



**ENAV GROUP**

**2022 SUSTAINABILITY REPORT**

**Consolidated Non-Financial Statement pursuant to  
Legislative Decree 254/2016**

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## Letter to Stakeholders

*For ENAV, 2022 was an important and successful year. After the very difficult period due to the consequences of the COVID-19 pandemic, the year that has just ended was characterised by a decisive upturn in air traffic, which in some periods even exceeded 2019 levels.*

*But the past year has also been one in which our approach to sustainability has become more solid and mature to the point that it is now the common thread linking all our initiatives. The full integration of sustainability into our strategies and day-to-day actions has enabled us not only to achieve the targets we set ourselves, but also to set additional, particularly challenging ones for 2023-2024.*

*Following the stabilisation of European performance regulations, the new 2022-2024 Business Plan was approved in 2022, and enhances the ENAV Group's sustainable success guidelines by leveraging its key values: safety, excellence of service quality, people, technological innovation and digitalisation. Correspondingly, the Sustainability Plan was updated, supplementing it with new targets consistent with the Business Plan initiatives and extending its validity until 2024. Finally, in order to define the guidelines for the future, the design of the Future Sky 2031 Plan was initiated.*

*ENAV's main ESG objective continues to be to make an increasingly decisive contribution to the reduction of aviation emissions, working simultaneously on our direct and indirect emissions, on the sustainable supply chain and on further increasing the production of energy from renewable sources. In this context, while our commitment is constantly focused on the challenges of the future, this is also the time to take stock of what has been achieved so far. Alongside well-established projects such as the Free Route - which this year alone has resulted in lower emissions for carriers of more than 205 million kg of CO<sub>2</sub>, the year just ended saw the launch of the Arrival Manager (AMAN) on the Rome ACC, a new approach management system that will further reduce CO<sub>2</sub> emissions from aircraft arriving. Also in 2022, by virtue of the strategy adopted by ENAV following the approval of our climate targets by the Science Based Target initiative - the first Italian company in the aviation sector - we achieved the reduction of our Scope 1 and 2 emissions by more than 80% compared to 2019. A goal that allows us, with the use of carbon credits to offset the portion of emissions we have not yet managed to reduce, to achieve carbon neutrality. This consolidates a virtuous path that has led ENAV to be recognised among the global leaders in sustainable development in the aviation sector, as also confirmed by the award received at the ATM World Congress 2022 together with NASA and Airbus. As part of this journey, we completed the project to phase out single-use plastics (-7.8 tonnes in 2022) and achieved the 45% target in replacing our car fleet with electric, hybrid and plug-in cars. In line with our targets, we have initiated an action plan for the next few years to reduce our Scope 3 emissions by at least 13.5% by 2030, and we are defining the roadmap to become a net zero company.*

*But of course our approach to sustainability is not just about environmental protection and climate change mitigation initiatives. In the **Social** sphere, we gave greater impetus to initiatives aimed at developing an increasingly strong culture of sustainability among ENAV people. Through training sessions, videos and podcasts, we further deepened the topics of diversity and inclusion, occupational health and safety, combating active and passive corruption, and respecting human rights throughout the supply chain, values around which we recognise ourselves as a community of people who act in harmony with the principles of sustainability in their work and in their daily lives. Having obtained ISO 37001 certification from the Parent Company on anti-corruption management systems, the goal we have set for 2023 is to define the path to also obtain certification on gender equality policies according to the UNI/PdR 125:2022 reference practice, certification on diversity and inclusion according to the ISO 56002 standard, and the adoption of the ISO 56002 standard for the management of innovation processes in the Company.*

*The full commitment of ENAV's **Governance**, from the Board of Directors to the Board Committees, including the Sustainability Committee, together with the commitment of the top management and all the people of the ENAV Group, has enabled us not only to achieve the objectives identified and to set new and ambitious ones for the years to come, but also to put sustainability at the heart of the Group's strategies, also through*

*innovation and the digital transformation process underway. Sustainability is now structurally consolidated in compensation policies, with the setting of clear and challenging goals in both short- and long-term incentive policies, and with timely disclosure of these goals and their achievement. These include the commitment to guarantee constant growth in ESG ratings, with particular reference to the CDP (formerly the Carbon Disclosure Project) and Standard and Poor's. With the objective of ensuring constant linearity with the Company's policies in the ESG sphere, and guaranteeing the consolidation of information flows within the Group on the basis of a prospective vision, a Sustainability Management Committee was therefore established.*

*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 technological and digital innovation that today represents for ENAV an inseparable pair with sustainability, being the key factor, together with the talent of our people, to ensure the achievement of the challenging goals of sustainability in the medium and long term.*

*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 major player in the realisation of this process of modernisation and social evolution, thanks to the professionalism of our people and the push for new cutting-edge dimensions of technology, such as artificial intelligence and the data-driven approach.*

*A sustainability-centric Group but also a civilised Company, where the value we produce is not only determined by profits, but by the quality of the services we provide, by health and safety, by the impact we have on the environment and on the quality of work and life of our people.*

## The history of the ENAV Group

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.

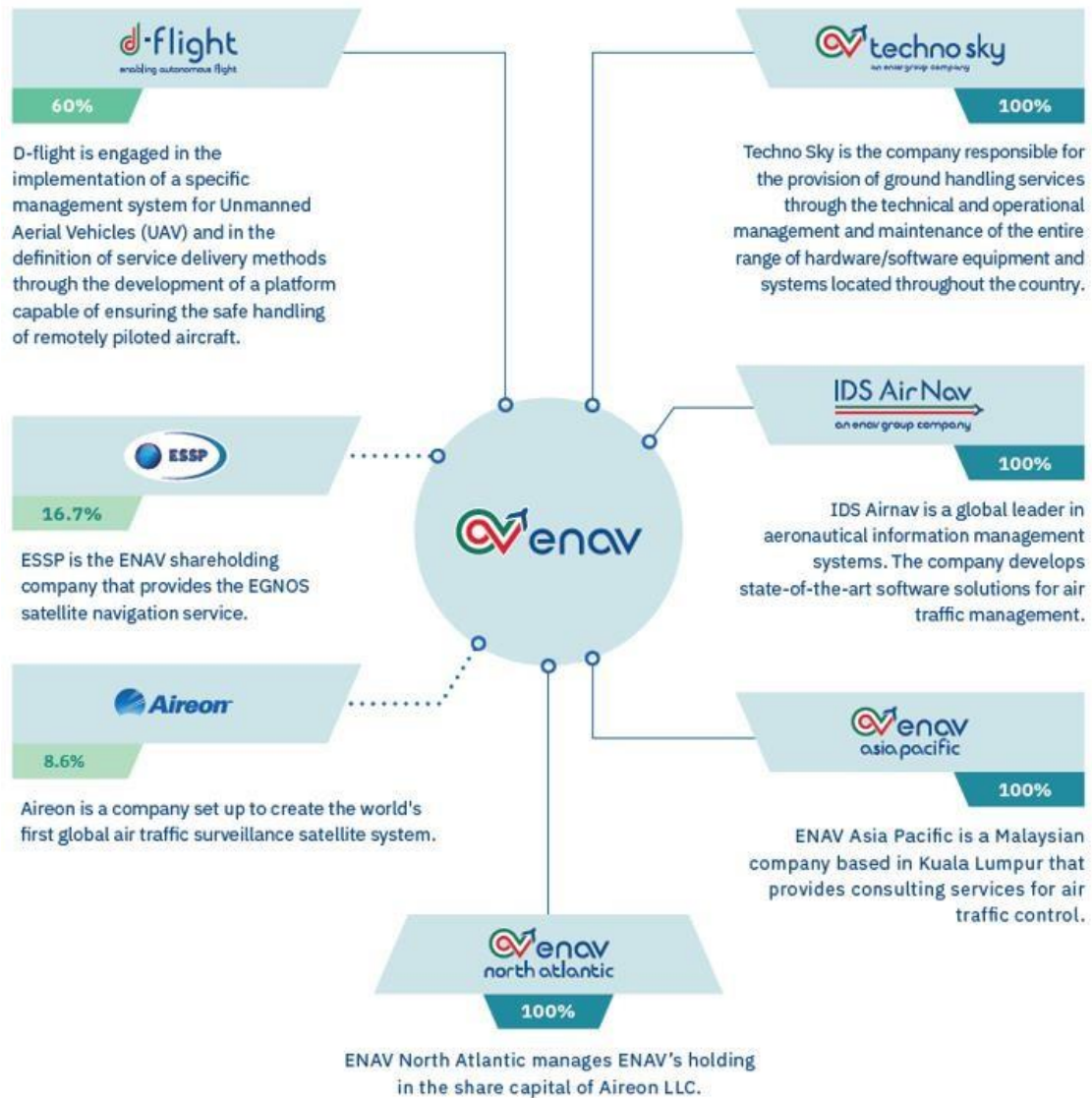
The present Company has its origins in the Autonomous Company providing Flight Assistance for General Air Traffic (AAAVTAG), established in 1981. The Autonomous Company took over from the commissariat for flight assistance established three years earlier as the GAT (General Air Traffic) Control Company 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 Infrastructure and Transport (MIT) and the National Civil Aviation Authority (ENAC).



# The ENAV Group

## THE STRUCTURE OF THE GROUP



## The ENAV Group's identity card and operating model

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.

ENAV has been listed since 26 July 2016 on the Mercato Telematico Azionario MTA (now EXM - Euronext Milan) managed by Borsa Italiana S.p.A., and is currently the only Air Navigation Service Provider (ANSP) to be listed on the capital market. The majority shareholder with 53.3% of the capital is the Ministry of Economy and Finance (MEF), while 46.7% is floating<sup>1</sup>.

The Company operates in a European regulated market and provides its services<sup>2</sup> in Italy under the supervision of the Ministry of Infrastructure and Transport (MIT) and the national regulator ENAC and the National Civil Aviation Authority (ENAC).

ENAV is a key component of the international Air Traffic Management (ATM) system and a major player in the realisation of the Single European Sky, the European Commission's programme to harmonise air traffic management in Europe.

***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 is the only Italian company that selects, trains and updates professionals working in air traffic control services, guaranteeing safety and punctuality to the millions of passengers flying the Italian skies for over 40 years, contributing to the growth of national and European air transport with 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.

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<sup>1</sup> More information on ENAV's shareholder structure can be found in the "Stakeholders" chapter.

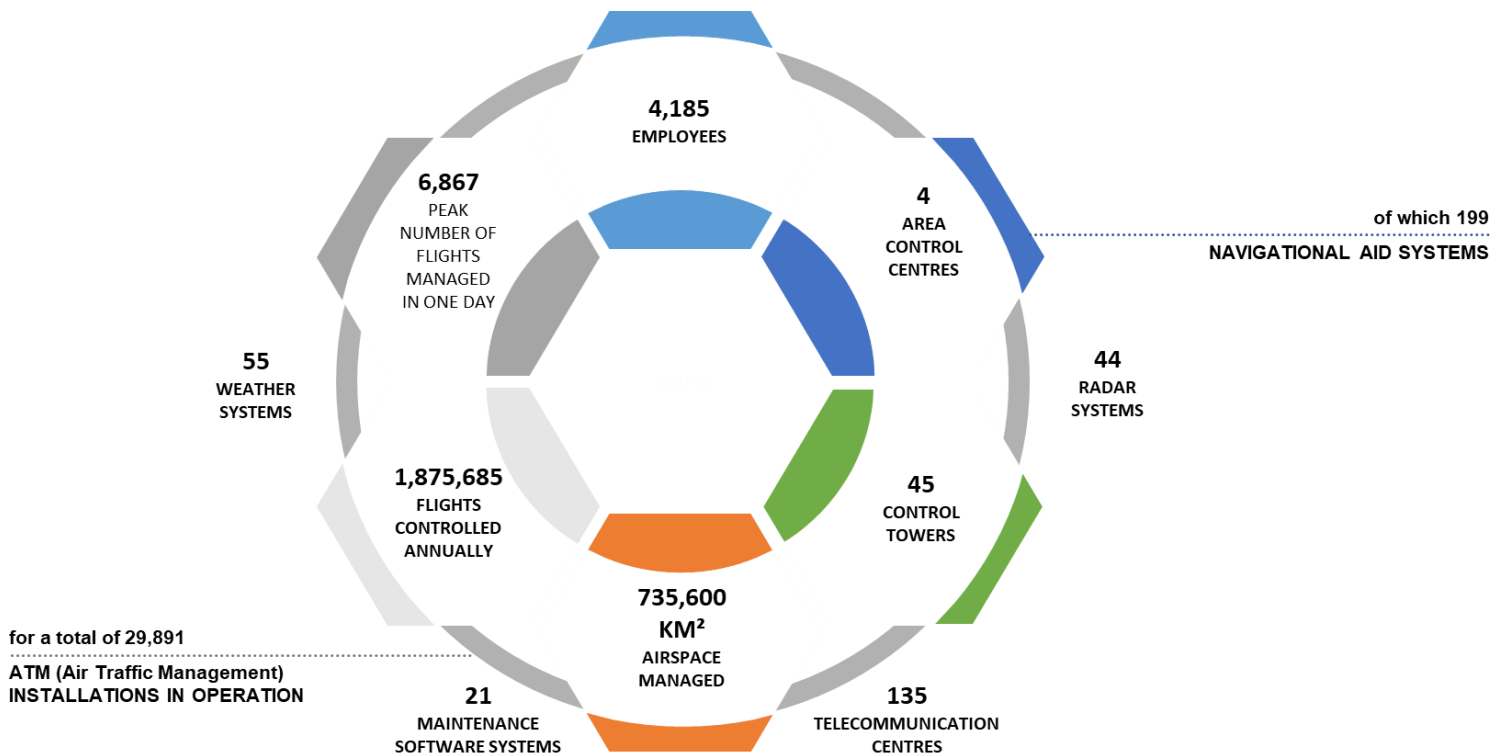
<sup>2</sup> The organisation is active in the following main areas: Air Traffic Control Service (ATCS); Flight Information Service (FIS); Aeronautical Information Service (AIS); Meteorological Observation and Forecasting Service, limited to the issuance of meteorological bulletins relating to airports (METAR) and the airspace under its jurisdiction. ENAV's Suppliers mainly consist of companies supplying goods, services and works that accompany the Company from its self-functioning activities to its core air traffic control activities (by way of example, the supply of hardware and software components that feed into the technological infrastructure serving air traffic control, the supply of telecommunications systems, the purchase and maintenance of electronic equipment, maintenance services for Aeronautical Ground Lights, etc.).



In 2022 more than one million planes flew over Italian airspace and ENAV, with its 4,185 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.

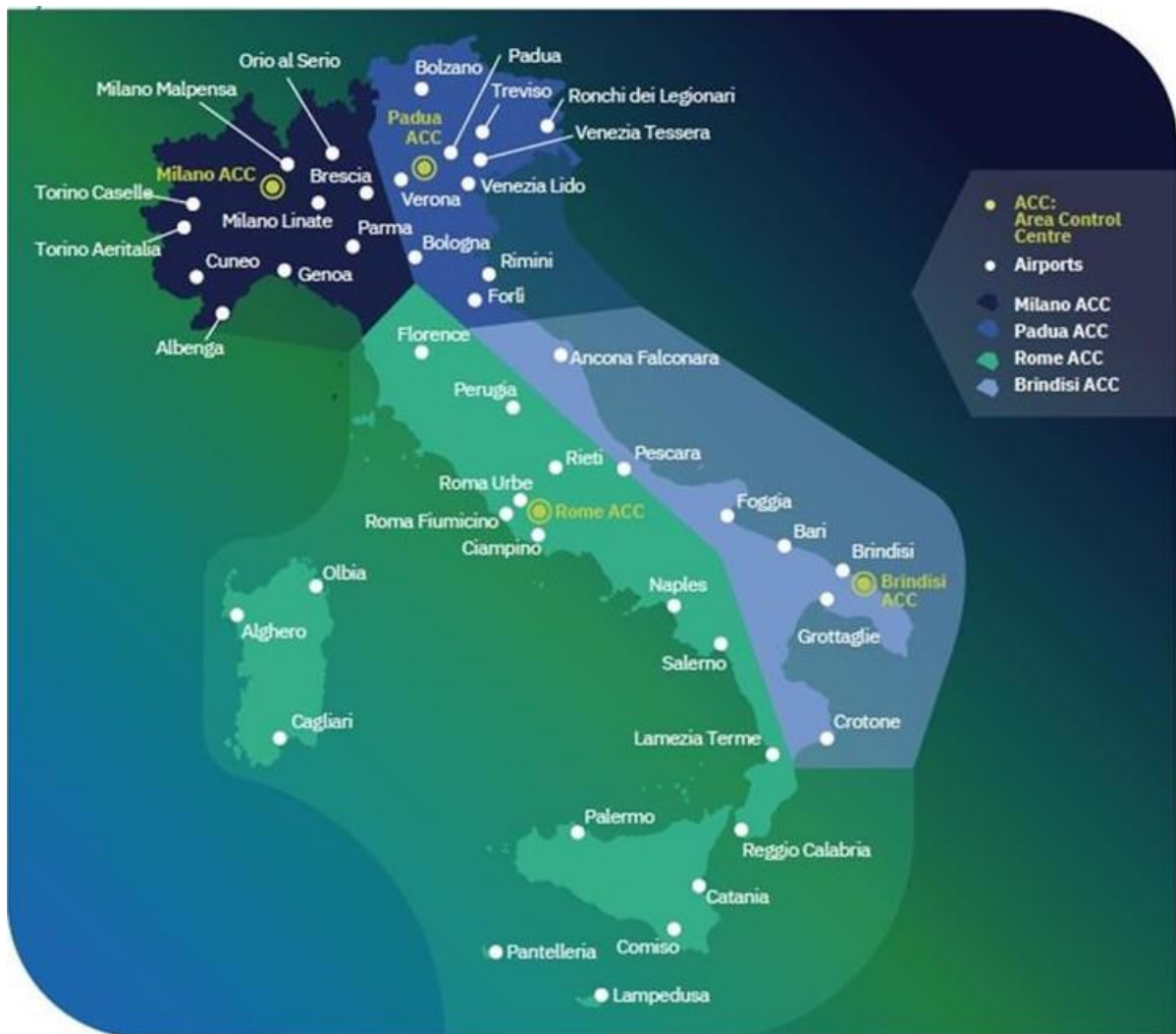
Long considered one of Europe's "big five" in terms of operational performance and innovation, the ENAV Group is now at the forefront of environmental support thanks to the constant optimisation of routes to reduce aircraft consumption and the use of innovative technologies to improve the efficiency of its infrastructure.



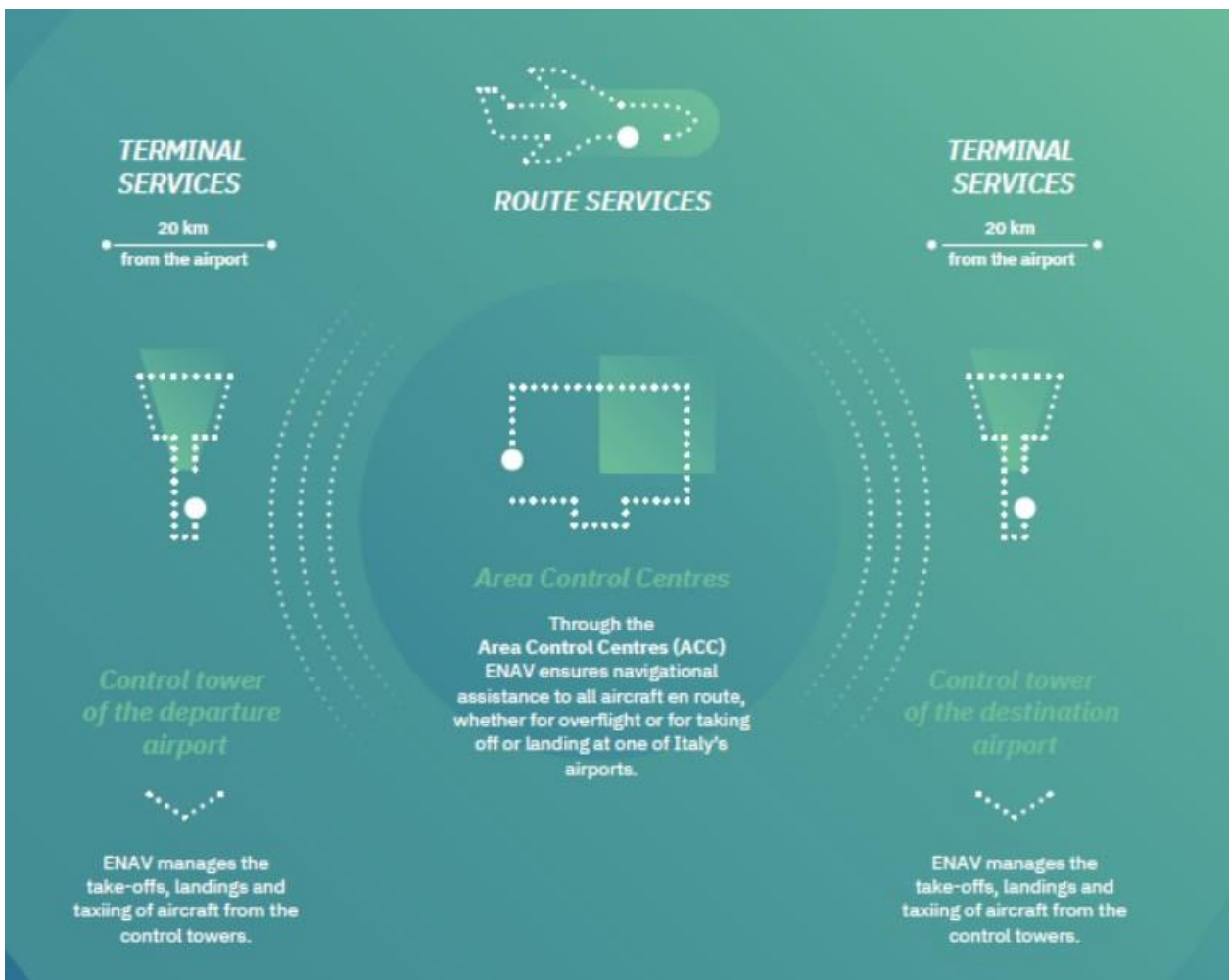
## The Operating Model

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.

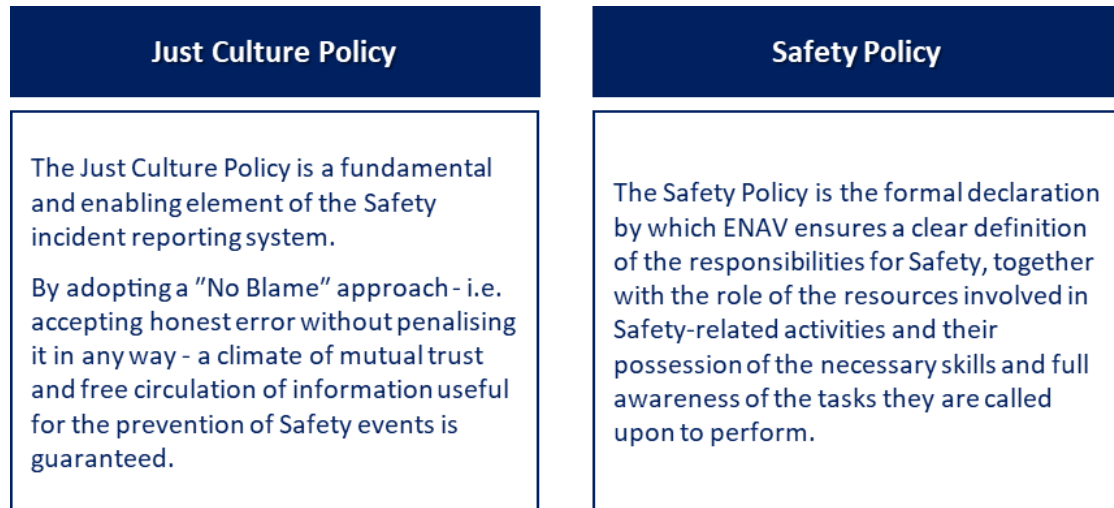


Air traffic control is guaranteed seamlessly, from the moment an aircraft's engines are turned on in the apron of the airport of departure, until they are cut once it arrives at the apron assigned at the airport of destination. The task of the air traffic controller is to guarantee safe and expeditious 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.



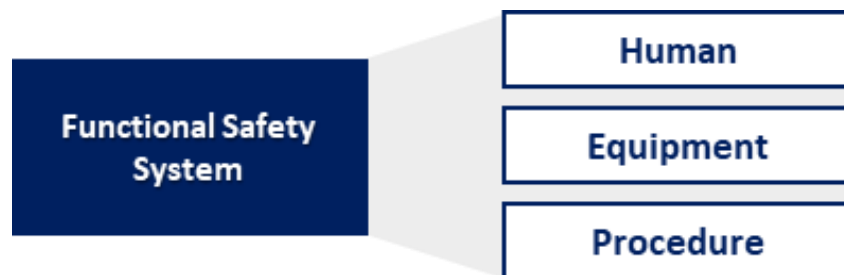
## A Safety Culture

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.



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.

As a preventive measure, it has set up a quantitative safety risk assessment system. This approach, which complies with the ATM/ANS service certification regulation, is based on the definition of certain risk models that allow the impact of changes to the ATS system (people, procedures and equipment) on safety levels to be assessed and the risks of each individual Territorial Unit to be identified and monitored.



In a reactive perspective, on the other hand, each safety event reported in accordance with the EU regulations on the subject<sup>3</sup> is duly analysed in order to identify possible "safety proposals" which, addressed to the relevant ENAV organisational structures, are then translated into "remedial action" or "improvement proposals".

<sup>3</sup> EU Regulation 376/2014 on occurrence reporting, analysis and monitoring in civil aviation.

Finally, in order to guarantee the highest safety levels ENAV monitors the safety of ATM/ANS services and the state of the Safety Management System with the aim of identifying any negative trends so that timely and effective corrective actions can be taken.

### **Interventions in 2022 in the field of Safety**

Below are the main activities in the field of Safety in 2022:

- the analysis of approximately 4,960 Safety occurrences which, via a Safety Dashboard implemented during the year, are presented in real time to operational management, enabling monitoring of Safety performance;
- through the conclusion of the second phase of the NOSS (Normal Operations Safety Survey) project at the Padua Area Control Centre and the start, in December 2022, of the third phase of the project at the Milan and Brindisi Area Control Centres, thanks to the training of 11 Air Traffic Controllers who will carry out observation activities at these centres. 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;
- conducting a “cross-border Safety Survey” between ENAV and AUSTROCONTROL for a joint assessment of the coordination procedures defined between ACC Padua and ACC Vienna through observations and interviews (with particular attention to “work as done”), in order to identify any safety criticalities and “best practices” used by the two entities;
- hand-out to all Group employees of a Safety Culture Survey, according to the methodology established by EUROCONTROL, which made it possible to assess the safety culture of the entire organisation (not only of operational staff) in order to identify its strengths and weaknesses. The activity will conclude with the development of a three-year Action Plan to address the aspects of Safety Culture that were identified as weaker.

## 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 (NFS) 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 Top Management, consolidates an integration vision in which 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.

Moreover, in December 2022, the ESG Steering Committee was formed in response to the increased strategic importance of incorporating sustainability into corporate governance and Business Plan initiatives. It comprises all unit heads reporting directly to the CEO,<sup>4</sup> the Chief of Sustainability and CSR, and the Sustainability Committee Secretariat. It seeks to develop corporate structure collaboration on ongoing efforts and the objectives of the 2021-2024 Sustainability Plan, as well as to maintain a continual flow of information on ongoing operations, guidelines, and regulatory changes in the industry.



Company governance ensures, further, 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

<sup>4</sup> Due to the organisational competences assigned to them, the corporate resources that make up the ESG Steering Committee are assigned responsibility for implementing the Company’s ESG commitments.

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<sup>5</sup>.

## **The ENAV Group's strategy**

### **The 2022-2024 Business Plan**

In a scenario of progressive recovery of pre-pandemic traffic volumes, the ENAV Group defined the new 2022-2024 Business Plan and launched the Future Sky 2031 Plan, approved by the Board of Directors at its meeting on 12 May 2022.

The Plan enhances the factors that characterise the sustainable development of the ENAV Group, leveraging its key values of safety, excellence in the quality of services rendered, human resources, technological innovation and digitalisation. The Plan describes the strategic objectives to be achieved during the period under review, broken down into six strategic pillars, assessing the economic, equity and financial projections of the results of the individual Group entities. The first three vertical pillars, directly related to the Parent Company's operations, focus on technological and operational excellence, digital transformation and commercial repositioning. The other three pillars represent a series of transversal actions that intersect the three vertical pillars and focus on the centrality of people, which will make it possible to generate long-term value for all Stakeholders with positive impacts for the sector and the entire supply chain to the benefit of the Italy's regions and economy. The main projects and their status as of 2022 are outlined below.

#### **Technical operational excellence**

The fulcrum of the Business Plan is the new technical-operational model, which aims to increase productivity and flexibility of the national airspace and air traffic control structure, to the benefit of airlines, passengers and the Italian economic system in general. The new model is based on three fundamental structural rationalisation measures for more efficient service delivery:

- the consolidation of the Radar Control Centres (ACC – Area Control Centres) with the change from 4 to 2 ACCs, located in Rome and Milan;
- the upgrading of the Brindisi and Padua ACCs, converted into Remote Tower Control Centres (RTCC) – among the most important in Europe – for the remote control of 13+13 low-traffic airports, with 24/7 operations, to the benefit of the local economies, both in terms of tourism and freight transport. The first Local Digital Tower was opened in Brindisi on 13 June 2022, while the preparatory activities for the implementation of the Local Digital Towers in Perugia and Parma, scheduled for 2023 and 2024 respectively, have begun;
- the integration of eleven approach services (APP), today provided by the airport towers, into their respective Area Control Centres (ACC). With the integration in pre-summer 2022 of the Naples approach on Rome ACC, 5 of the 11 planned interventions have been completed, 3 more will be completed in 2023.

The path of technological innovation finds its realisation in the new Flight Data Processing tool "Co-flight" and in the new ATM (Air Traffic Management) platform "4-Flight", two technological platforms that, by renewing the existing ones in operation for more than 20 years, will allow greater capacity, flexibility and scalability of the Italian airspace and its air traffic control system, necessary to manage the expected increase

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<sup>5</sup> Further information on sustainability governance can be found in the chapter "Governance".

in traffic forecast for 2031 (+15/20% against the 2019 record). For both platforms, the planned software releases in 2022 have been completed.

In December 2022, the Technical Operation Centre (TOC) in the Ciampino ACC came into operation, implementing a new maintenance management model. The new facility allows the remote supervision and management of maintenance activities of ground systems (e.g. radar, towers, landing guidance, etc.) located throughout the country, which now manages more than 47,800 devices.

### **Digital Innovation**

The ENAV Digital path launched in 2021 aims to promote the digital transformation of ENAV's management systems through process innovation, information systems and enabling technologies, such as big-data availability, AI, Machine Learning and IOT. The Group also undertook the unification and migration of its management systems to the cloud. The new corporate ERP went into operation at IDS AirNAV in December 2022, and preparatory activities for the transition of the other Group Companies to take place in 2023 and 2024 were commenced.

In addition, the first Open-Innovation initiative materialised with the ENAV Thinking Cup 2022, held in Forlì on 22-24 September, focusing on Unmanned Traffic Management and Advanced Air Mobility.

### **Commercial development**

The ENAV Group is present with its systems and services in about 100 countries. In 2022, the Group recorded new orders worth more than €31M, in line with 2021 and an increase in its turnover in the unregulated market of more than 35% compared to 2021, with further significant prospects of strengthening in 2023-2024.

Of particular note are the maintenance of the position in almost all geographical areas, the acquisition of a significant project in the Middle East with the Qatar Civil Aviation Authority aimed at supporting the FIFA World Cup 2022 and the start-up of the new FIR in Doha, and the acquisition of the first technology supply orders in "As A Service" mode in line with the strategy set out in the Business Plan for the third market. Also worth mentioning is the start of the first projects in the UTM sector, for the development of complex operations that will allow the definitive development of the drone market in Italy.

### **ENAV People**

Personnel is a key factor for the ENAV Group. Putting industry back at the centre means focusing on young people, on talent and on new digital skills.

In 2022, some 400 people (more than 50% of whom are under 30 years of age) were employed within the Group and induction processes on key SW development topics were initiated.

In the important process begun, special attention is paid to the inclusion of resources with an innovation-oriented digital mindset.

## **The 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, the ENAV Group had already started a change management process in the three-year period 2018-2020 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, supplemented then, in 2022, with new objectives and extended until 2024, has



allowed the Group's sustainability strategy to be consolidated through the definition of a road map that aims to lead ENAV to play 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 initiative (ENAV was the first company in the Italian air transport sector and the first service provider in the world to achieve this important milestone) and the reduction of Scope 1 and 2 emissions by approximately 75% compared to 2021), are just some of the results achieved in 2022 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.

## **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
- "Anti-corruption" 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

## 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*.
- Reduction of Scope 1 and 2 emissions by about 75% compared to 2021
- Consolidation of the supplier assessment process against ESG criteria
- Obtaining CDP and Standard and Poor's rating
- Launch of the Arrival Manager (AMAN) system at Roma Fiumicino, which will allow a considerable reduction in CO<sub>2</sub> emissions by aircraft arriving
- Achievement of the electromagnetic emission reduction target by decommissioning 50% of NDBs (Non-directional beacons) used for instrument air navigation
- Reaching the 45% target of replacing the car fleet with electric/hybrid/plug-in vehicles.
- Achievement of the targets, set out in the Sustainability Plan, related to self-production of energy from renewable sources and consumption efficiency

## The 2021-2024 Sustainability Plan

In light of the results achieved and the new challenges that the Company has decided to set for itself in the long but also in the short term, the Sustainability Plan was updated in 2022 to ensure perfect alignment with the time horizons of the Business Plan, integrating new objectives and extending its validity until 2024.

The 2021-2024 Plan, like the 2021-2023 Plan, is based on the 17 Sustainable Development Goals (SDGs) set by the United Nations and is directed within the established perimeter of strategic development lines, defining a series of measures that draw inspiration from several fields, including: (i) the Group's materiality; (ii) the findings of Stakeholder management activities; (iii) an analysis of the ENAV Group's positioning with respect to assessments conducted on some important sustainability indices and (iv) a benchmark analysis on sustainability issues of greatest interest to the market and the Group.

The structure remains articulated on 6 pillars, namely: (i) Strategy and Governance, (ii) Policies, (iii) Technological Innovation, (iv) Reporting and Communication, (v) Culture and Dedicated Projects, and (vi) Climate Change. It also includes 32 objectives that represent the main projects on which the Company will be engaged in the two-year period 2023-2024.

As for the new projects planned for 2023 and 2024, these concern:

- the **"Strategies and Governance"** pillar, for the development of a model for measuring the economic, social and environmental impacts generated by strategic sustainability initiatives;
- the **"Policies"** pillar, for the maintenance of ISO 37001 and ISO 45001 certification; obtaining EASI (Integrated Sustainability Corporate Ecosystem) certification; the feasibility assessment for the adoption of the ISO 56002 standard for the management of innovation processes in the Company; the feasibility assessment for certification according to the UNI/PdR 125 Reference Practice: 2022 (Gender Equality Policies); to the feasibility assessment for certification according to ISO 30415:2021 (Diversity & Inclusion);
- the **"Technological Innovation"** pillar, for the development of research and innovation activities related to the SDGs; for research and development of artificial intelligence and machine learning algorithms, to be executed in High Performance Computing cloud environments, functional to the Group's core and non-core activities and to sustainability issues;
- in the **"Reporting and Communication"** pillar, to the development of materiality analysis according to the "Double Materiality" concept; to the elaboration of the GHG Report; to the further impetus of external communication on sustainability issues; to the dissemination of sustainability issues to new generations through a "Generational Report"; to the integrated reporting of corporate performance;
- in the **"Culture and Dedicated Projects"** pillar, to the acquisition of new talent with sensitivity to ESG issues;
- the **"Climate Change"** pillar includes the further reduction of electromagnetic energy transmitted through optimisation on navigation instruments; the further replacement of the car fleet with electric-hybrid-plug-in cars; the development of new projects aimed at energy efficiency; the improvement of the reporting process of Scope 3 emissions - capital goods; the definition of a new approach to the Circular Economy; the definition of the impacts of climate change on ENAV's business; the strategy aimed at achieving SBTi Scope 1 and 2 objectives by 2030; the definition of the strategy aimed at reducing Scope 3 emissions by 13.5% by 2030.

Each objective is articulated by referring it to one or more units responsible for achieving it and is accompanied by KPIs, which define its measurability and targets that allow its achievement within the reference period to be verified.

For a more in-depth and comprehensive analysis of all the Plan's objectives, please refer to Appendix 4.

## The EU Taxonomy<sup>6</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>7</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;
- 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 second year of application, a disclosure should be prepared that includes the share of taxonomy-aligned and taxonomy-not-aligned economic activities (or “Taxonomy – Aligned/Not Aligned”), relative to turnover, capital expenditure and total operating expenditure incurred.

The following paragraphs outline the ways in which the ENAV Group assessed compliance with Regulation (EU) 852/2020 and the prospectus with the quantitative KPIs requested.

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. Therefore, the scope of analysis and the data included in this disclosure refer only to these two objectives.

### ANALYSIS OF ELIGIBLE ACTIVITIES

The evaluation process to determine the eligibility of economic activities began in 2021. Specifically, to determine the eligibility of economic activities, both the “Statistical classification of economic activities in the European Community” (Nomenclature of Economic Activities - NACE)<sup>8</sup> and the descriptions of the activities reported in Annex I and Annex II of the Climate Delegated Act were analysed.

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<sup>6</sup> In compliance with the European common enforcement priorities for 2022 annual financial reports, issued by ESMA on 28 October 2022.

<sup>7</sup> 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.

<sup>8</sup> 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.

On the basis of the interpretation of the requirements applicable, the ENAV Group has assessed that its main activities are not among those identified to date by the reference legislation for the two environmental objectives of Climate Change Mitigation and Climate Change Adaptation, set out respectively in Annex I and II of the Climate Delegated Act.

This assessment focused on issues related to 6.17 “Low-carbon airport infrastructure”, 9.1. “Research, development and innovation close to the market” and 9.2 “Research, development and innovation for the direct capture of CO<sub>2</sub> directly into the atmosphere”.

The findings of the analysis were also confirmed for 2022, whereby the ENAV Group has no eligible activities and consequently none aligned with the Taxonomy.

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.

#### **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>9</sup>, as described below, the ENAV Group carried out an analysis of turnover, investments and operating expenses for the 2022 financial year.

##### **For the turnover portion<sup>10</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>11</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 2022, eligible investments amounting to €1,457,435.05 were identified, resulting in a ratio of about 1.8% on CapEx as defined below.

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<sup>9</sup> 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.

<sup>10</sup> The financial data included in this KPI correspond to the Group’s net revenues included in the Annual Report at 31 December 2022: Consolidated Financial Statements.

<sup>11</sup> The financial data included in this KPI correspond to the increases in fixed assets included in the 2022 Annual Report: Consolidated Financial Statements.

- 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.

**For the portion of eligible operational expenditure<sup>12</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.

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<sup>12</sup> The financial data included in this KPI are comprised in the consolidated operating costs contained in the 2022 Annual Financial Report: Consolidated Financial Statements.

## RESULT OF THE ANALYSIS CARRIED OUT

Economic activities (1)	Code(s)	Absolute CapEx (€)	Proportion of CapEx (4)	Substantial contribution criteria						Do Not Significant Harm' (DNSH) Criteria						Minimum safeguards (17)	Taxonomy aligned proportion of CapEx Year 2022 (18)	Taxonomy aligned proportion of CapEx Year 2021 (19)	Category (enabling activity) (20)	Category (transitional activity) (21)
				Climate change mitigation (5)	Climate change adaptation (6)	Water and marine resources (7)	Circular economy (8)	Pollution (9)	Biodiversity and ecosystems (10)	Climate change mitigation (11)	Climate change adaptation (12)	Water and marine resources (13)	Circular economy (14)	Pollution (15)	Biodiversity and ecosystems (16)					
<b>A. TAXONOMY-ELIGIBLE ACTIVITIES</b>																				
<b>A.1. Environmentally sustainable activities (Taxonomy-aligned)</b>																				
A.1. Environmentally sustainable activities (Taxonomy-aligned) (A.1)		0,00 €	0%	0%	0%	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0%	0%	T	
<b>A.2 Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)</b>																				
Activity 1	4,19	470,929,04 €	0.59%																	
Activity 2	7,3	22,670,96 €	0.03%																	
Activity 3	7,6	816,464,05 €	1.02%																	
Activity 4	8,1	147,371,00 €	0.18%																	
CapEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)																				
<b>Total (A.1+A.2)</b>		<b>1,457,435,05 €</b>	<b>1.8%</b>																	

B. TAXONOMY-NON-ELIGIBLE ACTIVITIES			
Capex of Taxonomy-non-eligible activities (B)		78,299,213,93	98.2%
<b>Total (A+B)</b>		<b>79,756,649 €</b>	<b>100%</b>

B. TAXONOMY-NON-ELIGIBLE ACTIVITIES			
Opex of Taxonomy-non-eligible activities (B)		672,122,565	100%
<b>Total (A+B)</b>		<b>672,122,565</b>	<b>100%</b>

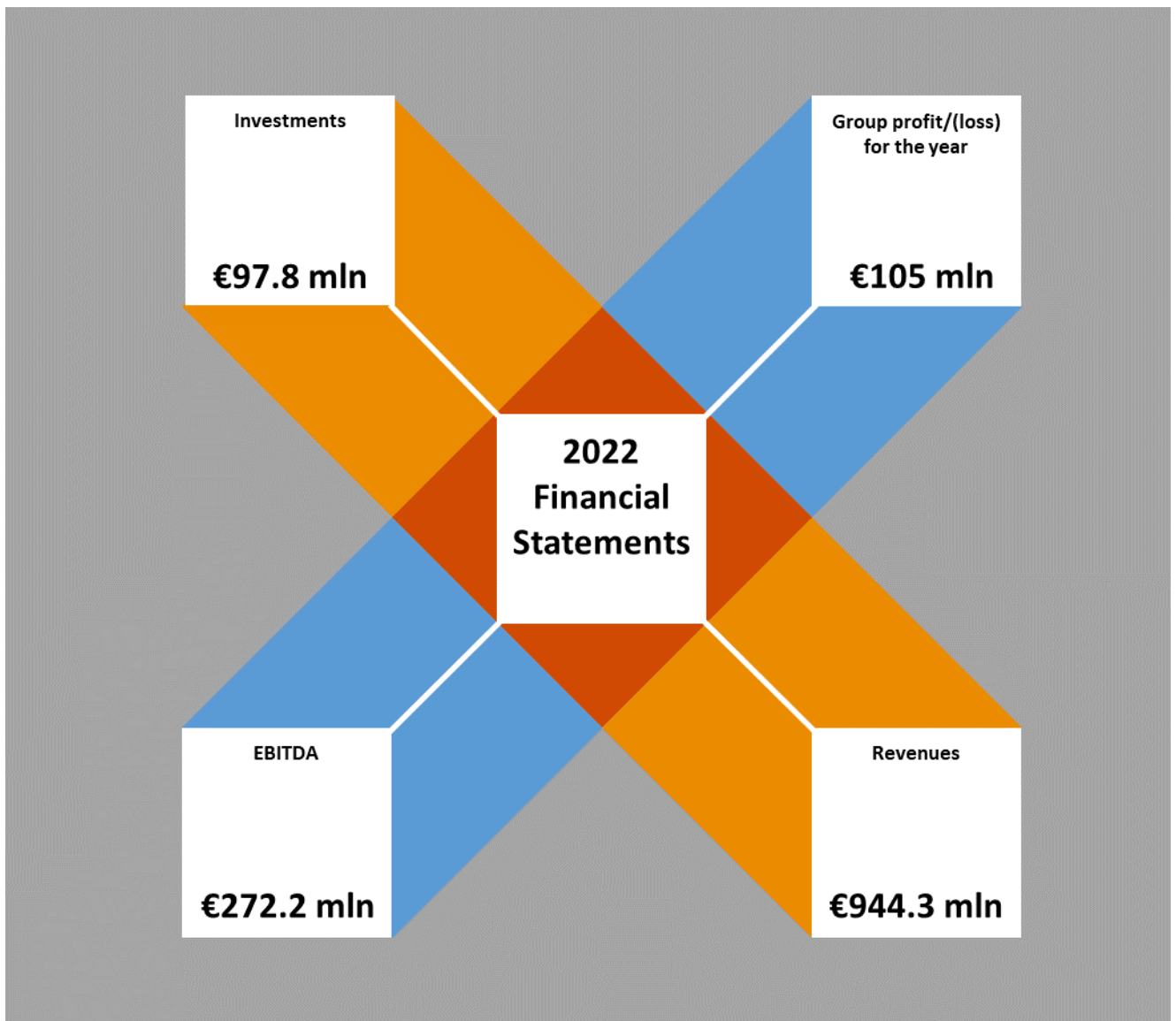
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES			
Turnover of Taxonomy-non-eligible activities (B)		952,780,248	100%
<b>Total (A+B)</b>		<b>952,780,248</b>	<b>100%</b>

	Taxonomy-Eligible activities	Taxonomy-Not Eligible activities
Turnover portion	0%	100%
Portion of capital expenditure	1.8%	98.2%
Portion of operational expenditure	0%	100%

Considering the evolving nature of the regulation and pending the publication of further Delegated Acts relating to the other environmental objectives set forth in the regulation, ENAV plans to follow its developments and carry out, where necessary, further in-depth analyses and updates of the information.



