

WHISTLEBLOWING FAQ

1. Does the decree on whistleblowing apply to ENAV?

Yes, in continuity with the previous legislation, ENAV falls within the application field of Italian Legislative Decree no. 24/2023 implementing Directive (EU) 2019/1937 on whistleblowing.

2. Is there an authority that guarantees the correctness of whistleblowing systems?

The ANAC (National Anti-Corruption Authority) has the power to apply financial administrative sanctions if it ascertains that no internal reporting channels have been established, that no procedures have been adopted for making and managing reports or that the adoption of such procedures does not comply with the provisions of the whistleblowing decree.

3. Who can report a violation?

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

In addition to the employees of the companies in the Group, internal parties include parties whose employment relationship has not yet begun (e.g. candidates in the selection phase) and interns. The internal parties also include the directors and members of the corporate bodies.

As for external parties, they may include suppliers, consultants, agents, partners, intermediaries, customers or users of the ENAV Group's services, and shareholders.

4. Which cases can be reported by the whistleblower?

Any behaviour, act or omission that harms the public interest or the integrity of the public administration or the private company. The provisions of the Whistleblowing Decree do not apply to disputes, claims or requests related to a personal interest of the reporting person that relate exclusively to their individual work relationships, even with hierarchically superior individuals.

5. Who can be the subject of a whistleblowing report?

Anyone (both natural persons and legal persons).

6. Do trade union representatives have to be involved?

Yes, in the activation phase of the internal reporting channel. However, it is a mere phase of joint examination that does not require the prior formalisation of a trade union agreement.

7. Which channels should be used to make the whistleblowing report?

The internal reporting channels prepared by the company are managed by a specific, autonomous function with trained personnel. The preferred whistleblowing report channel is the IT one, as it guarantees the utmost confidentiality and effectiveness of the whistleblowing.

Additional channels are also available, including the email addresses of the Supervisory Bodies of the Group companies or of the Compliance Function for the Prevention of Corruption. The latter may be used if the reported conduct, acts or omissions have as their object predicate offences pursuant to Article 231 and/or corrupt phenomena.

As an alternative to the above-mentioned channels, the report may also be made "**verbally**", by requesting a direct meeting with the Internal Audit Manager.

8. In what form should the whistleblowing report be submitted?

The report may be submitted both in writing and verbally. Each whistleblowing report is always provided with a notice of receipt within seven days and a response within 90 days from the person in charge of handling the whistleblowing report.

9. Are external whistleblowing channels also available?

Without prejudice to the preference for the internal channel, the whistleblowing decree now provides, also for private sector entities, the possibility of making a report through the external whistleblowing channel prepared by the ANAC, even if only when specific conditions are met. In particular, if the Whistleblower:

- a. has already made an Internal Whistleblowing Report and it has not been "followed up" on;
- b. has "reasonable grounds" to believe that, if he/she were to make the Internal Whistleblowing Report, it would not be effectively followed up on, or that the Report might give rise to the risk of retaliation;
- c. has "reasonable grounds" to believe that the breach may constitute an imminent or obvious danger to the public interest.

It is specified that there has been a "**failure to follow up**" if the activities provided for by the Group Whistleblowing Regulation have not been undertaken (verification of the admissibility of the report, investigation, communication of results).

Moreover, it is important to point out that the "**well-founded reasons**" referred to in the preceding points must be reasonably based on concrete circumstances of which evidence and actually acquirable information can be provided and, therefore, not on simple illusions.

10. What protections are provided for the whistleblower and other persons concerned?

- The identity of the whistleblower and any other information from which such identity can be inferred, directly or indirectly, cannot be revealed, without their express consent;
- any act of retaliation against the whistleblower is to be considered null and void;
- the list of Third Sector entities that provide support measures to whistleblowers such as: information, assistance and advice free of charge is established at the ANAC (the same support will always and in any case also be guaranteed internally by the Internal Audit Body)
- limitations of liability in the event of disclosure of information covered by an obligation of secrecy.

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

- (i) facilitators, i.e. those who assist the Whistleblower during the reporting process and whose assistance must be confidential;
- (ii) other persons connected with the Whistleblowers (e.g. colleagues or family members), including, but not limited to: persons in the same work environment as the whistleblower with whom they are linked by a stable emotional or kinship link up to the fourth degree, work colleagues of the whistleblower who work in the same work environment as the whistleblower and who have a habitual and current relationship with that person.

11. Are anonymous whistleblowing reports allowed?

The ENAV Group accepts both named and anonymous reports, and the IT platform allows both reporting modalities. Clearly, the protections are only applicable to whistleblowers who have revealed (even after the first dialogue) their personal details, which would in any case remain private and confidential.