



## SUSTAINABILITY POLICY

### The ENAV Group's sustainability model

The ENAV Group believes that to develop sustainability goals and to integrate them in its business strategy is consistent with its mission, its business purpose and the values of its Code of Ethics.

At the ENAV Group we believe that to operate sustainably is to create shared value for stakeholders and to use resources in a way which does not compromise the needs of future generations and which respects people, the environment and society as a whole.

The Group has taken up the challenge of the UN 2030 Agenda for Sustainable Development and understands the urgent nature of the climate crisis. Consequently, it pursues a policy which places sustainability at the heart of its business strategy by basing and focusing its operations on the values of mutuality, ethics and reciprocity to the common benefit of all.

The Group bases its actions on the principles of fairness, transparency, honesty and integrity and therefore it:

- adopts the highest international standards and guidelines in the management of its activities in all the contexts in which it operates;
- ensures that its activities are sustainable by deploying a process-driven governance model across all company departments, oriented towards innovation and the achievement of long-term goals, and also by deploying risk assessment and risk management strategies to prevent or mitigate the relative risks;
- sets goals designed to lay the foundations for a new culture of sustainability among its people, to consolidate sustainability governance and launch ESG projects to build a solid basis for the future ahead;
- has embraced the key principles of social responsibility (Accountability, Transparency, Ethical behaviour, Respect for stakeholder interests, Respect for the rule of law, Respect for international norms of behaviour, Respect for human rights).

The ENAV Group strives constantly to comply with environmental, social and governance regulations. It is aware of both the direct and indirect impact of its activities on the environment and is committed to going beyond mere regulatory compliance, by anticipating and adapting to future environmental and social standards, demands and requirements.

Courtesy translation

---

ENAV S.p.A. 716 , Via Salaria, – Rome 00138

Tel. +39 06 81661 – Fully paid up share capital: €541,744,385.00

VAT No. 02152021008 – Rome Company Register

Tax Identification Number and Chamber of Commerce No. 97016000586 - REA (business registration number) 965162

[www.enav.it](http://www.enav.it)



## **Commitment to ecological transition**

The Group's commitment to the environment and to combatting climate change is based on a strategy designed not only to reduce its CO<sub>2</sub> emissions, but also to study and take action on all those areas of its business which might have a negative impact on the environment and on people's lives.

Consistent with the important role it plays in the European network as a key part of international Air Traffic Management, ENAV is committed to reducing environmental impacts generated by the consumption of resources, the production of waste and other activities considered to have a direct impact, and also to managing the effects of the indirect impacts of its activities by taking the following action to mitigate them:

- *reduction of direct (scope 1) and indirect (scope 2 and 3) emissions*
- *reduction of emissions resulting from air traffic*
- *reduction of electromagnetic emissions*
- *reduction of single-use plastics*

The ENAV Group also employs a system for the measurement, study and management of climate-change related risks in order to be able to take appropriate mitigation and adaptation measures in its activities.

## **Integrity, accountability and transparency**

Integrity, accountability and transparency are the general principles on which the ENAV Group's Code of Ethics and the conduct of its activities are based.

The Group strives to follow these principles in its operations by means of its governance and business conduct models, consistent with national and international conventions and best practices.

In compliance with the United Nations Global Compact principle which states that "Businesses should work against corruption in all its forms, including extortion and bribery" the ENAV Group pursues a commitment to fight corruption in all its forms, both direct and indirect.

Respect for the rule of law is pursued, amongst other things, through constant training of personnel on compulsory rules and regulations in force within the Group.

## **Stakeholder engagement**

At the ENAV Group we are fully aware that stakeholder engagement is fundamental to the creation of value and we have always set ourselves the objective of constantly improving engagement with our stakeholders, whom we consider an integral part of accountable and sustainable business management.

The Group constantly supports its stakeholders by identifying solutions that meet their expectations and create shared and long-term value. The Group uses its stakeholder management activities to update its materiality analysis in order to identify the most important issues (material topics) that significantly reflect the organisation's economic, environmental and social impacts, or influence stakeholder decisions.

Courtesy translation

## Valuing people

People are key in the ENAV Group when it comes planning our business to make it sustainable. We digitise work processes, re-assess workplaces and transform training to make it increasingly “smarter”, both in person and online, and we incentivise group activities as essential factors in developing skills and achieving a better work-life balance for our people.

The Group offers people career growth and development paths based on their type of work. The professional growth of personnel is supported by a series of training programmes that includes projects designed for specific groups of personnel in the organisation, such as new recruits.

The ENAV Group also pursues a policy to continuously protect its workers and spread a culture of health and safety at the workplace. It also shares these principles in its dealings with its partners and suppliers.

## Inclusion, diversity and respect for human rights

The ENAV Group is committed to guaranteeing the inclusion, diversity and protection of the human rights of its people and its communities.

The Group places great importance on its people and makes sure that its personnel management is based on general ethical principles of legality, honesty and accountability and how these are implemented in the organisation, which sees good management, respect, fairness and transparency as the fundamental principles that govern conduct.

The ENAV Group recognises the value of diversity and the uniqueness of its people, which it seeks to enhance by creating an inclusive work environment that encourages collaboration and creativity, in which each individual's potential can be developed to the full.

In its pursuit of these goals, the ENAV Group considers training and communication to be key activities, by promoting a culture in which socio-cultural behaviour changes to eliminate prejudices, customs and practices based on stereotypes of gender, orientation, age, ability and culture.

\* \* \*

ENAV promotes the adoption of this Policy in all Group companies and its communication to all through appropriate communication channels, with a view to further communicating and promoting the Group's culture of sustainability.

With reference to sustainability topics, the Board of Directors of ENAV S.p.A. approves the Group's consolidated non-financial statement pursuant to Legislative Decree No. 254/2016 and its Sustainability Plan, which includes important projects in line with the Group's business strategy.

The Sustainability Committee has advisory and proposal-making duties on sustainability issues in addition to monitoring functions on both ESG reporting and related strategies.

\* \* \*

The ENAV Group has made a formal commitment to the distribution, publication and review of this policy and takes steps to see that it is shared by all company personnel.