## Economic performance



## Economic value generated and distributed

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

In 2022, the Group generated €992.1 million in economic value, an increase of 11.9% compared to 2021 as a result of the full resumption of the air transport business. Although air traffic has not yet fully returned to pre-crisis levels, the economic value generated by the Group is up by 4.6% compared to 2019 values.

86.7% of the economic value generated was distributed and 13.3% was retained.

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

- 17.8% relates to operating costs incurred for the purchase of goods and services benefiting the Group's suppliers.
- 63.2% was distributed to employees in the form of salaries, social contributions and bonuses.
- 13.6% was distributed to providers of risk capital and financing as dividends and remuneration of loan agreements entered into.
- 5.3% was distributed to government authorities for direct and indirect taxes.
- 0.1% was distributed to the community.

### Economic value directly generated and distributed (in €/mln)

	2022	2021	2020
<b>Economic value generated</b>	<b>992,090</b>	<b>886,633</b>	<b>811,060</b>
<b>Economic value distributed</b>	<b>(860,156)</b>	<b>(732,262)</b>	<b>(607,979)</b>
<i>Operating costs</i>	<i>(153,645)</i>	<i>(140,203)</i>	<i>(124,887)</i>
<i>Value distributed to employees</i>	<i>(543,979)</i>	<i>(499,241)</i>	<i>(460,957)</i>
<i>Value distributed to capital providers</i>	<i>(116,680)</i>	<i>(65,297)</i>	<i>(7,943)</i>
<i>Value Distributed to the Government</i>	<i>(45,217)</i>	<i>(26,829)</i>	<i>(13,254)</i>
<i>Value distributed to the community</i>	<i>(635)</i>	<i>(692)</i>	<i>(938)</i>
<b>Economic value retained</b>	<b>(131,934)</b>	<b>(154,371)</b>	<b>(203,081)</b>

Included in the value distributed to capital providers is the 2022 dividend to be distributed to Shareholders, proposed to the Board of Directors and subject to the approval of the Shareholders' Meeting of 28 April 2023.

## Russia-Ukraine conflict<sup>13</sup>

The offensive action taken by the Russian government against Ukraine, has wrought changes in the geopolitical balances and inevitable repercussions on the global macroeconomic framework are evident.

As a result of the sanctions consequently applied by the European Union states against Russian natural and legal persons, the Group immediately took steps to examine this sanctions regime, including the restriction on the financial and capital markets of the European Union, the closure of air space to carriers traceable to the Russian Federation, and the restrictions on the export of goods, services and technologies, in order to verify the impact on its business and to take any appropriate initiative aimed at ensuring full compliance with the sanctions policy.

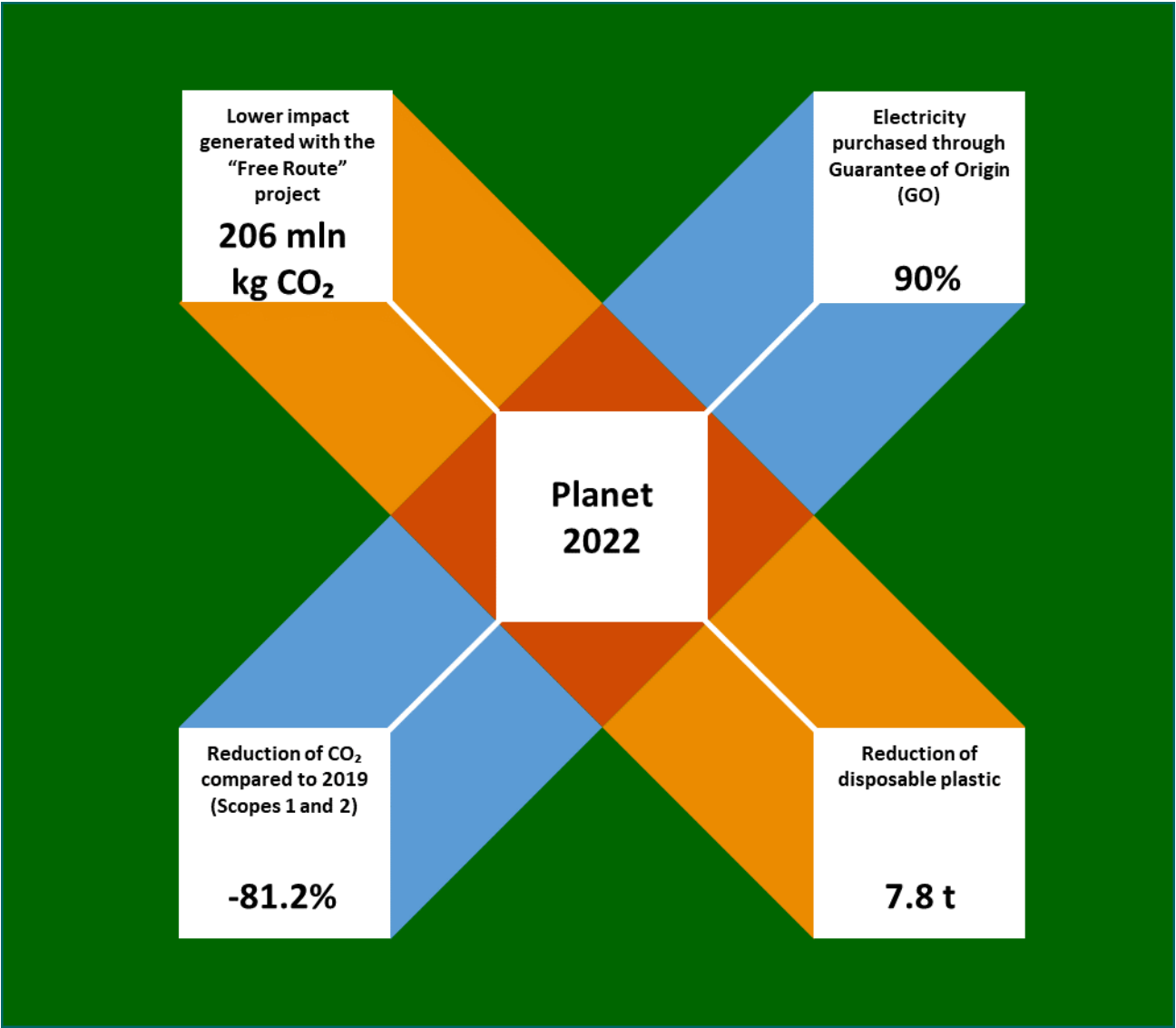
In 2022, the Group fully wrote off open positions with customers belonging to the Russian Federation amounting to €0.7 million and has no further outstanding relations with nations within the scope of the conflict. In the global context, the continuing conflict between Russia and Ukraine is generating impacts on raw material supplies and significant increases in energy prices. Furthermore, inflationary pressure has begun to show the first significant signs of rising prices of various cost natures. In 2022, the ENAV Group recorded a significant increase in the costs associated with energy procurement; however, due to the Group's business model and the EU regulations to which the Parent Company is subject, which, in particular, allow for the recovery of the variation of inflation with respect to the forecast figure through the balance mechanism, no significant risks in terms of inflationary effects are foreseen. Furthermore, with reference to the possible effects of the shortage of electronic components, at present there are no critical issues in the supply chain with negative impacts in terms of business continuity. In addition, the Group holds an adequate back-up stock of materials necessary for the operational systems supporting its business, such that any delays in the supply chain are contained. The Group continues to monitor the impact on its business and to take all appropriate steps to ensure full compliance with the sanctioning regime adopted by the European Union states and to promptly identify possible consequences on its current and prospective business in view of the ongoing critical nature of the scenario.

With reference to the above, the Group has no significant impact on the main alternative performance indicators<sup>14</sup> and no impact is foreseen on expected cash flows as depicted in the approved Business Plan.

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<sup>13</sup> In compliance with the European common enforcement priorities for 2022 annual financial reports, issued by ESMA on 28 October 2022.

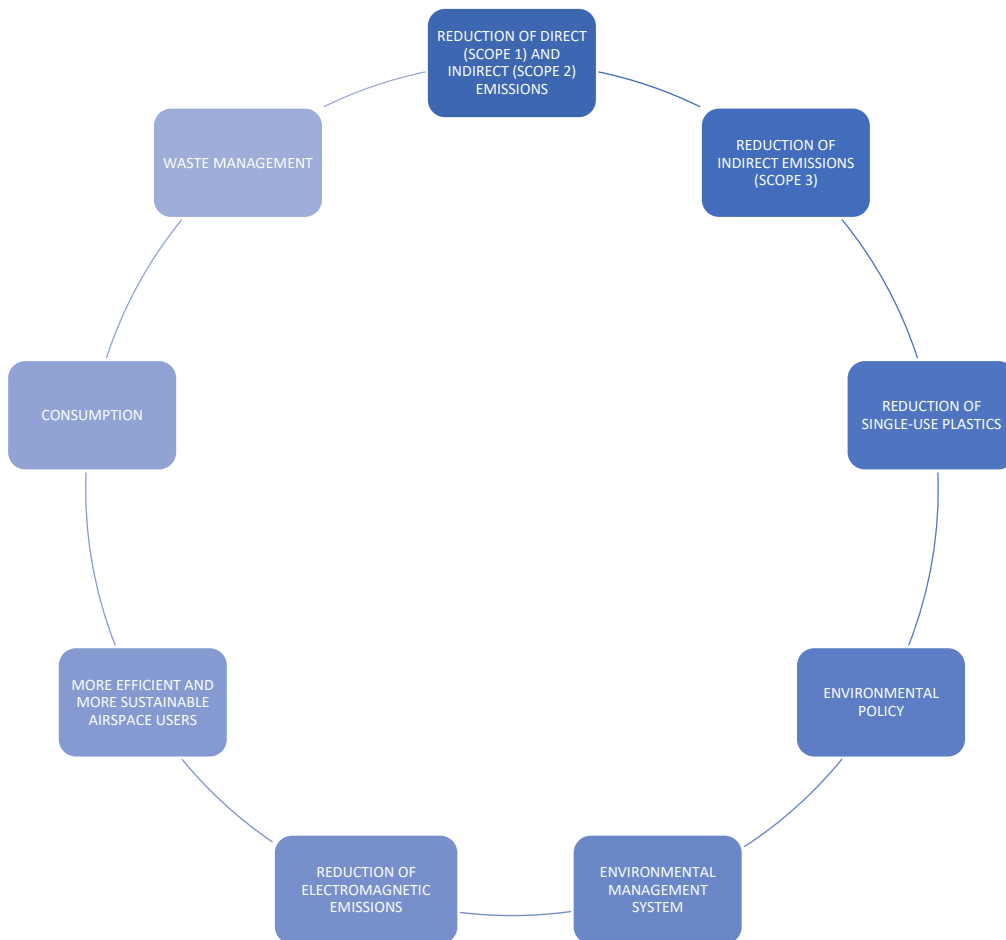
<sup>14</sup> For alternative performance indicators, please refer to the Annual Financial Report 2022.



# 1. Planet

## The ENAV Group's environmental strategy

Aware of its role in the Italian economy, the ENAV Group has long been committed to reducing the environmental impact of its activities and considers the protection of the planet to be an essential objective.



Considering the operating model adopted, the environmental impacts directly generated by the ENAV Group's activities are attributable to the use of electricity for the operation of the technological infrastructure and Company premises and, to a lesser extent, fuel consumption.

#### **Environmental impacts of the ENAV Group**

- **climate-changing emissions**, generated by:
  - electricity consumption for the operation of the ENAV Group's technological infrastructure and sites.
  - fuel consumption for air conditioning in offices and operations centres.
  - fuel consumption of the car and air fleet owned by the ENAV Group and used for the radiological service.
  - activities upstream and downstream in the value chain.
- **electromagnetic emissions** produced as part of the provision of Communication, Navigation and Surveillance (CNS) services necessary for air navigation.
- **waste production**.

Due to the awareness of the impact of its activities and the importance of protecting the planet and its resources, an Environmental Policy has been defined which formalises the ENAV Group's commitment in this area, as well as an Environmental Management System inspired by the principles of ISO 14001.

## Climate engagement

The fight against climate change is the challenge of the century and the ENAV Group wants to make its contribution. ENAV's climate commitment stems from a deep-rooted awareness of the impact of its activities on climate and, more generally, of the contribution of civil aviation as a whole to the phenomenon of climate change.

With this in mind, ENAV has mapped out the two routes towards which to direct its climate commitment:

- Contributing to the decarbonisation of the aviation sector
- Reducing the carbon footprint of the ENAV Group's activities

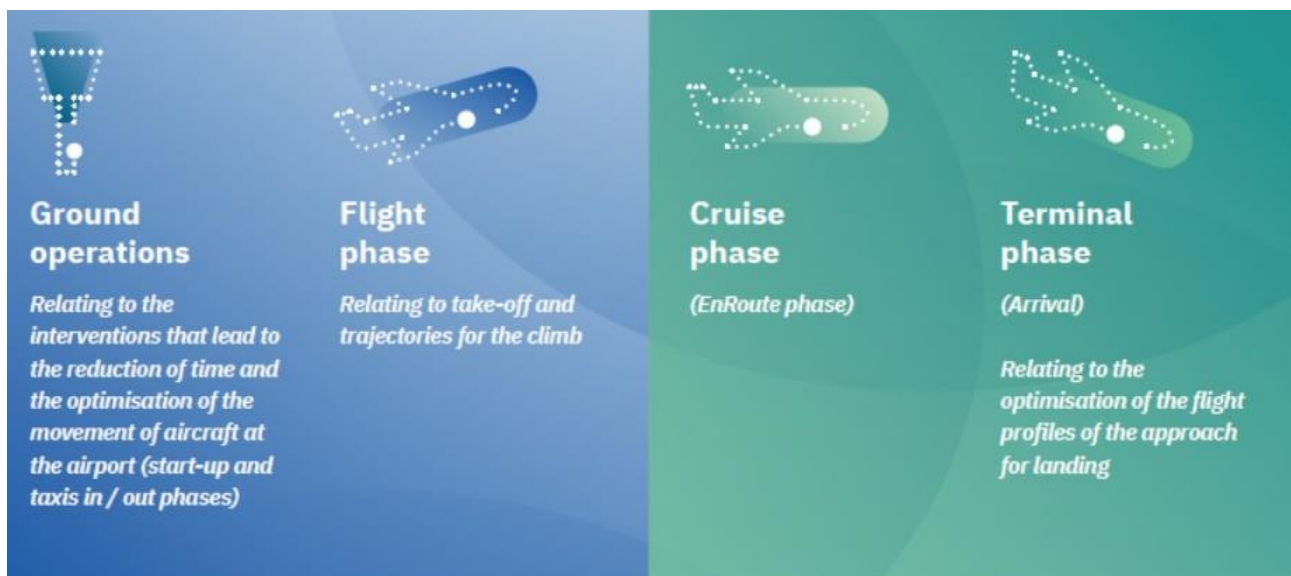
## Commitment to the decarbonisation of the aviation sector

ENAV is a key player in the international air traffic management system: it plays a key role in the initiatives aimed at the realisation of the Single European Sky promoted by the European Commission, through EASA (European Union Aviation Safety Agency) and EUROCONTROL, an intergovernmental organisation that supports the development of an efficient air traffic control system at European level.

ENAV is constantly engaged in the complex of activities aimed at modernising and optimising the infrastructure and network of ATS (Air Traffic Services), maintaining the *safety* levels of air navigation and contributing to the objective of progressive decarbonisation of the air transport sector.

The performance targets assigned at European level to ANSPs (Air Navigation Service Providers) require them to ensure the safe, timely and environmentally friendly movement of aircraft in their airspace at all stages of flight.

All actions planned and implemented in this area are catalogued and monitored, periodically, in the Flight Efficiency Plan (FEP). In the annual update of the FEP, all of the implementations of Operational Efficiency measures carried out by the Parent Company in the reporting period and in the various business segments are reported and assessed.



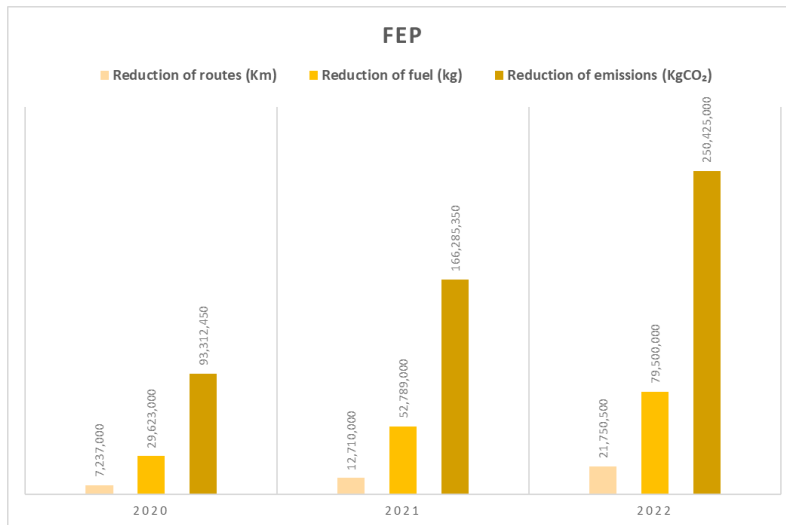


## Flight Efficiency Plan

The Flight Efficiency Plan (FEP) is a multi-year action plan that is part of the European Single European Sky programme. Its aim is to create an airspace structure geared towards route network optimisation. The objective of the FEP is to contribute to the introduction of a state-of-the-art navigation system in Italian airspace, which can enable the reduction of energy consumption needed for flying and enable a decrease in customer operating costs.

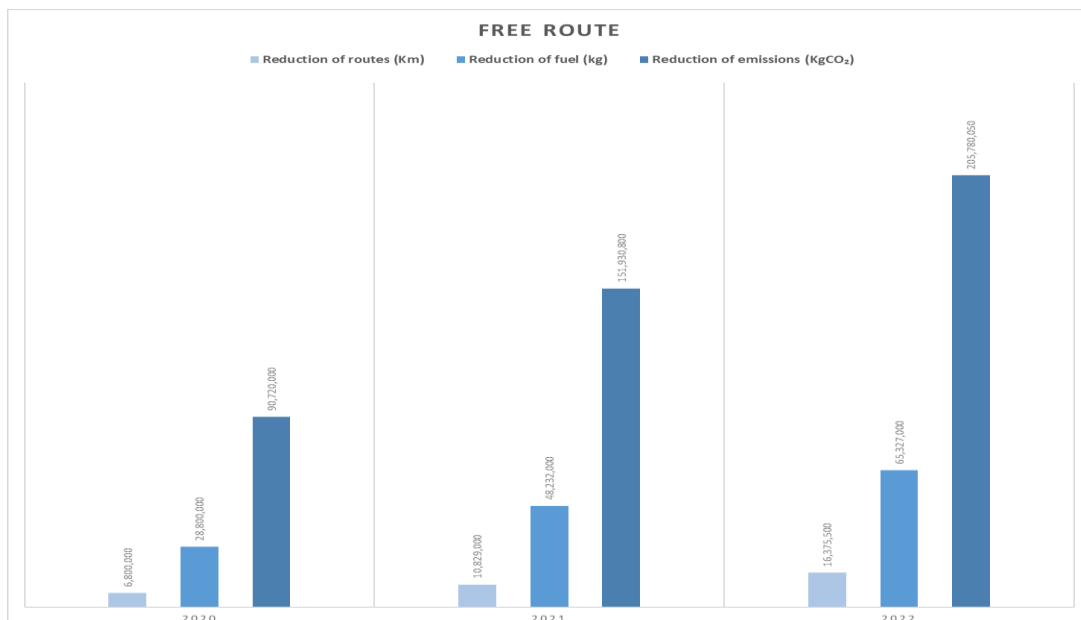
Main benefits:

- increasingly efficient flight profiles
- direct routes with positive effects on consumption, emissions and costs
- reduction of flight times resulting in lower operating costs
- maintaining safety levels unaltered



## Free Route Airspace Italy

The Free Route Airspace Italy (FRAIT) is a revolutionary project implemented by ENAV in 2016, as the first ANSP in Europe, which allows aircraft overflying at an altitude in excess of 9,000 metres to cross Italian airspace following a direct route that is free from the conventional route network. This design reduces fuel consumption and improves the energy profile of the flight, while maintaining safety levels.



## Airport Collaborative Decision Making

Airport Collaborative Decision Making (A-CDM) is an operational procedure implemented at major Italian airports thanks to a cooperation between ENAV, the Airport Operators and EUROCONTROL's Network Manager Operation Centre (NMOC).

The objective of the procedure is to increase the efficiency and resilience of airport operations by optimising the use of resources through a continuous exchange of information.

Through the technology platform supporting the A-CDM, information on departing and arriving flights is exchanged between all Stakeholders involved. Based on the information received from the airlines, the platform is able to calculate the appropriate start time for all flights, in order to ensure the fastest taxi route and avoid waiting before departure.



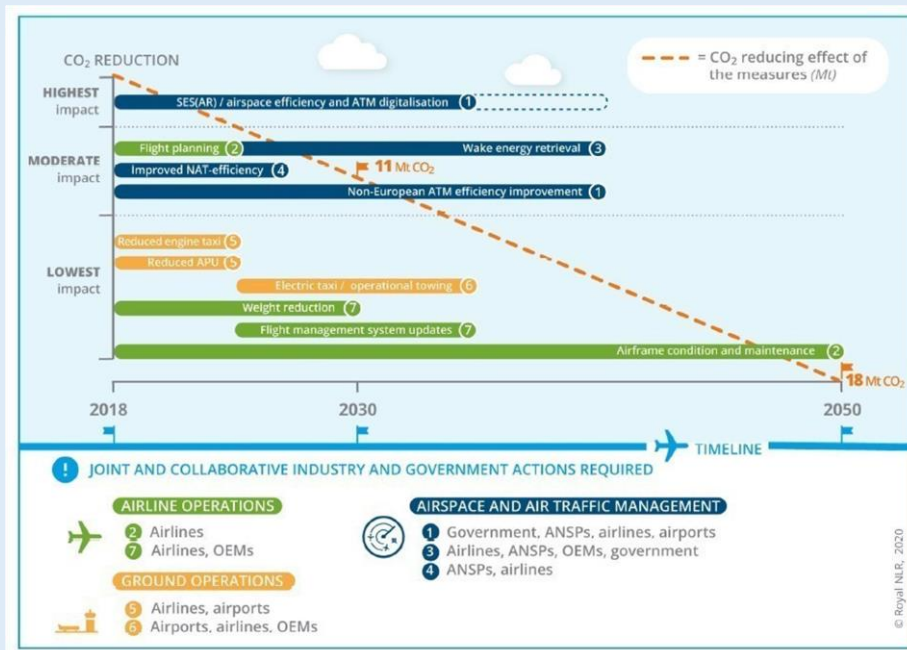
## Arrival Management

The Arrival Management (AMAN) system optimises the arrival sequence of aircraft in heavy traffic conditions. This system tells the controller the optimal sequence for separating aircraft and allows the arrival interval to be reduced, enabling a reduction in fuel and emissions generated by airlines, as well as a limitation of flight delays, which also benefits passengers.

During 2022, AMAN was implemented on Rome Fiumicino (at the Rome ACC where, among other things, approaches to Rome's airports are handled) and it is planned to implement this innovation also on Milan Malpensa (at the Milan ACC) in 2023.

### FOCUS

Several sector studies have highlighted the need for a joint effort by all actors in the civil aviation sector to achieve a progressive reduction of the emissions generated and achieve carbon neutrality of aviation by 2050.



## The commitment to decarbonisation of the Group's activities<sup>15</sup>

Alongside the broader objective of contributing to the progressive decarbonisation of air transport, the ENAV Group is committed to reducing the carbon footprint of its activities and has defined two main objectives in this area:

- Carbon Neutrality 2022
- SBTi targets to 2030

### Carbon Neutrality 2022

The achievement of Carbon Neutrality represents an important - albeit intermediate - milestone in the ENAV Group's path towards a progressive reduction of its carbon footprint.

In 2022, through the projects and initiatives described below, ENAV achieved a reduction of approximately 75% in Scope 1 and Scope 2 emissions compared to the previous year. The currently non-reducible share of emissions will be offset, following the approval of this document, through carbon credits related to two environmental protection projects.

#### FOCUS

**Renewable energy** hydro India, a project to build a 300 MW flowing water hydroelectric power plant, whose main objective is to supply renewable energy to local communities in Kuppa, Kinnaur District Himachal Pradesh, India.

**Efficiency improved cookstoves**, a project developed in the city of Maputo in Mozambique (Chamanculo C and Xipamamine districts), whose main objective is the replacement of the traditional, highly polluting stoves used by about 1,800 households that will benefit from this project.

### Science Based Goals to 2030 (SBTi)

The ENAV Group has defined climate targets for 2030 in which, parallel to the reduction of at least 70% of Scope 1 and Scope 2 emissions, a reduction of at least 13.5% of Scope 3 emissions in the categories "Capital goods", "Fuel and Energy-related activities" and "Employee Commuting" will be achieved<sup>16</sup>.

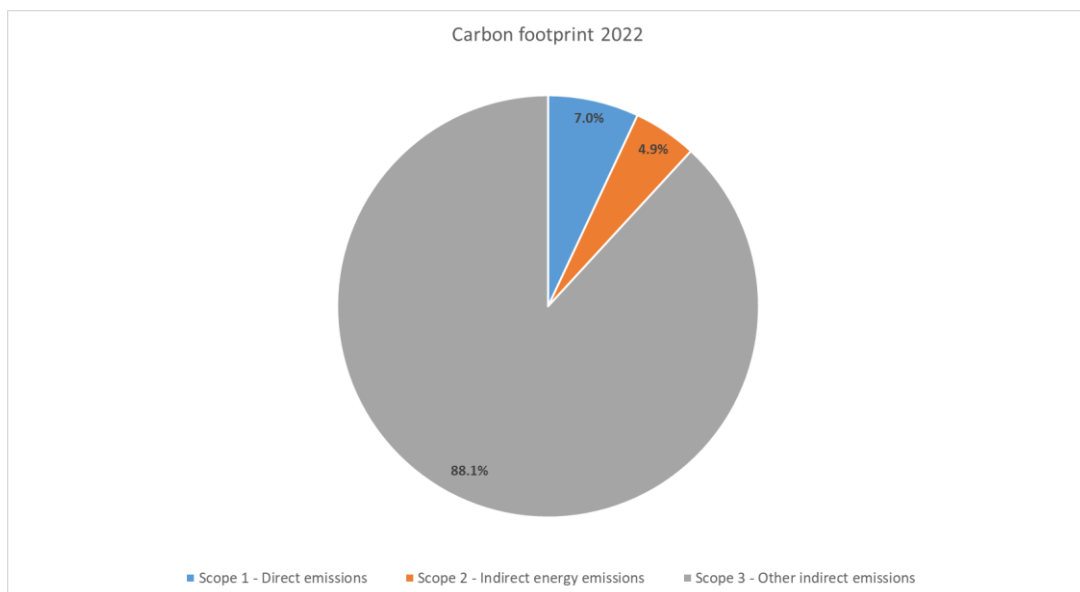
These emission reduction targets have been validated by the Science Based Target initiative (SBTi), the initiative born out of a partnership between CDP (formerly the Carbon Disclosure Project), the UN Global Compact, WRI (World Resources Institute) and WWF in order to guide the private sector to climate action through science-based emission reduction targets.

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. For details of the Scope 3 emissions included in the ENAV Group's scope of operations, see Annex 1.

<sup>15</sup> In compliance with the European common enforcement priorities for 2022 annual financial reports, issued by ESMA on 28 October 2022.

<sup>16</sup> In 2019, the baseline year for the emission reduction targets validated by SBTi, these categories accounted for about 68% of total Scope 3 emissions.

**GROUP CARBON FOOTPRINT**



The commitment to reducing the carbon footprint of the ENAV Group’s activities is structured as follows:

- Electricity purchase via Guarantee of Origin (GO)
- Interventions aimed at the energy efficiency of the ENAV Group’s assets
- Progressive increase in the share of self-produced energy from renewable sources
- Replacement of the Company car fleet with electric-hybrid-plug-in vehicles
- Development of energy research and innovation projects

Intervention	Description
Purchasing electricity via GO	All electricity purchased by the ENAV Group comes from institutional suppliers and is certified from renewable sources with Guarantee of Origin (GO)
Energy efficiency of assets	<ul style="list-style-type: none"> <li>▪ 3 installations of LED systems with command and control domotics</li> <li>▪ 6 ongoing modernisation of air conditioning systems</li> <li>▪ 12 retrofitting of air-conditioning systems by 2025</li> </ul>
Increasing self-produced energy from renewable sources	<ul style="list-style-type: none"> <li>▪ Trigeneration plant being commissioned at ACC in Rome</li> <li>▪ Planned geothermal plant at the new ACC in Milan</li> <li>▪ 2 photovoltaic systems soon to be activated</li> <li>▪ 10 photovoltaic plants under construction</li> <li>▪ 7 photovoltaic systems in the planning stage</li> <li>▪ 18 additional photovoltaic systems installed by 2025</li> </ul>
Electric mobility	<ul style="list-style-type: none"> <li>▪ 45% of the Company car fleet “electrified” in 2022</li> <li>▪ 22 charging stations for electric cars installed in 2022</li> <li>▪ 13 additional ENAV sites equipped with charging stations by 2024</li> </ul>
Research and innovation projects	<ul style="list-style-type: none"> <li>▪ Experimental design of 3 wind power plants</li> <li>▪ Future installation of a hydrogen-powered fuel cell system (Blue)</li> <li>▪ Presentation of a research project for the realisation of a plant for the production of Green hydrogen from photovoltaic systems</li> <li>▪ Experimental project to replace conventional diesel fuel for powering GEIA plants<sup>17</sup> with HVO (Hydrotreated Vegetable Oil) fuel</li> </ul>

In addition, the following is provided for in all investment projects, related to new implementations and adaptations of existing systems and facilities:

- LED lighting systems
- new fire protection and air conditioning systems using gas in accordance with the latest regulations.

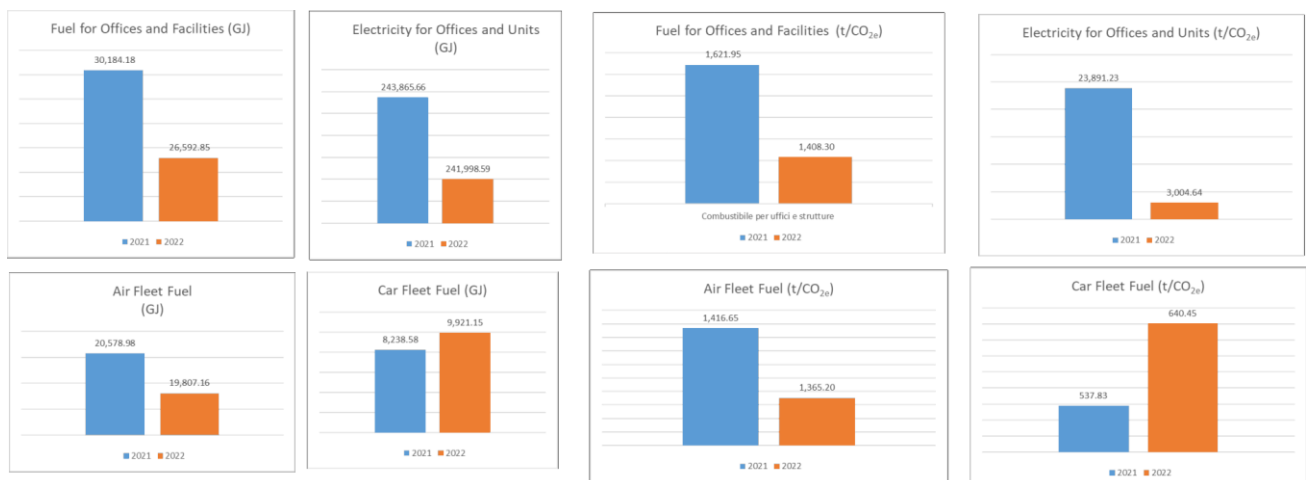
<sup>17</sup> Automatically activating generators to ensure the supply of electricity in the event of a blackout.

- specific control units for air conditioning systems that improve management and maintenance, providing ideal temperature conditions for personnel and equipment, resulting in reduced energy consumption.
- where possible, infrastructures equipped with “thermal jackets” and appropriate fixtures in order to improve thermal insulation and allow for an increase in energy class.

During 2022, the ENAV Group carried out an assessment to identify aspects for improvement and the main opportunities in the area of **energy source management**. The results of this evaluation, which will be further investigated in the near future, highlighted the following opportunities for ENAV:

- construction of additional photovoltaic plants for self-production of electricity
- conclusion of PPAs (Power Purchase Agreements)
- participation in Renewable Energy Communities (both as “prosumer” and “consumer”)
- further impetus to the use of interior and exterior LED lighting
- installation of Building Energy Management System (BEMS) for HVAC consumption management
- installation of anti-solar thermal films
- implementation of Uninterruptible Power Supply (modernisation of UPS devices).

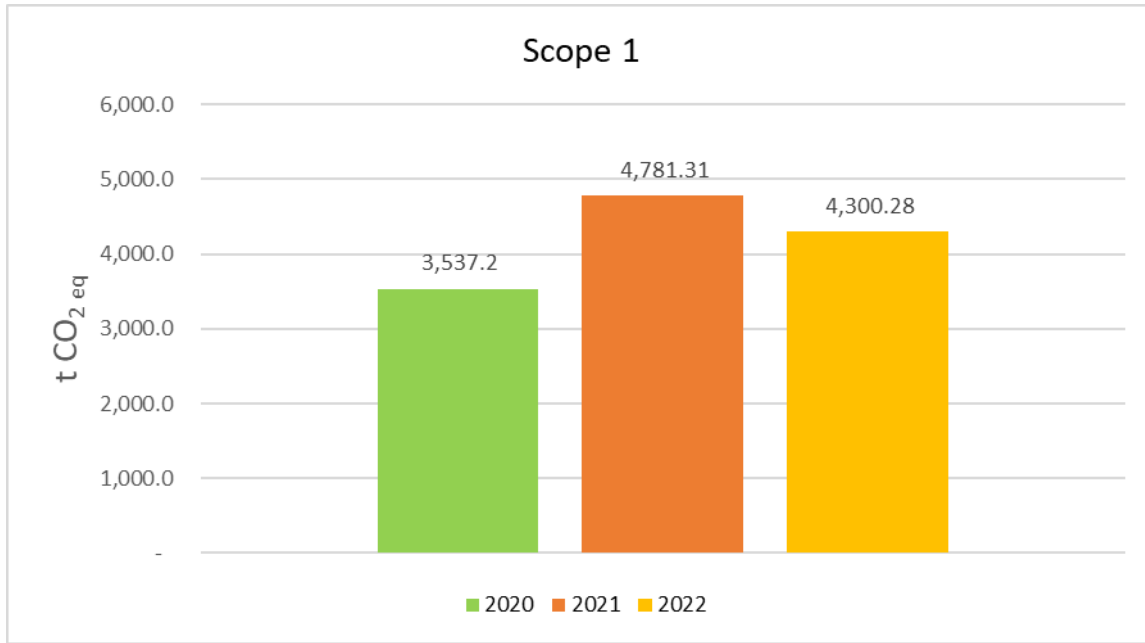
Finally, in compliance with Legislative Decree 102/2014, in the course of 2023, the third energy diagnosis will be activated on 17 ENAV sites according to the clustering provided by ENEA. These sites were selected from the 30 most energy-intensive ones where ENAV is installing an energy management and monitoring system compliant with UNI ISO 50001 standards, which allows the analytical measurement of possible energy weaknesses in order to remedy them and turn them into future opportunities.



ENAV Group's Scope 1 emissions are generated by:

- fuel consumption for air conditioning of ENAV offices and facilities
- fuel consumption to power the car and aircraft fleet<sup>18</sup>
- fuel consumption for emergency power supply of operational facilities
- leaks associated with the use of refrigerant gases.

During 2022, Scope 1 emissions decreased slightly (-10%) compared to 2021.

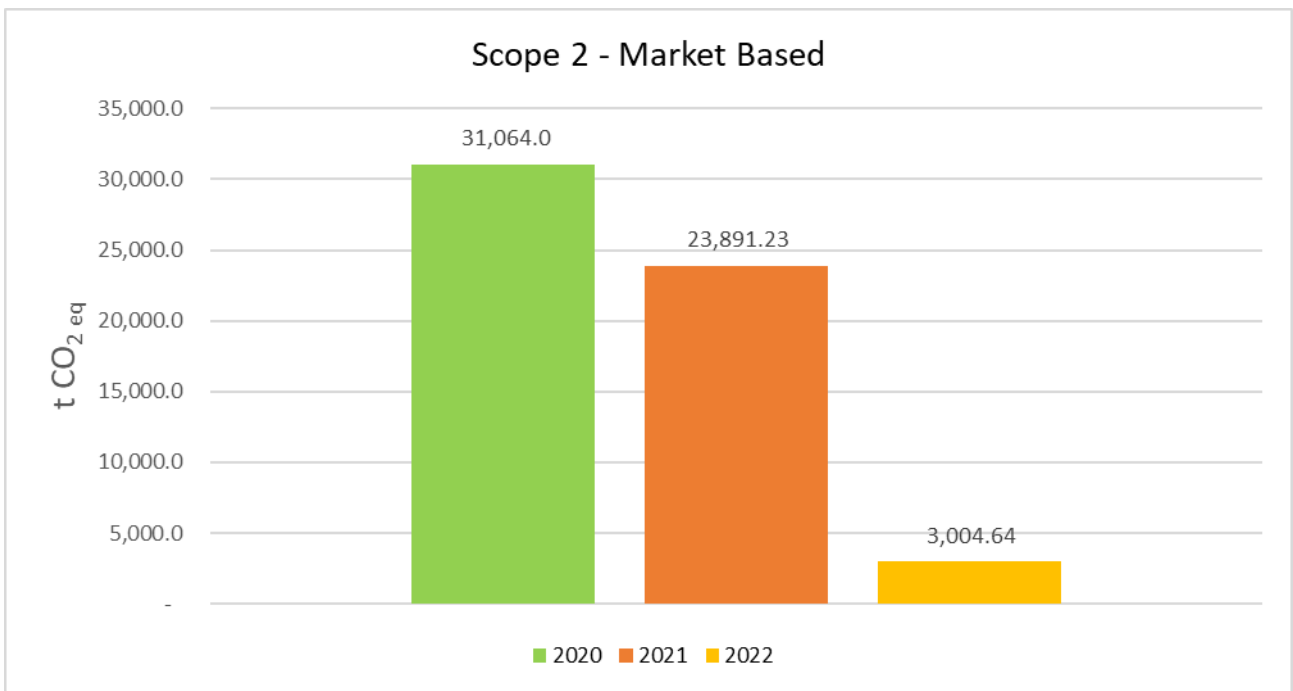
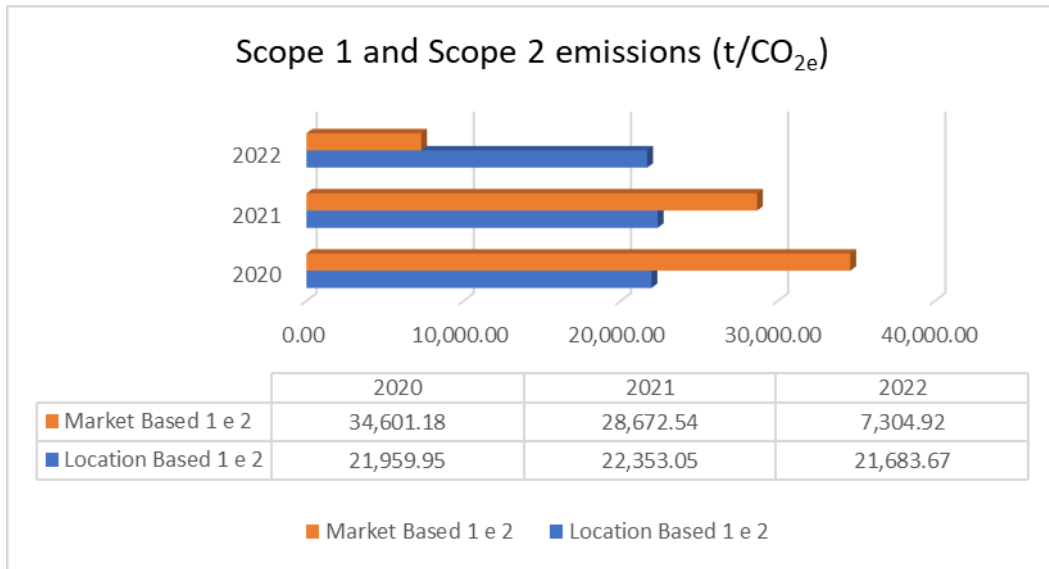


As required by the GRI Sustainability Reporting Standard, the ENAV Group has calculated Scope 2 emissions according to the following two methodologies:

- Location-based method, based on average emission factors for power generation on a regional, sub-regional or national basis;
- Market-based method, based on the CO<sub>2</sub> emissions generated by the electricity suppliers from which the organisation procures or on factors relating to the reference market.

<sup>18</sup> ENAV has 4 Piaggio Aero P180 Avanti II aircraft at its disposal for the provision of the Flight Inspection service, aimed at ensuring maximum reliability of air navigation aid systems and enabling aircraft to operate safely and on time.

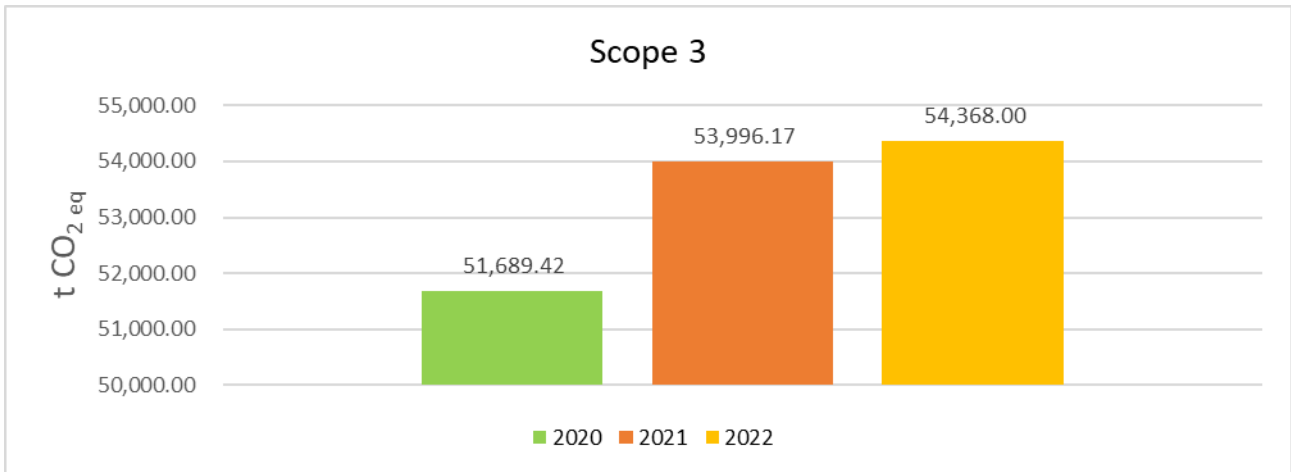
The graph below represents the total Scope 1 and Scope 2 emissions calculated according to the two methodologies described above.





In 2019, the ENAV Group started reporting on Scope 3 emissions, i.e. those generated upstream and downstream in the value chain. At present, the reporting of these emissions is in the following categories:

1. Capital Goods, included in the reduction targets approved by SBTi.
2. Fuel and Energy-related Activities, included in the reduction targets approved by SBTi.
3. Employee Commuting, included in the reduction targets approved by SBTi.
4. *Purchased Goods and Services.*
5. *Business Travel.*
6. *Upstream Transportation and Distribution.*
7. *Waste Generated in Operations.*



In order to achieve a reduction in emissions generated along the value chain, the ENAV Group is evaluating the implementation of specific corporate projects and initiatives that will mainly be related to the following aspects:

- further boost to energy efficiency measures.
- where possible, increasing supplier involvement and further reviewing green procurement policies.
- green mobility plans dedicated to ENAV Group people, including 'agile working' solutions to be progressively extended to an increasing portion of the corporate population.

