its employees' conditions of service.

- **Workplace and personal dignity**

ENAV safeguards human dignity, in the sense of not discriminating on the grounds of race, colour, gender, language, religion, political opinions, sexual

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orientation, nationality, social origin or status, membership of a trade union, age, disability and in the sense of rejecting any other behaviour that might constitute a form of discrimination or intolerance of diversity. It rejects and punishes, including by imposing remedies within the Group, any type of physical, verbal, sexual or psychological harassment, abuse, threats or intimidation in the workplace.

The Group's acknowledgment of the right to family life takes the form of welfare policies focused on work-life balance.

- **Right to privacy**

In pursuing its institutional purposes, ENAV processes the data of natural persons, whether employees, collaborators, visitors, customers, suppliers or any other person with whom it enters into a relationship. In accordance with the principles laid down in its Code of Ethics, ENAV deems the protection of natural persons and the processing of personal data to be an absolute priority of its system of management and of its organisation. Accordingly, ENAV acknowledges the principles and rules for the protection of natural persons and acts on them, taking any technical and organisational measures necessary for the respect of their fundamental rights and freedoms and in particular of their right to have their personal data protected.

Furthermore, it also ensures the dignity of its workers by respecting privacy in correspondence and in interpersonal relations between employees, while also prohibiting the improper communication and/or disclosure of personal data without the consent of the person concerned.

- **Occupational health and safety**

In compliance with current regulations, ENAV is committed to protecting the health, physical well-being and safety of its workers by implementing any and all necessary and appropriate measures with an unremitting commitment to the conformity of the workplace to the highest standards of safety and hygiene.

- **Relations with suppliers and sub-suppliers**

ENAV asks its suppliers to observe its Code of Ethics, which prohibits forced labour and human trafficking, and also requests them to safeguard equal opportunities, health and safety at work and observance of the minimum wage and proper working conditions and hours.

- **Relations with customers**

ENAV has based its relations with its customers on sharing its corporate values and respecting human rights in all types of business dealings.

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- **Relations with the community**

ENAV has based its relations with the community on the principles of listening to and dialogue with various areas in civil society. It supports voluntary and non-profit associations by giving hospitality and carrying out social work, some of which through voluntary Group projects. It pays particular attention to respect for human rights in selecting the organisations that it assists and in deciding on the beneficiaries of its contributions.

ENAV acknowledges:

- the right to life and health;
- native populations' rights to preserve, protect and broaden their traditions and culture.

In compliance with the provisions of the United Nations Guiding Principles on Business and Human Rights, ENAV will see that the contents of this policy are circulated and that measures will also be taken to verify that they are actually implemented in the form of awareness and training campaigns.