As also recalled by the Environmental Policy, the ENAV Group is sensitive to the issue of biodiversity protection and, in this sense, has launched a number of initiatives, including with a view to raising awareness among internal and external Stakeholders.

### FOCUS - URBAN BEEKEEPING

Bees play a fundamental role for our planet, as they ensure the presence of different plant species and are therefore a key element in the protection of biodiversity. Furthermore, a lesser-known aspect in which the contribution of this extraordinary pollinator insect is crucial is environmental biomonitoring.

In fact, bees are so-called “bio-indicator” insects as they are particularly sensitive to changing environmental conditions. In this sense, the analysis of their health status and behaviour can provide important information about their environment. For these reasons, in 2022 the ENAV Group decided to invest in an urban beekeeping project at the ENAV Training Centre in Forlì. As part of this project, three beehives were installed and currently “house” around 180,000 bees.

In the period from May to July 2022, beekeepers from apicolturaurbana.it carried out an initial biomonitoring of the health conditions and behaviour of the bees in the 3 hives installed at the ENAV Training Centre. They found an excellent state of health of the insects and a decidedly healthy environment.

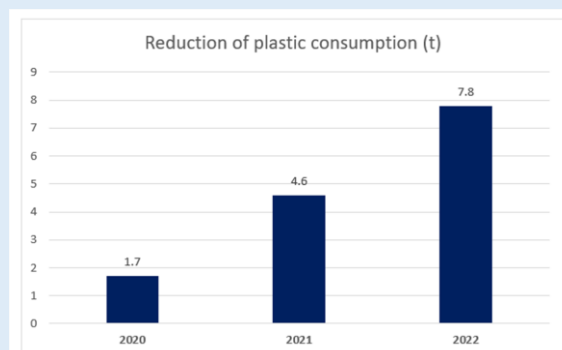
### FOCUS - REDUCING PLASTIC FOOTPRINT

Environmental pollution caused by the consumption of plastics and their dispersion and accumulation into the environment is causing problems to the habitat of flora and fauna. Inevitably, the consequences of this form of pollution also affect our health.

With a view to raising awareness in the ENAV ecosystem on this issue, a Company project aimed at eliminating plastic in our premises was launched in 2019. As part of this initiative, over the past two years water dispensers have been installed and a contract for the supply of water with containers other than disposable ones has been activated. In addition, the replacement of plastic material in vending machines throughout the country was ordered.

In the course of 2022, all contractual agreements for Company canteens throughout the country were remodelled to be “plastic free”.

This, together with the actions already implemented in previous years, allowed a reduction of approximately 7.8 t of single-use plastics in 2022, compared to a reduction target of 1.5 t. This target represented the last step in the reduction of single-use plastics consumption, which was estimated at 14.2 t in 2019.



## Reduction of electromagnetic emissions

The provision of Communication, Navigation and Surveillance services by ENAV is ensured by systems that generate electromagnetic fields of different magnitudes. In particular, radar, radio-assistance and radio-communication systems installed at airport sites (45) and remote sites (about 100) distributed throughout the country are used. Compliance with the prescribed emission limits for non-ionising radiation is ensured by conducting appropriate electromagnetic impact assessments during both the design and installation phases.

Indeed, 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 is not only to ensure compliance with the prescribed limits but also to try to reduce electromagnetic emissions compatibly with the quality and continuity of the services provided. With this in mind, as part of the plan to decommission the NDB (Non Directional Beacon) radio beacons, a further 8 NDBs were switched off in 2022, making it possible to achieve the intermediate target of reducing the electromagnetic emissions generated by these facilities set out in the 2021-2024 Sustainability Plan for 2022.

The NDB radio systems decommissioning plan involves a rationalisation of these facilities that is functional to ENAV's PBN (Performance-Based Navigation) Transition Plan required by Regulation (EU) 2018/1048, whose main Stakeholders involved are ENAC, the European Commission and EUROCONTROL (European Network Manager).

The gradual phasing out of the radio systems is leading to a reduction not only in the electromagnetic impact generated but also in the consumption for the routine and extraordinary maintenance of these systems, including the costs and fuel consumption of the vehicles used to reach the remote sites where these systems were located.

## Waste management

On the issue of waste management, the ENAV Group assumes and defines as strategic the commitment to govern waste disposal activities through the traceability of the entire process with the aim of giving the maximum possible implementation to the hierarchical criterion of prevention, reuse, recycling, recovery and disposal, in full compliance with current regulations.

The management of this matter and its impacts takes place through:

- the adoption, in line with the commitment expressed in the ENAV Group's Environmental Policy, of an Environmental Management System that meets the requirements of the ISO 14001 standard;
- prevention of the possibility of non-compliance with regulatory requirements, through the use of a computerised system for managing waste registers and transport forms;
- the progressive increase in the percentage of special waste sent for recovery out of the total waste produced, through the adoption of appropriate reward criteria for the awarding of waste transport and disposal/recovery services;
- the adoption of various initiatives regarding the management of waste produced by office activities, such as the elimination of plastic containers from beverage dispensing machines used by ENAV Group Companies.

The effectiveness of the actions undertaken is monitored through internal audits and the monitoring of indicators.

Waste created by ENAV Group enterprises is collected, transported, and subjected to recovery/disposal operations by third-party organisations with the relevant qualifications and authorisations, with which the ENAV Group has special contractual connections.

The share of municipal waste is handled through the companies in charge of cleaning services by qualified third-party companies, as mentioned above, or by the public collection service.

Verification that the companies in charge of waste management services, as well as the companies in charge of cleaning services, operate in accordance with both contractual and legislative obligations is carried out by the Contract Managers in charge and the Managers of the sites and territorial offices concerned, in application of the ENAV Group's Environmental Management System procedures.

The "Prometeo Rifiuti" software application is used to collect and monitor data relating to special waste, in which data are entered on all waste loading and unloading operations carried out at all operational sites and offices of ENAV Group Companies located throughout the country.

## Technological innovation and digitalisation

In ENAV, innovation, technological development and professional growth are the drivers through which all assets are best exploited.

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 environmental issues (such as the aforementioned Free Route, A-CDM, AMAN and others), are the result of investments that have led ENAV to be an international leader and have been dedicated to:

### ➤ INNOVATION OF INFRASTRUCTURES

Participation in experimental programmes for the implementation of flight procedures based on Satellite Navigation systems, programmes that have enabled free-route navigation and which, together with new techniques for the design of operating procedures (PBN), are already enabling ENAV to decommission terrestrial navigation infrastructure.

### ➤ DIGITALISATION OF COMMUNICATION

Replacement of printed communications in the towers with information displayed in real time on the radar screen at your station (EFS - Electronic Flight Strips). In addition, with the new Datalink system, digital and traditional communication – ground-air-ground radio – are integrated, reducing the risk of misunderstandings in radio communication between controllers and pilots. ENAV is also collaborating in the evolution of the datalink through the development activities of the IRIS satellite constellation that will transmit datalink messages via satellite.

### ➤ 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 DSN that makes it possible to further improve the system for the automation of operations.

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 activities already described (in particular the aforementioned Free Route), the ENAV Group is working on other innovative projects that will revolutionise the sector, such as the Virtual Centre concept for the delegation of ATS services between ATC centres and for the management of contingency situations, the innovative Conflict Detection & Resolution tool based on the use of on-board data and artificial intelligence-based logics, and systems for the dynamic configuration of airspace according to traffic demand. Each of these solutions is characterised by an important impact on ATM performance from a green perspective.

### ➤ REMOTE TOWER

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. In June 2022, the first Remote Tower in Italy went into operation at Brindisi Airport. In addition, within the SESAR programme, research activities were conducted on Remote Tower Centre and Multiple Remote Tower Operations.

### ➤ **ARRIVAL MANAGEMENT SYSTEM**

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. The first operational implementation in Italy took place in December 2022 at the ACC in Rome.

### ➤ **SATELLITE SURVEILLANCE – AIREON**

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.

### ➤ **CONSOLIDATION OF APPROACHES IN AREA CONTROL CENTRES**

The consolidation of the approaches into Area Control Centres will optimise the approach procedures.

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.

### **Future goals**

1. Monitoring and promoting digitisation and technological evolution with particular reference to the automation of CNS/ATM infrastructures.
2. Ensuring the evolution process of Communication, Navigation and Surveillance infrastructures, and synchronised deployment of ATM infrastructures, in line with European infrastructure planning and EU regulations.
3. Ensuring that the deciding factor in the selection of research and development activities in Europe is increasingly oriented towards sustainability objectives.

As part of the management of technological innovation and digitalisation, the ENAV Group participates in the European research and development programme SESAR, an initiative launched by the European Commission to provide the Single European Sky regulatory framework with innovative technological elements that enable the creation of a new air traffic management system that is modern, interoperable, sustainable, resilient, efficient and capable of ensuring the development of air transport on a safe, environmentally friendly and less fragmented basis in airspace management.

In particular, in 2022 ENAV conducted a series of experiments on innovative operational concepts and supporting technologies aimed at improving the performance of the ATM system. In addition, it participated in European calls for tender for the new SESAR 3 programme (2023-2031), related to the objectives of the European Aviation Green Deal and the digital transition, responding with project proposals for exploratory and industrial research, as well as launching 2 new demonstration projects.

Also in the context of managing the theme of technological innovation, the ENAV Group is engaged in planning and launching the rationalisation of the less efficient components of the CNS (Communication, Navigation and Surveillance) infrastructures, thanks to the use of innovative distributed and satellite architectures and new operating procedures.

Finally, ENAV constantly oversees technical round tables aimed at promoting the standardisation of new sustainable and environmentally friendly technologies.

In this context, the main commitments undertaken by the ENAV Group can be summarised as follows:

- Research and validation of new technologies (including satellite technologies) enabling innovative CNS/ATM services, planning their deployment through research projects to reach the appropriate maturity levels for operational commissioning.
- Planning demonstration trials whose purpose is to accompany new technologies towards industrialisation and deployment.
- Undertaking ongoing collaborative relationships with key industry Stakeholders, universities and national and European research centres to identify low-impact opportunities arising from the use of new technologies such as artificial intelligence or machine learning algorithms applied to the CNS/ATM context.
- Pursuing *the directions provided in the European Airspace Architecture Study and ATM Master Plan regarding the evolution of the CNS infrastructure and ATM services with a focus on improving the Key Performance Areas of Capacity, Environment, Cost and Safety.*
- Planning investments based on operational priorities, selecting the most sustainable technologies from the portfolio of executed projects.

In order to monitor the effectiveness of its commitment to technological innovation, the ENAV Group has implemented the following tools:

- Processes of periodic technical and financial reporting to the financing bodies.
- Monthly internal structure reporting.
- Definition and monitoring of critical project milestones and the investment plan.
- Structuring meetings as a time to share the technical progress of actions, discussing activities and identifying areas for improvement.

In this context, dialogue with industry Stakeholders plays a central role. In fact, international round tables involves the participation of strategic Stakeholders in the decision-making chain to define the European roadmap for the evolution of CNS/ATM infrastructures and services.

In addition, participation in strategic organisations for the implementation of the new European ATM/CNS infrastructure such as the new SESAR Deployment and Infrastructure Partnership (SDIP), SESAR 3JU and the A6 alliance enables the prioritisation and allocation proposals of European funds for the launch of projects of interest, while ensuring that they are driven by real operational needs.

In the near future, the ENAV Group plans to manage the issue of technological innovation:

- monitoring and promoting digitisation and technological evolution with particular reference to the automation of CNS/ATM infrastructures.
- ensuring the evolution process of Communication, Navigation and Surveillance infrastructures, and synchronised deployment of ATM infrastructures, in line with European infrastructure planning and EU regulations.
- ensuring that the deciding factor in the selection of research and development activities in Europe is increasingly oriented towards sustainability objectives.

## INNOVATION, DIGITAL AND SUSTAINABILITY IN THE ENAV GROUP

The ENAV Group has embarked on a path of integration of innovation and digital transformation to support sustainable development.

Innovation, digital and sustainability are intrinsically linked and necessary elements of the Business Plan. This approach implies the realisation of technological innovation projects in line with sustainability issues, also investigating new potentials in the commercial market by proposing prototype and demonstration solutions, feasibility studies and pilot projects needed in the embryonic stages of evaluation and production of new services.

Innovation and Sustainability activities stimulate, accelerate, and accompany the implementation of projects through the formation of intra-Company working groups and external Stakeholders, selecting technological excellence and talent. All activities are united by the intention to support the ENAV Group's evolution towards ESG objectives and are differentiated into macro-areas with different impact focus and timeframe:

- **ENAV Digital:** promotes the Group's digital transformation by integrating and maintaining harmony between the Company and the continuous evolution of society, the labour market, changes in people, culture, expectations and aspirations of the individuals who make up the ENAV employee community.
- **Data-driven Company:** promotes the culture and usability of data in the Company to support strategic choices, direct activities and operations by making decisions at all levels based on objective, up-to-date and transparent information;
- **Disruptive Innovation:** represents the group of initiatives aimed at generating opportunities in new markets through continuous testing of emerging technologies, resulting in the development of innovative services.
- **ATM Virtualisation:** this chain represents the next step in terms of technological evolution in ATM, with positive impacts in terms of safety and flexibility in service delivery, also constituting a key element to make ENAV an ATM Data Service Provider to other Air Navigation Service Providers.

The objectives it concretely pursues, in line with what has already been stated in the 2022 Business Plan, can be summarised as follows:

- Pursue the Digital Innovation strategy and governance fully integrated to sustainability; hence, to the development of new sustainable (low impact) digital tools that in turn have a direct and indirect positive impact on the ESG sustainability of our industry and circular economy context.
- Realise "ENAV Digital" by fostering the evolution of digital systems to support the paperless Company, a sustainable supply chain, efficiency and quality of work also in the interactions between the ENAV employee community and between them and external Stakeholders through process innovation, and the introduction of new technologies (cloud and intelligent automation).
- Support the "Data-driven Company" approach and paradigm through a data strategy, data supply chain governance models, digital technologies (e.g., Big Data, Data Lake, AI, IoT, predictive systems) and change management (e.g., upskilling, reskilling and certification of employees on technologies, roles and new agile working methodologies).
- Integrate the open innovation paradigm in the Company, capitalise on the benefits of open-source software, new business models, partnerships, and an industrial intellectual property protection strategy in order to improve business results.
- Present the ENAV Group to the market and the Italian economy as excellence in technology, sustainability, and a working environment capable of growing its resources, attracting, and continuously motivating young digital talent and innovators. The integration of innovation, digital and sustainability in ENAV is proposed as an incubator of sustainable and innovative solutions on digital issues, in order to anticipate the technological evolution of the market, explore and generate partnerships and opportunities for new commercial services.



## ENAV Group 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.

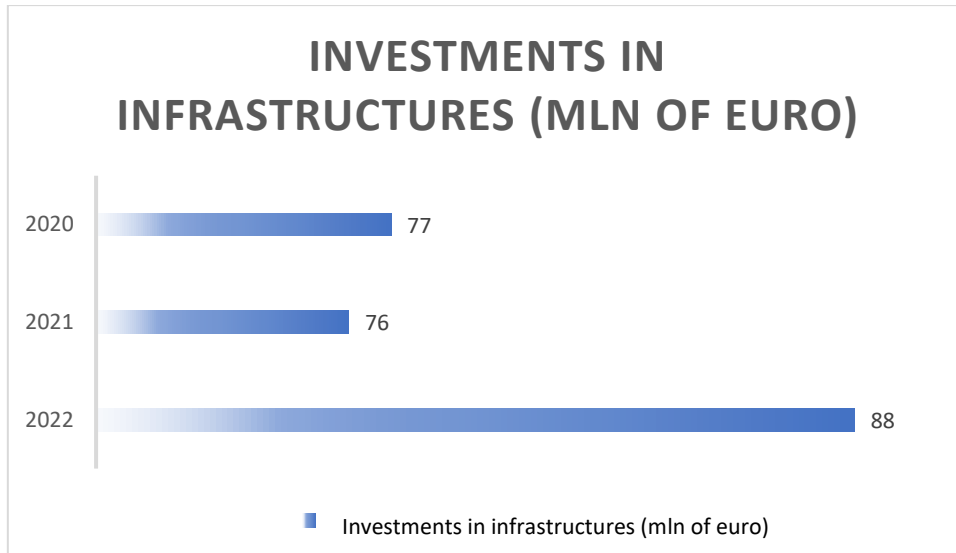
In line with technological changes that are occurring internationally in the sector, ENAV has crafted a technical operations development plan with the aim of remaining competitive on an international stage and maintaining its leadership in technological innovation, in keeping with the Single European 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 approaches in Area Control Centres (ACCs), 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 them 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, remotisation 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, which is 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 2022 the ENAV Group invested overall approximately €88 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 €97.8 million.



## Actions related to the provision of air navigation services

Starting from 2012, the results of the actions reported in the Flight Efficiency Plan (FEP) are emphasised in the national plan for the reduction of carbon dioxide emissions - "Italy's Action Plan on CO<sub>2</sub> Emissions Reduction" - that Italy is required to implement as part of the broader programme for combating climate change adopted, in the aviation sector, by ECAC/ICAO.

In 2020, the extraordinary situation caused by the health emergency due to the COVID-19 pandemic had resulted in an absolutely significant global contraction of air connections, which had also characterised 2021, albeit with a less pronounced incidence from the second half of the year.

Since the beginning of 2022, particularly April, in continuity with the trend recorded in 2021 and in parallel with the other countries in the ECAC area, the upturn in traffic has been noticeable, both in overflights and in air connections departing/arriving from domestic airports, with numbers stabilising at over 90% compared to 2019 values.

In the middle months of the summer season, especially at domestic airports serving tourist destinations, traffic values were even higher than the pre-COVID period; similarly, the upswing in planning related to the Christmas period reached values similar to those recorded during the same period in 2019.

The balance for 2022 shows, in terms of en route service units, a rise of 63.2% compared to 2021 and, in terms of assisted flights, fall of 9.1% compared to pre-pandemic volumes.

In order to meet the increased demand for ATC capacity effectively and to optimise the management of air traffic flows, against the backdrop of the planning of so-called Airspace Users, in the ATC EnRoute sectors and for flights taking off from or landing at domestic airports, in the course of 2022, the gradual reactivation of constraints on the use of the network that had been suspended in 2020 and 2021 was carried out.

In continuity with what has been implemented in previous years and in addition to what has already been achieved with the implementation of the *Free Route Airspace Italy* (FRAIT) Project<sup>19</sup>, during 2022 - thanks to the coordination with the Air Force (AM) - the Parent Company maximised "Airspace Availability", continued the updating and synchronisation activities of the ATS Network below FRAIT and in the Terminal areas, but also carried out interventions that allowed for improvements in performance related to airport movement area operations.

In particular, with regard to the FRAIT Airspace alone, it should be noted that about 43% of the assisted air traffic was able to benefit from a reduction in the total distance, from the departure airport to the destination airport (gate-to-gate), resulting in an overall reduction of about 16.3 million planned kilometres (equal to almost 32 km per aircraft), with a consequent saving of fuel needed for 'cruising' flight operations (En Route) estimated at about 65.3 million kg in total and CO<sub>2</sub> emissions of about 210 million kg.

At the same time as the reduction in the total distance of the trajectory flown in FRAIT airspace, and taking into account, above all, the increase in the cost of fuel, but also the changed connection scenario that has seen the creation of commercial flights based on new City Pairs and the consequent updating of the planning of the connection trajectories of new destinations, a factor to highlight is the significant increase - compared to what was recorded in 2019 - of the occupancy value of national airspace, most used by Airspace Users.

Occupancy values increased, on average by about 2 minutes per assisted flight.

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<sup>19</sup> A Project that consists of greater freedom in planning of trajectories in airspace above 30,500 ft (approx. 9,000 m) and allows airlines to choose the shortest flight path.

The attractiveness of the use of airspace was supported by the combination of the excellent performance in terms of capacity and predictability, but also by the numerous Flight Efficiency measures implemented to make flight paths more efficient and, consequently, to contain and optimise fuel consumption and the associated CO<sub>2</sub> emissions into the atmosphere.

Evidence of the added value generated by the various measures taken together can be found in the reduction of the Total Route Length planned by airspace users on the City Pair and the concomitant preference to plan their flight in Italian airspace rather than in neighbouring airspaces. If in the FRAIT Airspace the constraints that characterised the previous Network had already been removed, allowing Airspace Users to plan and fly according to direct trajectories (from a defined point of entry into national airspace to a point of exit from airspace), continuing on this approach, additional interventions were carried out in 2022 to allow further harmonisation of flight profiles involving Military Areas.

In close cooperation with the Air Force, and in a shared application of the Flexible Use of Airspace (FUA) concept, these interventions resulted in a further reduction of planned/flighted distances with results that can be estimated at a reduction of about 2.17 million kg of fuel, with a consequent reduction of CO<sub>2</sub> emissions into the atmosphere estimated at about 6.83 million kg.

Also in 2022, with reference to the Terminal areas, the Parent Company continued to implement two multi-year programs:

- i) the plan for the transition to Performance Based Navigation (PBN), with the publication of satellite-based instrument flight procedures and the associated phasing out of outdated, ground-based, radio systems that are more polluting in terms of radio emissions, such as Non-Directional Beacons (NDB) and/or Locators.
- ii) the transfer of responsibility for the provision of approach control services in area control centres (which, in 2022, involved the transfer of the approach control service of the Naples CTR to Rome ACC).

The two programmes make it possible to optimise the ATS network in the Terminal with a further balance between Flight Efficiency and Capacity and Predictability performance, with expected overall reductions in fuel consumption and CO<sub>2</sub> emissions estimated at around 12.0 million kg of fuel and 37.8 million kg of lower CO<sub>2</sub> emissions by 2022.

## **The ENAV Performance Based Navigation 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.

## The Development of Advanced Air Mobility

The future of sustainable mobility also passes through the development of Advanced Air Mobility and its urban component. This new dimension is bound to have a significant impact on the urban mobility sector of goods and people and its allied industries.

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<sup>20</sup>, EVLOS<sup>21</sup> and BVLOS<sup>22</sup>, 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 “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.

To understand fully the potential behind Advanced Air Mobility applications, it is crucial to comprehend how important the drone segment is for the sustainable development of air traffic.

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<sup>20</sup> Visual Line of Sight (VLOS): operations conducted within a distance, both horizontal and vertical, such that the remote pilot is able to maintain continuous visual contact with the aircraft, without the aid of sight-enhancing instruments, allowing him/her direct control of the aircraft to manage flight, maintain separation and avoid collisions.

<sup>21</sup> Extended Visual Line of Sight (EVLOS): operations conducted in areas whose dimensions exceed the limits of VLOS conditions and for which VLOS requirements are met by the use of alternative methods.

<sup>22</sup> Beyond Visual Line of Sight (BVLOS): operations conducted at a distance that does not allow the remote pilot to remain in direct and constant visual contact with the aircraft, which does not allow flight management, maintaining separations and avoiding collisions.

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.

This is why - in partnership with Leonardo S.p.A. and Telespazio S.p.A. - D-Flight S.p.A. was created, the only platform in Italy, and one of the first in Europe, for the provision of services to remotely piloted aircraft and all other types of aircraft that fall under the category of Unmanned Aerial Vehicles (UAV).

The Group's new Company, D-Flight, pursues the development and provision of services for the low-altitude air traffic management of all types of aircraft in the unmanned aerial vehicle (UAV) category and all related activities.

With the development of the U-space platform, which enables the safe integration of drones into civil airspace, ENAV, through its subsidiary D-Flight, intends to make its indispensable contribution by guaranteeing 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.

## **The flight inspection service for safety in the sky**

ENAV, in line with the objective of enabling air transport operators to fly in compliance with the highest levels of safety, through its own fleet of aircraft, carries out punctual control activities on the quality and accuracy of radio signals, both nationally and internationally, and validates flight instrument procedures for fixed-wing aircraft and helicopters, thus providing a guarantee of safe and efficient navigation.

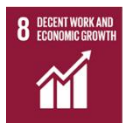
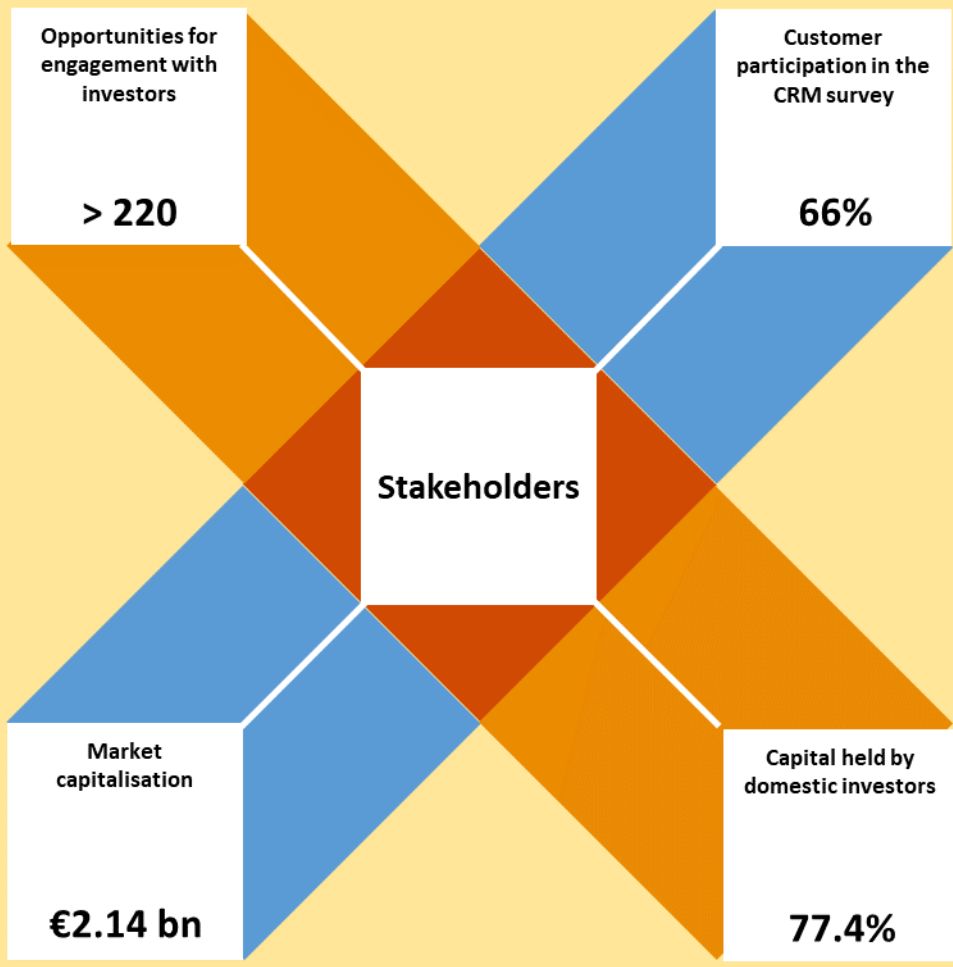
The mission of the Flight Inspection and Validation service is to ensure the maximum reliability of air navigation aids and enable carriers to operate safely and efficiently.

The control activity is carried out by 13 pilots and 7 technicians on board 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.

From 2023, the Flight Inspection and Validation service can count on a new mobile validation platform (RIFIS), developed by ENAV and dedicated to the validation of procedures used by helicopters.

The Flight Inspection and Validation facility is also active in the field of research. In fact, the fleet's aircraft are used as a technologically advanced 'laboratory' thanks to which it is possible to carry out tests for the experimentation and validation of new ATM projects.





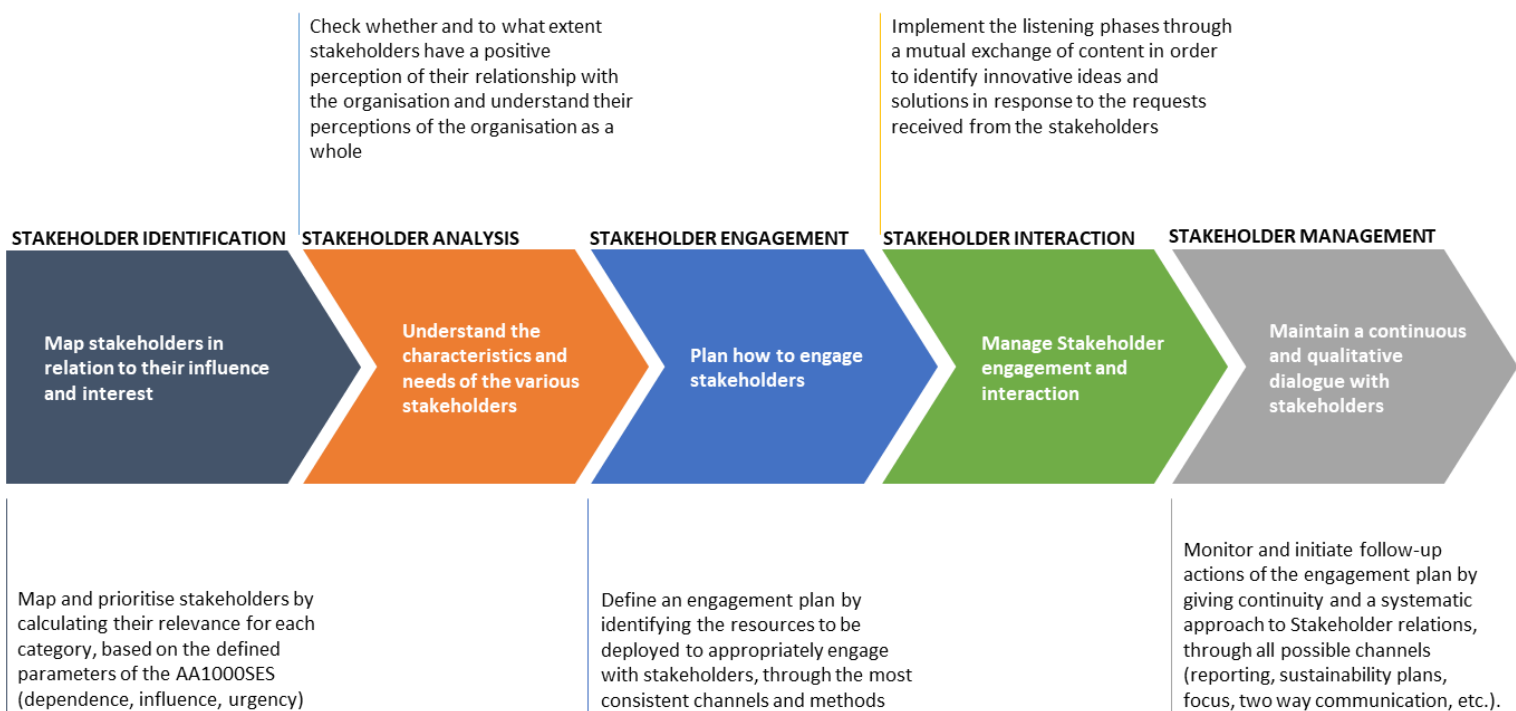
## 2. Stakeholders

### Stakeholder engagement

Stakeholders are fundamental in the process of value creation and are considered an integral part of the responsible and sustainable management of the business, so Stakeholder engagement is an essential process for the Company, and ENAV, over time, has strengthened it further through Stakeholder management.

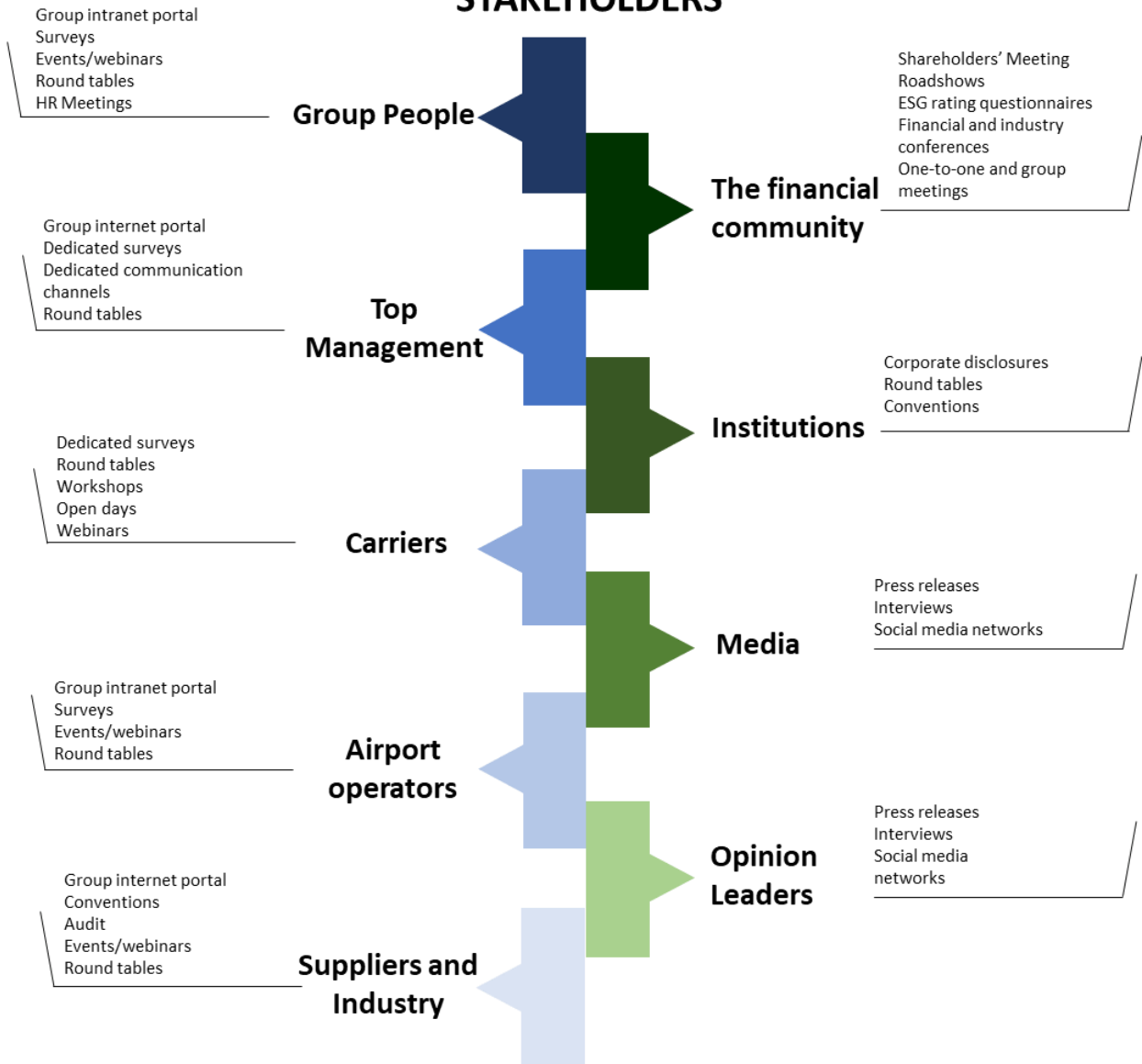
In 2022, dialogue continued with the most representative Stakeholders, with a view to maintaining ongoing relations through a programmatic and proactive approach to managing their needs and expectations. The development of long-term relationships increases the trust of both internal and external Stakeholders and strengthens the Company's image and reputation.

In its relations with its Stakeholders ENAV pursues a five-step strategy:





## STAKEHOLDERS



## 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 and industry conferences, site visits and roadshows. In these events, the management team, typically the CEO (Chief Executive Officer) and/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 2022, ENAV had more than 220 interactions with institutional investors, carried out partly in person and partly virtually due to the continuation of the pandemic emergency that mainly characterised the first half of 2022.

In addition to investor relations, ENAV maintains frequent contacts with financial analysts covering the stock (so-called "sell-side"). The 11 analysts who covered ENAV stock in 2022 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 eleven analysts, at the end of 2022 nine had a "BUY" rating on the ENAV stock and two a "HOLD" rating.

Finally, it is important to underline that during the year the interest of the main institutional investors in (ESG) 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 2023, 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. In addition, during 2023 the Company aims to expand its investor base, focusing on:

- investors located in geographic areas not reached during the listing process.
- investors with a medium- to long-term investment perspective, with a focus on Sustainable and Responsible Investment (SRI) funds, expanding their disclosure on ESG issues.
- specialised infrastructure funds.

## ENAV share performance

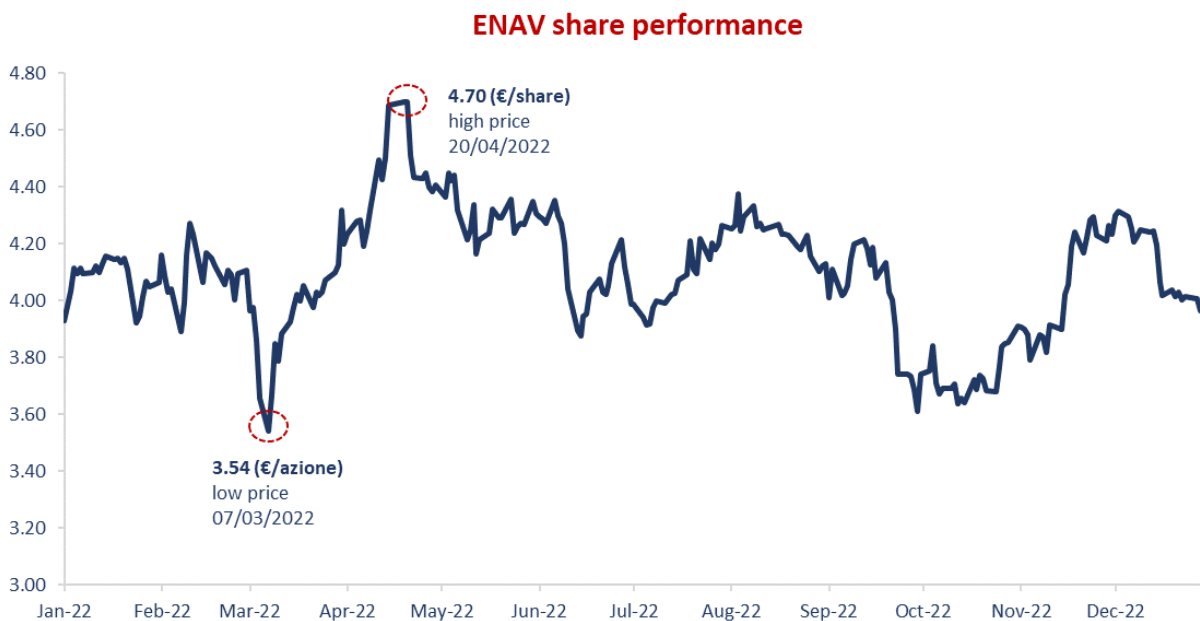
ENAV has been listed since 26 July 2016 on the Mercato Telematico Azionario MTA (now EXM - Euronext Milan) managed by Borsa Italiana S.p.A. and is currently the only Air Navigation Service Provider (ANSP) to be listed on the capital market.

Since the listing date, ENAV's share price has increased by 20%, with a market capitalisation as at 31 December 2022 of approximately €2.14 billion.

During FY2022, the share price showed a slightly positive trend, starting with an opening of the year at €3.93 and closing the year at a price of €3.96 (an increase of about 1%).

The performance of ENAV shares during the year was influenced by exogenous factors mainly related to the outbreak of the conflict in Ukraine and the significant increase in interest rates and inflation.

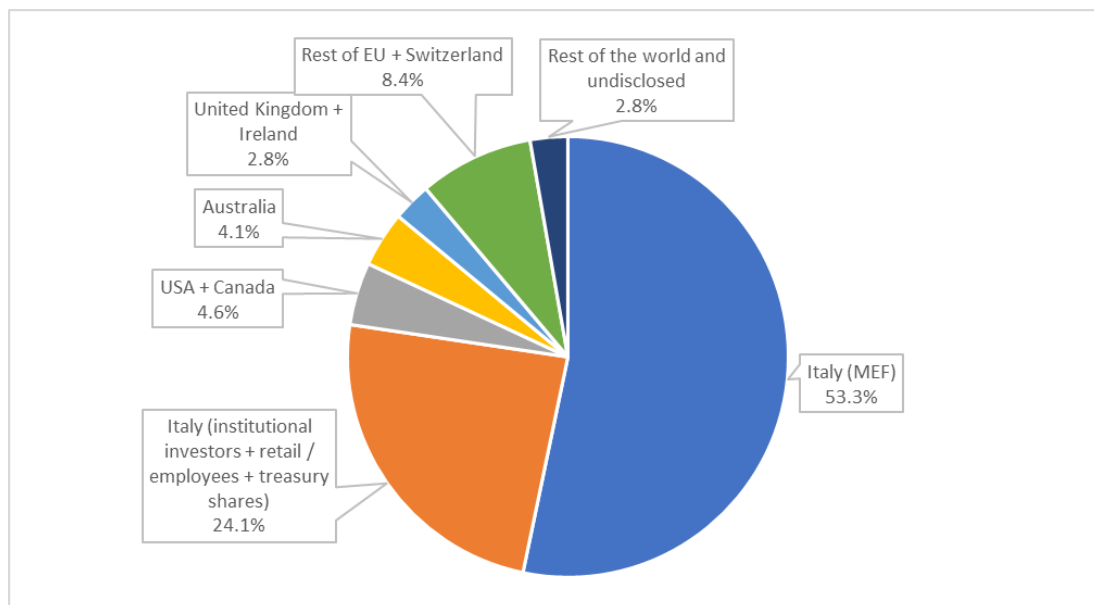
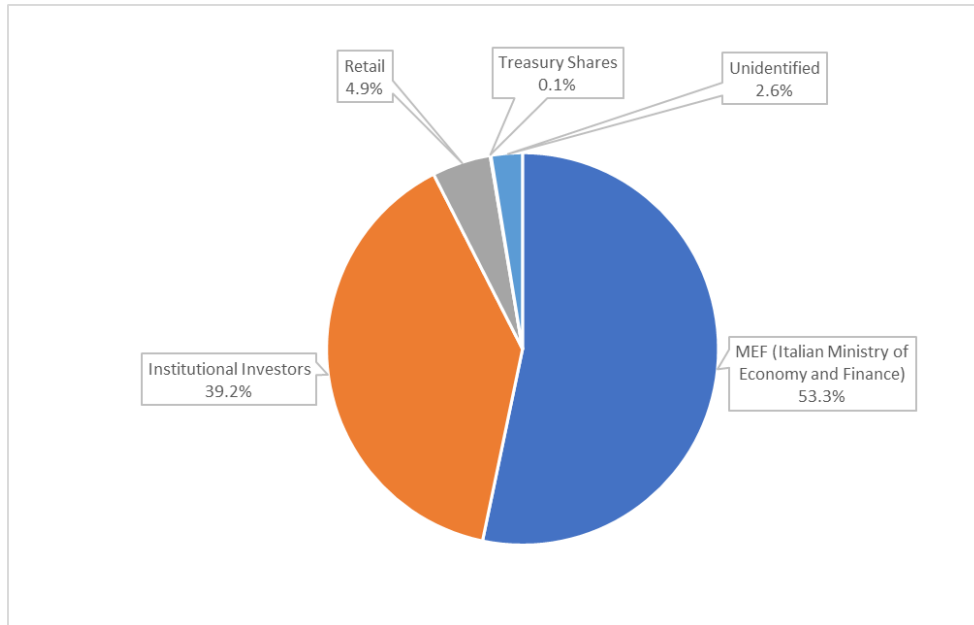
The highest share price in 2022 was on 20 April, with a price of €4.70, while the lowest price was on 7 March, at €3.54.



## Shareholding structure

At the end of 2022, ENAV's share capital amounted to €541,744,385 and remained unchanged compared to 2021.

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 November 2022, divided by type and geographical area.



## Relations with industry organisations, institutions, and 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 activities.

In fact, ENAV operates in a highly regulated sector, with a predominantly international perspective due to the nature of the aviation industry, which has many elements of regulatory complexity.

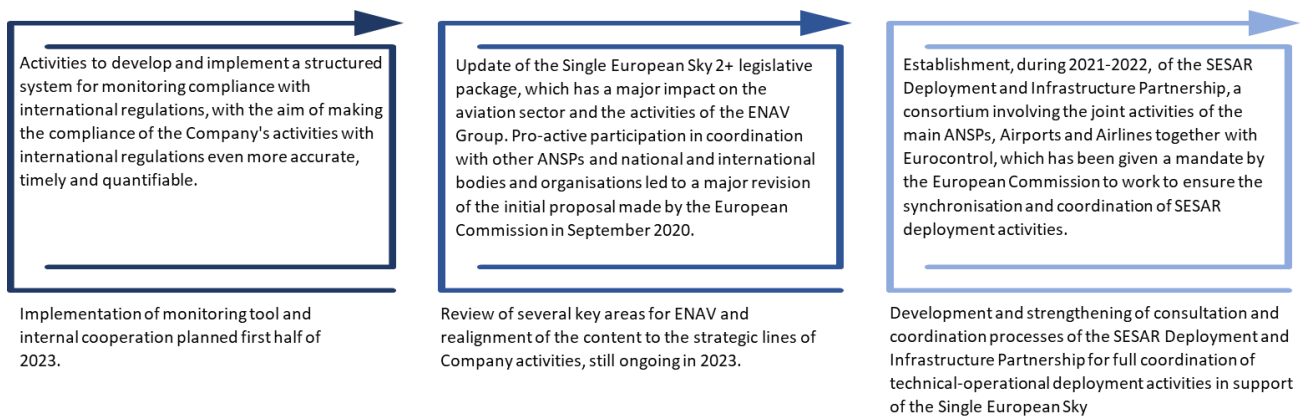
The main organisations, institutions and sector associations with which ENAV collaborates:



Regarding the management of activities concerning relations with organisations, institutions and sector associations, ENAV has in place Procedures of the Company's Quality Management System (QMS), which define the processes, responsibilities and internal and external actors involved.

By way of example, the set of procedures relating to international regulations and the participation of ENAV personnel in the activities of international bodies should be noted. These procedures define the processes and methods for engaging internal resources and the national and international organisations and institutions that are entitled to issue and amend standards for ENAV (e.g., procedures for international participations and for consulting international regulations). Further initiatives are also in place, which identify areas of risk/opportunities that this sphere may create in the life of the Company by providing tools to monitor and influence the regulatory sphere as necessary, in accordance with the objectives set out in the Business Plan, by organising the lines of action, i.e. planning the activities and methods by which corporate/group objectives are identified, developed and pursued, supporting the implementation of concrete measures and the verification of the progress of activities (e.g. the International Regulatory Action Plan).

### Main ongoing activities:



The relationship with entities, institutions and industry associations is one of the material issues for the Company, and in this sense the Company has identified the regulatory dimension related to it as one of the areas on which to focus in the Business Plan for the risks and opportunities it may create. To this end, the adoption of and compliance with the aforementioned procedures are essential to mitigate the potential negative impacts arising from relations with sector bodies, institutions and associations. In particular, being aware of the state of development of the international, community and national processes, defining the strategic areas and priority issues to be monitored for the achievement of corporate objectives, actively participating in the various international and national decision-making fora promoting ENAV's role, positioning and role, the activities carried out, the investments made as well as the skills acquired, which represent the success factors and the competitive advantage that characterises the ENAV Group, minimises the risk of negative impact of the activities. With this in mind, monitoring actions were implemented to identify critical activities and their progress index, as well as the identification of opportunities for ENAV, in relation to the planning set out in the Business Plan. Once critical issues and opportunities have been identified, action is taken in a synergetic manner, including coordination between external bodies, institutions and organisations and/or Organisational Structures of the Company responsible for the topic. The process involves, through Quality Management System and other initiatives, the identification of the risks/opportunities that international regulation and international strategic positioning may create for the Company and the verification of the progress of related activities (e.g. Action Plan International Regulation, Procedure for Monitoring Reporting). Priority regulatory areas are defined, the external and internal actors involved are identified and then the progress of activities is constantly monitored, through the periodic



updating of the Action Plan itself, in cooperation with the Organisational Structures concerned. The effectiveness of what the Company has put in place can be defined on the basis of the alignment of regulatory and international planning developments with the Company's strategic lines and activities.

Future goals	Deadline
<p><b>Primary role of ENAV in Traffic Management for UAS - UTM</b></p> <p>ENAV, together with its subsidiary D-Flight, and in cooperation with Italian authorities, plays a driving role in this new sector, with enormous benefits on a social and economic level, both on a European and international level. The recognition of a leadership role offers ENAV and the Country System valid commercial opportunities for the supply of services, know-how and infrastructure systems on the international market.</p> <p>In addition, the subsidiary Techno Sky received the necessary authorisations from EASA for the use of drones in the monitoring of certain technological systems, with considerable benefits in environmental and economic terms.</p>	2023-2025
<p><b>ENAV's primary role in Higher Airspace Operations (HAO) and Space Traffic Management (STM)</b></p> <p>The aim of the STM is to ensure the safe development of airspace operations at higher altitudes than those currently used by traditional aviation, reducing the risk of collisions and interference, in cooperation with the ATM, promoting the long-term sustainability of space activities.</p> <p>From that point of view, ENAV is playing an active role in important initiatives, in synergy with the national regulator ENAC and with other national and international actors. One example is the ECHO project (European Concept of Operations for Higher Airspace Operations), which aims to develop an operating concept and solutions for the development of this new type of traffic, analysing in particular demand, aircraft types and operational requirements.</p>	2023-2025
<p>Intercept market opportunities related to the ATM Data Services Provision (ADSP) concept addresses in the legislative proposal SES II+. These opportunities can be taken advantage of directly by the ENAV Group or through its partnerships (e.g. Coflight Cloud Services) or its subsidiaries (ESSP, Aireon, etc.).</p>	2023-2025

Projects	Description
CoFlight e 4Flight	ENAV is also involved, in partnership with the French provider DSNA and the Leonardo - Thales industrial consortium, in the Coflight programme, which aims to design, develop and implement a new-generation system for the management of aircraft flight trajectories, to support increasingly efficient operations management.
Coflight Cloud Services	As part of the Coflight project, ENAV, together with its partner DSNA, is also involved in the development of a new concept for the remote provision of Flight Data Processing (FDP) services, with the Swiss provider Skyguide as a customer. The concept is innovative in that, unlike normal cases, FDP is provided as a service instead of as a system with operational, technological and economic benefits.

## Customer relations

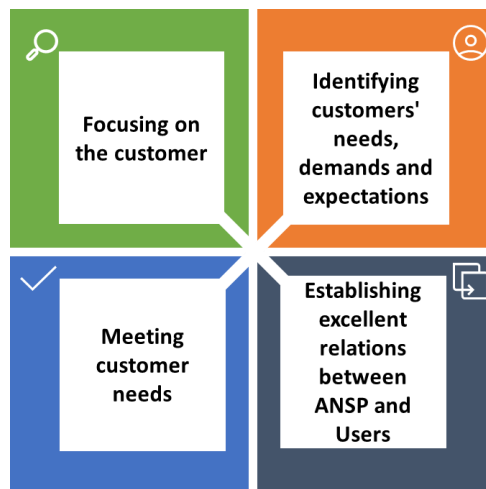
Among the Stakeholders of the ENAV Group, air navigation companies, together with the other components of commercial aviation, play an absolutely central role as customers of the ATS services provided.

ENAV, through the Operations units most in direct contact with customer needs, Airspace Users, has developed an effective network of relationships over recent years. Proactivity is the hallmark of the system, supported by a network of operational cooperation agreements signed with major air transport operators. By virtue of these relationships and cooperation, ENAV ensures a constant and up-to-date flow of information between providers and customers and consequent involvement in activities. Thanks to the operational appendices included in each agreement, dedicated to professional enrichment and joint training activities, ENAV has an effective tool to understand customers' needs and expectations better, aligning, where necessary, service requirements to the dynamic needs of the aviation sector.

The programmes shared with the companies constitute a consolidated work agenda that, throughout the year, allows for general or specific information activities, such as Open Days, Workshops, Webinars and various meetings.

Among the initiatives introduced by Operations, the plenary web meeting for the implementation of the first Remote Tower, in service in Italy for the airport of Brindisi and managed by ENAV, was of particular interest.

The organisation of customer relations, the user-friendliness of the initiatives promoted and the constant support provided to customers of ATS services give the Customer Relationship service a position close to excellence in customer ratings.



IDS AirNav has activated its own support services for all customers, by means a group dedicated to around 10 people (Customer Care Team, part of the Services area of IDS AirNav) which performs the initial analysis of the requests for technical support made by customers (users of the IDS AirNav system/SW). This initial support phase can end with instructions (or procedure) for the removal of the problem that was presented and/or in direct support in the use of the system/SW or with a workaround that can be defined permanent or temporary.

When managing customer satisfaction, the Freshdesk tool can be used to generate 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.

These indicators are provided to the various figures in the Company organisation that need these details in order to:

- define/adapt/start commercial actions and/or strategies.
- solicit greater attention and/or support in the technical management of the customer.
- directing energies and means towards those areas (or sub-areas) of the system/SW that present problems most frequently.
- extrapolate common elements for the medium/long term development plans for the system/SW.

Future goals	Deadline
Maintain response times for support tasks that do not require development (TR/CR) or hot-fixes.	Q4 2023
Continue with the standardisation of reports on the status of customer service activities towards customers.	Q4 2023

## The 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 among sustainability advocates. 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.

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.
- - wikietico 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

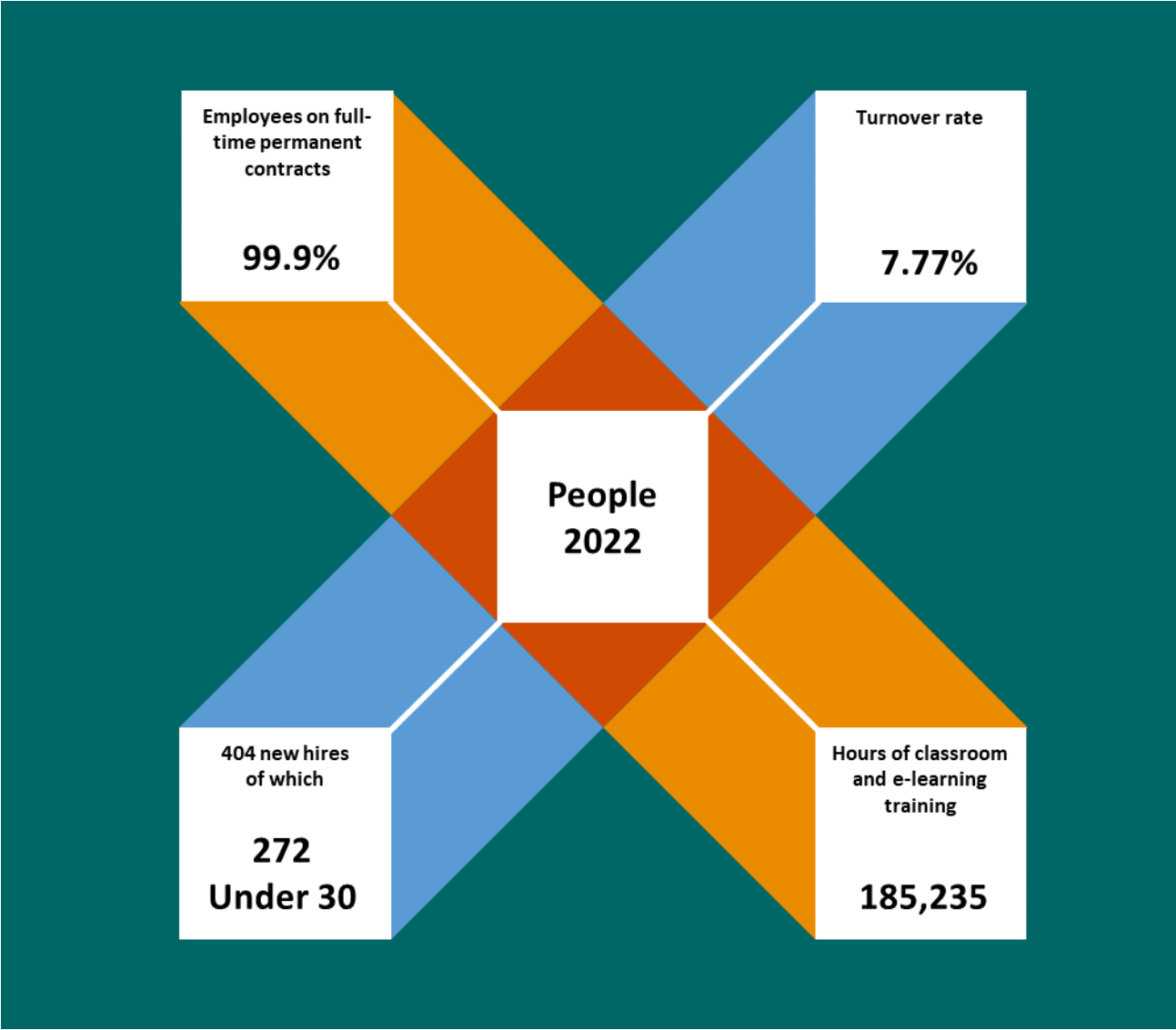
CEO for life awards is an initiative founded by HR Community, which brings together the CEOs of the most important companies in Italy committed to sustainable development and to which ENAV has been signed up since 2021.

## Sustainable Infrastructure Association (AIS)



AIS is a technical-scientific association, which characterises itself as a think tank of excellence, positioning itself as an authoritative and valuable interlocutor for public and private institutions.

The main objective of the Association is to foster the dissemination of a broad and qualified culture of sustainability and an increasing awareness of the social and economic value of having sustainable infrastructure.



### 3. People

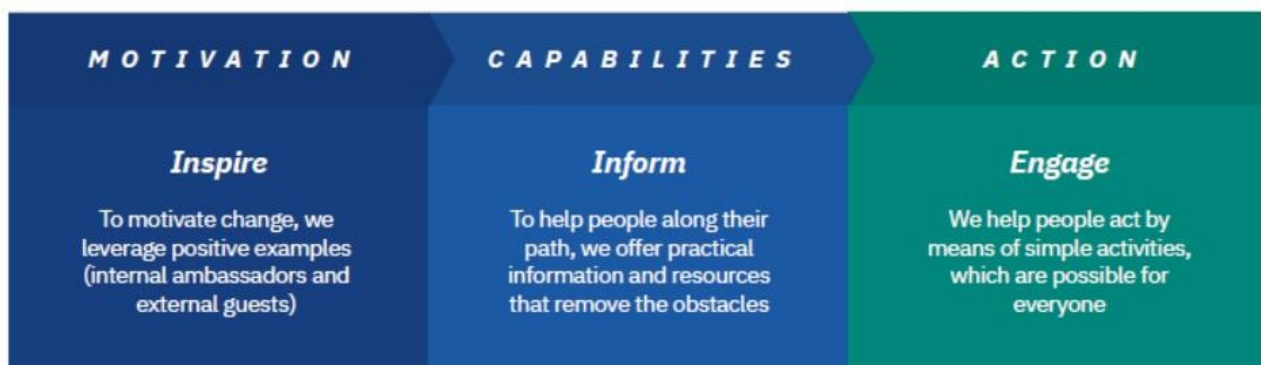
The Group's people are the key factor in designing and making sustainable the sky of the future. Thanks to the dedication and professionalism of its people, the ENAV Group is able to provide services of the highest quality for air transport, while maintaining a constant commitment to creating an inclusive, collaborative and sustainable working environment in which everyone can feel valued and involved.

#### Sustainability culture

Ever since the ENAV Group decided to invest decisively in sustainable development, one thing became immediately clear: in order to achieve any goal, it is necessary to start with people.

In ENAV, the human factor is decisive and any objective must necessarily be shared at all levels. However, developing a "culture of sustainability" is more than a corporate objective. In fact, this meant starting a real journey to raise awareness on the topic of sustainability.

For this reason, in order to spread the "culture of sustainability" in ENAV, a three-pronged strategy was developed.



#### 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 ENAV Group. In 2022, the group of ambassadors consisted of around 50 people.



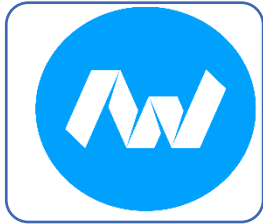
#### The portal of sustainability in the new intranet

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 sustainability area dedicated to ENAV people is updated continuously and organised in 4 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.



## Diversity and inclusion

For the ENAV Group, promoting diversity and inclusion is a moral imperative, because everyone has the right to express themselves to the best of their abilities in a working environment that is fair, inclusive and respectful of individual differences.

The ENAV Group has equipped itself with a Diversity and Inclusion Policy, with a view to concretising its commitment to enhancing the value of its human resources and promoting the support of policies in favour of inclusion, diversity and equal opportunities.

The Policy is inspired by national and international reference principles and values in the field of diversity and inclusion, including the “Charter for Equal Opportunities and Equality at Work” promoted by Sodalitas, the UN Global LGBTI Standards for Conduct, the UN Women and UN Global Compact - Women’s Empowerment Principles, the United Nations Equal Pay International Coalition (EPIC).

In 2022, a dedicated Organisational Structure - Talent Experience, Diversity and Inclusion Initiatives - was set up with the mission of gathering and directing initiatives capable of promoting an inclusive culture and enhancing everyone’s skills.

In addition, in January 2023, a new Trust Advisor (a specialised, external and impartial figure) - provided for in the Regulation on Abuse, Harassment and Violence in the Workplace, which the ENAV Group has adopted - was appointed to manage and carry out functions to prevent and combat discrimination, abuse and harassment in the workplace. The Adviser works in cooperation with the HR department and the Equal Opportunities Committee, activating processes for the care and protection of labour relations at risk of discrimination or harassment.

Preventive actions include training processes and Diversity and Inclusion initiatives, as well as the appointment of a Confidence Advisor, in agreement with the Equal Opportunities Committee and the three-year Plan of Positive Actions 2022-2024 drawn up by the latter.

In November 2022, a training activity on the subject of “Diversity and team management” was launched for the ENAV Group’s middle management, which will be completed during 2023. As part of this activity, 66 heads of organisational structures were involved.

In addition, during 2023, the entire Company population will be involved in e-learning training on the topics of workplace harassment and unconscious bias, and cross-Company mentorship initiatives will be promoted to foster the exchange of professional experiences and enhance existing skills.

Membership of the Valore D network of companies will allow constant updating of the corporate population on D&I issues with the dissemination of best practices (by way of example, the Group is currently adhering to the ValoreD4STEM campaign aimed at enhancing the skills of STEM women).

In cooperation with the Equal Opportunities Committee, a preliminary assessment of the UNI/PdR 125:2022 Gender Equality Certification was initiated and will be developed in 2023.

The “ImproveYourself” project, aimed at ENAV Group people with disabilities who, on a voluntary basis, were able to undertake a skills assessment course, with the aim of guiding their career path through the recognition and enhancement of their skills and personal aspirations, ended in 2022.

The positive impacts generated by the promoted initiatives are constantly monitored through the collection of feedback and the provision of specific moments of sharing with internal Stakeholders. Moreover, downstream of the various activities undertaken (reporting by the Confidence Advisor, monitoring of training and development processes for fragile workers, possible outcomes of the Gender Equality Certification,

Project aimed at new-parent workers in the validation phase), it will be possible to orient subsequent actions according to the evidence that has emerged.

Interaction with Stakeholders (Equal Opportunities Committee, Company managers and population, HR) enables constant monitoring of inclusiveness issues and their continuous adaptation.

For example, during the training course aimed at ENAV Group middle management, a demand for integration between professional skills and internal experience emerged: projects and actions will follow in this regard to share skills and job rotation opportunities, cross-Company mentorship projects in partnership with Valore D.

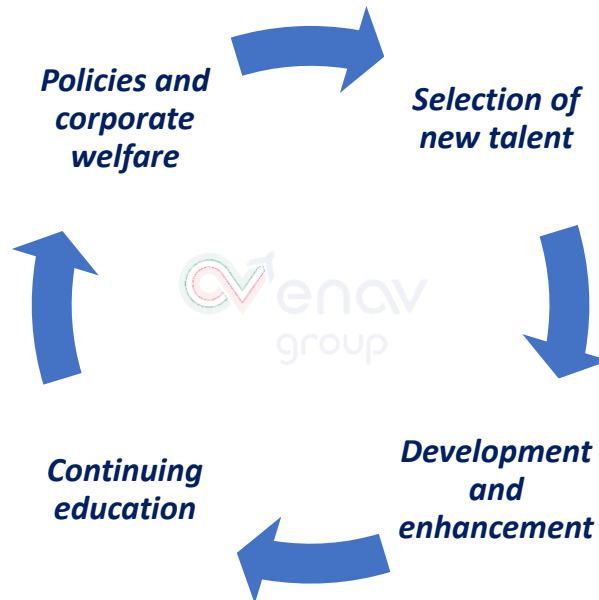
Future goals	Deadline
Promoting internal and cross-Company communities to foster the development of internal integration.	End of 2023
Gender equality certification UNI/PdR 125/2022	End 2023_Pre-assessment
Training on D&I issues through training snippets delivered by our partner Valore D	End of 2023
Creation of the Equal Opportunities Committee in Techno Sky Group	By 2023
Establishment in the territorial entities of a contact person for the central Equal Opportunities Committee to enable the Committee to be closer to colleagues in these locations with advantages in terms of both communication and support - Pilot project.	By 2023

Projects	Description
<b>“Parenting Management” project for new parents</b>	Project aimed at facilitating the integration of the new parents’ experience with work experience, in order to reduce the risk of dispersion of skills caused by the temporary break from work and to impact positively on the physiological time of return to work after maternity/paternity leave.

Projects	Description
<b>Reverse mentoring/sharing of experiences through participation in Valore D actions</b>	Participation in cross-Company reverse mentoring initiatives to foster the exchange of experiences and expertise.
<b>Maternity and paternity protection</b>	Development of a brochure to help workers as parents to inform themselves about their rights and to be able to reconcile work and lifetime (CPO).
<b>Projects shared with other Equal Opportunities Committees</b>	Mainly study and training on Diversity and Inclusion issues to increase the culture of respect for diversity starting in the area of leadership.

## Management and Development

Elevating people management and development to a corporate priority is the most valuable investment in building a sustainable, innovative organisation that can successfully meet the challenges of the future.



### The selection of new talent

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.

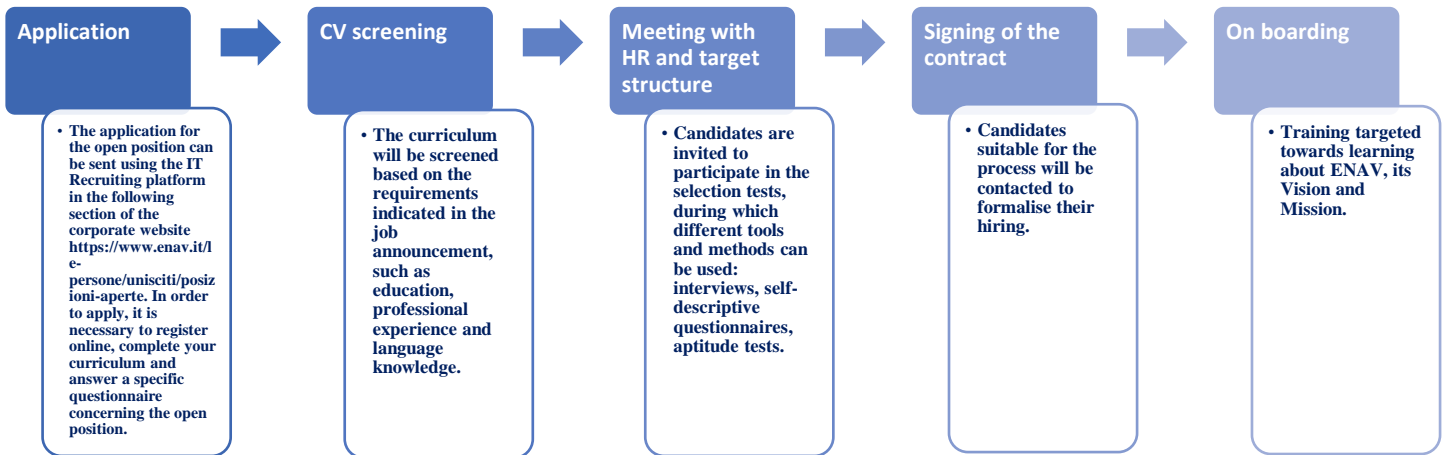
In particular, the selection process is governed by an ISO 9001 certified Quality Procedure, which ensures candidates are treated with maximum transparency, equal opportunity, uniformity and objectivity in the assessment criteria, and confidentiality in any personal information provided to the Company.

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.

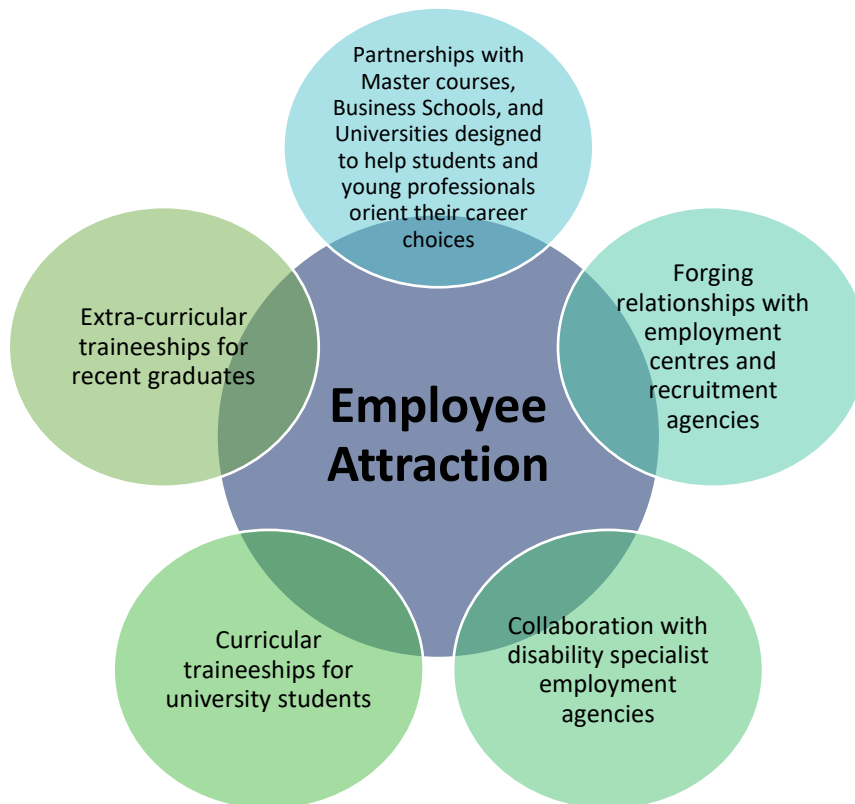
In order to ensure that the hiring process is impartial and objective, both in-house audits and audits are periodically conducted, and actions for improvement in the management and execution of the process are taken based on the results of these audits.

## The selection process

Selection activities aim at mutual acquaintance between the ENAV Group and potential new resources and make up the selection process, which is divided into several steps. The process can be integrated by additional steps depending on the transversal skills required for the job.



During 2022, the ENAV Group consolidated its Employee Attraction strategy, promoting the following activities:



Through its Career Days (digital and in-person, constantly publicised in the “Recruiting Events” section of the site), the ENAV Group meets young talents in search of employment, with the ultimate aim of promoting the ENAV brand and attracting new resources.

- Inclusion Job Day**
  - Event dedicated to people with disabilities
- Job Meeting in Rome**
  - Events focused on engineering disciplines
- 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;

In addition, the LinkedIn Talent Solutions platform was used to carry out external selections and to convey vacancies even more extensively, which enabled a wider pool of candidates to be reached, thanks to the use of job slots and the sharing of specific job postings customised according to hiring needs.

On-boarding of new recruits is followed by established practices aimed at monitoring engagement, performance and development actions necessary to ensure retention of new recruits.

In fact, at least five months after recruitment, the direct manager of the resource is involved for structured feedback on the placement and, at the same time, the relevant HR Business Partner<sup>23</sup> conducts an individual interview to deepen the perception and satisfaction of the new joiner.

Future goals	Deadline
Identification of 200 resources to integrate within Group Companies.	2023
Participation in recruiting events: <ul style="list-style-type: none"> <li>• 15 February: Virtual Inclusion Job Day Virtual event dedicated to work for people with disabilities</li> <li>• 16 March: 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>• May: LUISS Career Day In-person event dedicated to students and graduates of LUISS Guido Carli University</li> <li>• 30 May: Job Meeting in Rome An in-person event targeted towards students and graduates of all universities in the region of Lazio</li> <li>• 11 October: Digital Recruiting Week Live Roma Sapienza An in-person event at Sapienza University of Rome that includes discussions between corporate HR and students.</li> </ul>	2023

<sup>23</sup> HR Business Partners are resources in charge of personnel management and represent the point of reference for human resources requests to the Group’s various organisational structures.

Future goals	Deadline
<ul style="list-style-type: none"> <li>• 23 November: Nazionale Engineering Virtual Job Meeting Virtual event dedicated to talented young engineers.</li> <li>• December: CV at Lunch In-person event dedicated to students and graduates of Università degli Studi Roma</li> </ul>	

Projects	Description
<b>LinkedIn Talent Acquisition</b>	Telling it in a nutshell, through posts on the Group's LinkedIn page, the main initiatives concerning Talent Acquisition strategies.
<b>Induction</b>	Networking event aimed at new joiners to engage them, increase their sense of belonging to the Group and foster acquaintance between the different structures.
<b>Open Door</b>	In-person event at ENAV headquarters aimed at increasing brand awareness and enhancing Talent Attraction strategies.
<b>Welcome Kit</b>	Implementing caring policies for new joiners, accompanying them from Day 1 in their development paths.

## Development and enhancement

In an increasingly evolving context affected by constant changes, prompted by technological innovations and profound changes in the social and economic landscape, for the ENAV Group it is essential to offer people growth and development paths that are up-to-date and consistent with their needs.

In 2022, a dedicated Organisational Structure - Talent Acquisition, Assessment and Learning - was established with the mission to oversee the recruiting and internal assessment process as well as the human capital development lifecycle ensuring, among other things, career path planning.

Fifty-four development assessments were carried out during the reporting year, with the dual aim of assessing the expendability of people to fill specific roles and identifying high-potential resources for whom to create *ad hoc* development paths in the short to medium term.

At the same time, 15 individual coaching courses were set up to strengthen the less-attended areas that emerged during the development assessment. Along these pathways, the direct managers were also involved in the definition of development goals in order to be able to create "on-the-job gyms" for the growth of the individual.

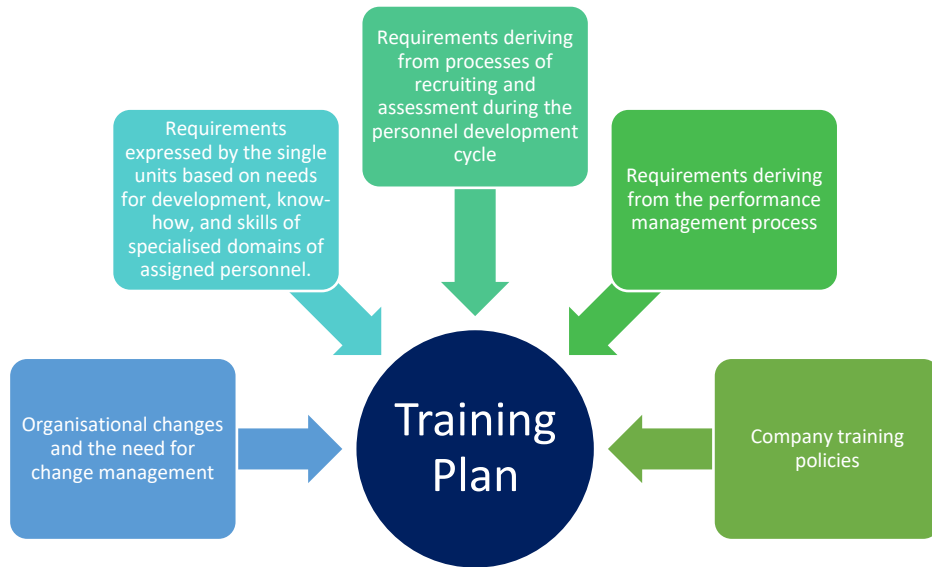
In addition, the performance management process targeted at all ENAV Group people aims to take an annual snapshot of performance and identify development plans and merit policies, including with the aim of supporting retention.

## Training

Managerial and specialised training activities are provided precisely to emphasise the focus on managing the life cycle of the individual within the Company, with a special focus on their development needs.

The ENAV Group has formalised a specific procedure aimed at regulating the management of training activities, which includes - among other things - the definition of an Annual Corporate Learning Plan.

This Annual Plan is designed from different inputs:



In defining the Annual Corporate Learning 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.

The consolidated adoption of distance learning and the subsequent reintroduction of some classrooms in synchronous mode, in tandem with the evolution of emergency regulations, made it possible to provide about 60,000 hours<sup>24</sup> of training for the ENAV Group’s corporate population in 2022.

The training activities were divided into five **areas of intervention**:



<sup>24</sup> Operational training hours are not included in the calculation of training hours.



**MANDATORY**  
indispensable for working

**47,148 hours**  
**4,105 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

- Refresher on Occupational health and safety
- Anti-corruption 2022: ISO 37001 and Whistleblowing Regulation
- Market Abuse and Privileged Information

**STAY ON BUSINESS**  
efficiency prerequisites

**3,295 hours**  
**308 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

**5,895 hours**  
**447 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.

- Digital Skill Upgrade, a series of workshops dedicated to exploring new and emerging technologies in the world of work.
- 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).
- Prometeo, training course dedicated to the introduction of the new application for special waste management.

## SUPPORT CHANGE

465 hours

a plethora of opportunities for individuals and groups

288 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
- Continue the delivery of “training snippets” on soft skills topics.
- Launch of a series of digital resources dedicated to increasing digital skills and mindset.
- Agenda 2030, a course dedicated to understanding a new corporate culture, towards circular economy and sustainable finance tools.
- Individual coaching paths dedicated to high potentials.

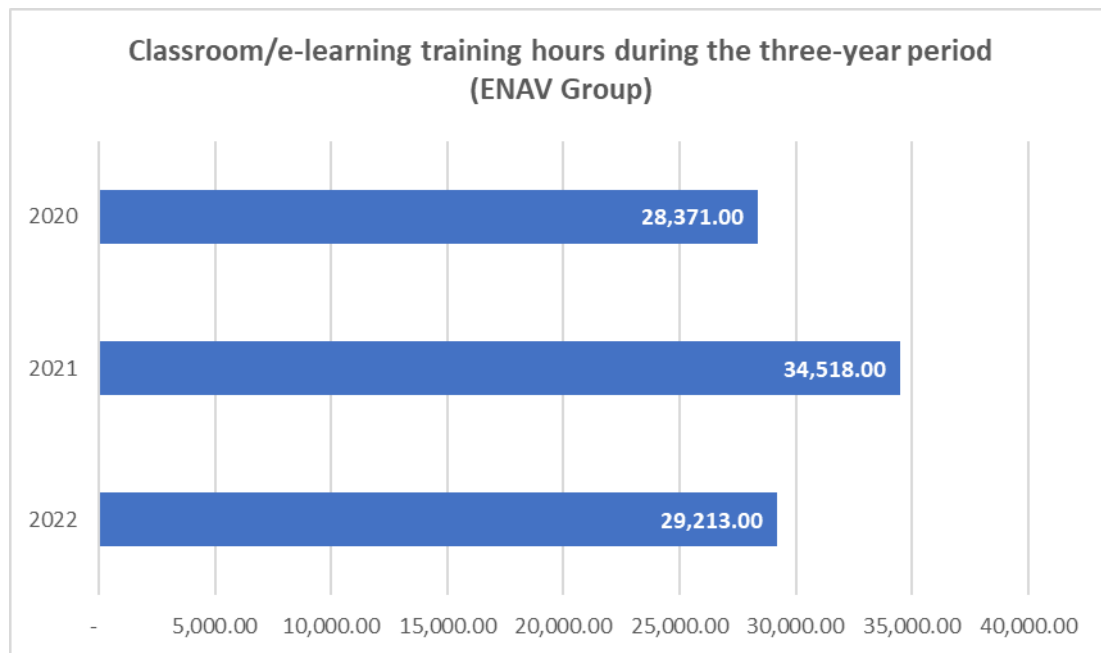
## GROWTH

2,004 hours

strategic training

142 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.
- Course for newly appointed managers: a course that alternates between classroom sessions and individual coaching with the goal of developing the leadership skills of middle management.
- An induction programme dedicated to the Group's new recruits that offers a cycle of meetings with the Company's top management to learn about the Group's main strategic guidelines; team coaching sessions with a certified coach aimed at improving organisational context skills; and the “To Us the Headset!” course, which, through the use of simulators, enables participants to learn about and experience the processes of the Company's core business - air traffic control



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

## Operational training

### *In-house training of ENAV Operative personnel*

Being an Air Traffic Controller (ATC) requires constant attention and safe and efficient operational behaviour. The internal training of ENAV operational staff is aimed at transmitting the skills necessary to operate in a highly reliable environment.

Indeed, whether they are in front of a monitor with lighted indications, or in an airport control tower, ATCs must constantly demonstrate their skill and ability to direct and manage the 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.

The training of Air Traffic Controllers, Flight Information Service Officers (FISOs) and aeronautical technicians is ensured by a dedicated organisational structure, whose mission is to oversee the training of air navigation services for both ENAV Group operational resources and external customers.

The training courses are modulated in accordance with the educational standards laid down by sectoral, national and international regulations, with particular reference to the Single European Sky regulations.

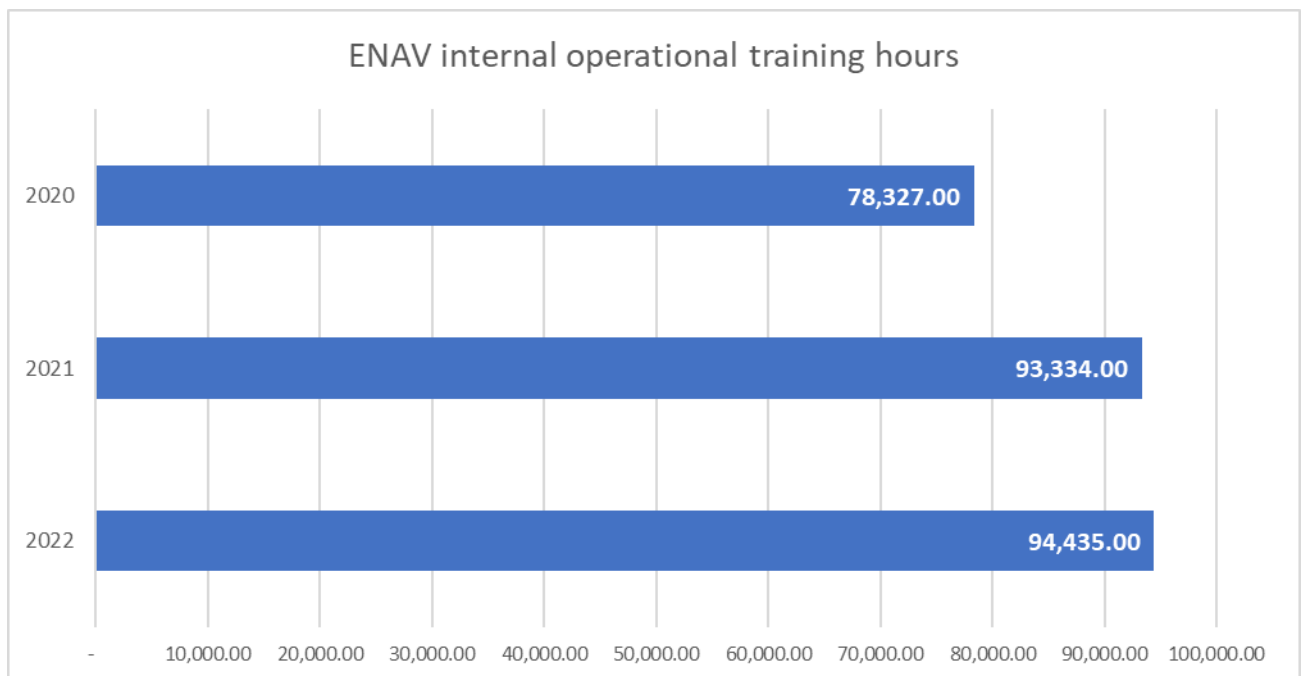
Because of this, certified and uncertified training design activities must meet certain general requirements in order to achieve the highest quality levels. ENAV therefore defines specific targets to achieve in developing its training, such as:

- 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.

In 2021, the effects of the pandemic led training to focus on competence maintenance programmes, through the “Back-To-Normal” programme, which provided training for operational personnel in a simulated environment, in anticipation of a future resumption of air traffic. In 2022, however, the focus of training shifted to the initial training of new hires.

### Hours of internal operational training (classroom and e-learning) ENAV



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

Technical operational training is also provided by Techno Sky, in particular through specific training courses for technical personnel involved in the operation, maintenance and installation of communication, navigation, surveillance and air traffic management systems.

The following courses were delivered during 2022:

- Technical training courses for ATSEP personnel (except Basic and Qualification training) to acquire the necessary skills to operate CNS/ATM equipment used by ENAV for air traffic control.

- Technical training courses for technical-engineering personnel not related to ATSEP competencies: these are technical courses on specific topics required for the activities of the Operations and Technology Unit.

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

In continuity with previous years, the management policy for technical-operational training is based on the facilitation/organisation of the following modalities:

- Study/self-study (possibly supported by internal tutors).
- Classroom or e-learning training sessions delivered by both IDS AirNav internal personnel and external instructors, either from the ENAV Group or outsourced.
- Operational coaching (contextual to the activities of existing “AIM Solution” projects).

For 2022, training initiatives for internal staff were aimed at the following objectives:

- Internal refresher course on developments in IDS Air Nav AIM Suite SW products.
- Improvements to or acquisition of enhanced international language skills necessary for the provision of the various activities and/or services offered by IDS Air Nav.

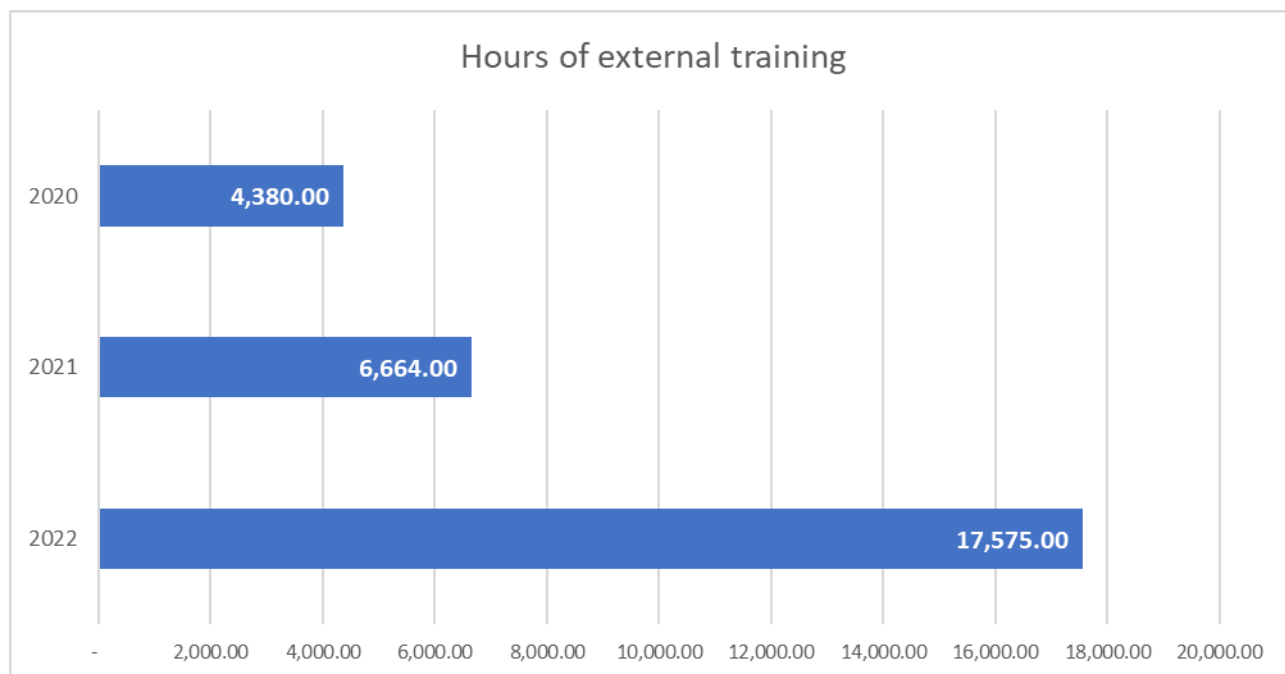
Future goals of IDS-AirNav	Deadline
<p>Training courses on the typical areas of the Services unit are planned for 2023.</p> <ul style="list-style-type: none"> <li>▪ Improving or acquiring greater expertise on some of the non-IDS (third party HW/SW) technologies integrated into the SW products of the IDS Air Nav AIM Suite.</li> <li>▪ Improvement or acquisition of more management skills used in team management for responsible persons only.</li> <li>▪ Improvement or acquisition of increased skills in communication aspects (public speaking), preparation of related material (slides, support material, exercises, etc.) both live and pre-recorded.</li> <li>▪ Updating or acquiring of greater expertise in training delivery methods/processes/techniques.</li> <li>▪ Update on quality processes and support tools used to implement both the management/release cycle of IDS Air Nav’s AIM Suite SW products.</li> </ul>	<p>2023</p>

### **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.

When defining training activities for external parties, the ENAV Group pursues the same objectives of excellence that characterise the management of training activities for internal staff.



As was to be expected as the Coronavirus-related emergency progressed, 2022 marked a return to normality with respect to supply to the third market.

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 in Forlì has had a significant impact on local development over the years, also through:

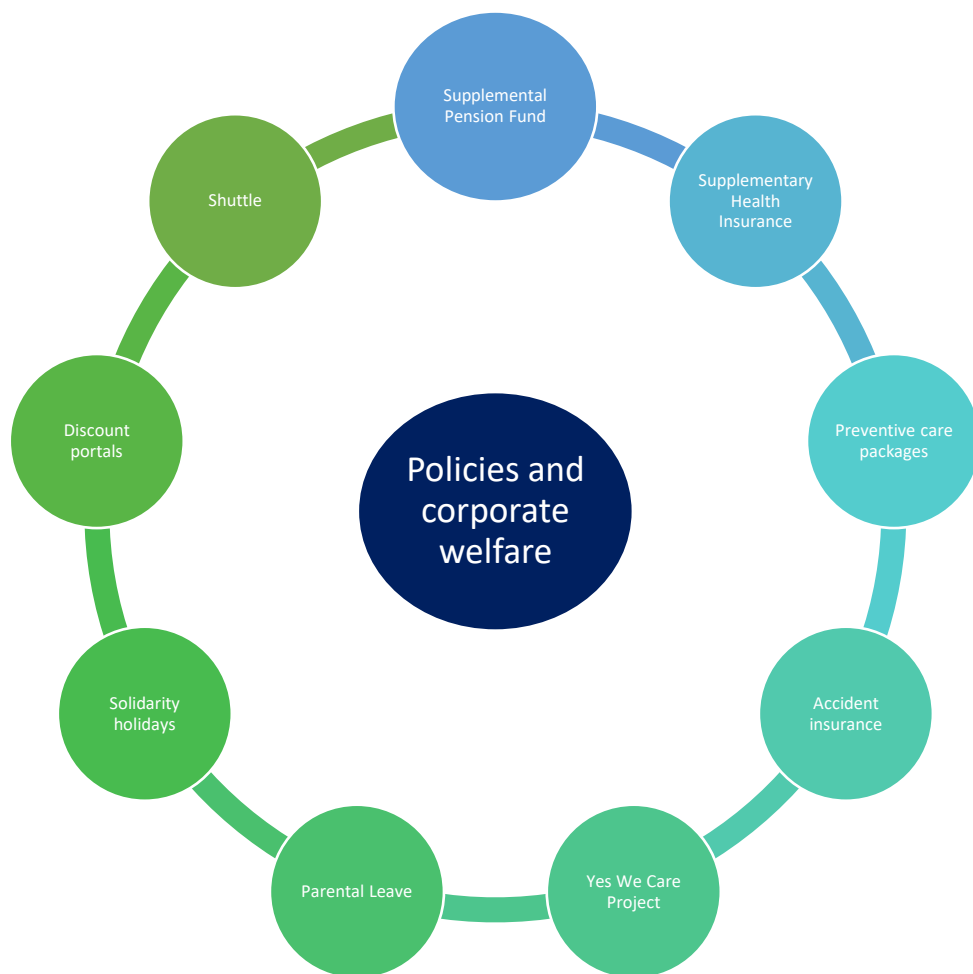
- improvement in education levels owing to the presence of new training opportunities.
- cooperation with local businesses and support for innovation processes.
- contribution to the development of the Aerospace Technological Centre, which has had a positive effect in making the area more attractive.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




In addition, the collaboration with the University of Bologna continued for the Academic Year 2021/2022, where the Training Centre staff will teach Air Traffic Control, two training modules envisaged in the Study Plan for students attending the Faculty of Aerospace Engineering. 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.

## Social policies and corporate welfare

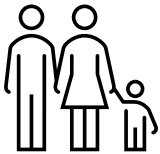
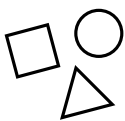


The ENAV Group firmly believes that the well-being of its people is essential to their happiness and success, and has therefore implemented corporate welfare policies aimed at improving the quality of life at work. Moreover, the ENAV Group is committed to designing and planning projects aimed at improving work-life balance, through a careful policy of listening to internal Stakeholders through the promotion of targeted surveys.

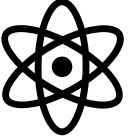
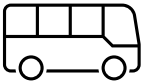
Effective welfare cannot disregard adequate listening policies, aimed at defining people's needs and expectations, which ENAV has introduced in order to be able to offer useful and appreciated services and benefits, thus also defining the scope of action.



AREA	PROJECT	ACTIVITIES
Social policies 	<b>Prevaer Supplemental Pension Fund</b>	The ENAV Group contributes 3% of the member's salary to the fund, in addition to the 2% paid by the member.
	<b>New Routes</b>	In order to support people who are approaching the end of their working career, the ENAV Group proposes a Life Coaching course to face this important moment of change in the best way possible. "New Routes" takes place through four sessions (two before and two after the retirement date) of Life Coaching, each of an hour and a half.
Insurance policies 	<b>Supplementary Health Insurance</b>	This policy insures the person 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 ENAV Group. The person is only responsible for paying the premium of non-dependent family members.
	<b>Preventive care packages</b>	Medical and dentist checks are also provided, with general and specific packages depending on gender and age.
	<b>Policy for problems in the nuclear family</b>	This includes expenses paid for therapies for children with learning disabilities, behavioural problems, development issues and autistic spectrum disorders. Furthermore, this policy also provides coverage in the case of illness due to COVID-19.
	<b>Accident insurance</b>	Compensates persons of the ENAV Group in the case of permanent invalidity caused by accidents that occurred during work or non-work activities.
Health 	<b>Yes We Care</b>	With this project, which was launched in 2019, the ENAV Group is seeking to increase awareness among Group people of the importance of prevention and a healthy lifestyle by organising health-related events with physicians and other experts. Also the collaboration with the Onda Foundation - National observatory for women and gender's health – promoter of the project HFC (Health Friendly Company), placed greater attention on people 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>Emotional support</b> <i>(30 minutes for an emotional switch that makes the day better)</i>	An experimental project aimed at preventing psychological distress was initiated and completed in 2022. The main objective was to create an environment conducive to emotional well-being and to provide each person with the necessary tools to manage their emotional emergencies effectively, through interventions aimed at rapid relief.



AREA	PROJECT	ACTIVITIES
Family 	<b>Parental leave</b>	The ENAV Group pays its new parents their full salary during parental leave, whereas current social welfare regulations provide for 80%. In addition, it offers the possibility of being absent from work for six months, extendable up to the child's third birthday, with 80% of salary for the first two months and 40% for the next four, unlike the current legislation that provides for 30% for the entire leave period. In addition, the ENAV Group provides parents with support tools such as paid leave in the event of their children's illness (with 50% pay for the first 30 days, not provided for under current legislation), and paid leave for specialist medical services.
Work-life balance 	<b>"Solidarity holidays"</b>	All people of the ENAV Group can assign a portion of their holidays to the benefit of co-workers experiencing particularly challenging family situations. In addition, the initiative has also been extended to persons who, within their own family, need to care for their parents, spouse, cohabiting partner and adult children.
Money saving 	<b>Platform for the provision of corporate welfare services</b>	It allows ENAV people to convert their performance bonus into benefits through the purchase of goods in kind (shopping, shopping, fuel) and services (sport & wellness, travel, training). The conversion percentage for ENAV is 10.2%. This platform was also activated for Techno Sky employees with a conversion rate of 14.5%. The platform also remains open to IDS AirNav for the use of the Company welfare bonus provided by the Metalworking Collective Bargaining Agreement.
	<b>"Corporate Benefit" and "Vip District" discount portal</b>	These discount platforms provide ENAV Group people with extensive benefits in the fields of banking, insurance, leisure, culture, mobility and fitness. In addition, further agreements were made with companies and organisations, with a special focus on those offering products and services with an ethical-environmental vocation (e.g., purchase of electric vehicles, sales against food waste).
	<b>Meal vouchers</b>	The ENAV Group provides the "Canteen Replacement Service" rendered through the disbursement of meal vouchers (provided both in the presence of a Company canteen and during agile workdays).
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.
	<b>Let's talk about...</b>	This new project, introduced in 2022, replacing the Open Project, broadens the target group, having introduced dedicated pathways for both 16- to 19-year-olds and 20 to 28 year-olds. For the former, the project offers the opportunity to meet with mentors and HR during two webinars, take part in quizzes on academic orientation topics, and discover trends on the most

AREA	PROJECT	ACTIVITIES
<p><i>Support for education</i></p> 		<p>popular universities and study paths. 31 young people participated with a level of satisfaction ranging from 4.3 to 4.8 (Likert scale 1-5).</p> <p>For older children, during the three webinars organised the project is intended to combine direct dialogue with recruiters, the telling of the stories of ENAV professionals, the discovery of the new roles most in demand in companies and advice on job profiles to develop an active job search strategy. 49 young people participated with a level of satisfaction ranging from 4.0 to 4.7 (Likert scale 1-5).</p>
	<b>Teaching visits</b>	<p>With this project, the ENAV Group ensures that technical institutes and Faculties in the aeronautical field and beyond can make educational visits to our facilities (Control Towers and ACCs) throughout the country. In 2022, the institutions involved (23 in all) took more than 1,000 students to visit 20 different sites. The visits, which took place between March and May, were coordinated with the operations staff, who were in charge of illustrating to the young people, teachers and accompanying persons the organisation of air traffic control activities and the operation of the support equipment.</p>
<p><i>Mobility</i></p> 	<b>Shuttle service and parking</b>	<p>For the headquarters in Rome, synergies were developed with the Istituto Poligrafico e Zecca dello Stato:</p> <ul style="list-style-type: none"> <li>• The use of the Istituto Poligrafico e Zecca dello Stato car park to increase the number of places available for ENAV Group personnel.</li> <li>• A shuttle service connects the car park of the Istituto Poligrafico e Zecca dello Stato with ENAV headquarters.</li> <li>• A shuttle service from the main local public transport hubs (Tiburtina and Nomentana stations) to ENAV headquarters.</li> </ul>

## Occupational health and safety

Aware of the importance of preserving the health and safety of its own people and third parties, the ENAV Group is dedicated to promoting a healthy and safe working environment. This commitment takes the form of a careful risk assessment, aimed at minimising the risks arising from work activities, and the adoption of appropriate safety measures, including numerous prevention, training and awareness-raising activities aimed at disseminating and consolidating the culture of health and safety in the workplace, developing risk awareness and promoting responsible behaviour by all personnel.

With the aim of pursuing the strategic objectives identified within the Group's Health and Safety Policy and in general the continuous improvement of occupational health and safety performance, the ENAV Group Companies have adopted an Occupational Health and Safety Management System (SGSSL) compliant with the international standard ISO 45001:2018 and in compliance with the Italian regulations pursuant to Legislative Decree 81/2008.

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. In fact, the Health and Safety Policy is shared at all levels of the Company, through publication on the portal.

On the whole, the System applies to all personnel belonging to the Group, permanent and temporary, managerial and non-managerial, workers of third-party companies who work in the Group's workplaces as part of contracts, as well as external visitors.

Within the ENAV Group there is an organisational structure that performs the role of supervision, direction and coordination over all the Group's Italian companies, headed by the Prevention and Protection Service Manager. There is also a system of employer delegations and sub-delegations in the field of occupational health and safety. Regular meetings pursuant to Article 35 of Legislative Decree 81/2008 are held annually in all ENAV Group Companies.

In relation to health and safety in the workplace, in compliance with relevant requirements, the employers carry out risk assessments for ENAV Group Companies, including the risk related to work activities in other countries, drawing up the associated Risk Assessment Reports (RAR).

The Risk Assessment Documents (RAD) were updated in 2022 for ENAV, Techno Sky, IDS AirNav and D-Flight.

The ENAV Group has adopted an internal procedure - included in the procedural body of the Health and Safety Management System - which describes the process of reporting, recording and analysing hazardous incidents with the aim of ascertaining possible areas for improvement in the field of occupational health and safety, identifying the need for corrective action or the opportunity for preventive action, communicating the results of investigations and preventing undesirable events with a view to continuous improvement.

In order to respond promptly to situations that may cause a potential emergency, the ENAV Group has defined and implemented, and kept constantly updated, the Emergency and Evacuation Plan of the individual sites, trained and designated an adequate number of emergency management personnel and organised periodic fire drills.

Within the Group, the health surveillance service is guaranteed as provided for by Legislative Decree No. 81/2008, as amended, which, in view of the location of the sites where staff work throughout the country, is ensured by a staff of medical officers (MO), under the direction of a health coordinator (HC).

During 2022, local committees met to review the implementation of the Shared Protocol for Updating Measures to Combat and Contain the Spread of SARS-CoV-2/ COVID-19 in the workplace.

Finally, a specific procedure included in the Occupational Health and Safety Management System regulates the travel security risk assessment process. In this context, assessments mainly concern factors that may endanger the life and safety of personnel, including others that may affect the very personal rights of the individual, such as deprivation of personal liberty due to arbitrary acts of authority or phenomena of intolerance based on ethnic, religious or sexist grounds.

In the context of business relations, the Italian Companies of the ENAV Group ensure the prevention and mitigation of all impacts, related to health and safety, through the application of the Health and Safety Management Systems adopted.

### **Worker training concerning occupational health and safety**

As far as occupational health and safety training is concerned, ENAV ensures the provision of training courses for all the workers of the Group's Italian companies, as defined in Article 2 of Legislative Decree 81/2008 as amended, through classroom/videoconference/e-learning sessions. In particular, training activities are aimed at personnel designated as emergency management personnel, workers elected/appointed as workers' safety representatives, and persons identified as Managers or Officers.

Courses delivered in e-learning mode on the TOTARA platform concern:

- General worker training.
- Specific worker risk training.
- Worker refresher courses.
- Travel safety.

In addition to the aforementioned training, the following courses are also delivered 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).

<b>Future goals</b>	<b>Deadline</b>
Update of the work-related stress risk assessment for ENAV, IDS AirNav and Techno Sky	2023
Maintenance of OHSMS certification pursuant to standard ISO 45001:2018 for the companies in the ENAV Group (ENAV, IDS AirNav, Techno Sky and D-Flight).	2023

<b>Projects</b>	<b>Description</b>
HSE software	Adoption of a management software in order to make more efficient the document production process on occupational health and safety for the whole ENAV Group.

## Industrial relations

In the course of 2022, discussions with the employer and worker organisations focused on various operational issues functional to the implementation of the Business Plan, such as the transfer of APPs (approaches) of the radar towers to the Area Control Centres (ACCs), on the reorganisation of the professionalism of the operations rooms, on the personnel policy and the implementation of the digital towers.

A further topic discussed was the 2021 performance bonus (paid in 2022), which was distributed to eligible personnel after the signing of an agreement protocol.

Furthermore, in order to make the organisation of the work of operating personnel even more efficient during the summer period, which is affected by a significant increase in the number of flights to be assisted, in the June-September period, the Company set up an attendance bonus with economic values differentiated according to the type of plant and professional category, functional to the complete performance of all the ordinary shifts in the roster, including taking holidays and recovering abolished holidays, where applicable.

Furthermore, the ENAV Group has actively collaborated with the other functions concerned on the issues of external recruitment of operational staff, professionalisation and geographical mobility of Air Traffic Controllers and Flight Assistance Experts.

In October and November 2022, several meetings were held with the trade union representatives, which led to the signing of a number of agreements relating to operational issues (mainly the timing of the transfer of the Florence, Turin and Venice approaches, to be carried out at the end of the Summer of 2023; maintenance of the salary levels of the personnel concerned, organisation of the operations rooms, geographical mobility and professionalisation) that led to the withdrawal by the trade unions of the disputes in progress on the above-mentioned matters.

In November, the following were defined:

- Agreement for the definition of the new contractual minimums as of 1 January 2023 with the trade unions FILT-CGIL, FIT-CISL, Uiltrasporti, UGL-TA and UNICA, which defined the recovery of inflation for the period 2018-2022, recognising on the average category an increase - excluded from future revaluations - of about 5.2% compared to the previous contractual minimums.
- Salary increases for the three-year period 2023-2025 based on ISTAT forecasts for the same period (6%).
- Company agreement for the definition of one-off amounts for inflation recovery 2020-2022 to fully and definitively cover the contractual holiday period.

Finally, during 2022, 117 meetings were held with ENAV National Organisations and 80 meetings with Company trade union representatives, and there were two national strikes (56.78% average taking part) and five local strikes.

For Techno Sky, the general objectives pursued are the maintenance of a good Company climate through dialogue and meetings with the trade unions and the improvement of the management and productivity of the workforce.

To this end, meetings were organised throughout the year with the aim of supporting an effective dialogue with the social partners.

From the continuous and constructive engagement, excellent results were achieved in terms of relations, leading to the signing of various agreements, aimed both at containing Company costs, such as the agreement on holiday pay, annual paid leave and the time bank (eliminated with the harmonisation process), and at improving the personal economic conditions of workers, such as the agreements on Company welfare, on one-off payments to cover the contractual holiday and the related inflationary recovery.

2022 saw the finalisation, through the signing of a trade union agreement, of the negotiation begun in 2018 to harmonise the working hours applied to Techno Sky staff with the working hours in force at ENAV.

Consistent with 2021, the process of informing and monitoring - towards the national and local trade unions - on the progress and start-up of the Technical Operation Centre project continued, in coordination with the Company's Technical Line.

The number of employees registered with the union stood at 306, or 42.7% of the workforce, in line with the figures for 2021. The number of registered employees is determined on 31 December each year.

With regard to national strikes affecting the entire air transport sector, there was a decrease in the number of days, from 11 in 2021 to 6 in 2022. As a result, the number of strike hours decreased during the year to 135, with a staff participation rate of 0%.

The number of employees covered by collective bargaining agreements of various levels is 717, equal to 100% of non-executive employees.

In line with the provisions of the national collective bargaining agreement, significant organisational changes are communicated in advance to the signatory parties.

Concerning IDS AirNav, the general objectives pursued refer mainly to the continued integration of the Company in the Group's Industrial Relations system, of the ENAV Group.

This objective was pursued through the maintenance of a good Company climate, with continuous dialogue and discussion with the Workers' Representatives Committees and the Territorial Structures of the Metalworking sector, aimed at improving the management and productivity of the workforce.

The main actions taken through meetings also led to the signing of the agile work agreement, in line with Group strategies.

In addition, minutes were drawn up in which a one-off financial reward was provided for all non-managerial staff for achievements attained during 2022.

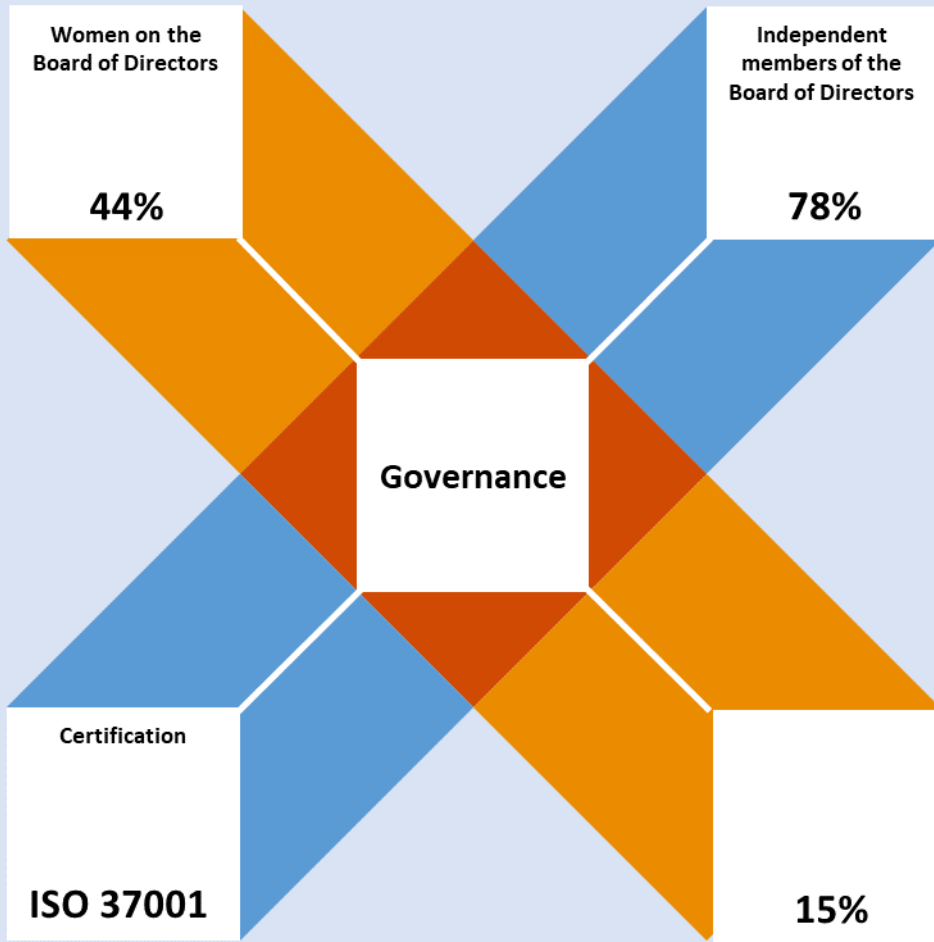
The number of employees registered with the union stood at 39, or 24.8% of the workforce, in line with the figures for 2021. The number of registered employees is determined on 31 December each year.

No strikes were called in 2022.

The number of employees covered by collective bargaining agreements of various levels is 157, equal to 100% of non-executive employees.

In line with the provisions of the national collective bargaining agreement, significant organisational changes are communicated in advance to the signatory parties.

Future goals	Deadline
Renewal of the regulatory part of the national collective bargaining agreement, Specific Part ATM Services and Specific Sections Strategic Installations and Low Traffic Installations	December 2023
(TS) Establishment of the Equal Opportunities Committee.	30/06/2023
(TS) Creation of a work group for the update of second level legislation	31/12/2023
(IDS AirNav) Adjustment of Group policies	31/12/2023

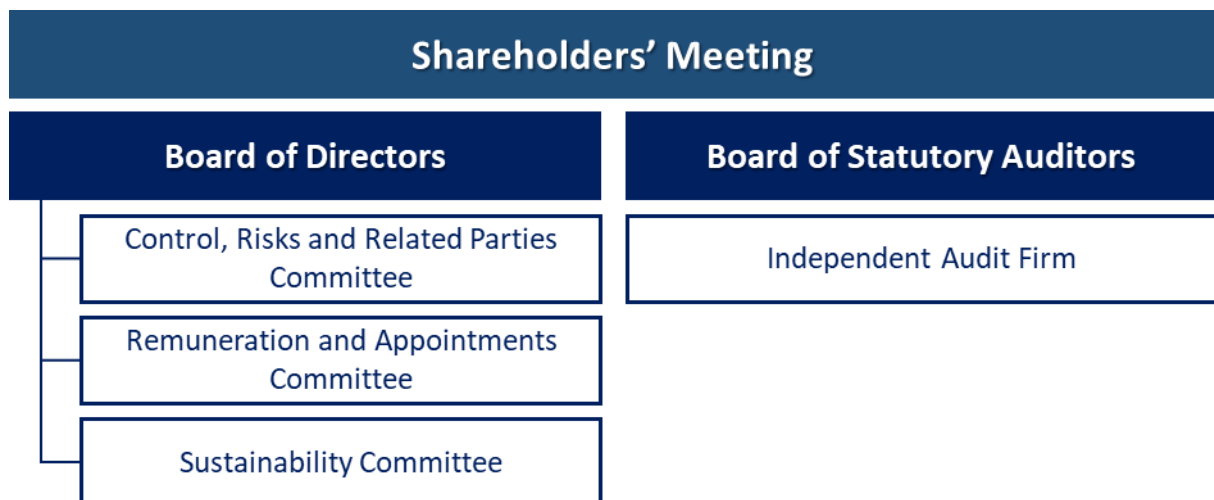


## 4. Governance

In view of the social importance of the ENAV's operations, the main objective of the Company's corporate governance system is to perpetuate the Company's sustainable success, to create long-term value for its shareholders and appropriately balance and foster all the interests involved.

The ENAV corporate governance structure is based on the traditional Italian model, which, save for the powers reserved to the Shareholders' Meeting by law and the Articles of Association, gives the Board of Directors responsibility for the strategic and operational management of the Company, while the Board of Statutory Auditors is charged with performing oversight functions.

According to Principle I of the Corporate Governance Code, the Board of Directors has the role of pursuing the Company's sustainable success, as well as to make decisions about the definition of strategies and monitor their implementation, as well as to establish the most functional corporate governance system for the business and for pursuing its strategies, taking into account the system's space for autonomy. The Board of Directors is supported by the Sustainability Committee to analyse matters relevant to long-term value generation.





In accordance with the provisions of the Articles of Association, the Board of Directors has appointed a Chief Executive Officer, who has been granted all powers for the ordinary and extraordinary management of the Company, while reserving decisions on certain matters to itself.

The Chief Executive Officer is thus the person primarily responsible for the management of the Company, without prejudice to the powers and responsibilities reserved to the Board of Directors.

The Board of Directors also granted the Chair the authority to coordinate internal auditing activities and, together with the Chief Executive Officer, responsibility for managing national and international institutional relations and chairing the governing body. The Chair, in agreement with the Chief Executive Officer, also handles the Company's external communication activities and relations with national and foreign media.

The model adopted by the Company separates of the functions of the Chair of the Board of Directors and the Chief Executive Officer, while both are responsible for representing the Company.

In accordance with the Articles of Association and the Corporate Governance Code, the Board of Directors has set up three internal committees with advisory and proposal-making functions vis-à-vis the Board itself, to which they report through their Chairs at each Board meeting.



The Committees constituted within the Board of Directors are all composed, in accordance with their respective regulations, of three non-executive directors, the majority of whom meet the independence requirements laid down by the Code, including the relevant Chair.

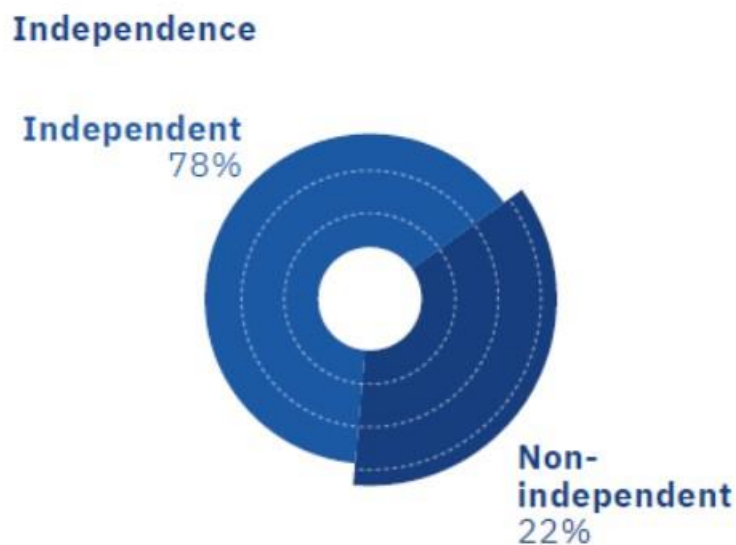
The Board of Directors, acting on a proposal of the Chief Executive Officer and taking note of the favourable opinion issued by the Board of Auditors in accordance with Article 18-*bis* of the Articles of Association, also appointed the Financial Reporting Officer in charge of drafting the Company's financial statements for the three-year period 2020-2022.

The task of performing independent statutory audit functions for the period from 2016 to 2024 is carried out by the audit firm EY S.p.A., which is entered in the register of audit firms and was appointed by the Shareholders' Meeting on 29 April 2016, acting on a proposal of the Board of Statutory Auditors.

## The Board of Directors

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.



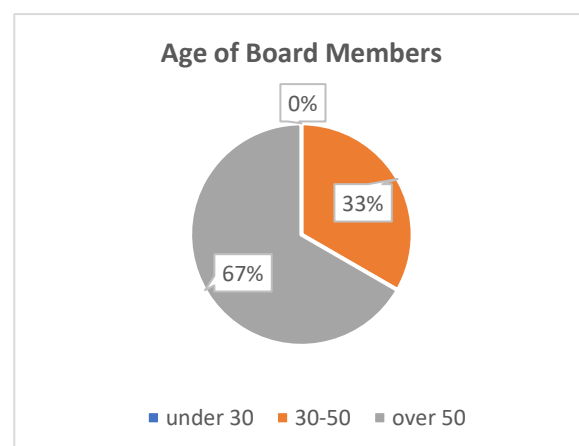
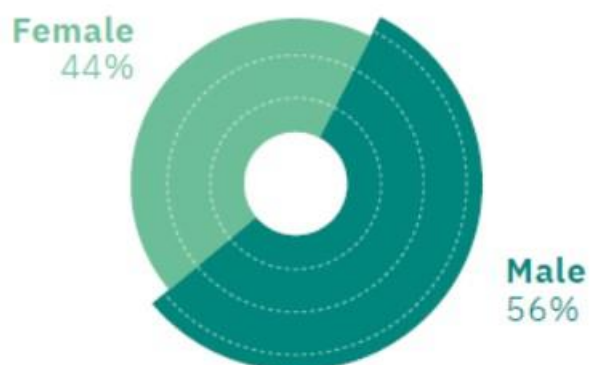
As regards gender diversity and balance in the composition of the Board of Directors, the Articles of Association provide for observance thereof in line with current legislation. The substitution and integration mechanisms of the Board of Directors are consistent with such criteria. Similar safeguards 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.

ENAV has adopted a Policy on Diversity in the Composition of Management and Control Bodies<sup>25</sup>. 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.

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<sup>25</sup> This Policy is published in the "Governance" section of the enav.it website, available at the following link: <https://www.enav.it/governance/documenti-societari>.

## Gender Diversity

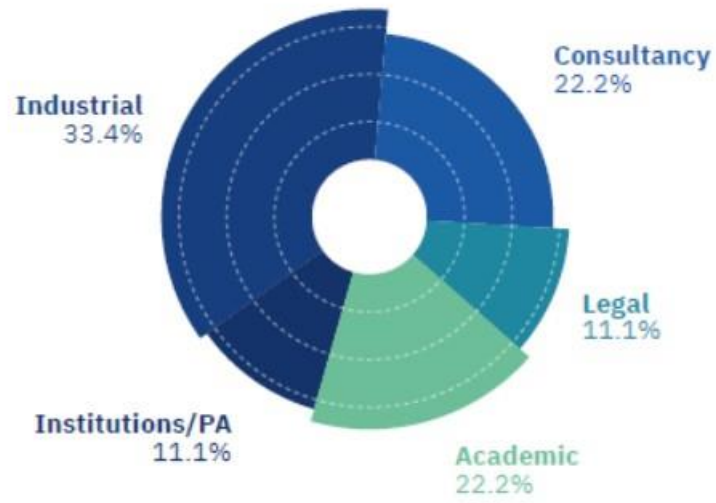


The competences relevant to the impact of the organisation of the Board of Directors are primarily to be found in the relevant provisions of the Articles of Association.

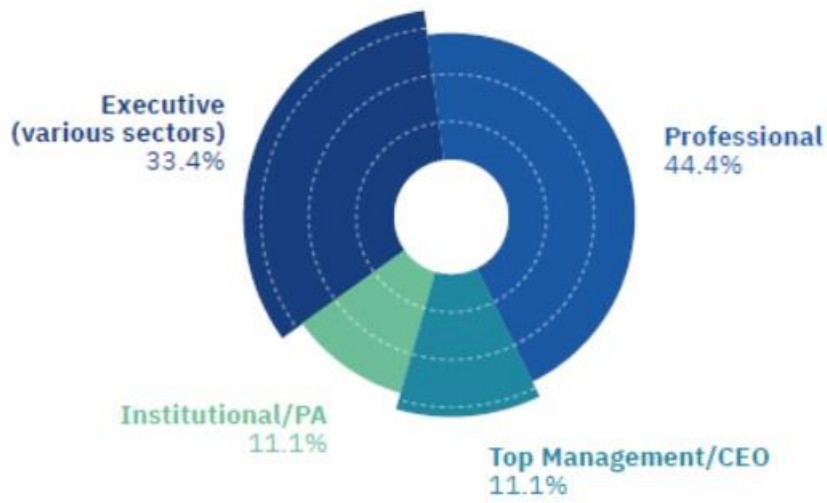
Pursuant to Article 11-*bis*, the directors must meet the professional requirements set forth by law, current regulations and the Articles of Association, pursuant to which the directors must be chosen in accordance with criteria of professionalism and competence from among persons who have accrued a total of at least three years' experience through the exercise of:

- activities involving administration or control or management within companies, or
- 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,
- administrative or management functions in government entities or departments, operating in sectors related to the Company's sector, or entities or departments that are not related to the aforementioned sectors provided the functions involve the management of financial resources.

### Sector of origin



### Background





### Tenure



For any other information regarding the requirements for the position of Company Director, please refer to the Corporate Governance and Ownership Structure Report, available on the Company's website<sup>26</sup>.

<sup>26</sup> <https://www.enav.it/governance/documenti-societari>

## Appointment to and composition of the Board of Directors

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<sup>27</sup>. As required by the specific Regulation, the Board of Directors is supported in the exercise of its powers by one or more Committees with investigative, advisory and proactive functions, whose tasks and composition it defines, taking into account the provisions of the Articles of Association, the recommendations of the Code and best governance practice; in any case, the Council establishes, including in a merged form, the Committees responsible for appointments, remuneration, control and risks, related parties as well as sustainability. The composition, duties and operations of the Committees are governed by specific regulations approved by the Board of Directors, acting on a proposal from the Chair of the Board of Directors, having heard from the Chairs of each Committee. All Board committees are established by resolution of the Board of Directors pursuant to Article 11-(2) of the Articles of Association, and in accordance with the provisions of the Corporate Governance Code. With regard to the rules governing the selection of the members of the Board committees, it should be noted that:

- the Control, Risks and Related Parties Committee is also composed in compliance with the requirements set forth in Consob Resolution No. 17221 of 12 March 2010 containing the Related Party Transaction Regulation (the RPT Regulation) and the "Procedure for related-party transactions" of ENAV (the Related Parties Procedure). This committee is composed of at least three non-executive Directors, the majority of whom meet the independence requirements laid down by the Code, including the Chair. The Committee as a whole has adequate expertise in the business sector in which the Company operates, functional to assess the relevant risks; at least one member of the Committee has adequate knowledge and experience in accounting and finance or risk management, to be assessed by the Board of Directors at the time of appointment.
- The Remuneration and Appointments Committee is established by a resolution of the Board of Directors pursuant to Article 11-*bis* of the Articles of Association, in compliance with the recommendations of the Corporate Governance Code (the Code); this committee is composed of at least three non-executive Directors, the majority of whom meet the independence requirements set forth by the Code, one of whom acts as Chair. Pursuant to the Code, if the Chair of the Board of Directors assessed as independent is appointed by the Board of Directors as a member of the Committee, the majority of the members shall be other independent directors.
- The Sustainability Committee is composed of at least three non-executive directors, the majority of whom meet the independence requirements set out in the Code, one of whom serves as Chair.

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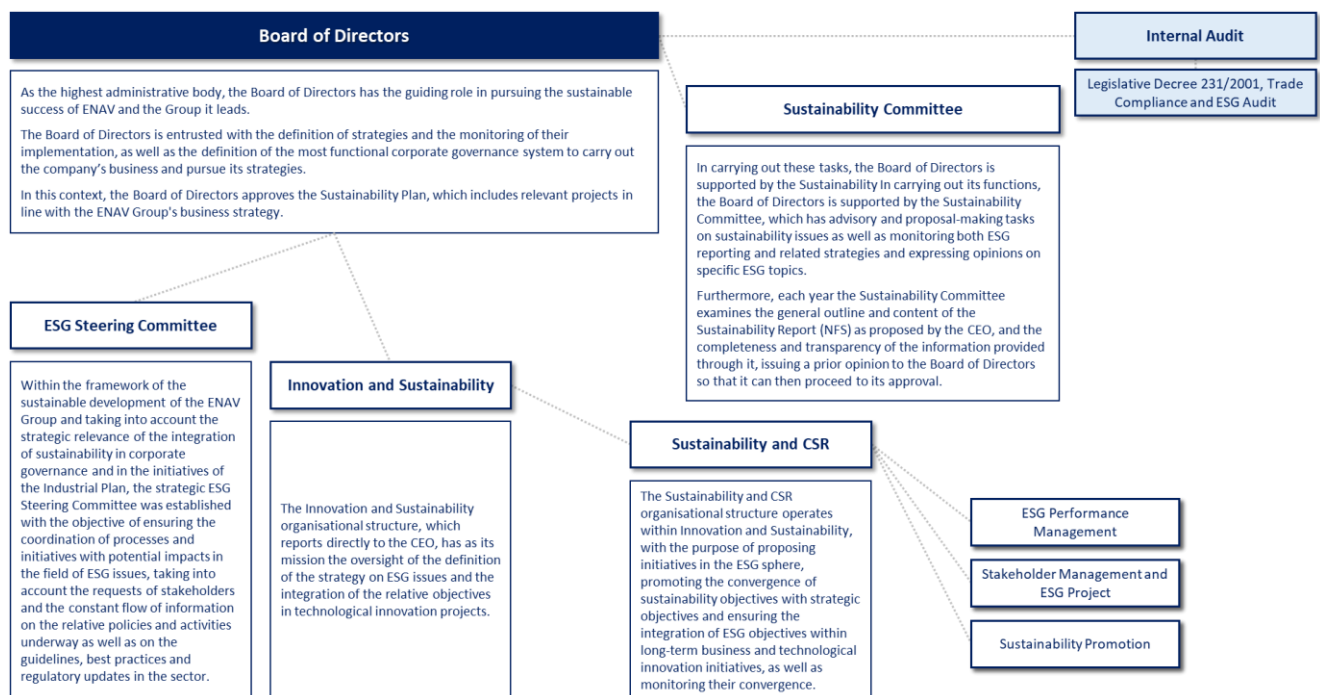
<sup>27</sup>This assessment is carried out on the basis of the Guidelines of the Board of Directors regarding the maximum number of offices that the Directors of ENAV S.p.A. may hold, which can be consulted in the "Governance" section of the Company's website (<https://www.enav.it/governance/documenti-societari>).

## Role of the Board of Directors in managing impacts<sup>28</sup>

The Board of Directors - as the highest administrative body - has delegated the management of ESG issues and sustainability strategies of the ENAV Group to the CEO. In order to pursue ESG objectives, the CEO has established the Innovation and Sustainability unit, to which the Sustainability and CSR unit reports, under the CEO's direct authority.

The responsibilities attributed to it at Group level relate to the definition of the objectives inherent to the sustainable development path and the coordination of the evolution of the Sustainability Plan, monitoring its implementation and taking care of its updating in line with the initiatives set out in the Business Plan.

The Sustainability and CSR organisational structure also develops sustainability initiatives in the ESG area and promotes the integration of sustainability issues in the corporate strategy, implementing the climate change, energy and mobility management strategy. This structure is also responsible for sustainability reporting, Stakeholder management, the promotion of the internal dissemination of the culture of sustainability and the implementation of "corporate giving" initiatives in support of socially useful causes. To this end, the Sustainability and CSR structure is divided into three areas of intervention: ESG Performance Management, Stakeholder Management and ESG Project and Sustainability Promotion.



In addition to the above, the Integrated Compliance and Risk Management structure - which also reports directly to the CEO - in its activities of defining and updating the Corporate Risk Profile (CRP) and the related risk assessment, includes the analysis of risks that may have an impact on ESG issues, including climate change.

The system of reporting and information flows to the governing body is formalised, as far as Internal Audit is concerned, within its Terms of Reference and its Manual, as also provided for by the International Standards for the Practice of the Profession to which the Structure is certified.

<sup>28</sup> In compliance with the European common enforcement priorities for 2022 annual financial reports, issued by ESMA on 28 October 2022.

Internal Audit reports quarterly to the Control, Risks and Related Parties Committee and half-yearly to the Board of Directors.

In both cases, the Board of Statutory Auditors is also present at the meetings of the two bodies and therefore also receives the periodic reports. The Board of Statutory Auditors as well as the Sustainability Committee, however, periodically convene the Head of Internal Audit to discuss matters on the agenda drawn up.

The reports to the Control, Risks and Related Parties Committee and the Board of Directors contain items of interest, any critical issues detected and any other useful information so that the two bodies are made aware of issues that may have an impact on management and business performance. The information reported includes, in addition to the audit findings, the results of whistleblowing received by the Structure.

In addition, the audits conducted in accordance with an Audit Plan approved by the Board of Directors (and updated during the year also with new elements) are formalised towards - and discussed with - the Chief Executive Officer (also in his capacity as Head of the Internal Control and Risk Management System (ICRMS), the Chair of the Board of Directors, the Risk and Related Parties Control Committee, the Board of Statutory Auditors and, in the case of relevant aspects pursuant to Legislative Decree 231/2001, the Supervisory Body.

In the event of elements requiring immediate attention on the part of the governing bodies, or requiring disclosure, the Head of Internal Audit directly forwards information notes or requests for hearings to address the findings in a timely manner.

The Supervisory Board also periodically submits its report to the Control, Risks and Related Parties Committee (CRRPC) and the Board of Directors, as provided for in its own regulation, to inform on the progress of its supervisory activities on the proper functioning of the 231 Model and to communicate any critical issues that have emerged in the course of its action, regardless of whether the activities were conducted with third parties outside the Company and/or through the Internal Audit action.

In the event of elements requiring immediate attention by the Governing Bodies, the Supervisory Board also directly forwards information notes or requests for hearings to address the findings without undue delay.

Furthermore, the trend of risks inherent to the safety of air navigation services, security, safety in the workplace, environmental protection, fraud and anti-corruption, privacy and trade compliance is periodically reported to the Risk and Related Parties Committee and to the Company's Board of Directors together with the trend of other enterprise-level risks. This communication is included among the Enterprise Risk Management activities that ENAV implements in application of the Corporate Governance Code of listed companies of Borsa Italiana.

Finally, pursuant to the law and the Board of Directors Regulation, the Board of Directors is the recipient of periodic management reports from the Chief Executive Officer. To that end, as required by the Regulation, the Board of Directors establishes the frequency, at least quarterly, at which the Chief Executive Officer provides a report on the exercise of delegations, identifying, with the support of the Control and Risks and Related Parties Committee at least every three years, the applicable materiality thresholds and the necessary claims. On the basis of the information periodically provided to him or her by his or her delegates, on the occasion of the meetings scheduled for the approval of the periodic financial reports, the Chief Executive Officer therefore provides the Board of Directors with a report on the exercise of the delegated powers. In addition, the Board of Directors provides for a precise structure of delegated powers in favour of the Chief



Executive Officer, including the provision of types of deeds and value thresholds inherent to the deeds themselves, and to assign certain powers to the Chair.<sup>29</sup>

### Engagement Policy

At its meeting held on 21 December 2021, the Board of Directors of ENAV adopted a policy for managing dialogue with the generality of ENAV's shareholders and other Stakeholders (the "Engagement Policy"), which *inter alia* outlined and evolved engagement practices, in an appropriately balanced manner and in accordance with best practice, in order to promote, in the most appropriate forms, dialogue with the generality of shareholders and other Stakeholders of relevance to the Company, in compliance with the regulatory provisions in force and the principle of equal treatment of shareholders who find themselves in identical conditions. Said Policy is published in full with a view to maintaining the highest degree of transparency in the governance practices adopted by the Board of Directors, and regulates the methods and forms of direct dialogue between the Stakeholders and the Board.<sup>30</sup>

As part of its oversight role, the Board of Directors carefully monitors the dynamics of investor relations, including by way of information provided in a standard format, on a fortnightly basis, by the Chief Executive Officer with the support of the Investor Relations structure, which not only addresses the absolute and relative performance of the stock and analysts' evaluations, but also issues of key interest in the dialogue with investors. These include the regulated business and related scenarios, including of a regulatory nature, the non-regulated market, the Business Plan and strategic prospects, also in terms of ESG issues.

Given the Company's growing sensitivity towards ESG issues and their current consolidated integration into its strategies for sustainable success, ENAV also adopts ongoing Stakeholder management methods. These include practices for mapping, identifying and engaging key Stakeholders at Company and Group level, who are considered an integral part of the responsible and sustainable management of the business. These Stakeholders, which include but are not limited to employees, the financial community, airport management companies, carriers and other players in the air transport chain, industry and suppliers and, of course, territorial, national and international reference institutions, are engaged on a regular basis in order to listen with a proactive approach to their requests, concerns and expectations, establish a constructive dialogue with them on material issues of mutual interest and, in the final analysis, orientate choices for the creation of shared value for the organisation and its Stakeholders. In addition to the development of relations with investors and other relevant Stakeholders, where applicable, the dialogue with traditional Stakeholders on industrial and institutional relations is also reported to the Board of Directors on a quarterly basis.

Furthermore, pursuant to the regulations of the Sustainability Committee, established within the Board of Directors, the Committee has - among other things - the task of assisting the Board of Directors and, to the extent of its competence, the CEO in overseeing sustainability policies related to business operations and Stakeholder engagement activities.

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<sup>29</sup> Considering the plurality of information flows to the Board of Directors and the different types of channels provided for by the set of rules governing corporate operations (by way of example only, the *Whistleblowing* channel, the *Engagement Policy*, the Equal Opportunities Committee, etc.), it is not possible - at present - to determine exactly the number and nature of the so-called '*critical concerns*' communicated to the governing body during the year of reporting as well as in the previous two years. However, the ENAV Group is evaluating the implementation of a specific process for collecting this information, which will be presented in the next Report.

<sup>30</sup> This document identifies and describes, *inter alia*, the ordinary channels of direct and continuous communication and information for the Company, the Stakeholders (including Shareholders), managed by the competent corporate functions as well as held at Shareholders' Meetings, and represents - alongside other channels (such as the Whistleblowing discipline) - one of the mechanisms for raising critical issues on business conduct made available to Stakeholders.

Furthermore, within the framework of the sustainable development of the ENAV Group and taking into account the strategic relevance of the integration of sustainability in corporate governance and in the initiatives of the Industrial Plan, the strategic ESG Steering Committee was established with the objective of ensuring the coordination of processes and initiatives with potential impacts in the field of ESG issues, taking into account the requests of Stakeholders and the constant flow of information on the relative policies and activities underway as well as on the guidelines, best practices and regulatory updates in the sector.

## **Responsibilities of the Board of Directors**

In addition to the general legislative obligation of directors to conduct themselves diligently according to the requirements of the nature of their office and to their specific skills, the Corporate Governance Code also recommends that they must be aware of the duties and responsibilities inherent in their office. The competence of Directors is not limited to their professional profile, but rather requires attention and constant updating in response to developments in the broad framework of the activity of the enterprise, not only with regard to the business in the narrow sense, but also with regard to developments in the related legislative, regulatory and corporate governance framework, with the primary objective of constantly enhancing the expertise and professionalism of each director.

In order to reinforce the level of competence and professionalism of the members of the administration and oversight bodies, in compliance with Recommendation 12(d) of the Code and the Board of Directors Regulations, the Chair of the Board of Directors, with the help of the Secretary of the Board itself, ensures that “all members of the management and oversight bodies can participate, after their appointment and during their term of office, in initiatives to provide them with adequate knowledge of the business sectors in which the Company operates, corporate dynamics and their trends, with a view also to the Company’s sustainable success, as well as the principles of proper risk management and the regulatory and self-regulatory framework of reference”.

To facilitate the members’ participation in these initiatives and sessions, the Board of Directors Regulations also provide that, at the beginning of the financial year, the Chair of the Board of Directors – with support from the Secretary – makes available the calendar of induction initiatives for the current financial year.

Since taking office, the Board of Directors of ENAV has pursued in a structured way a broad, structured induction programme, with the support of management as well as, where appropriate, with the support of leading experts in the fields in question, to favour to the greatest extent the increase of specific skills and the onboarding of its members, including specific in-depth sessions on strategic issues.

In the course of the year and as of the date of this Sustainability Report, 5 induction and information and sharing sessions on scenarios and strategic issues have been held. In particular, these initiatives, also conducted with the support of external advisors, concerned: the 2022-2024 Business Plan (28 February 2022); two sessions on the implementation of strategic initiatives aimed at technological and operational excellence (13 April 2022 and 17 October 2022, respectively); digital crisis management (14 November 2022); and the new European Directive on Corporate Sustainability Reporting (20 December 2022).

More information on the induction process carried out by the Board of Directors in 2022 can be found in the Report on Corporate Governance and Ownership Structure.

Furthermore, in accordance with best practice, the Board of Directors regularly carries out a board evaluation exercise, with the support of the Remuneration and Appointments Committee, which is entrusted with the task of assisting the Board in reviewing the methodology used by the appointed independent advisor.

In line with the Recommendations of the Code, the Board of Directors carried out the self-assessment of the Board itself and of its Committees for 2022 with the support of the advisor. The work specifically involved

the administration of questionnaires and the conduct of direct interviews with the Directors on the effectiveness, size, composition and functioning of the Board, including through peer-to-peer reviews. The results of the initiative were illustrated at a meeting held on 20 February 2023, during which the Board of Directors conducted its own self-assessment, identifying the strengths of the Board and certain areas for improvement, which will represent the starting point for work on the improvements that may constitute working points for the next board term.

### **Managing conflicts of interest**

With regard to the provisions of Article 2391 of the Italian Civil Code, ENAV's Board of Directors has, for some time now, implemented the practice whereby, at each meeting of ENAV's Board of Directors, the Directors are invited to declare, at the opening of the proceedings, any personal interest or interest on behalf of third parties in connection with the items on the meeting's agenda.

Insofar as the position of the Directors is relevant herein, having regard to the contents of Article 2391-bis of the Italian Civil Code, concerning transactions with related parties, of Legislative Decree 49/2019, and transposing Directive 2017/828/EU ("SHRD II") and the amendments subsequently made (by way of Resolution No. 21624 passed on 10 December 2020) to the Related Parties Regulation, the Company approves related-party transactions in compliance with the provisions of the current laws and regulations, with its own Articles of Association, and with the procedures adopted in this regard. ENAV's current "Procedure for related-party transactions" ("RPT Procedure"<sup>31</sup>) adopted in compliance with the provisions of the applicable legal and regulatory framework, was last updated, taking into account the latest regulatory changes, by ENAV's Board of Directors on 1 July 2021, having obtained the opinion of the Control, Risks and Related Parties Committee.

Furthermore, ENAV's Board of Directors approved the new Code of Ethics at its meeting on 24 March 2022.

The rules of the Code of Ethics apply without exception to corporate bodies, management, employees, external collaborators, business partners, suppliers and all those who have relations with the Company (including non-subordinate collaborators) and, in general, with the Companies of the ENAV Group. The Code of Ethics regulates the set of rights, duties and responsibilities that ENAV expressly assumes towards the Stakeholders with whom it interacts on a daily basis in the performance of its activities.

The set of ethical principles and values expressed in this Code of Ethics shall inspire the activities of the addressees, taking into account the importance of their roles, the complexity of their functions and the responsibilities entrusted to them for the pursuit of the purposes of the Company itself.

The ENAV Group recognises the importance of ethical-social responsibility in the exercise of its mission and institutional tasks, aspiring to maintain and develop relationships of trust with its Stakeholders. Ethics orientation is an indispensable approach for the reliability of the Company's behaviour towards shareholders, customers and, more generally, towards the entire civil and economic context in which the Company operates.

Furthermore, the Code of Ethics follows the principles set out in the "Code of conduct for public employees" referred to in Presidential Decree 62 of 16 April 2013, issued by the Government to "ensure ... compliance with the constitutional duties of diligence, loyalty, impartiality and exclusive service in the public interest".

For the above reasons, it was important to clearly define the set of values that ENAV Group Companies recognise, accept and share and the set of responsibilities that they assume internally and externally.

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<sup>31</sup> <https://www.enav.it/governance/documenti-societari>.

These requirements are met by the drafting of the Code of Ethics, which constitutes a code of conduct the observance of which is of fundamental importance for the good functioning, reliability and reputation of the ENAV Group and the non-compliance with which may give rise to disciplinary measures.

## Corporate Integrity

The development of an integrated sustainability is based on a solid and efficient governance structure, which promotes ethical business conduct and transparent communication of information about ENAV's operations, with a view to the creation of shared value between ENAV and its Stakeholders.

In order to manage activities and relations in the light of these principles, all Stakeholders - internal and external - are required to strictly comply with the law and the behavioural and procedural rules adopted and implemented within the ENAV Group over time, with a view to developing constructive relations and therefore creating value in relations with Stakeholders.

To this end, ENAV has adopted a Code of Ethics which sets out principles and rules of conduct that contribute to affirming its credibility and reliability in the civil and economic context in which it operates.

In compliance with the provisions of Legislative Decree 231/2001 ("Decree 231"), the Company has also adopted the Organisation, Management and Control Model referred to in Decree 231 (the "Organisational Model"). The Company's Model was updated taking into account the experience gained, the evolution of case law and doctrine, as well as the regulatory changes of Legislative Decree No. 231/2001.

In accordance with Decree 231, the Supervisory Body is tasked with supervising the functioning and compliance with the Organisational Model and the Code of Ethics, as well as to update it with regard to the evolution of the organisational structure or the regulatory context of reference. In addition, specific training activities on the Organisational Model are carried out through communication channels to involve all employees of the Company and the ENAV Group.

These important documents are also joined by:

i) the "Human Rights Policy" containing the reference principles and commitments undertaken by the ENAV Group itself for the protection and promotion of human rights in the performance of its business activities and in every context in which it operates. ENAV endeavours to promote the standards enshrined in international regulations and internal codes to some of the Group's main Stakeholders: employees, customers, suppliers and business partners.

(ii) the "Diversity and Inclusion Policy", with a view to concretising the commitment to sustainable development, including through the enhancement of its human resources, by promoting the support of policies in favour of inclusion, diversity and equal opportunities. The Policy is inspired by national and international reference principles and values in the field of diversity and inclusion, including the "Charter for Equal Opportunities and Equality at Work" promoted by Sodalitas, the UN Global LGBTI Standards for Conduct, the UN Women and UN Global Compact - Women's Empowerment Principles, the United Nations Equal Pay International Coalition (EPIC).

iii) the "Environmental Policy", with the aim of considering the environmental risks and opportunities connected to the performance of the ENAV Group's activities, in accordance with international, EU and national legislation.

(iv) the "Occupational Health and Safety Policy", with the aim of continuously improving occupational health and safety performance and eliminating or reducing risks for all ENAV Group personnel and other Stakeholders.

These policies<sup>32</sup> are approved by the Chief Executive Officer of the Parent Company and apply to the entire Company population - who can also view them through the Company intranet - and to the business relations established by the ENAV Group.

### **Directors' Interests and Related-Party Transactions**

Directors are invited to declare at the opening of the proceedings whether they have an interest of their own or on behalf of third parties with regard to the items on the agenda of the meeting.

The Company approves transactions with related parties in accordance with the provisions of applicable law and regulations, the provisions of its Articles of Association and the procedures adopted in this regard. ENAV's current "Procedure for related-party transactions" ("RPT Procedure") adopted in compliance with the provisions of the applicable legal and regulatory framework, was last updated, taking into account the latest regulatory changes, by ENAV's Board of Directors on 1 July 2021, having obtained the opinion of the Control, Risks and Related Parties Committee<sup>33</sup>.

### **Guidelines concerning the market abuse regulation and internal dealing procedures**

The Company adopts and constantly updates its controls regarding the internal management and external dissemination of documentation and information concerning the Company and its subsidiaries, with particular reference to the inside information referred to in Regulation (EU) no. 596/2014 (the "MAR Regulation") or information that is likely to become such.

The rules and principles contained in the Guidelines for the management of inside information (the "MAR Guidelines"), are aimed at ensuring compliance with the provisions of applicable market abuse laws and regulations and ensuring preservation of the maximum confidentiality of information that already qualifies as inside information or is otherwise likely to become such information, in order to prevent the selective dissemination of documentation and information concerning the Company and the Group, such as advance release to certain parties, or delayed, incomplete or otherwise inadequate dissemination.

The Company carries out periodic training and provides information on issues of market abuse and the respective sanctions.

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<sup>32</sup> These policies (published on the enav.it website and available at the following link: <https://www.enav.it/node/17519>) are integrated in the broader framework of regulatory instruments that the ENAV Group has adopted over the years (by way of example only, the Enterprise Risk Management System and the various management systems implemented at ENAV Group level) which - also due to the nature of the services provided by the Group - require the application of the precautionary principle.

<sup>33</sup> This procedure identifies the rules governing the identification, approval and execution of Related Party Transactions carried out by ENAV S.p.A. - directly or through subsidiaries - in order to ensure the transparency and substantive and procedural correctness of the transactions themselves.

## **Management System for the Prevention of Corruption**

The Management System for the Prevention of Corruption is based on the commitment of the Company and its Group to combat corruption, applying criteria of transparency and conduct based on the principle of “Zero Tolerance for Corruption”. In this context, the Company is basing its work on broader compliance with the anti-corruption rules set out in national and international law and, as such, opposes and does not tolerate in any way bribery, fraudulent behaviour or illicit or irregular conduct in general that may be actively or passively committed by its employees or by third parties such as contractors, consultants, suppliers, commercial partners, agents and other individuals, legal entities and de facto entities that have relations with ENAV or its subsidiaries.

The “Policy for the Prevention of Corruption”, adopted pursuant to the international standard ISO 37001:2016, and the “Management System Guidelines for Preventing and Combating Corruption” list the activities that are most exposed to the risk of corruption, based on an assessment of the risk associated with the activities carried out by the Company and its subsidiaries, and provide indications regarding the principles for the relative prevention and protection of the Group’s integrity and reputation, and the sanctions applicable in the event of violation of the relative precepts.

### **Whistleblowing**

In order to allow all Group employees and all Stakeholders to make reports, the Company has implemented a whistleblowing system for the reporting of alleged offences suitable for guaranteeing, pursuant to the reference legislation of Law 179/2017, the protection of the reporter by ensuring that the activities of analysis of the reported facts are conducted in compliance with the principles on confidentiality and anonymity prescribed by the aforementioned legislation and within a reasonable time interval.

Reports received through the various whistleblowing channels made available (IT platform, certified email, email, oral reports) are first assessed by the competent structure, which is set up for this purpose within the Internal Audit department. If they are considered relevant, they are further investigated by way of a preliminary investigation coordinated by the Internal Audit department, in cooperation with the competent structures where appropriate. The entire process (in addition to the Guidelines for the management of whistleblowing) is regulated in detail by the “Whistleblowing Regulation”.

### **Succession Plans for Executive Directors**

Efficient governance is first and foremost sound governance.

In this regard, Recommendation No. 24 of the Code states that: *“In large companies, the Board of Directors shall: establish, with the support of the appointments committee, a plan for the succession of the CEO and Executive Directors, which shall at least identify the procedures to be followed in the event of early termination of office; - ascertain the existence of adequate procedures for the succession of top management”*.

Following the resolution passed on 27 February 2018 to adopt a Policy (the “Contingency Plan”) aimed at regulating the actions to be taken in the event of the early termination of the office of the Chief Executive Officer with respect to the ordinary expiry of the term of office or his inability to perform the related functions, in order to ensure continuity in the regular management of the Company pending the identification of a new Chief Executive Officer, at its meeting of 25 January 2022 the Board of Directors, taking into account the subsequent evolutionary path of its corporate governance, proceeded to develop and define a plan for the succession of the Executive Directors taking into account considerations inherent to the structure of the corporate structure as well as the circumstance that, by law and by the Articles of Association, Directors are appointed by the Shareholders’ Meeting on the basis of slates presented by the

Shareholders. The Board of Directors has therefore disciplined the actions to be taken in the event of the early termination of the office of the CEO with respect to the ordinary expiration of the mandate, or in the case of imponderable and unforeseeable events that prevent the CEO - ENAV's only executive director - from exercising his or her role.

## **Interventions 2022 related to the protection of legality, the fight against corruption and the protection of human rights**

2022 saw a strengthening by the ENAV Group of controls on sustainability and trade compliance verticals, also thanks to an expansion of the perimeter of the Internal Audit function in the context of a broader project to strengthen controls on the subject matter, promoted also for the purpose of fighting corruption and protecting human rights, both on the first and second level of control through the creation of specific structures, the promotion of tools to guarantee compliance and an advisory activity towards internal Stakeholders for the dissemination of the culture of sustainability as a shared value, understood and integrated into daily activities by the entire corporate population.

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, which establishes zero tolerance for corruption.

In the context of the activities following the important milestone reached by ENAV in December 2021 with the certification of the ISO 37001:2016 Anti-Corruption Management System, during 2022 ENAV carried out the fraud risk assessment project, with the aim of pinpointing and assessing the areas at risk of fraud and identifying the design and improvement of the internal control system to prevent and mitigate such risks, through the identification of processes and sub-processes at risk, the definition of unambiguous metrics, the relative assessment of the inherent risk and the residual risk net of existing controls.

In general, there were several interventions on the entire body of internal Company regulations, including those on the Organisational, Management and Control Model (the “231 Model”), which all Group Companies, governed by Italian law, adopt in compliance with the provisions of Legislative Decree 231/2001. In the course of 2022, having identified the need to proceed with an update in relation to the changes introduced in Decree 231, a risk and gap analysis project was launched, taking into account the Confindustria Guidelines for the construction of 231 Models, which will lead to the updating of the Model of ENAV and the other Group Companies by the first half of 2023. In addition, a project was launched to digitise, computerise and innovate the 231 Model, which envisages actions to foster the dissemination, consultation and compliance activities of the 231 Model, including with reference to issues related to anti-corruption and the protection of legality.

In the course of 2022, the Supervisory Bodies (SB) of ENAV and the other Companies of the Group, were renewed, under Italian law, with the task of supervising the effective implementation of the 231 Model, and were all provided with a specific budget. With the appointment of the new Supervisory Bodies, the aim was to strengthen the control and supervision of 231 Models, appointing them with a composition that is either totally external or mixed with a majority of external members, as extensively reported in the Report on Corporate Governance and Ownership Structure for the year 2022, available in the appropriate section of the website [www.enav.it](http://www.enav.it). Closely related to Model 231 is also the ENAV Group’s Code of Ethics (“Code of Ethics”), which governs the rights, duties and responsibilities that ENAV and the Group Companies assume towards the Stakeholders with whom they find themselves interacting for the performance of their activities, and is applied to corporate bodies, management, employees, external collaborators, business partners, suppliers and all those who have relations with the Company.

The adoption of certain principles of conduct and ethical standards to be observed in interactions with third parties is part of the Group’s commitment, including in relation to preventing the offences referred to in Decree 231, and the prevention of corruption and fraud, and in this sense the Code of Ethics forms an integral part of Model 231. During 2022, in line with the other Companies of the ENAV Group, ENAV implemented a project to integrate the Group’s Code of Ethics. The update stemmed from a need to adapt to exogenous



events impacting on the Code of Ethics, with particular regard to current geopolitical events and the various restrictive measures adopted by national and international institutions in response to the contingent conflict emergency, to this end reaffirming the need to promote a corporate culture based on full respect for life and human rights, as well as the commitment to conduct business activities in compliance with national and international rules, restrictions, provisions and guidelines on national and foreign policy and common security. The Code of Ethics also outlines further safeguards with particular regard to ESG issues, and includes the principles of diversity, protection of equal opportunities, and the protection and promotion of human rights, as provided for by the applicable internal policies.

The Code of Ethics adheres to the principles of the “Code of Conduct for Civil Servants” - aimed at ensuring respect for the constitutional duties of diligence, loyalty, impartiality and exclusive service to the care of the public interest - and recognises the following additional principles and values that are fundamental to the affirmation of the Company’s mission, to which the various Stakeholders involved must refer in order to favour the good functioning, reliability and reputation of the Company: legality, safety in the provision of air navigation services, confidentiality, honesty and fairness, responsibility, equality, integrity, transparency, equity and sustainability. The rules of the Code of Ethics form an essential part of the contractual obligations of personnel, and the Group assesses from a disciplinary point of view, pursuant to the regulations in force, any conduct contrary to the principles enshrined therein, applying the sanctions that the varying seriousness of the facts may justify.

In order to enable all Group employees and Stakeholders to make reports, the Group has implemented a system for reporting alleged wrongdoing known as Whistleblowing, which was updated in the course of 2022 - in line with the provisions of Directive (EU) 2019/1937 - with the introduction of two new cases subject to possible reporting: (i) the existence of relations with persons adhering to criminal organisations of any nature or participating in violation of the principles of legality in contrast with the Code of Ethics; (ii) the violation of restrictive measures in economic and trade relations and/or sanctions adopted at national, EU and international level. The system adopted is appropriate to guarantee the protection of the whistleblower, ensuring that the activities of analysing the reported facts are conducted in compliance with the principles of confidentiality and anonymity prescribed by the reference legislation and within a reasonable time frame. The task of analysing and handling the reports received is assigned to a specially established internal committee.

In the context of the training measures envisaged by the Sustainability Plan in the areas of legality, human rights and anti-corruption, numerous training and dissemination activities were carried out in 2022 for all Group employees through corporate communication channels (newsletter, Company newspaper, e-learning courses and live sessions); the courses organised followed a risk-based approach, with specialised training tailored to individual internal structures considering the risk of committing offences under Legislative Decree 231/2001. A further in-depth training event was held on the subject of safeguards against corruption.

ENAV cooperates closely and effectively with the international organisation Transparency International. In particular, ENAV hosted and managed the organisation of Transparency International’s customary annual event, which in 2022 focused on the integrity supply chain. It participated in the round table held at the end of the year on transparency, anti-corruption, ESG values and SDGs activities; and, in the context of the RIPARTIRE project aimed at increasing civic participation of young people, it took part in a session at a school in Frascati (RM), where students discussed integrity and CSR issues as pillars of their business.

Future goals	Deadline
Updating of all ENAV Group 231 Models	By the first half of 2023
Completion of the adaptation of the whistleblowing system to Directive (EU) 2019/1937	By the first half of 2023
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	By December 2023

## Managing risks and opportunities

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 actions to contain the level of risks within the propensity thresholds approved by the Board of Directors (Risk Appetite).

During 2022, the Corporate Risk Profile (CRP), the Risk Treatment Plan and the Key Risk Indicators system were updated, and risk monitoring was carried out in April and November.

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 is discussed in more detail in the sections addressing those specific risks.

The table below presents, for each aspect of Legislative Decree 254/2016 and with reference to CRP 2022, the related risk events, the impact for ENAV and the categories of Stakeholders involved and the main ways of managing the risks generated and suffered. 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	POTENTIAL IMPACT OF THE ENAV GROUP	STAKEHOLDERS IMPACTED	POTENTIAL IMPACT ON STAKEHOLDERS	MAIN MANAGEMENT METHODS
Governance & Compliance and fight against corruption	<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</li> </ul>	<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>

TOPIC OF LEGISLATIVE DECREE 254/2016	RISK EVENTS	POTENTIAL IMPACT OF THE ENAV GROUP	STAKEHOLDERS IMPACTED	POTENTIAL IMPACT ON STAKEHOLDERS	MAIN MANAGEMENT METHODS
	activities) - Fraud and corruption - Failure to comply with Legislative Decree 50/2016 on the public contracts code - Failure to comply with Legislative Decree 254/2016 regarding non-financial reporting - Uncertain positioning of ENAV with respect to the Public Contracts Code - Failure to comply with applicable regulations for the certification of Training Organisations				
Environment	- Compliance of systems and infrastructures with reference legislation - Failure to respect the reference legislation concerning the environment - Human rights and the environment in the supply chain	- Operational - Compliance - Reputational	- Operators - Suppliers - Employees - Shareholders	<b>Operators:</b> - Economic damage <b>Suppliers:</b> - Occupational Health and Safety <b>Employees:</b> - Occupational Health and Safety <b>Shareholders:</b> - Economic damage	- Environmental Management System - Occupational quality, health and safety management systems - Company policies - System for the delegation of functions - Dedicated organisational structures

TOPIC OF LEGISLATIVE DECREE 254/2016	RISK EVENTS	POTENTIAL IMPACT OF THE ENAV GROUP	STAKEHOLDERS IMPACTED	POTENTIAL IMPACT ON STAKEHOLDERS	MAIN MANAGEMENT METHODS
					- Specific mitigation measures of a design nature
Respect for human rights	<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</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>
Pertinent to personnel	<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>- Labour disputes</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>- Dedicated organisational structures</li> <li>- Specific mitigation measures of a design nature</li> </ul>

TOPIC OF LEGISLATIVE DECREE 254/2016	RISK EVENTS	POTENTIAL IMPACT OF THE ENAV GROUP	STAKEHOLDERS IMPACTED	POTENTIAL IMPACT ON STAKEHOLDERS	MAIN MANAGEMENT METHODS
Social	<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>	<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>
Climate change	<ul style="list-style-type: none"> <li>- Climate change (emerging risk)</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>

### Risks associated with climate change<sup>34</sup>

<b>Types of risks and impacts</b>	<p>All possible direct impacts for ENAV related to the effects of climate change translate in the long term into potential interruptions/degradations in the provision of services due to damage to infrastructures or technological assets and reduction of traffic flow also due to the reduction of airport capacity and, therefore, into potential lost revenues and/or increases in operating costs.</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 EUROCONTROL document “Climate change risks for European aviation” (6 September 2021) identifies five main types of weather phenomena that could potentially impact aviation:</p> <p>1. PRECIPITATION</p> <p>Events related to heavy rainfall may require greater safety distances between aircraft, directly impacting airport capacity. Furthermore, airport</p>
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<sup>34</sup> In compliance with the European common enforcement priorities for 2022 annual financial reports, issued by ESMA on 28 October 2022.

	<p>infrastructures, as well as electrical equipment, can be exposed to a risk of flooding.</p> <p><b>2. TEMPERATURE</b> Rising temperatures can cause impacts on infrastructure, with associated energy costs, as well as impacts on engine performance and aircraft aerodynamics, with potential impacts on flight procedures and noise footprints in the areas surrounding airports.</p> <p><b>3. RISING SEA LEVEL AND OVERFLOWING OF RIVERS</b> Potential impacts on airports located on the coastal strip or near rivers, which are exposed to the risk of flooding and inundation.</p> <p><b>4. WIND</b> Risk of strong cross winds impacting flight safety. 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> Potential impacts in terms of flight delays. Furthermore, European continental areas could experience larger convective systems that could potentially involve multiple major airports in the same region. This could reduce the choice of alternating airports with a consequent decrease in service capacity.</p> <p>In August 2022, ENAV set up a special Working Group to assess in detail the effects of climate change in the specific locations where it provides its services in Italy and in particular at airports. The Working Group worked with the specialist support of external experts to assess the possible impacts of climate change on ENAV's core business activities over two distinct time horizons (2030 and 2050).</p> <p>The study, which is currently being finalised, made it possible to assess the possible impacts of climate change on ENAV's core business activities over two different time horizons and two different climate scenarios used by the Intergovernmental Panel on Climate Change (IPCC). The first scenario (SSP8.5), the most pessimistic, assumes, by 2100, atmospheric CO<sub>2</sub> concentrations will triple or quadruple (840/1120 ppm) compared to pre-industrial levels (280 ppm). This scenario is energy-intensive with total consumption continuing to grow over the century to well over 3 times current levels.</p> <p>The second (SSP4.5) assumes the implementation of certain initiatives such as the use of a range of technologies and strategies to reduce greenhouse gas emissions. A stabilisation scenario has been proposed: CO<sub>2</sub> emissions will peak around mid-century and by 2070 fall below current levels. The atmospheric concentration of carbon dioxide will stabilise by the end of the century at about twice (520 ppm) pre-industrial levels.</p> <p>Although the study is currently being finalised, it is nevertheless possible to anticipate here that:</p> <ul style="list-style-type: none"> <li>▪ with regard to extreme precipitation, a progressive intensification of the phenomenon is expected in the long term (2050), which is expected to affect an increasing number of airports over time;</li> <li>▪ as far as wind is concerned, there do not seem to be any critical issues, as the forecasts of the above-mentioned scenarios are oriented towards a decrease in the average wind intensity (consequently, the crosswind component should decrease proportionally);</li> <li>▪ temperature is expected to rise by 1-1.5° C (2030) and 2-2.5° C (2050) depending on the scenarios, which will affect an increasing number of airports over time;</li> <li>▪ with regard to the rise in sea levels, the flood risk of infrastructure located in coastal areas remains virtually unchanged.</li> </ul>
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	<p>The results of the analyses conducted will lay the foundations for monitoring the phenomena under study over time. This can be achieved by regularly updating the climate scenario analysis (e.g., every 2-3 years) in order to process an adequate amount of new data (business and scenario), so as to update the quantification of the operational and financial impacts of climate risks.</p> <p>Any further mitigation or adaptation actions will be taken downstream of the monitoring, as a possible consequence of the increased risk level.</p> <p>In the long run, ENAV's ability to ensure the pursuit of its business objectives, first and foremost by guaranteeing the continuity of its service provision, is undoubtedly interdependent on the resilience to the effects of climate change of the entire air transport system. 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>
<p><b>Adaptation and management method</b></p>	<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. The Group has defined and regularly tests specific Business Continuity and Disaster Recovery plans on the basis of an in-depth Business Impact Analysis, defining the appropriate procedures to be applied in the event of events involving a significant deterioration or interruption of services, in order to preserve continuity in the 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>



## Remuneration policies

The 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.

The remuneration policy is defined through a detailed preliminary activity performed by the Remuneration and Appointments Committee, the majority of which is composed of independent bodies, with the collaboration of an external advisor and the contribution of the Sustainability Committee and/or other internal units. The proposal is submitted to the Board of Directors, which, pursuant to Legislative Decree 49/2019, proposes it to the Shareholders' Meeting, which resolves by binding vote. Market practices and suggestions from proxy advisors are analysed as part of the investigative activities.

As far as the Chief Executive Officer and Managers with Strategic Responsibilities are concerned, the remuneration policy, as defined in section 1 of the Report on Remuneration Policy and Compensation Paid (approved with a binding vote by the Shareholders' Meeting of 21 April 2022) provides for the recognition of a fixed remuneration component as well as a short-term and long-term variable remuneration component, the latter anchored to objectives of an economic-financial and ESG nature, with a view to contributing to the achievement of the results of the corporate strategy and the pursuit of 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.

The Remuneration Policy provides for severance pay for the Chief Executive Officer in the event of non-renewal of the employment relationship or early termination of office. In particular, in the event of non-renewal at the end of the term of office, the variable short-term incentive payment *pro rata temporis* will be granted to the CEO.

The provisions on the long-term variable incentive pursuant to the 2020-2022 LTI Plan and respective Implementing Rules of the 2020-2022 LTI Plan shall also apply. In the case of early termination of office without just cause, in accordance with the recommendations of the Corporate Governance Code, the amount due to the Chief Executive Officer as severance pay is equal to two years of fixed remuneration pursuant to Article 2389(1) and (3) of the Italian Civil Code, plus a pro-rated share of the long-term variable incentive already vested at the time of termination. The incentive is only paid for the years in which the performance target was achieved, and its amount is determined by the Board of Directors subject to the assessment of the actual performance achieved and recalculated only for the years considered.

With regard to the short-term incentive, the Board of Directors shall, on a case-by-case basis, determine the amounts that may have vested and whether the required conditions for the associated payment have been met, taking due account of the period of the year in which the termination occurs and other contingent circumstances.

For Managers with Strategic Responsibilities, in the event of termination of the employment relationship with the Company, the conditions provided for in the relevant collective bargaining agreement apply, without prejudice to any existing individual agreements.

With regard to the variable components of remuneration paid to the Chief Executive Officer, and the other Managers with Strategic Responsibilities, the Remuneration Policy envisages a claw-back clause covering both negligence and loss and material error for a period of 36 months after the approval of the financial statements containing the irregularities that triggered the clause. This provision is in line with the recommendations of the Corporate Governance Committee.

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. Individual objectives are linked to economic-financial dimensions, investment, technological innovation also aimed at environmental and social aspects.

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 competent organisational structures of lists of all the Group’s resources (ENAV, Techno Sky and IDS), which meet the necessary requirements to become part of the perimeter of persons 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 evaluations expressed, specific “calibration” sessions are promoted with first and second level supervisors, in order to make the evaluation metrics as consistent and objective as possible, as well as to identify the possibilities of intervention on individual resources from a managerial (training, job rotation, assessment) or economic point of view.

### SHORT-TERM

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

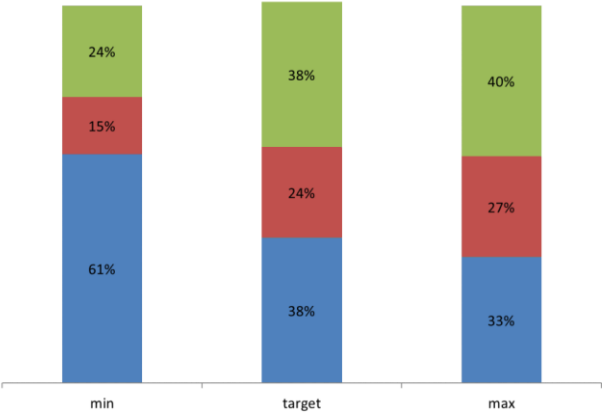
\* Consisting of 2 independent project objectives with on/off type achievement criterion

### LONG-TERM

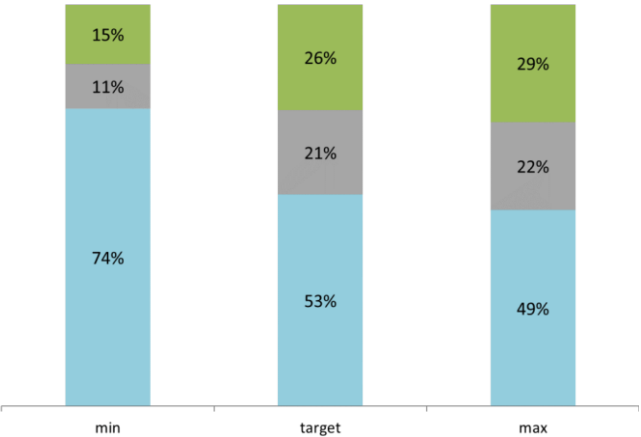
	Weighting
EBIT	30%
Free Cash Flow	30%
Relative TSR	40%

A sustainability objective with negative/positive corrective effects and with a maximum impact on the bonus of ±10%.

Chief Executive



Managers with Strategic



## Tax management

In line with the principles of transparency and legality set out in the Code of Ethics, the ENAV Group's approach to taxation is geared towards full compliance with tax regulations. Although there is no formalisation of a tax strategy policy, the ENAV Group, whose main activity is in Italy, also correctly fulfils its tax obligations through a well-defined organisation and procedures under Law 262 that define activities, roles and responsibilities.

Any controversial regulatory aspects are addressed and discussed with external consultants and, in some cases, brought to the attention of the tax authorities by means of petitions for appeal.

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.

Tax returns are subject to audit by the tax consultants and signing by the 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.

In 2022, tax risks were the subject of a new comprehensive risk assessment project for the purpose of the 231 Model update planned for 2023.

Tax offences were the subject of analysis in 2020 as part of the updating of the 231 Organisational Model, which also covered tax risks. The analysis carried out for the purpose of adjustments did not reveal any organisational criticalities in the management of tax risks within the Group.

## Responsible supplier 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, given that ENAV's and Techno Sky's awarding procedures are subject to the Public Contracts Code<sup>35</sup>, it should be noted that, in view of the specific provisions of Legislative Decree 18 April 2016 no. 50 as amended, the Companies started an initial process of analysis on some suppliers in order to 'test' their relative conduct in the ESG sphere. Specifically, an experimental process of analysis was started in relation to a number of suppliers and more significantly on:

- suppliers that represent the strategic supply line for the Group, also in light of the amounts contracted with them (core suppliers).
- suppliers that may be considered more "at risk" in this respect on the basis of their ATECO (economic activity) category.

In this context, with the aim of analysing the "conduct" of the aforementioned suppliers in the ESG sphere, a specific IT platform was adopted at an experimental level, dedicated to the collection of specific data and information in order to "test", with reference to the aforementioned suppliers, the relative "level of sensitivity" in this sphere in light of specific automated drivers.

With regard to the above, it is hereby reported that, during 2022, the concrete analyses carried out recorded, in relation to the panel of "tested" suppliers, a satisfactory outcome, also in consideration of the fact that more than 50% of the suppliers surveyed provided appropriate feedback through the aforementioned platform.

In view of all this, it can therefore be stated that an effective channel of information exchange has most certainly been established that can help to increase the commitment to ESG on the part of ENAV and Techno Sky and their suppliers also through a future shared path of improvement.

Within ENAV's ERP Oracle Application system, there is also a supplier performance evaluation process, governed by a special procedure, where suppliers are evaluated by the Managers of the relevant contracts/PM on the basis of the following criteria:

- level of compliance of performance with contractual requirements.
- full compliance of the contractual services performed with the SLAs foreseen in the contract.

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 th1818e 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 152/2006) must be communicated by sending the "Critical issues/blocking events form" to the system (ERP).

The procedure 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.

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<sup>35</sup> It should be noted that for the subsidiary D-Flight, the Public Contracts Code is applied to the contract awarding procedures

The analysis of the ratings found by the performers/PMs and processed by the system did not reveal any critical issues in the environmental and social fields.

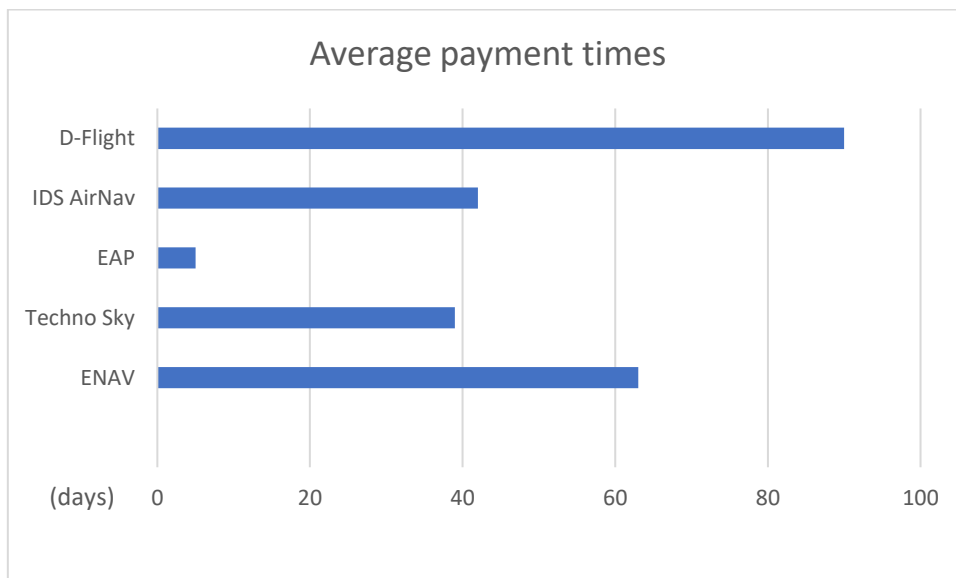
Parallel to the development of these assessment systems, a “Code of Conduct for Suppliers” has been drawn up, acceptance of which is mandatory for all ENAV and Techno Sky suppliers.

It should be noted that, at the Procurement level, ENAV continued the process aimed at including, in the context of specific contracts relating to labour-intensive contracts, the obligation of suppliers to undergo third-party audits in relation to compliance with specific contractual provisions aimed at ensuring compliance with environmental and social requirements related to the particular services entrusted. To this end, on a practical level, two audits were carried out by a third-party company appointed for this purpose on a category considered to be particularly at risk according to its ATECO code (cleaning services).

In addition, depending on the type of contract, there are specific provisions in the Contracts and their annexes that refer to explicit regulations in the area of respect for Human Rights, with particular reference to the prohibition of the exploitation of child labour and compliance with any similar regulations on the matter.

In line with what has been implemented by the Parent Company, in the majority of its orders and contracts with Italian suppliers IDS Air Nav includes clauses regarding the principles contained in the Code of Ethics and in Legislative Decree 231/2001. It should be noted that IDS Air Nav includes clauses in its contracts, similar to ENAV, referring to respect for human rights.

Lastly, it should be noted that, over the last few years, ENAV, in relation to its tenders, has paid increasing attention to environmental sustainability; this choice is based on ENAV’s desire to reduce the environmental impact of the services that are purchased and the works that are carried out, in accordance with the provisions of Legislative Decree 50/2016, and in particular Article 34 thereof.



## FURTHER INFORMATION ON THE GROUP'S ACTIVITIES, VALUE CHAIN AND BUSINESS RELATIONS

**Techno Sky** is active in the following main areas:

- ensure the Business Continuity of ENAV.
- perform overall "System Integrator" activities both for the Parent Company ENAV S.p.A. and within the so-called Third Market.

Techno Sky's Suppliers mainly consist of companies supplying goods, services and works that accompany the Company from self-functioning activities to the 'core' activities aimed at maintaining the systems used by the Parent Company for the air traffic control service, in order to ensure its business continuity (by way of example, the supply of hardware components necessary for the operation of the technological infrastructure, the purchase and maintenance of electronic equipment, etc.). With reference to the selection operations of Suppliers, Techno Sky is required to apply Legislative Decree 50/2016, as amended. (the so-called 'Public Contracts Code'). On the other hand, with regard to the selection of Suppliers, who shall support Techno Sky in the activities entrusted to it with reference to the Third-Party Market, the latter operates in accordance with the aforementioned Legislative Decree and, therefore, according to the logic of transparency and competitiveness with reference to the specific procurement context.

**IDS AirNav** is a Company that develops technology solutions for the air navigation market, both nationally and internationally. The target market in which IDS AirNav operates consists of civil and military ANSPs (Air Navigation Service Providers), civil aviation authorities and airport operators.

IDS AirNav works along two axes:

- the development of COTS (Commercial Off The Shelf) software products;
- the development of turnkey technical solutions, consisting of different software products that are suitably assembled and configured to suit specific customer needs.

The products developed can be classified into the following categories:

- Aeronautical Information Management, i.e., products for the management of aeronautical data and the exchange of these data between the various Stakeholders (airport operators, ANSPs, civil aviation authorities)
- Air Traffic Flow Management, i.e., products for managing traffic flows and identifying any imbalances between air traffic volumes and control capacity, in response to which action must be taken (flight delays, ATCO staffing, etc.)
- Aviation Revenue Management System, i.e. the product for calculating and managing invoices on services provided by ANSPs

While COTS products are developed on in-house orders (investment or maintenance), customer solutions are developed within the framework of revenue-generating orders that generally involve the provision of the following services:

- Requirements analysis, i.e. analysis of specific customer needs;
- Designing the technical solution needed to meet the requirements;
- Carrying out product configuration activities, as stable in the design phase;
- Operational testing and transition at customer sites of supplied solutions.

Obviously, there is a close interconnection between products and the implementation of technical solutions for customers. For example, if the requirements analysis reveals gaps in COTS products, development activities on those products are planned and conducted in order to compose the complete solution required by the customer. When a given technical solution enters into operational use at a customer's premises, a maintenance contract is typically activated, which includes the provision of product updates to the customer and customer service.

In carrying out COTS product development activities and customer solutions, IDS AirNav uses external suppliers for software development services and for the provision of third-party hardware and software on which the products and solutions offered to customers are based.

**ENAV Asia Pacific** provides aviation consultancy services to institutional customers in Malaysia (Ministry of Transport) and Taiwan (ANSP) and provides FPDAM Flight Procedure Design and Management) maintenance services. The services are provided through the technical support of ENAV S.p.A. and IDS AirNav, formalised in the intercompany agreement, in addition to the project management activities provided by personnel seconded to Malaysia. As far as the supply chain is concerned, ENAV Asia Pacific continues to make use of ENAV Group's suppliers - mainly for consultancy activities relating to aspects of Malaysian corporate and tax compliance - and/or verified through a formal request for details (e.g., verification through the SSM - Companies Commission of Malaysia).

## Security management

The issue of Security, understood in its broadest sense, is one of the central elements in the ENAV Group's activities, both as a critical infrastructure and an essential service operator, with a mission defined by law and directed to the protection of primary interests of the legal system such as the safeguarding of human life in flight and on the ground, and safeguarding the protective needs of personnel, infrastructures, systems, data, information and networks in its purview.

The Group Security Policy summarises the ENAV Group's commitment in its entirety to the pursuit of protection objectives, in the context of the mission and obligations of the Group and of each of its component Companies.

This commitment is in line with developments in current as well as newly introduced legislation, in view of which the Group has substantially strengthened its security structures, with a more significant presence in the areas of security culture development, security by design, monitoring and response capability.

These undertakings, defined and formalised, have found correspondence, on the one hand, in specific investment measures to increase security levels, and on the other hand, in the launch of a programme to strengthen the Security organisation structure, correlated with a specialised training plan for personnel, to enrich skills, knowledge and abilities in a plan to increase the Group's internal value.

The residual effects of the pandemic and those related to the Russia-Ukraine conflict have led to the adoption of specific reinforcement actions, in full awareness of the volatility of the risk scenario, which has a more than appreciable impact on the dimension of prevention, containment and response to security events, in their various manifestations.

Fundamental in this framework are:

- the involvement of all Group personnel in training, practice and competence-building activities, including in non-traditional ways.
- the definition of specific security requirements, which characterise the principle of "security by design", and the verification of their compliance throughout the life cycle of the systems is not only an element of compliance, but also an operational necessity, in order to keep the level of service capability and continuity of operations constantly updated.
- the monitoring of security levels, the analysis of potential threat matrices, the management of events and the adoption of countermeasures to vulnerability detection and resolution actions, with the use of two monitoring and response structures, the Security Operation Centre for physical security and the Security Operation Centre for information security, which also functions as a certified and accredited Computer Emergency Response Team.

In the framework described above, it is clear that security is an integral and fundamental part of the ENAV Group's mission, which is reflected - at different levels - in all the relations that the Group's Companies have with national, European and international institutions as well as with users, customers and suppliers.

With particular regard to the latter, because of the complexity and delicacy of the supply chain today, a structured management process of the principles of supply chain security is operative, aimed at determining the conscious involvement of partners in works, supplies and services, as they too are an integral part of the duty of protection, imposed by law and ethically due for the safeguarding of the fundamental values entrusted to ENAV S.p.A. and to a collateral extent to the other Group Companies.



Within the framework of the strong focus on fundamental rights, the duty of protection that Group Companies have towards expatriate staff is well in place, through the strengthening of preventive measures and during missions; as well as the increase in training tools for due respect for the cultures and sensitivities of the countries visited.

## Annex 1 – Non-financial indicators

### PLANET

Table 1. 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.	2022	2021	2020
Electricity	GJ	<b>241,998.59</b>	<b>243,865.66</b>	<b>241,131.29</b>
<b>from renewable sources</b>		<b>218,329.67</b>	<b>56,307.74</b>	<b>1,095.28</b>
Of which self-produced and consumed		1,120.27	1,031.71	1,095.28
Of which from GO sources		217,209.40	55,276.93	0
<b>From non-renewable sources</b>		23,668.92	187,557.92	240,036
<b>Fuels for offices and other facilities</b>		<b>26,592.85</b>	<b>30,184.18</b>	<b>24,509.94</b>
Diesel		3,696.66	5,751.02	3,787.48
Natural gas		22,896.19	24,433.16	20,722.46
<b>Fuels for car fleet – Company cars</b>		<b>5,714.26</b>	<b>4,119.33</b>	<b>3,743.45</b>
Diesel		2,178.14	3,019.84	3,046.88
Petrol		3,536.12	1,099.49	696.57
CNG		0	0	0
LPG		0	0	0
<b>Fuels for car fleet – Mixed-use cars</b>		<b>4,206.89</b>	<b>4,119.25</b>	<b>3,891.36</b>
Diesel		1,583.19	3,136.96	2,842.35
Petrol		2,600.68	971.42	954.70
CNG		20.92	10.87	90.36
LPG		2.09	0	3.94
<b>Fuels for air fleet</b>		<b>19,807.16</b>	<b>20,578.98</b>	<b>19,691.80</b>
Jet fuel		19,807.16	20,578.98	19,691.80
<b>Total energy consumed</b>		<b>298,319.75</b>	<b>302,867.40</b>	<b>292,967.84</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.

The self-produced electricity fed into the grid in 2022 was 63.65 GJ, in 2021 263.78 GJ and in 2020 382.45 GJ.

Table 2. Energy intensity [GRI 302-3]

Energy intensity within the organisation				
	<i>u.m.</i>	2022	2021	2020
Energy intensity	GJ/Number of full-time employees	71.8	74.4	71.5

Table 3. 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	<i>u.m.</i>	2022	2021	2020
Location based electricity		17,383	17,572	18,422
Market based electricity		3,005	23,891	31,064
Fuel for offices and other facilities		1,408.30	1,621.95	1,309.52
<i>Diesel</i>		247.62	378.38	253.1
<i>Natural gas</i>		1,160.68	1,243.56	1,056.42
Fuel for car fleet – Company cars		369.08	268.87	247.96
<i>Diesel</i>		145.91	198.69	203.61
<i>Petrol</i>		223.17	70.19	44.35
<i>CNG</i>		0	0	0
<i>LPG</i>		0	0	0
Fuels for car fleet – mixed-use cars	<i>t CO<sub>2</sub>e</i>	271.37	268.96	255.57
<i>Diesel</i>		106.05	206.39	189.94
<i>Petrol</i>		164.14	62.01	60.78
<i>CNG</i>		1.06	0.55	4.62
<i>LPG</i>		0.12	0	0.23
Fuels for air fleet		1,365.20	1,416.65	1,355.57
<i>Jet fuel</i>		1,365.20	1,416.65	1,355.57
Refrigerant gases		886.32	1,204.89	368.56
Total emissions ( <i>location based</i> )		21,683.67	22,353.02	21,959.95
Total emissions ( <i>market based</i> )		7,304.92	28,672.54	34,601.18

Scope 2 emissions inherent to the consumption of electricity are calculated according to the Location Based methodology, using the emission factors published by ISPRA 2021 and according to the market-based approach using the emission factors published by AIB – European Residual Mixes 2021.

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 2022 by the Department for Environment Food & Rural Affairs.

It should be noted that in 2022, the methodology for calculating emissions from the consumption of electricity from Guarantees of Origin (GO) was updated according to the Market-Based methodology. This methodology was also applied to the 2021 figure, in order to report a value as accurate and comparable to the current reporting year as possible. The previously reported 2021 figure was 24,464 tCO<sub>2</sub>e

Table 4. Other indirect greenhouse gas (GHG) emissions (Scope 3) [GRI 305-3]

Emissions	u.m.	2022	2021	2020
Fuel- and Energy-Related Activities	t CO <sub>2</sub> e	1,319.17	5,568.92	4,483.57
Employee commuting		7,289.93	7,086.22	6,489.77
Capital goods		31,902.66	28,601.97	29,601.13
Purchased goods and services		12,513.23	12,134.49	10,665.64
Others		85.90	161.39	116.73
Business Travel		1,257.11	443.19	332.57
Scope 3 total		54,368.00	53,996.17	51,689.42

The method used to calculate emissions uses the emission factors of the Department for Environment Food & Rural Affairs (DEFRA) 2021 e 2022, Ecoinvent 3.8 e Base Carbon v.19.

Within the category "Others", data for the categories "Waste" and "Upstream transportation and distribution" are included and merged as they each have a weight of 0.2% of total emissions.

It should be noted that in 2022, the methodology for calculating the emissions generated by electricity consumption from Guarantees of Origin (GO) was updated for the calculation of the Fuel- and Energy-Related Activities category. This methodology was also applied to the 2021 figure in order to report as accurate a value as possible and make it comparable to the current reporting year. The previously reported 2021 figure was 6,994.05 tCO<sub>2</sub>e.

Table 5. Intensity of greenhouse gas (GHG) emissions [GRI 305-4].

Intensity of emissions (Scope 1 + Scope 2)				
	u.m.	2022	2021	2020
Intensity of emissions	tCO <sub>2</sub> eq Location based/full-time employees	5.22	5.49	5.36
Intensity of emissions	tCO <sub>2</sub> eq Market based/full-time employees	1.76	7.04	8.45

Intensity of other indirect emissions (Scope 3)				
	u.m.	2022	2021	2020
Intensity of emissions	tCO <sub>2</sub> eq Scope 3/full-time employees	13.08	13.26	12.62

Table 6. Greenhouse gas (GHG) emissions avoided through electricity production from existing photovoltaic systems [GRI 305-5].

Reduction of emissions	u.m.	2022	2021	2020
Reduction of CO <sub>2</sub> e (Scope2)	t CO <sub>2</sub> e	85	94	113

The methodology used for the reporting year 2021 and 2022 for emission reduction calculations involves the use of the ISPRa 2021 emission factors. The methodology used for the 2020 reporting year involves the use of emission factors published in 2020 by the Department for Environment Food & Rural Affairs (DEFRA).

Table 7. Waste generated [GRI 306-3]

Type of waste	u.m.	2022			2021			2020			
		Sent for recycling	Sent for disposal	Waste generated	Sent for recycling	Sent for disposal	Waste generated	Sent for recycling	Sent for disposal	Waste generated	
Batteries from accumulators	t	39.80	0	39.80	52.35	0	52.35	37.37	0	37.37	
Waste engine oil, gear oil and lubricating oils		4.77	0	4.77	5.00	0	5.00	5.82	0	5.82	
Waste from electrical and electronic equipment		48.46	0.13	48.59	103.78	0	103.78	35.99	0.01	36	
Other municipal waste (septic tank sludge, bulky waste)		24.64	54.35	78.99	18.77	111.11	129.88	39.57	62.27	101.84	
Packaging (including municipal waste from separate collection)		21.56	0	21.56	29.20	0	29.20	19.28	0	19.28	
Metals (including their alloys)		57.30	0	57.30	24.26	0	24.26	9.07	0	9.07	
Other waste		35.30	4.43	39.73	21.03	2.94	23.97	37.31	5.50	42.81	
<b>TOTAL WASTE</b>			<b>231.83</b>	<b>58.91</b>	<b>290.74</b>	<b>254.39</b>	<b>114.05</b>	<b>368.44</b>	<b>184.41</b>	<b>67.78</b>	<b>252.19</b>

Table 8. Waste for recovery and waste for disposal [GRI 306-4; 306-5].

Hazardous waste	u.m.	2022	2021	2020
Landfill disposal	t	1.46	1.65	1.17
Sent for recycling		57.46	69.27	54.47
<b>TOTAL WASTE</b>		<b>58.92</b>	<b>70.92</b>	<b>55.64</b>
Non-hazardous waste	u.m.	2022	2021	2020
Landfill disposal	t	57.45	112.40	66.61
Sent for recycling		174.37	185.12	129.94
<b>TOTAL WASTE</b>		<b>231.82</b>	<b>297.52</b>	<b>196.55</b>

Note: All waste is managed at external sites

Table 9. Investments in infrastructures.

Collision		2022	2021	2020
Infrastructures	€000	<b>87,763</b>	<b>76,068</b>	<b>77,493</b>
<i>a) Implementation and maintenance of operational technology infrastructures</i>		50,092	44,418	39,760
<i>b) Upgrading the ATM platform with new operational concepts</i>		15,459	14,075	24,566
<i>c) Infrastructures and systems</i>		13,152	12,333	7,639
<i>d) Management information systems</i>		9,060	5,242	5,528

Note: 2022 CAPEX of € 97.8 million

Table 10. 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.	2022	2021	2020	Trend 2016-2022
Reduction of routes	km	-21,750,500	-12,710,000	-7,237,000	- 77,867,335
Reduction of fuel used	kg	-79,500,000	-52,789,000	-29,623,000	-294,968,500
Reduction of CO <sub>2</sub> emissions	kg CO <sub>2</sub>	- 250,425,000	-166,285,350	-93,312,450	-929,150,775

Table 11. Number of flight hours carried out by the air fleet broken down by domestic and foreign contracts.

Flight hours	u.m.	2022	2021	2020
<b>Domestic hours</b>	Hours	<b>943.60</b>	<b>1,048.93</b>	<b>967.30</b>
<b>Abroad</b>		<b>419.01</b>	<b>321.60</b>	<b>368.84</b>
<i>Saudi Arabia</i>		0	0	0
<i>Kenya</i>		0	0	0
<i>Eritrea</i>		0	0	0
<i>Uganda</i>		61.09	14.58	28.75
<i>BLUE GNSS</i>		0	0	0
<i>Albania</i>		19.00	13.67	4.58
<i>Lithuania</i>		18.25	20.75	9.17
<i>United Arab Emirates</i>		0	0	0
<i>ONDA (Morocco)</i>		0	0	0
<i>Qatar</i>		84.83	33.25	0
<i>Phoenix (Romania)</i>		0	157.34	216.50
<i>INEA</i>		0	0	0
<i>Cyprus</i>		16.08	0	0
<i>Croatia</i>		108.84	115.26	110.84
<b>Total</b>			<b>1,362.61</b>	<b>1,370.53</b>

Table 12. Average response time for extraordinary interventions thanks to the Flight Inspection and Validation service.

Average response time for extraordinary interventions	u.m.	2022	2021	2020
Average response time	Hours	24	24	24

## STAKEHOLDERS

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

Average system availability	u.m.	2022	2021	2020
Percentage of average system availability	%	99.99	99.98	99.97

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

Resolution of anomalies on first attempt	u.m.	2022	2021	2020
Percentage of anomaly resolution on first attempt	%	87%	90.00	91.00

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

Repair and restoration	u.m.	2022	2021	2020
Average repair and restoration times	Minutes	33.52	33.20	33.57

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

Processing for measurement confirmation	u.m.	2022	2021	2020
Average processing time for measurement confirmation of weather sensors	Days	15.58	14.58	14.87

Table 17. Approach to Stakeholder Engagement [GRI 2-29].

Degree of Stakeholder involvement	u.m.	2022	2021	2020
Stakeholder Engagement initiatives	No.	18 one-to-one meetings with airline companies. Three plenary meetings extended, for the topics covered, to all customers of our services.	12 meetings (10 web and 2 in person) for the updates.	Web meeting for updates. Cooperation agreements for structure in relationships and advanced involvement
Number of Stakeholders involved		Variable number depending on events. Invitations to plenary meetings extended to more than 40 companies on average. Output of meetings made available to all-	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
Other		Direct involvement of customers in line with the contents of signed cooperation agreements and memoranda of understanding.	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.

## PEOPLE

Table 18. Total number of employees by Group Company. [GRI 2-7]

Total number of employees in the Group	u.m.	2022	2021	2020
ENAV	No.	3,306	3,295	3,330
Techno SKY		721	658	665
IDS AirNav		158	152	150
ENAV Asia Pacific		0	1	2
ENAV North Atlantic		0	0	0
<b>Total</b>			<b>4,185</b>	<b>4,106</b>

Note: It should be noted that in D-Flight, there are 7 seconded employees (4 ENAV, 3 IDS AirNav), and 3 seconded from Leonardo and Telespazio.



Table 19. Total number of employees by contract type, geographical area (where they are employed), and gender. [GRI 2-7]

Employees (headcount)	u.m.	2022			2021			2020		
		Male	Female	Total	Male	Female	Total	Male	Female	Total
<b>Fixed-term contract</b>	No.	2	3	5	1	-	1	-	-	-
<i>Italy</i>		2	3	5	1	-	1	0	0	0
<i>Americas</i>		0	0	0	0	0	0	0	0	0
<i>Asia</i>		0	0	0	0	0	0	0	0	0
<i>Other - Europe</i>		0	0	0	0	0	0	0	0	0
<b>Open-ended contract</b>		3,331	849	4,180	3,273	832	4,105	3,300	847	4,147
<i>Italy</i>		3,331	849	4,180	3,273	831	4,104	3,300	845	4,145
<i>Americas</i>		0	0	0	0	0	0	0	0	0
<i>Asia</i>		0	0	0	0	1	1	0	2	2
<i>Other - Europe</i>		0	0	0	0	0	0	0	0	0
<b>Total</b>		3,333	852	4,185	3,274	832	4,106	3,300	847	4,147

Note: the Group does not employ employees on zero-hours contracts

Table 20. Total number of employees by type of employment and gender. [GRI 2-7]

Employees (headcount)	u.m.	2022			2021			2020		
		Male	Female	Total	Male	Female	Total	Male	Female	Total
Full-time employees	No.	3,324	831	4,155	3,264	807	4,071	3,282	814	4,096
Part-time employees		9	21	30	10	25	35	18	33	51
<b>Total</b>		3,333	852	4,185	3,274	832	4,106	3,300	847	4,147

Table 21. Number of non-employee workers [GRI 2-8]

Professional category	u.m.	2022	2021	2020
Temporary staff	No.	2	3	0
Trainees		6	18	6
Other (*)		304	256	1
<b>Total</b>		312	277	7

(\*) The category "Other" in 2022 includes non-employee workers for engineering support, systems engineers, maintenance, plant certification, postal service, transport, canteens, cleaning services and welcome service. In 2021, the category "Other" includes maintenance, certification, postal service, transport, canteens, cleaning services, and a coordinated and continuous collaboration. The total figure for the category "Other" is not available for 2020, but only non-employees with coordinated and continuous collaboration are considered.

Note: The total number of non-employees is an estimated figure and represents the number of non-employees who worked for the Company during the year.

Table 22. Employees by age, gender and level. [GRI 405-1]

Employees (headcount)	2022						2021						2020					
	Male		Female		Total		Male		Female		Total		Male		Female		Total	
	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%
<b>Senior management</b>	48	1,1%	3	0,1%	51	1,2%	46	1,1%	4	0,1%	50	1,2%	51	1,2%	5	0,1%	56	1,4%
<i>less than 30 years old</i>	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<i>between 30 and 50</i>	4	0,1%	0	0	4	0,1%	7	0,2%	1	0	8	0,2%	9	0,2%	4	0,1%	13	0,3%
<i>over 50</i>	44	1,1%	3	0,1%	47	1,1%	39	0,9%	3	0,1	42	1,0%	42	1,0%	1	0,0%	43	1,0%
<b>Middle management</b>	347	8,3%	63	1,5%	410	9,8%	351	8,5%	61	1,5%	412	10%	355	8,6%	62	1,5%	417	10,1%
<i>less than 30 years old</i>	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<i>between 30 and 50</i>	90	2,2%	20	0,5%	110	2,6%	99	2,4%	25	0,6%	124	3%	109	2,6%	26	0,6%	135	3,3%
<i>over 50</i>	257	6,1%	43	1,0%	300	7,2%	252	6,1%	36	0,9%	288	7%	246	5,9%	36	0,9%	282	6,8%
<b>Office staff</b>	2,911	69,6%	786	18,8%	3,697	88,3%	2,842	69,2%	767	18,7%	3,609	87,9%	2,853	68,8%	780	18,8%	3,633	87,6%
<i>less than 30 years old</i>	200	4,8%	31	0,7%	231	5,5%	162	3,9%	23	0,6%	185	4,5%	165	4,0%	28	0,7%	193	4,7%
<i>between 30 and 50</i>	1,617	38,6%	432	10,3%	2,049	49%	1,631	39,7%	433	10,5%	2,064	50,3%	1,667	40,2%	446	10,8%	2,113	51,0%
<i>over 50</i>	1,094	26,1%	323	7,7%	1,417	33,9%	1,049	25,5%	311	7,6%	1,360	33,1%	1,021	24,6%	306	7,4	1,327	32,0%
<b>Blue collar</b>	27	0,6%	0	0	27	0,6%	35	0,9%	0	0	35	0,9%	41	1,0%	0	0	41	1,0%
<i>less than 30 years old</i>	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<i>between 30 and 50</i>	12	0,3%	0	0	12	0,3%	18	0,4%	0	0	18	0,4%	23	0,6%	0	0	23	0,6%
<i>over 50</i>	15	0,4%	0	0	15	0,4%	17	0,4%	0	0	17	0,4%	18	0,4%	0	0	18	0,4%
<b>Total</b>	3,333	79,6%	852	20,4%	4,185	100%	3,274	79,7%	832	20,3%	4,106	100%	3,300	79,6%	847	20,4%	4,147	100%

Table 23. Number of new hires by age group, gender, and geographical area. [GRI 401-1]

Number of new hires	u.m.	2022			2021			2020		
		Male	Female	Total	Male	Female	Total	Male	Female	Total
<b>Italy</b>	No.	<b>338</b>	<b>66</b>	<b>404</b>	<b>226</b>	<b>20</b>	<b>246</b>	<b>138</b>	<b>11</b>	<b>149</b>
<i>less than 30 years old</i>		238	34	<b>272</b>	176	16	<b>192</b>	116	8	<b>124</b>
<i>between 30 and 50</i>		85	32	<b>117</b>	48	4	<b>52</b>	21	2	<b>23</b>
<i>over 50</i>		15	0	<b>15</b>	2	-	<b>2</b>	1	1	<b>2</b>
<b>Americas</b>		0	0	<b>0</b>	0	0	<b>0</b>	0	0	<b>0</b>
<i>less than 30 years old</i>		0	0	<b>0</b>	0	0	<b>0</b>	0	0	<b>0</b>
<i>between 30 and 50</i>		0	0	<b>0</b>	0	0	<b>0</b>	0	0	<b>0</b>
<i>over 50</i>		0	0	<b>0</b>	0	0	<b>0</b>	0	0	<b>0</b>
<b>Asia</b>		0	0	<b>0</b>	0	0	<b>0</b>	0	0	<b>0</b>
<i>less than 30 years old</i>		0	0	<b>0</b>	0	0	<b>0</b>	0	0	<b>0</b>
<i>between 30 and 50</i>		0	0	<b>0</b>	0	0	<b>0</b>	0	0	<b>0</b>
<i>over 50</i>		0	0	<b>0</b>	0	0	<b>0</b>	0	0	<b>0</b>
<b>Other - Europe</b>		0	0	<b>0</b>	0	0	<b>0</b>	0	0	<b>0</b>
<i>less than 30 years old</i>		0	0	<b>0</b>	0	0	<b>0</b>	0	0	<b>0</b>
<i>between 30 and 50</i>		0	0	<b>0</b>	0	0	<b>0</b>	0	0	<b>0</b>
<i>over 50</i>		0	0	<b>0</b>	0	0	<b>0</b>	0	0	<b>0</b>
<b>Total</b>	<b>338</b>	<b>66</b>	<b>404</b>	<b>226</b>	<b>20</b>	<b>246</b>	<b>138</b>	<b>11</b>	<b>149</b>	
<i>less than 30 years old</i>	238	34	<b>272</b>	176	16	<b>192</b>	116	8	<b>124</b>	
<i>between 30 and 50</i>	85	32	<b>117</b>	48	4	<b>52</b>	21	2	<b>23</b>	
<i>over 50</i>	15	-	<b>15</b>	2	-	<b>2</b>	1	1	<b>2</b>	

Note: the calculation of the number of new hires also includes employees with a fixed-term pseudo pilot contract (192 for 2022, 167 for 2021 and 97 for 2020)

Inter-company transfers for 2022 included:

- 20 resources were recruited in ENAV from TS, divided between:
  - 2 women of which 0 women aged < 30 years, 1 woman aged between 30 and 50 years and 1 woman aged > 50 years,
  - 18 men of whom 0 men aged <30 years, 14 aged between 30 and 50 years and 4 men aged >50 years.
- In TS, 23 ENAV resources were recruited:
  - 23 men of whom 0 men aged < 30 years, 6 men between 30 and 50 years and 17 men aged > 50 years.

Table 24. Number of employees who left the Group, by age, gender, and geographical area. [GRI 401-1]

Employees who left the Group	u.m.	2022			2021			2020		
		Male	Female	Total	Male	Female	Total	Male	Female	Total
<b>Italy</b>	No.	<b>279</b>	<b>45</b>	<b>324</b>	<b>252</b>	<b>34</b>	<b>286</b>	<b>172</b>	<b>25</b>	<b>197</b>
<i>less than 30 years old</i>		171	21	<b>192</b>	155	13	<b>168</b>	93	8	<b>101</b>
<i>between 30 and 50</i>		32	6	<b>38</b>	15	0	<b>15</b>	12	1	<b>13</b>
<i>over 50</i>		76	18	<b>94</b>	82	21	<b>103</b>	67	16	<b>83</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>
<i>less than 30 years old</i>		0	0	<b>0</b>	0	0	<b>0</b>	0	0	<b>0</b>
<i>between 30 and 50</i>		0	0	<b>0</b>	0	0	<b>0</b>	0	0	<b>0</b>
<i>over 50</i>		0	0	<b>0</b>	0	0	<b>0</b>	0	0	<b>0</b>
<b>Asia</b>		<b>1</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>1</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>0</b>
<i>less than 30 years old</i>		0	0	<b>0</b>	0	0	<b>0</b>	0	0	<b>0</b>
<i>between 30 and 50</i>		0	0	<b>0</b>	0	0	<b>0</b>	0	0	<b>0</b>
<i>over 50</i>		1	0	<b>1</b>	0	1	<b>1</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>
<i>less than 30 years old</i>		0	0	<b>0</b>	0	0	<b>0</b>	0	0	<b>0</b>
<i>between 30 and 50</i>		0	0	<b>0</b>	0	0	<b>0</b>	0	0	<b>0</b>
<i>over 50</i>		0	0	<b>0</b>	0	0	<b>0</b>	0	0	<b>0</b>
<b>Total</b>		<b>280</b>	<b>45</b>	<b>325</b>	<b>252</b>	<b>35</b>	<b>287</b>	<b>172</b>	<b>25</b>	<b>197</b>
<i>less than 30 years old</i>	171	21	<b>192</b>	155	13	<b>168</b>	93	8	<b>101</b>	
<i>between 30 and 50</i>	32	6	<b>38</b>	15	0	<b>15</b>	12	1	<b>13</b>	
<i>over 50</i>	77	18	<b>95</b>	82	22	<b>104</b>	67	16	<b>83</b>	

Note: the calculation of the number of employees who left the Group also includes employees with a fixed-term pseudo pilot contract (192 for 2022, 167 for 2021 and 97 for 2020).

Furthermore, during 2022, 43 inter-group transfers were recorded, as follows:

23 resources left ENAV to be recruited in TS, specifically:

- 23 men of whom 0 men aged < 30 years, 6 men between 30 and 50 years and 17 men aged > 50 years.

For Techno Sky, 20 employees left to be hired by ENAV, comprising:

- 2 women, of whom: 0 women aged <30 years; 1 woman aged between 30 and 50 years; 1 woman aged >50 years.
- 18 men, of whom: 0 employees <30 years old; 14 employees between 30 and 50 years old; 4 employees >50.

Table 25. Turnover rate [GRI 401-1].

Turnover rate	u.m.	2022			2021			2020		
		Male	Female	Total	Male	Female	Total	Male	Female	Total
Italy	%	8.37	5.28	7.74	7.7	4.09	6.97	5.2	3.0	4.8
Americas		0	0	0	0	0	0	0	0	0
Asia		100	0	100	0	100	100	0	0	0
Other - Europe		0	0	0	0	0	0	0	0	0
<b>Total</b>		<b>8.40</b>	<b>5.28</b>	<b>7.77</b>	<b>7.7</b>	<b>4.21</b>	<b>6.99</b>	<b>5.2</b>	<b>3.0</b>	<b>4.8</b>

Table 26. Rate of new hires [GRI 401-1].

Rate of new hires	u.m.	2022			2021			2020		
		Male	Female	Total	Male	Female	Total	Male	Female	Total
Italy	%	10.14	7.75	9.65	6.9	2.41	5.99	4.2	1.3	3.6
Americas		0	0	0	0	0	0	0	0	0
Asia		0	0	0	0	0	0	0	0	0
Other - Europe		0	0	0	0	0	0	0	0	0
<b>Total</b>		<b>10.14</b>	<b>7.75</b>	<b>9.65</b>	<b>6.9</b>	<b>2.4</b>	<b>5.99</b>	<b>4.2</b>	<b>1.3</b>	<b>3.6</b>

Table 27. Number of hours of classroom and e-learning operational training by gender and category [GRI 404-1].

Training hours by gender and level	u.m.	2022			2021			2020		
		Male	Female	Total	Male	Female	Total	Male	Female	Total
Senior management	Hours	0	0	0	3	0	3	0	0	0
Middle management		108	48	156	354	0	354	112	32	144
Office staff		112,031	13,950.5	125,981.5	105,577.5	8,223.5	113,801	96,586	3,092	99,678
Blue collar		140	0	140	200	0	200	363	0	363
<b>Total</b>		<b>112,279</b>	<b>13,998.5</b>	<b>126,277.5</b>	<b>106,134.5</b>	<b>8,223.5</b>	<b>114,358</b>	<b>97,061</b>	<b>3,124</b>	<b>100,185</b>

Table 28. Number of hours of classroom and e-learning training by gender and category [GRI 404-1].

Training hours by gender and level	u.m.	2022			2021			2020		
		Male	Women	Total	Male	Women	Total	Male	Women	Total
Senior management	Hours	277	21	298	772	16	788	995	38	1,033
Middle management		3,681	884	4,565	3,941	1,080	5,021	4,465	1,190	5,655
Office staff		17,745.5	6,460.5	24,206	22,517	5,886	28,403	15,306	6,231	21,537
Blue collar		144	0	144	299	0	299	146	0	146
<b>Total</b>		<b>21,847.5</b>	<b>7,365.5</b>	<b>29,213</b>	<b>27,529</b>	<b>6,982</b>	<b>34,511</b>	<b>20,912</b>	<b>7,459</b>	<b>28,371</b>

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

Table 29. Number of hours of classroom and e-learning training in occupational health and safety by gender and category [GRI 404-1].

Training hours by gender and level	u.m.	2022			2021			2020		
		Male	Female	Total	Male	Female	Total	Male	Female	Total
Senior management	Hours	235	8	243	132	0	132	32	0	32
Middle management		2,367.00	374	2,741	670	46	716	448	52	500
Office staff		21,914	4,347	26,261	7,587	574	8,161	7,256	493	7,749
Blue collar		104	0	104	96	0	96	356	0	356
<b>Total</b>			<b>24,620</b>	<b>4,729</b>	<b>29,349</b>	<b>8,485</b>	<b>620</b>	<b>9,105</b>	<b>8,092</b>	<b>545</b>

Table 30. Number of hours of classroom and e-learning environmental training [GRI 404-1].

Training hours by gender and level	u.m.	2022			2021			2020		
		Male	Female	Total	Male	Female	Total	Male	Female	Total
Senior management	Hours	0	0	0	0	0	0	45	8	53
Middle management		7	1	8	34	49	83	186	30	216
Office staff		339	48	387	169	28	197	928	108	1,036
Blue collar		0	0	0	0	0	0	10	0	10
<b>Total</b>			<b>346</b>	<b>49</b>	<b>395</b>	<b>203</b>	<b>77</b>	<b>280</b>	<b>1,169</b>	<b>146</b>

Table 31. Average hours of training. [GRI 404-1]

Hours of training (classroom and e-learning)	u.m.	2022			2021			2020		
		Male	Female	Total	Male	Female	Total	Male	Female	Total
Total number of training hours provided to employees	<i>Hours</i>	159,093	26,142	<b>185,235</b>	142,351	15,904	<b>158,255</b>	116,578	10,986	<b>127,564</b>
<b>Total number of employees</b>	<i>No.</i>	<b>3,333</b>	<b>852</b>	<b>4,185</b>	<b>3,274</b>	<b>832</b>	<b>4,106</b>	<b>3,300</b>	<b>847</b>	<b>4,147</b>
<b>Average employee training hours</b>	<i>Hours/no.</i>	<b>48</b>	<b>31</b>	<b>44</b>	<b>43</b>	<b>19</b>	<b>39</b>	<b>39</b>	<b>13</b>	<b>33</b>
Total number of training hours provided to senior management	<i>Hours</i>	512	29	<b>541</b>	908	17	<b>925</b>	1,072	46	<b>1,118</b>
<b>Total number of senior managers</b>	<i>No.</i>	<b>48</b>	<b>3</b>	<b>51</b>	<b>46</b>	<b>4</b>	<b>50</b>	<b>51</b>	<b>5</b>	<b>56</b>
<b>Average training hours provided to senior management</b>	<i>Hours/no.</i>	<b>11</b>	<b>10</b>	<b>11</b>	<b>20</b>	<b>4</b>	<b>19</b>	<b>21</b>	<b>9</b>	<b>20</b>
Total number of training hours provided to middle management	<i>Hours</i>	6,163	1,307	<b>7,470</b>	5,001	1,175	<b>6,176</b>	5,211	1,304	<b>6,515</b>
<b>Total number of middle managers</b>	<i>No.</i>	<b>347</b>	<b>63</b>	<b>410</b>	<b>351</b>	<b>61</b>	<b>412</b>	<b>355</b>	<b>62</b>	<b>417</b>
<b>Average training hours provided to middle management</b>	<i>Hours/no.</i>	<b>18</b>	<b>21</b>	<b>18</b>	<b>14</b>	<b>19</b>	<b>15</b>	<b>15</b>	<b>21</b>	<b>16</b>
Total number of training hours provided to office staff	<i>Hours</i>	152,030	24,806	<b>176,836</b>	135,847	14,713	<b>150,559</b>	120,076	9,924	<b>130,022</b>
Total number of office workers	<i>No.</i>	2,911	786	<b>3,697</b>	2,842	767	<b>3,609</b>	2,853	780	<b>3,633</b>
<b>Average training hours provided to office staff</b>	<i>Hours/no.</i>	<b>52</b>	<b>32</b>	<b>48</b>	<b>48</b>	<b>19</b>	<b>42</b>	<b>42</b>	<b>12</b>	<b>35</b>

Total number of training hours provided to blue collar workers	<i>Hours</i>	388	0	<b>388</b>	595	0	<b>595</b>	875	0	<b>875</b>
Total number of blue collar workers	<i>No.</i>	27	0	<b>27</b>	35	0	<b>35</b>	41	0	<b>41</b>
<b>Average training hours provided to blue collar workers</b>	<i>Hours/no.</i>	<b>14</b>	<b>0</b>	<b>14</b>	<b>17</b>	<b>0</b>	<b>17</b>	<b>21</b>	<b>0</b>	<b>21</b>



Table 32. Number of ongoing training hours by gender.

Ongoing training hours by gender and category	u.m.	2022			2021			2020		
		Male	Female	Total	Male	Female	Total	Male	Female	Total
Employees	Hours	45,802	7,109	<b>52,911</b>	53,172	6,572	<b>59,744</b>	67,618	8,358	<b>75,976</b>

Table 33. Number of employees involved in ongoing training by gender.

Number of employees involved by gender	u.m.	2022			2021			2020		
		Male	Female	Total	Male	Female	Total	Male	Female	Total
Employees	No.	1,946	302	<b>2,248</b>	1,769	241	<b>2,010</b>	1,854	261	<b>2,115</b>

Table 34. Number of ongoing operating unit training hours by gender.

Ongoing operating unit training hours by gender and category	u.m.	2022			2021			2020		
		Male	Female	Total	Male	Female	Total	Male	Female	Total
Employees	Hours	78,385	9,214	<b>87,599</b>	65,041	12,389	<b>77,430</b>	19,591	3,621	<b>23,212</b>

Table 35. Number of employees involved in ongoing operating unit training by gender.

Number of employees involved by gender and category	u.m.	2022			2021			2020		
		Male	Female	Total	Male	Female	Total	Male	Female	Total
Employees	No.	1,625	191	<b>1,816</b>	440	65	<b>505</b>	307	48	<b>355</b>

Table 36. Number of new grievances with employees.

Number of pending grievances with employees	u.m.	2022	2021	2020
Number of new grievances with employees	No.	40	48	51

Table 37. Number of new grievances with employees.

Number of new grievances with employees	u.m.	2022	2021	2020
Number of new grievances with employees	No.	6	11	13

Table 38. Percentage of employees covered by collective bargaining agreements. [GRI 2-30]

Percentage of employees covered by collective bargaining agreements	u.m.	2022	2021	2020
Percentage of employees covered by collective bargaining agreements	%	100%	100%	99,95%

Note: Senior management is excluded from the calculation.

Table 39. Percentage of employees registered with a union.

Percentage of employees registered with a union	u.m.	2022	2021	2020
Percentage of employees registered with a union	%	61%	67%	68%

Note: senior management is excluded from the calculation

Table 40. Number of strikes.

Number of strikes	u.m.	2022	2021	2020
Number of strikes	No.	8	16	6

Table 41. Number of strike hours.

Number of strike hours	u.m.	2022	2021	2020
Number of strike hours	No.	163	240	84

Table 42. Number of recordable work injuries, injury rate and number of hours worked by employees [GRI 403-9].

Employees	u.m.	2022			2021			2020		
		Male	Female	Total	Male	Female	Total	Male	Female	Total
<b>Total recordable injuries at work</b>		3	2	5	6	1	7	10	2	12
Recordable injuries at work (with the exclusion of injuries with serious consequences)	No.	3	2	5	6	1	7	8	2	10
Number of injuries at work with serious consequences (with the exclusion of deaths)		0	0	0	0	0	0	2	0	2
Deaths following injuries at work		0	0	0	0	0	0	0	0	0
<b>Number of hours worked</b>	No.	4,893,064	1,144,149	6,037,213	4,752,198	1,158,156	5,910,354	4,321,669	1,091,212	5,412,881
death rate resulting from injuries at work		0	0	0	0	0	0	0	0	0
death rate at work with serious consequences	No.	0	0	0	0	0	0	0.46	0	0.37
rate of recordable injuries at work		0.61	1.75	2.36	1.26	0.86	1.18	2.31	1.83	2.22

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.

Total hours worked by non-employees of the ENAV group in 2021 were estimated at 208,970 hours. The categories taken into account for the calculation of the estimated hours were as follows: maintenance and certification services, cleaning services and canteen services, postal services, and transportation services, as they were considered significant according to the exposure to the risk of occupational injury and categories that are consistently present from year to year. It should be noted that in February 2021, an accident episode of a non-employee worker, engaged in a construction site activity for the supply and installation of the new cabin under TWR at Alghero Airport, was recorded by the Group Prevention and Protection structure. The recordable occupational injury rate is 4.8.

The total number of hours worked by non-employees of the ENAV Group in 2022 was estimated at 292,328 hours.

The categories considered in calculating the estimated hours for 2022 were the same as in 2021, with the addition of the following: engineering support, systems engineers, welcome service, and trainees. It should be noted that in 2022, the Group's Prevention and Protection unit recorded two accidents involving two non-employee workers, the first engaged in a construction site activity at Linate Airport and the second in cleaning services. The recordable work injury rate of non-employees is 6.84.

Table 43. Number of hours of outside training in the classroom by category of recipient.

Training hours by category	u.m.	2022	2021	2020
Private Customer	<i>Hours</i>	0	6,664	4,380
Business Customer		17,575	0	0
<b>Total</b>		<b>17,575</b>	<b>6,664</b>	<b>4,380</b>

Table 44. Number of external participants involved in external classroom training by category of recipient.

Number of third parties involved by category	u.m.	2022	2021	2020
Private Customer	<i>No.</i>	0	145	55
Business Customer		295	0	0
<b>Total</b>		<b>295</b>	<b>145</b>	<b>55</b>

Table 45. Results of training for local development carried out in 2022.

Activities carried out	2022		2021		2020	
	Days attended	Attendees	Days attended	Attendees	Days attended	Attendees
Apprenticeship Training	3,132	19	1,818	25	171	42
Teaching visits	41	1,100	0	0	0	0
<b>Total</b>	<b>3,173</b>	<b>1,119</b>	<b>1,818</b>	<b>25</b>	<b>171</b>	<b>42</b>

Note: In 2020 and 2021, educational visits and the intercultural project were suspended due to the health emergency.

Table 46. Annual total remuneration ratio [GRI 2-21]

	2022	2021	2020
Ratio of the annual total remuneration of the person receiving the highest remuneration to the median annual total remuneration of all employees (excluding the aforementioned person)	<b>15.05</b>	<b>12.56</b>	<b>12.38</b>
Ratio of the percentage increase in the annual total remuneration of the person receiving the highest remuneration to the median percentage increase in the annual total remuneration of all employees (excluding the aforementioned person)	<b>4.72</b>	<b>0.57</b>	<b>3.40</b>

Note: The total annual remuneration of employees consists of the Gross Annual Remuneration (RAL) and fringe benefits such as overtime, Performance Bonus, LTI and other allowances. The person receiving the highest remuneration is the CEO of ENAV S.p.A..

Table 47. Percentage of employees who received an evaluation of performances and of professional development [404-3]

		2022			2021			2020		
		Men	Women	Total	Men	Women	Total	Men	Women	Total
Number of employees at 31/12	Senior management	48	3	51	46	4	50	51	5	56
	Middle management	347	63	410	351	61	412	355	62	417
	Office staff	2,911	786	3,697	2,842	767	3,609	2,853	780	3,633
	Blue collar	27	-	27	35	-	35	41	-	41
	<b>Total</b>	<b>3,333</b>	<b>852</b>	<b>4,185</b>	<b>3,274</b>	<b>832</b>	<b>4,106</b>	<b>3,300</b>	<b>847</b>	<b>4,147</b>
Number of employees who received an evaluation	Senior management	46	3	49	43	4	47	46	4	50
	Middle management	69	9	78	-	-	-	-	-	-
	Office staff	1,215	461	1,676	968	404	1,372	955	401	1,356
	Blue collar	-	-	-	-	-	-	-	-	-
	<b>Total</b>	<b>1,330</b>	<b>473</b>	<b>1,803</b>	<b>1,011</b>	<b>408</b>	<b>1,419</b>	<b>1,001</b>	<b>405</b>	<b>1,406</b>
% Total	Senior management	96%	100%	96%	93%	100%	94%	90%	80%	89%
	Middle management	20%	14%	19%	-	-	-	-	-	-
	Office staff	42%	59%	45%	34%	53%	38%	33%	51%	37%
	Blue collar	-	-	-	-	-	-	-	-	-
	<b>Total</b>	<b>40%</b>	<b>56%</b>	<b>43%</b>	<b>31%</b>	<b>49%</b>	<b>35%</b>	<b>30%</b>	<b>48%</b>	<b>34%</b>

## GOVERNANCE

Table 48. Numero totale degli individui all'interno degli organi di governo delle società<sup>36</sup> suddivisi per gruppo di età e genere [GRI 405-1]

Members of the governing bodies (headcount)	2022						2021						2020						
	Men		Women		Total		Men		Women		Total		Men		Women		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 years old	4	21	1	5	5	26	5	25	3	15	8	40	3	15	5	25	8	40	
over 50 years old	8	42	6	32	14	74	8	40	4	20	12	60	9	45	3	15	12	60	
<b>Total</b>	<b>12</b>	<b>63</b>	<b>7</b>	<b>37</b>	<b>19</b>	<b>100</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>	

<sup>36</sup> Board of Directors as at 31.12.2022 of ENAV, Techno Sky, IDS AirNav and D-Flight.

Table 49. Numero totale degli individui all'interno degli organi di controllo delle società<sup>37</sup> suddivisi per gruppo di età e genere [GRI 405-1]

Members of the governing bodies (headcount)	2022						2021						2020						
	Men		Women		Total		Men		Women		Total		Men		Women		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 years old	0	0	0	0	0	0	0	0	2	17	2	17	0	0	3	25	3	25	
over 50 years old	8	67	4	33	12	100	8	67	2	17	10	83	8	67	1	8	9	75	
<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>8</b>	<b>67</b>	<b>4</b>	<b>33</b>	<b>12</b>	<b>100</b>	

Table 50. Country-by-country reporting [GRI 207-4].

Group tax jurisdiction.

Dimensions	u.m.	2022	2021	2020
Number of employees	<i>N</i>	4,185	4,106	4,147
Tax-related data	u.m.	2022	2021	2020
Revenue from sales to third parties	€	952,780,248	845,123,689	780,916,323
Revenue from inter-Company transactions with other tax jurisdictions		270,138	306,418	459,163
Profit/loss before taxes		147,781,945	104,839,979	79,924,758
Tangible assets other than liquid assets and cash equivalents		2,414,606,300	2,368,554,293	2,087,275,743
Income tax defined based on a cash basis		39,532,966	15,350,978	37,388,520
Income tax for companies accrued on profits/losses		44,633,100	29,189,049	22,502,453

<sup>37</sup> Board of Statutory Auditors as at 31.12.2022 of ENAV, Techno Sky, IDS AirNav and D-Flight.

It should be noted that in 2022, the calculation methodology Group Tax Jurisdiction was updated, whereby the value of Pre-tax Profit/Loss is derived from the consolidated. 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.	2022	2021	2020
Number of employees	N	4,185	4,105	4,145
Tax-related data	u.m.	2022	2021	2020
revenue from sales to third parties	€	952,431,844	844,051,944	778,224,700
revenue from inter-Company transactions with other tax jurisdictions		270,138	306,418	459,163
Profit/loss before taxes		147,616,151	104,697,323	79,011,601
tangible assets other than liquid assets and cash equivalents		2,346,675,520	2,306,012,830	2,031,761,584
income tax defined based on a cash basis		39,567,685	15,253,362	37,195,978
income tax for companies accrued on profits/losses		44,631,222	29,130,169	22,226,547

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.	2022	2021	2020
Number of employees	N	0	1	2
Tax-related data	u.m.	2022	2021	2020
revenue from sales to third parties	€	348,404	1,071,745	2,690,778
revenue from inter-Company transactions with other tax jurisdictions		0	0	0
Profit/loss before taxes		3,205	198,662	991,945
tangible assets other than liquid assets and cash equivalents		638,946	685,409	890,751
income tax defined based on a cash basis		34,719	97,616	192,542
income tax for companies accrued on profits/losses		1,878	58,880	275,906

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

Dimensions	u.m.	2022	2021	2020
Number of employees	N	0	0	0
Tax-related data	u.m.	2022	2021	2020
revenue from sales to third parties	€	0	0	845
revenue from inter-Company transactions with other tax jurisdictions		0	0	0
Profit/loss before taxes		-91,488	-56,006	-78,788
tangible assets other than liquid assets and cash equivalents		67,291,834	61,856,054	54,623,408
income tax defined based on a cash basis		0	0	0
income tax for companies accrued on profits/losses		0	0	0

Table 51. Average payment period for suppliers.

Number of days for payment of suppliers (ENAV)	u.m.	2022	2021	2020
Average payment period for suppliers	Days	63	84.5	70.7
Average advance (delay) in relation to contractual conditions		-34	-93.73	51.6
Number of days for payment of suppliers (Techno Sky)	u.m.	2022	2021	2020
Average payment period for suppliers	Days	39	40	40
Average advance (delay) in relation to contractual conditions		-46	40.4	23.4
Number of days for payment of suppliers (ENAV Asia Pacific)	u.m.	2022	2021	2020
Average payment period for suppliers	Days	5	5	5
Average advance (delay) in relation to contractual conditions		0	0	0
Number of days for payment of suppliers (IDS AirNav)	u.m.	2022	2021	2020
Average payment period for suppliers	Days	42	23.6	27.3
Average advance (delay) in relation to contractual conditions		-17	- 22	34.9
Number of days for payment of suppliers (D-Flight)	u.m.	2022	2021	2020
Average payment period for suppliers	Days	90	60	60
Average advance (delay) in relation to contractual conditions		30	40	24

Table 52. Negative social impacts in the supply chain and actions taken. [GRI 414-2]

Negative social impacts in the supply chain and actions taken				
Type of evaluation	Unit of measurement	2022	2021	2020
	No.			
Number of suppliers assessed for social impacts	No.	804	720	727
Number of suppliers identified as having significant actual and potential negative social impacts		0	0	0
Percentage of suppliers identified as having significant actual and potential negative social impacts with which improvements were agreed upon as a result of assessment	%	0,00%	0,00%	0,00%
Percentage of suppliers identified as having significant actual and potential negative social impacts with which relationships were terminated as a result of assessment, and why		0,00%	0,00%	0,00%

Note: The values reported refer to the suppliers of the companies ENAV, Techno Sky and D-Flight, as they are subject to the Code of Public Contracts Legislative Decree 50/2016, through which the evaluation in question is carried out. The remaining companies, on the other hand, are not subject to the aforementioned Code and, therefore, do not carry out this type of evaluation.

Table 53. Governance structure and composition [GRI 2-9]

Structure and composition of ENAV's governance.

2020									
Board of Directors									
First and Last Names	Gender	Executive Director	Independent Director	Duration of term of office of the governing body	Number of other significant assignments and commitments held by each member	Nature of these commitments	Membership of under-represented social groups	Representation of Stakeholders	Skills relevant to the impacts of the organisation
Director 1	FEMALE	NO	YES	3	0	NA	NO	NO	YES
Director 2	MALE	YES	NO	3	1	Chair	NO	NO	YES
Director 3	FEMALE	NO	YES	3	1	Director	NO	NO	YES
Director 4	FEMALE	NO	NO	3	0	NA	NO	NO	YES
Director 5	MALE	NO	YES	3	0	NA	NO	NO	YES
Director 6	MALE	NO	YES	3	0	NA	NO	NO	YES
Director 7	MALE	NO	YES	3	1	Chair of the Board of Statutory Auditors	NO	NO	YES
Director 8	FEMALE	NO	YES	3	2	Director	NO	NO	YES
Director 9	MALE	NO	YES	3	1	Director	NO	NO	YES



2021											
Board of Directors											
First and Last Names	Gender	Executive Director	Independent Director	Duration of term of office of the governing body	Number of other significant assignments and commitments held by each member	Nature of these commitments	Membership of under-represented social groups	Representation of Stakeholders	Competencies relevant to the impacts of the organisation		
Director 1	FEMALE	NO	YES	3	0	NA	NO	NO	YES		
Director 2	MALE	YES	NO	3	0	NA	NO	NO	YES		
Director 3	FEMALE	NO	YES	3	1	Director	NO	NO	YES		
Director 4	FEMALE	NO	NO	3	0	NA	NO	NO	YES		
Director 5	MALE	NO	YES	3	0	NA	NO	NO	YES		
Director 6	MALE	NO	YES	3	0	NA	NO	NO	YES		
Director 7	MALE	NO	YES	3	1	Chair of the Board of Statutory Auditors	NO	NO	YES		
Director 8	FEMALE	NO	YES	3	2	Director	NO	NO	YES		
Director 9	MALE	NO	YES	3	0	NA	NO	NO	YES		

2022											
Board of Directors											
First and Last Names	Gender	Executive Director	Independent Director	Duration of term of office of the governing body	Number of other significant assignments and commitments held by each member	Nature of these commitments	Membership of under-represented social groups	Representation of Stakeholders	Competencies relevant to the impacts of the organisation		
Director 1	Women	NO	YES	3	1	Board Member	NO	NO			
Director 2	Men	YES	NO	3	0	-	NO	NO			
Director 3	Women	NO	YES	3	1	Board Member	NO	NO			
Director 4	Women	NO	NO	3	0	-	NO	NO			
Director 5	Men	NO	YES	3	0	-	NO	NO			
Director 6	Men	NO	YES	3	0	-	NO	NO			
Director 7	Men	NO	YES	3	1	Chair of the Board of Statutory Auditors	NO	NO			
Director 8	Women	NO	YES	3	2	Board Member	NO	NO			
Director 9	Men	NO	YES	3	1	Board Member	NO	NO			

2020 – 2021 – 2022											
Control, Risks and Related Parties Committee											
First and Last Names	Gender	Executive Director	Independent Director	Duration of term of office of the governing body	Number of other significant assignments and commitments held by each member	Nature of these commitments	Membership of under-represented social groups	Representation of Stakeholders	Competencies relevant to the impacts of the organisation		
Director 1	MALE	NO	YES	3	1	Chair of the Board of Statutory Auditors	NO	NO	YES		
Director 2	FEMALE	NO	NO	3	0	NA	NO	NO	YES		
Director 3	MALE	NO	YES	3	0	NA	NO	NO	YES		

2020 – 2021 – 2022									
Remuneration and Appointments Committee									
First and Last Names	Gender	Executive Director	Independent Director	Duration of term of office of the governing body	Number of other significant assignments and commitments held by each member	Nature of these commitments	Membership of under-represented social groups	Representation of Stakeholders	Competencies relevant to the impacts of the organisation
Director 1	MALE	NO	YES	3	0	NA	NO	NO	YES
Director 2	FEMALE	NO	NO	3	0	NA	NO	NO	YES
Director 3	FEMALE	NO	YES	3	1	Chair of the Board of Statutory Auditors	NO	NO	YES

2020 – 2021 – 2022									
Sustainability Committee									
First and Last Names	Gender	Executive Director	Independent Director	Duration of term of office of the governing body	Number of other significant assignments and commitments held by each member	Nature of these commitments	Membership of under-represented social groups	Representation of Stakeholders	Competencies relevant to the impacts of the organisation
Director 1	MALE	NO	YES	3	1	Director	NO	NO	Yes
Director 2	FEMALE	NO	YES	3	1	Director	NO	NO	Yes
Director 3	FEMALE	NO	YES	3	2	Director	NO	NO	YES

Structure and composition of Techno Sky's governance.

2020									
Board of Directors									
First and Last Names	Gender	Executive Director	Independent Director	Duration of term of office of the governing body (years)	Number of other significant assignments and commitments held by each member	Nature of these commitments	Membership of under-represented social groups	Representation of Stakeholders	Competencies relevant to the impacts of the organisation
Director 1	MALE	YES	NO	3			NO	NO	YES
Director 2	FEMALE	NO	NO	3			NO	NO	YES
Director 3	MALE	NO	NO	3			NO	NO	YES

2021									
Board of Directors									
First and Last Names	Gender	Executive Director	Independent Director	Duration of term of office of the governing body (years)	Number of other significant assignments and commitments held by each member	Nature of these commitments	Membership of under-represented social groups	Representation of Stakeholders	Competencies relevant to the impacts of the organisation
Director 1	MALE	YES	NO	3			NO	NO	YES
Director 2	FEMALE	NO	NO	3			NO	NO	YES
Director 3	MALE	NO	NO	3			NO	NO	YES

2022									
Board of Directors									
First and Last Names	Gender	Executive Director	Independent Director	Duration of term of office of the governing body (years)	Number of other significant assignments and commitments held by each member	Nature of these commitments	Membership of under-represented social groups	Representation of Stakeholders	Competencies relevant to the impacts of the organisation
Director 1	Men	YES		3			NO	NO	
Director 2	Women	NO		3			NO	NO	
Director 3	Men	NO		3			NO	NO	

Structure and composition of the governance of IDS AirNav

2020									
Board of Directors									
First and Last Names	Gender	Executive Director	Independent Director	Duration of term of office of the governing body (years)	Number of other significant assignments and commitments held by each member	Nature of these commitments	Membership of under-represented social groups	Representation of Stakeholders	Competencies relevant to the impacts of the organisation
Director 1	MALE	YES	NO	3			NO	NO	YES
Director 2	FEMALE	NO	NO	3			NO	NO	YES
Director 3	MALE	NO	NO	3			NO	NO	YES

2021									
Board of Directors									
First and Last Names	Gender	Executive Director	Independent Director	Duration of term of office of the governing body (years)	Number of other significant assignments and commitments held by each member	Nature of these commitments	Membership of under-represented social groups	Representation of Stakeholders	Competencies relevant to the impacts of the organisation
Director 1	MALE	YES	NO	3			NO	NO	YES
Director 2	FEMALE	NO	NO	3			NO	NO	YES
Director 3	MALE	NO	NO	3			NO	NO	YES

2022									
Board of Directors									
First and Last Names	Gender	Executive Director	Independent Director	Duration of term of office of the governing body (years)	Number of other significant assignments and commitments held by each member	Nature of these commitments	Membership of under-represented social groups	Representation of Stakeholders	Competencies relevant to the impacts of the organisation
Director 1	Men	YES		3			NO	NO	
Director 2	Men	NO		3			NO	NO	
Director 3	Women	NO		3			NO	NO	

Table 54. Compliance with laws and regulations during the reporting period. [GRI 2-27]

Significant instances of non-compliance with laws and regulations in the reporting period				
		2022	2021	2020
Cases for which fines were imposed	no.	0	1	0
Cases for which non-pecuniary penalties were incurred		0	0	0
Fines for non-compliance with laws and regulations that were paid during the reporting period and a breakdown of this total				
		2022	2021	2020
Penalties for non-compliance with laws occurring in the current reporting period	no.	0	1	0
	€	0	146,095	0
Penalties for non-compliance with laws that occurred in previous reporting periods	no.	0	0	0
	€	0	0	0

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

Table 55: Benefits provided to full-time employees that are not provided to temporary or part-time employees [401-2]

		2022	2021	2020
Life insurance		YES	YES	YES
Healthcare		YES	YES	YES
Insurance cover in the event of disability and invalidity		YES	YES	YES
Parental leave		YES	YES	YES
Pension contributions		YES	YES	YES
Shareholding		NO	NO	NO

Notes: Life insurance is only provided for Executives.  
The indicator refers to the ENAV Group as a whole.

## Annex 2 - GRI Content Index and correlation tables

Table: Aspects of Legislative Decree 254/2016, material topics and GRI aspects

Domain of Legislative Decree 254/2016	No.	Material issues	GRI aspect
Company	1	Quality of service	
	2	Responsible supplier management	GRI 414: Supplier Social Assessment
	3	Relations with industry organisations, institutions and associations	GRI 2-28: Membership Associations
	4	Safety	GRI 416: Customer Health and Safety GRI 404: Training and Education
	5	Security	
	6	Technological innovation and digitalisation	
Personnel <sup>38</sup>	7	Adequacy, enhancement and development of human capital	GRI 404: Training and education
	8	Diversity and inclusion	GRI 401: Employment GRI 405: Diversity and equal opportunity GRI 406: Non-discrimination
	9	Corporate welfare	GRI 401: Employment GRI 402: Labour/management relations
	10	Health and Safety in the workplace	GRI 403: Occupational Health and Safety
Anti-Corruption	11	Corporate Governance and Integrity	GRI 205: Anti-corruption
	12	Economic and financial value creation	GRI 201: Economic performance GRI 207: Tax
Environment <sup>39</sup>	13	Energy consumption and climate change	GRI 302: Energy GRI 305: Emissions
	14	Electromagnetic emissions	GRI 413: Local communities

<sup>38</sup> Regarding the "Personnel" aspect, it should be noted that D-Flight data are not separately detailed because the Company has 7 seconded employees hired by ENAV, Techno Sky and IDS AirNav, which are in addition to 3 seconded employees hired by Telespazio S.p.A./Leonardo S.p.A.

<sup>39</sup> Regarding the "Environment" aspect, ENAV Asia Pacific, by virtue of the characteristics of the company (1 office) is not considered relevant for environmental impacts. It should be noted that d-flight workers on secondment operate in the head office of Techno Sky.

Domain of Legislative Decree 254/2016	No.	Material issues	GRI aspect
	15	Waste management	GRI 306: Waste
Human rights <sup>40</sup>	16	Responsible supplier management	GRI 414: Supplier Social Assessment
	17	Diversity and inclusion	GRI 406: Non-discrimination

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<sup>40</sup> As concerns the “Human rights” aspect, the topic is covered transversally within the scope of other material issues.

**Table: GRI Content Index**

Statement of use	<i>Enav S.p.A. has reported in accordance with the GRI Standards for the period 1<sup>st</sup> January 2022 – 31<sup>st</sup> December 2022</i>
GRI 1 used	<i>GRI 1: Foundation 2021</i>
Applicable GRI Sector Standard(s)	<i>Not Applicable</i>

GRI STANDARDS	Disclosure	Reference page	Omission		
			Requirement(s) Omitted	Reason	Explanation
General Disclosure					
GRI 2: General Disclosures	2-1 Organisational Details	6 - 7; 62 <i>ENAV's registered office is in Via Salaria 716, Rome, Italy</i>			
	2-2 Entities included in the organisation's sustainability reporting	7			
	2-3 Reporting period, frequency and contact points	<i>Reporting is annual. For information or comments on this document, please submit a request to <a href="mailto:sostenibilita@enav.it">sostenibilita@enav.it</a></i>			
	2-4 Revision of information	177			
	2-5 External assurance	179			
	2-6 Activities, value chain and other business relationships	8 – 11; 125 - 127			
	2-7 employees	136 - 137			
	2-8 Non-employees	137			
	2-9 Structure and composition of governance	96 – 101; 152 - 155			
	2-10 Appointment and selection of the highest governing body	102			
	2-11 Chair of the highest governing body	The president is not a senior executive of the Society			
	2-12 Role of the highest governing body in impact management control	98 - 101; 103 - 107			

GRI STANDARDS	Disclosure	Reference page	Omission		
			Requirement(s) Omitted	Reason	Explanation
	2-13 Delegation of responsibility for impact management	103 - 106			
	2-14 Role of the highest governance body in sustainability reporting	14 -15; 96 - 98; 103 - 107			
	2-15 Conflicts of interest	107 - 109			
	2-16 Disclosure of criticalities	103 - 113			
	2-17 Collective knowledge of the highest governing body	106 - 109			
	2-18 Performance assessment of the highest governing body	106 - 107			
	2-19 Remuneration regulations	121 - 123			
	2-20 Remuneration determination procedure	121 - 123			
	2-21 Total annual salary ratio	147			
	2-22 Sustainable development strategy statement	4 -5			
	2-23 Policy commitment	108 - 113			
	2-24 Integration of policy commitments	108 - 113			
	2-25 Processes to remedy negative impacts	108 - 113			
	2-26 Mechanisms for requesting clarification and raising concerns	108 - 113			
	2-27 Compliance with laws and regulations	156			
	2-28 Membership in associations	63 - 69			
	2-29 Approach to Stakeholder engagement	58 - 59			
	2-30 Collective bargaining agreements	145			
Material issues					



GRI STANDARDS	Disclosure	Reference page	Omission		
			Requirement(s) Omitted	Reason	Explanation
GRI 3: Material Topics	3-1 Process for determining material topics	175 - 176			
	3-2 List of material topics	175 - 176			
Economic performance					
GRI 3: Material Topics	3-3 Management of material topics	25 – 26; 175 - 176			
GRI 201: Performance economiche 2016	201-1 Directly generated and distributed economic value	26			
Anti-corruption					
GRI 3: Material Topics	3-3 Management of material topics	108 - 113; 175- 176			
GRI 205: Anti-corruption 2016	205-1 Options evaluated for risks related to corruption	<i>In the three-year period 2020-2022, the risks related to corruption were assessed in the context of the risk assessment process in 100% of processes.</i>			
	205-3 Verified episodes of corruption and actions taken	<i>From the analyses and investigations conducted, no acts of corruption (active or passive) were discovered during the 2020-2022 period.</i>			
Tax					
GRI 3: Material Topics	3-3 Management of material topics	114 – 118; 124; 175 - 176			
GRI 207: Taxes 2019	207-1 Approach to taxes	124			
	207-2 Fiscal governance, control and risk management	114 - 118; 124			
	207-3 Involvement of the <i>stakeholders</i> and management of tax concerns	124			
	207-4 Country by country reporting	148 - 150			
Energy					

GRI STANDARDS	Disclosure	Reference page	Omission		
			Requirement(s) Omitted	Reason	Explanation
GRI 3: Material Topics	3-3 Management of material topics	37 - 38; 175- 176			
GRI 302: Energy 2016	302-1 Energy consumed in the organisation	37 – 38; 130			
	302-3 Energy intensity	131			
Emission					
GRI 3: Material Topics	3-3 Management of material topics	29-31; 35-41; 116; 118-120; 175 - 176			
GRI 305: 2016 Emissions	305-1 Direct greenhouse gas (GHG) emissions (Scope 1)	29-31; 35-41; 131			
	305-2 Indirect greenhouse gas (GHG) emissions (Scope 2)	29-31; 35-41; 131			
	305-3 Other indirect greenhouse gas (GHG) emissions (Scope 3)	29-31; 35-41; 132			
	305-4 Intensity of greenhouse gas (GHG) emissions	132			
	305-5 Reduction of GHG emissions	133			
Waste					
GRI 3: Material Topics	3-3 Management of material topics	29 -31; 44; 175 - 176			
GRI 306: 2020 waste	306-1 Waste generation and significant waste-related impacts	44			
	306-2 Management of significant waste-related impacts	44			
	306-3 Waste generated	44; 133			
	306-4 Waste diverted from disposal	44; 133 - 134			
	306-5 Waste directed to disposal	44; 133 - 134			
Employment					
GRI 3: Material Topics	3-3 Management of material topics	71 – 72; 76 – 79; 175 - 176			

GRI STANDARDS	Disclosure	Reference page	Omission		
			Requirement(s) Omitted	Reason	Explanation
GRI 401 Employment 2016	401-1 New hires and turnover	139 - 141			
	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	87 - 90; 155			
Relationships between workers and management					
GRI 3: Material Topics	3-3 Management of material topics	71 – 72; 76 – 79; 93 - 94; 175 - 176			
GRI 402: Relationships between workers and management 2016	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.</i></p> <p><i>More specifically:</i></p> <ul style="list-style-type: none"> <li>- 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;</li> <li>- 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 disclosures are specified according to provisions of law and/or collective contracts and/or union agreements.</li> </ul>			

GRI STANDARDS	Disclosure	Reference page	Omission		
			Requirement(s) Omitted	Reason	Explanation
Occupational health and safety					
GRI 3: Material Topics	3-3 Management of material topics	91 - 92; 175 - 176			
GRI 403: Occupational health and safety 2018	403-1 Health and safety at work management system	91 - 92; 167 - 169			
	403-2 Identification of hazards, risk assessment and surveys on incidents	114 – 118			
	403-3 Occupational medicine services	91 - 92			
	403-4 Participation and consultation of workers and notification concerning occupational health and safety	91 - 92			
	403-5 Worker training concerning occupational health and safety	91 - 92			
	403-6 Promotion of worker health	91 - 92			
	403-7 Prevention and mitigation of the impacts in terms of occupational health and safety in business relationship	91 - 92			
	403-9 Injuries at work	146			
	3-3 Management of material topics	<i>No incidents of discrimination occurred in the ENAV Group in the three-year period 2020-2022.</i>			
Training and instruction					
GRI 3: Material Topics	3-3 Management of material topics	79 - 86; 175 - 176			
GRI 404: Training and instruction 2016	404-1 Average hours of annual training per employee	141 - 144			
	404-2 Programmes for upgrading employee skills and transition assistance programmes	79 - 86			

GRI STANDARDS	Disclosure	Reference page	Omission		
			Requirement(s) Omitted	Reason	Explanation
	404-3 Percentage of employees who received an evaluation of performances and of professional development	148			
Diversity and equal opportunities					
GRI 3: Material Topics	3-3 Management of material topics	73 - 75; 175 - 176			
GRI 405: Diversity and equal opportunities 2016	405-1 Diversity in governing bodies and between employees	138; 148 - 149			
Non-discrimination					
GRI 3: Material Topics	3-3 Management of material topics	73 - 75; 175 - 176			
GRI 406: Non-discrimination 2016	406-1 Episodes of discrimination and corrective measures adopted	<i>No incidents of discrimination occurred in the ENAV Group in the three-year period 2020-2022.</i>			
Local communities					
GRI 3: Material Topics	3-3 Management of material topics	43; 175 - 176			
GRI 413: Local communities 2016	413-2 Activities with significant negative impacts, potential and current, on local communities	43			
Social evaluation of suppliers					
GRI 3: Material Topics	3-3 Management of material topics	125 - 126; 175 - 176			
GRI 414: Social evaluation of suppliers	414-2 Negative social impacts in the supply chain and actions taken	152			
Health and safety of customers					
GRI 3: Material Topics	3-3 Management of material topics	12 – 13; 128 - 129; 175 - 176			
GRI 416: Health and safety of	416-1 Assessment of the impacts on the health and safety by product and service categories	<i>All activities of ENAV and Techno Sky. This indicator does not apply to IDS AirNav and D-Flight as the</i>			

GRI STANDARDS	Disclosure	Reference page	Omission		
			Requirement(s) Omitted	Reason	Explanation
customers 2016		<i>characteristics of the product and services offered by nature do not have an impact on the Health and Safety of customers.</i>			
Security					
GRI 3: Material Topics	3-3 Management of material topics	128 - 129; 175 - 176			
Technological innovation and digitalisation					
GRI 3: Material Topics	3-3 Management of material topics	45 - 48; 175 - 176			
Quality of service					
GRI 3: Material Topics	3-3 Management of material topics	45 - 48; 51 - 56; 128 - 129; 175 - 176			

**Table: TCFD (Task Force on Climate-related Financial Disclosure) recommendations**

Thematic area	TCFD recommendation	Disclosure	Page
<b>Governance</b>	<ul style="list-style-type: none"> <li>Describe the Board of Directors' oversight of climate-related risks and opportunities</li> </ul>	Governance – Role of the Board of Directors in managing impacts	103
	<ul style="list-style-type: none"> <li>Describe the role of management in assessing and managing climate-related risks and opportunities</li> </ul>	Governance – Role of the Board of Directors in managing impacts	103
<b>Strategy</b>	<ul style="list-style-type: none"> <li>Describe the climate-related risks and opportunities that the Company has identified in the short, medium and long term</li> </ul>	Governance – Possible impacts of climate change on core business	118 - 120
	<ul style="list-style-type: none"> <li>Describe the impact of climate-related risks and opportunities on the Company's activities, strategy and financial planning</li> </ul>	Governance – Possible impacts of climate change on core business	118 - 120
	<ul style="list-style-type: none"> <li>Describe the resilience of the Company's strategy, taking into consideration different climate-related scenarios, including a temperature increase scenario of 2° C or less</li> </ul>	Governance – Possible impacts of climate change on core business	118 - 120
<b>Risk management</b>	<ul style="list-style-type: none"> <li>Describe the processes implemented by the organisation to identify and assess climate change risks</li> </ul>	Governance - Managing risks and opportunities, Possible impacts of climate change on business	114 - 120
	<ul style="list-style-type: none"> <li>Describe the organisation's implemented processes for managing climate change risks</li> </ul>	Governance - Managing risks and opportunities, Possible impacts of climate change on business	114 - 120
	<ul style="list-style-type: none"> <li>Describe how processes to identify, assess and manage climate change risks are integrated into the Company's overall risk management</li> </ul>	Governance - Managing risks and opportunities, Possible impacts of climate change on business	114 - 120
<b>Metrics and targets</b>	<ul style="list-style-type: none"> <li>Disclose the metrics used by the Company to assess climate change risks and opportunities in line with its strategy and risk management process</li> </ul>	Planet – The commitment to decarbonisation of the Group's activities Governance – Possible impacts of climate change on core business	32; 118 - 120
	<ul style="list-style-type: none"> <li>Disclose Scope 1, Scope 2 and, where applicable, Scope 3 greenhouse gas (GHG) emissions and related risks</li> </ul>	Planet – The commitment to decarbonisation of the Group's activities	32
	<ul style="list-style-type: none"> <li>Describe the targets used by the Company to manage climate-related risks and opportunities and performance against those targets</li> </ul>	Planet – The commitment to decarbonisation of the Group's activities The 2021-2024 Sustainability Plan	32; 170

## **Annex 3 - Group Management Systems, Certifications and Attestations**

### **ENAV**

#### **ENAV Group Management System:**

- ENAV Quality Management System (197 documents, including procedures, guidelines and operating instructions)
- Techno Sky Quality Management System (107 documents, including procedures, guidelines and operating instructions)
- ENAV Group Occupational Health and Safety Management System (20 documents, including procedures and operating instructions)
- ENAV Management System for the Prevention of Corruption (7 procedures)
- IDS AirNav Quality Management System (24 documents, including procedures and operating instructions)
- ENAV Group Security Management System (42 documents, including rules, 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 and attestations**

- 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 37001:2016 certification for the Anti-corruption 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
- 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 and certificates**

- 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
- 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 V2.0 (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 V2.0 (CMMI-DEV) for the development of products and services that certifies the degree of maturity reached in software development (Maturity level 3)

### **D-Flight certifications:**

- ISO 45001:2018 certification for the Occupational Health and Safety Management System issued by an accredited certification body.

## Annex 4 – 2021-2024 Sustainability Plan

Objectives	KPIs	Targets	Year	Target achieved in 2022
Supplier evaluation against ESG criteria	Percentage of core suppliers involved in the assessment (against ESG criteria) of total ENAV core suppliers	Assessment launch date	2021	77% of core suppliers assessed against ESG criteria
		75%	2022	
		100%	2023	
ESG Rating (As per the LTI 2023 plan)	Rating identification Assessment on rating (Gap analysis + Action Plan)  Improvement of the ESG Rating	Assessment	2021	
		S&P Rating (+30% compared to 2021 score)	2023	
Increase in training delivered to ENAV Group employees on issues that include aspects related to Legislative Decree 231/2001 and the Code of Ethics, Anti-Bribery and Anti-Corruption, Fraud and Whistleblowing.	Percentage of increase in hours of training delivered to employees compared to 2020 (hours delivered by Internal Audit in 2020 = 4 hours 50 minutes). For 2023, ownership of training topics related to Anti Bribery and Anti Corruption and Fraud will be shared by the IA and ICRM units.	+5%	2021	2022 targets exceeded
		+6.5%	2022	
		+7.5%	2023	
Definition of a model for measuring the economic, social and environmental impacts generated by the Company's strategic sustainability initiatives	Development of measurement model	Presentation date	2023	

Objectives	KPIs	Targets	Year	Target achieved in 2022
Monitoring of standards regarding health and safety in the workplace by means of retaining ISO 45001:2018 certification	Retention of ISO 45001:2018 certification.	Certificate renewal	2023	
Anti-corruption management systems (indicator as per the short-term incentive policy and MBO 2021 for AD and Managers with Strategic Responsibilities)	Obtain ISO 37001 certification	Certificate obtained	2021	
	Retention of ISO 37001 certification	Certificate renewal	2023	
Publication of the media policy	Publication of the policy on the company intranet	Publication date	2021	
Drafting of the regulations on harassment and abuse in the workplace	Publication of the regulations on the company intranet	Publication date	2021	

Objectives	KPIs	Targets	Year	Target achieved in 2022
Obtain EASI (Integrated Sustainability Corporate Ecosystem) certification <small>NEW</small>	Obtain certification	Certification date	2023	
Feasibility assessment for the adoption of the ISO 56002 standard for the management of innovation processes in businesses <small>NEW</small>	Elaboration of feasibility study and cost/opportunity assessment	Assessment date	2023	
Feasibility assessment for certification according to UNI/PdR 125:2022 Reference Practice (Gender Equality Policies) <small>NEW</small>	Elaboration of feasibility study and cost/opportunity assessment	Assessment date	2023	
Feasibility assessment for certification according to ISO 30415:2021 (Diversity & Inclusion). <small>NEW</small>	Elaboration of feasibility study and cost/opportunity assessment	Assessment date	2023	

Objectives	KPIs	Targets	Year	Target achieved in 2022
Advanced automation of major control towers by means of a new airport ATM platform (Electronic strip/Radar presentation)	Testing of the system at each airport involved as per the yearly schedule	Testing date	2021 LIN ✓	Test at Rome Ciampino in December 2022
			2021 TV ✓	
			2022 CIA ✓	
			2023 FCO	
			2024 OLB	
Approach sequence optimisation system (Arrival Manager – AMAN)	Testing of systems applied at Malpensa and Fiumicino airports	Testing dates	2022 RM ✓	Implementation in December 2022
			2023 MI	
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	
METAR AUTO' weather automation project (weather observation system with automatic messaging in the event of a contingency)	Testing of "METAR AUTO" automated weather systems at the 23 designated airports	Testing dates	2021 ✓	

Objectives	KPIs	Targets	Year	Target achieved in 2022
Integration of approaches (transfer of radar approaches from certain airports to their respective control centres of reference)	Testing and implementation of Transfers of Verona to Milan, Trieste to Padua, Bari to Brindisi, Lamezia Terme to Rome	Testing dates	2021 ✓	
	Testing and entry into operation of Transfer of Naples to Rome		2022 ✓	Transfer completed on 19/05/2022
	Testing and entry into operation of Transfer of Turin to Milan, Venice to Padua, Florence to Rome		2023	
	Testing and entry into operation of Transfer of Genoa to Milan, Palermo to Rome, Bologna to Padua		2024	
Development of research and innovation activities related to the SDGs	Completion of 3 Enav Group research and innovation projects enabling the use of drones for environmental monitoring and civil infrastructure monitoring.	Date of project closure report	2024	
Research and development of artificial intelligence and machine learning algorithms, to be executed in Performance Computing environments, functional to the Group's core and non-core activities and to sustainability issues	Number of algorithms developed on corporate business issues	Development of 4 algorithms	2024	

Objectives	KPIs	Targets	Year	Target achieved in 2022
Internal Communication Plan on the development of sustainability culture	Number of internal communications projects to be launched over the year	3	2021	
	% growth in entries on Follow me (1,051,578 visits in December 2020)	+20%	2021	
Convey the image of ENAV as an benchmark player in the industry in the fight against climate change and sustainable digital innovation.	Number of followers on the LinkedIn (20,300 followers on ENAV LinkedIn in March 2021)	+10%	2021	
Development of materiality analysis according to the Double Materiality tool <b>NEW</b>	Identification of the new list of relevant topics	Approval date	2024	
GHG Report processing <b>NEW</b>	GHG Report publication	Publication date	2024	
Further boost to external communication on sustainability topics <b>NEW</b>	Making the short film on sustainability topics	Publication date	2023	

Objectives	KPIs	Targets	Year	Target achieved in 2022
Dissemination of sustainability topics to the younger generation through a "Generational Report" <b>NEW</b>	Production of the "Generational Report"	Presentation date	2024	
Integrated corporate performance reporting <b>NEW</b>	Presentation of the Integrated Annual Report template to Top Management	Presentation date	2024	

Objectives	KPIs	Targets	Year	Target achieved in 2022
Definition of the ENAV "Purpose"	Publication of the purpose	Presentation date	2021	
To develop initiatives aimed at promoting the inclusion of all employees, regardless of age, gender, ethnicity, religion, sexual orientation and people living with disabilities	Number of people involved in the pilot project to improve the position of people living with disabilities	20	2021	
To develop further the culture of sustainability by means of increased engagement in the in-country Group organisational units	Engagement in focus on in-country staff	At least 3 focus groups	2021	
	Number of in-country ambassadors identified	10	2021	
Improving the quality of life of employees by means of targeted welfare initiatives	Development of platform to convert performance bonus into welfare instruments	Presentation date	2021	
	Measurement of the work-life balance satisfaction index, including by means of new working arrangements (e.g. agile working)	Analysis presentation date	2022	The results of the measurement were presented on 20/02/2022

Objectives	KPIs	Targets	Year	Target achieved in 2022
Assessment on diversity management, gap analysis and action plan (Indicator as per the short-term incentive policy and MBO 2021 for AD and DIRS)	Preparation of assessment, gap analysis and action plan	Work presentation	2021 ✓	
Operational training (Objectives that fall within the two ESG Sustainability Linked Term Loans, taken out in October 2020)	Hours of operational training (73,000 hours in 2019)	78,000	2021 ✓	
		82,000	2022 ✓	Targets exceeded (> 94,000 hours)
Acquiring new talent with sensitivity to ESG issues <span style="background-color: black; color: white; padding: 2px;">NEW</span>	Construction and validation of a new selection tool to support the assessment of the value framework on ESG issues during the talent acquisition process.	Carrying out the initial selection using the new tool	2023	

Objectives	KPIs	Targets	Year	Target achieved in 2022
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 technical-operational roles	Launch of the outreach project	Launch date	2022 ✓	Several activities commenced in 2022 (more details in the People chapter)
In external selections, the proportion of women in operational roles must be at least 25% (comply or explain)	Minimum participation of the female population	25%	2021 ✓	
In internal assessments aimed at filling new operational positions, the proportion of women must be at least 20% (comply or explain)	Minimum participation of the female population	20%	2021 ✓	
In internal assessments aimed at filling new corporate positions, the proportion of women must be at least 50% (comply or explain)	Minimum participation of the female population	50%	2021 ✓	

Objectives	KPIs	Targets	Year	Target achieved in 2022
Achieve Group Carbon Neutrality (Scope 1 and Scope 2) by reducing emissions and the purchase of carbon credits for the proportion that cannot be reduced (As per the LT plan for the 2020-2022 cycle)	Percentage of reduction of CO <sub>2</sub> emissions per year compared to the total emissions produced in 2019 (38,816 t – market-based) and purchase of carbon credits	-23% CO <sub>2</sub>	2021 ✓	The 2022 emissions offset - for the purpose of achieving Carbon Neutrality - will take place following the approval of this Report
		-70% CO <sub>2</sub> emissions (Scope 1 and 2) + Carbon Neutrality	2022 ✓	
Abatement of electromagnetic energy transmitted by means of optimisation on navigation instruments	Percentage of NDB decommissioning	50% <span style="background-color: black; color: white; padding: 2px;">NEW</span>	2022 ✓	As of 31/12/2022, 50% of NDBs have been discontinued
		90%	2024	
Further development of the "Plastic-Free" project aimed at gradual reduction in single-use plastics at all company offices	Tons of single-use plastics reduced at sites (total ENAV consumption in 2019: 14.2 t)	1.5 t	2021 ✓	
Further development of the project to replace the company car fleet with electric/hybrid/plug-in vehicles	Percentage of company car fleet replaced with electric/hybrid/plug-in vehicles	31%	2021	As of 31/12/2022, 45% of the Company car fleet has been replaced
		45%	2022 ✓	
		73%	2023 ✓	
		80% <span style="background-color: black; color: white; padding: 2px;">NEW</span>	2024	
CO <sub>2</sub> emissions assessment: extension to scope 3 (Indicator as per the short-term incentive policy and MBO 2021 for AD and DIRS)	Presentation of the assessment to top management	Presentation date <span style="background-color: black; color: white; padding: 2px;">NEW</span>	2021 ✓	

Objectives	KPIs	Targets	Year	Target achieved in 2022
Preparation of the Science-based Target (Indicator as per the short-term incentive policy and MBO 2021 for AD and DIRS)	Obtained certification from SBTi	Certification date	2021	
Implementation of energy efficiency projects	Authorisation, testing and entry into force: <ul style="list-style-type: none"> <li>• 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	Plants activated by December 2022 (more details in the Planet chapter)
	Authorisation, testing and entry into force: <ul style="list-style-type: none"> <li>• Prototype use of eco-fuels for emergency GE</li> <li>• Forli, Brancasi, APT Brindisi Photovoltaic Plant ACADEMY</li> <li>• Elimination of 1 boiler (Ciampino ACC)</li> </ul>	100%	2023	
	Authorisation, testing and entry into force: <ul style="list-style-type: none"> <li>• Air conditioning system - Naples BT</li> <li>• Air conditioning system - Bari BT</li> <li>• Air conditioning system - Malpensa BT</li> <li>• Conversion of 40 emergency GEs to eco-fuels</li> <li>• Photovoltaic plant – Ustica </li> <li>• Elimination of 2 boilers (Bari, Malpensa)</li> </ul>	100%	2024	
Objectives	KPIs	Targets	Year	Target achieved in 2022
Preparation of the Science-based Target (Indicator as per the short-term incentive policy and MBO 2021 for AD and DIRS)	Obtained certification from SBTi	Certification date	2021	
Implementation of energy efficiency projects	Authorisation, testing and entry into force: <ul style="list-style-type: none"> <li>• 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	Plants activated by December 2022 (more details in the Planet chapter)
	Authorisation, testing and entry into force: <ul style="list-style-type: none"> <li>• Prototype use of eco-fuels for emergency GE</li> <li>• Forli, Brancasi, APT Brindisi Photovoltaic Plant ACADEMY</li> <li>• Elimination of 1 boiler (Ciampino ACC)</li> </ul>	100%	2023	
	Authorisation, testing and entry into force: <ul style="list-style-type: none"> <li>• Air conditioning system - Naples BT</li> <li>• Air conditioning system - Bari BT</li> <li>• Air conditioning system - Malpensa BT</li> <li>• Conversion of 40 emergency GEs to eco-fuels</li> <li>• Photovoltaic plant – Ustica </li> <li>• Elimination of 2 boilers (Bari, Malpensa)</li> </ul>	100%	2024	

## Annex 5 - Materiality analysis, methodological note and reporting boundary

### Materiality analysis<sup>41</sup>

2022 was characterised by the new approach to materiality, dictated by the Global Reporting Initiative (GRI) 2021 reporting standard, built around the concept of impact<sup>42</sup>. The impacts of the ENAV Group have been defined through an in-depth analysis of the reference context - also drawing on the experience in non-financial reporting and in the Stakeholder management process of the ENAV Group - from the analysis of the Business Plan and the Sustainability Plan as well as from the analysis of the main public reference sources and best practices. This process was also carried out through the involvement of all the organisational structures of the Parent Company, the newly established *ESG* Steering Committee and the main Stakeholders of the ENAV Group. Materials were defined as those topics that reflected the Company's most significant impact on the economy, the environment, people and human rights.

The table below shows the impacts associated with the material issues<sup>43</sup>:

IMPACTS	MATERIAL ISSUES	GRI ASPECT
Maintaining high performance levels related to the quality of air navigation assistance services that enable people's mobility	Quality of service	
Promotion of responsible behaviour and verification of suppliers' compliance with the Group's ethical principles to support ENAV's supply chain resilience	Responsible supplier management	Supplier Social Assessment (414)
Development of synergies with civil aviation bodies, institutions and associations in order to realise a common vision for the harmonisation of the European air traffic management system	Relations with industry organisations, institutions and associations	Membership Associations (2-28)
Maintenance of safety levels of air navigation and air traffic management services through the prevention of possible degradation/failure of the performance of one or more components (People, Procedures, Equipment) of the functional system such as to impact on the provision of Air Navigation Services	Safety	Customer Health and Safety (416) Training and Education (404)
Adoption of appropriate security measures to protect the confidentiality, integrity and availability of managed information data, in order to prevent negative impacts on operations and business	Security	
Actions to disseminate the culture of safety in the workplace, aimed at the prevention of occupational accidents and diseases	Health and Safety in the workplace	Occupational Health and Safety (403)

<sup>41</sup> In compliance with the European common enforcement priorities for 2022 annual financial reports, issued by ESMA on 28 October 2022.

<sup>42</sup> Impacts may be actual or potential, negative or positive, short-term or long-term, intentional or unintentional, reversible or irreversible

<sup>43</sup> With respect to the material topics reported in the CNFS 2021, the material topics 'Sound Governance' and 'Anti-Corruption and Corporate Integrity' were integrated into the material topic 'Corporate Governance and Integrity', the material topic 'Quality of Human Capital' was expanded into 'Adequacy, Enhancement and Development of Human Capital', and the material topic 'Protection and well-being of employees' was changed to 'Corporate Welfare'. In addition, some material topics were reworded as follows: 'Health and safety of employees' (2021) amended to 'Health and Safety in the workplace'; 'Diversity, Inclusion and Equal Opportunities' (2021) amended to 'Diversity and Inclusion'; 'Responsible Supply Chain Management' (2021) amended to 'Responsible Supplier Management'.

IMPACTS	MATERIAL ISSUES	GRI ASPECT
Development of technological and digital solutions for the improvement of air navigation services	Technological innovation and digitalisation	
Creating professional excellence and enhancing and improving the skills of employees through training and professional development plans	Adequacy, enhancement and development of human capital	Training and Education (404)
Creating an inclusive and fair working environment in order to prevent discrimination or abuse in the Company and offer equal opportunities in all evaluation processes	Diversity and inclusion	Employment (401) Diversity and Equal Opportunity (405) Non-discrimination (406)
Supporting work-life balance and promoting corporate welfare initiatives to enhance people's well-being	Corporate welfare	Employment (401) Labor/Management Relations (402)
Ethical business conduct and transparent disclosure of information about the Company's operations in order to prevent situations of non-compliance with applicable legislation of any kind, including anti-corruption legislation	Corporate Governance and Integrity	Anti-corruption (205)
Creation of financial economic value for the benefit of Stakeholders, including through proper tax management	Economic and financial value creation	Economic Performance (201) Tax (207)
Efficiency of energy consumption for the operation of assets and commitment to reducing and offsetting climate gas emissions in order to mitigate the Group's impact on climate change	Energy consumption and climate change	Energy (302) Emissions (305)
Commitment to the optimisation of Communication, Navigation and Surveillance (CNS) equipment - also through participation in international tables at which new standards are defined - in order to promote the containment of electromagnetic emissions generated in the provision of related services	Electromagnetic emissions	Local Communities (413)
Commitment to limiting the impact on ecosystems by favouring the adoption of recovery of waste generated by the Company's activities	Waste management	Waste (306)



## 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 active and passive corruption and bribery. Reporting reflects the principles of the GRI Sustainability Reporting Standards (accuracy, balance, clarity, comparability, completeness, timeliness, verifiability and sustainability context<sup>44</sup>).

The Statement was drawn up in accordance with the GRI Standards published by the Global Reporting Initiatives (GRI Standards - “in accordance with” option), the independent authoritative body which defines models for non-financial reporting. Disclosures and indicators within the text are given in the GRI “Content Index” (Annex 2 “GRI Content Index and Correlation Tables”).

It should be noted that where the Group considered it unnecessary to adopt policies related to several 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.

Any changes to information published in previous reporting years have been appropriately noted in this CNFS.

This CNFS meets 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 “The EU Taxonomy”.

This document was approved by ENAV Board of Directors on 15 March 2023.

In compliance with Legislative Decree 254/2016, this Non-Financial Statement, with the exception of the disclosures relating to the indicators summarised in the table “TCFD (Task Force on Climate-related Financial Disclosure) Recommendations” and the content of the paragraph “The EU Taxonomy”, has been subjected to limited review in accordance with the “International Standard on Assurance Engagements ISAE 3000 (Revised) - Assurance Engagements Other than Audits or Reviews of Historical Financial Information”, issued by the International Auditing and Assurance Standards Board (IAASB), by EY S.p.A. Furthermore, it should be noted that the quantitative indicators that do not refer to any general or topic-specific disclosure of the GRI Standards, reported on the pages indicated in the Content Index, are not subject to limited review by EY S.p.A.

The 2022 Consolidated Non-Financial Statement, as well as those for 2021, 2020, 2019, 2018 and 2017, are available on the Group’s website ([www.enav.it](http://www.enav.it)).

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<sup>44</sup> See the chapter “Stakeholders” and “Annex 5 - Materiality analysis, methodological note and reporting boundary”.

## 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 2022. The frequency of reporting is annual and the reporting period of this document is the same as that of the Annual Financial Report. In addition, to help the reader better compare and contextualise the information herein, the data for the years 2021 and 2020 have been included and appropriately indicated.

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” (Annex 2). In any case, these limitations do not impair the comprehension of the performance and representativeness of the information.

**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, 2022 in accordance with article 4 of the Decree and approved by the Board of Directors on March 15, 2023 (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:
  - Group's management and organization business model, with reference to the management of the matters indicated in the article 3 of the Decree;
  - policies adopted by the Group related to the matters indicated in the article 3 of the Decree, results achieved and related key performance indicators;
  - 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 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., that we have selected based on its 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, 2022 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, March 28, 2023

EY S.p.A.  
Signed by: Riccardo Rossi, Auditor

*This report has been translated into the English language solely for the convenience of international readers.*