



# Whistleblowing Policy

*[Approved by the ENAV Board]  
on 17 October 2024*

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## DEFINITIONS

- a) **Code of Ethics:** the Group's Code of Ethics, together with any attachments, as supplemented or amended from time to time.
- b) **Whistleblowing Committee:** the committee whose composition and operating rules are described in para. 4.3.
- c) **Public Disclosure:** the act of placing information about breaches of policy into the public domain, through print or electronic media or other means of distribution capable of reaching a large number of people.
- d) **Italian Legislative Decree 231/2001 or the Decree:** Italian Legislative Decree No. 231 of 8 June 2001, which lays down "*Provisions on the administrative liability of legal persons, companies and associations, including those without legal personality*" and any subsequent amendments and additions.
- e) **Italian Legislative Decree 24/2023 or WB Decree:** Italian Legislative Decree No. 24 of 10 March 2023 on "*Provisions concerning the protection of persons who report breaches of national laws, implementing Directive (EU) No. 2019/1937*".
- f) **ENAV or the Company:** ENAV S.p.A.
- g) **ABCF:** Anti-Corruption Compliance Function, provided for in paragraph 5.3.2 of ISO 37001 and appointed by Senior Management, which has the responsibility and authority to supervise the MSPC, provide advice and guidance to staff on matters of corruption, and report on the performance of the MSPC to senior-level management.
- h) **ENAV Group or the Group:** the ENAV Group, consisting of ENAV and its subsidiaries in Italy and abroad.
- i) **Model 231:** the organisational, managerial, and auditing code of ethics adopted by ENAV and the companies in the Group, pursuant to Italian Legislative Decree 231/2001, together with any attachments, as supplemented or amended from time to time. Model 231 outlines all the measures put in place to limit the risks of criminal activity, including rules and procedures, audits on personnel and processes, training aimed at preventing criminal activity, and setting up an internal control environment.
- j) **Supervisory Body:** the supervisory body of ENAV and the companies in the Group, endowed with autonomous powers of intervention and control to ensure compliance with Italian Legislative Decree 231/2001 and established in accordance with the provisions of the Confindustria Guidelines for the preparation of the organisation, management, and control models.
- k) **Procedures:** the term procedures is to be understood in a broad sense to include all the operational procedures, policies, regulations, guidelines and work instructions in force within the Group.
- l) **Whistleblowing Officer:** reporting to the Internal Audit department, the Whistleblowing Officer sits on the Whistleblowing Committee, as Secretary with responsibility for part of the Complaints management process.
- m) **Whistleblowing Report:** a detailed report, based on precise and corroborating facts made by the persons listed in para. 4.1 through the appropriate channels as indicated in para. 5, relating to the commission, attempted commission or reasonable risk of commission of one of the crimes or predicate offences governed by the WB Decree.
- n) **Internal Whistleblowing Report :** a Whistleblowing Report made through the appropriate internal channels provided by the ENAV Group, as referred to in para. 5.1.
- o) **External Reports:** the Whistleblowing Reports sent to the National Anti-Corruption Authority (ANAC) through the channel indicated in para. 5.2 of this policy.
- p) **Bad faith reports:** Whistleblowing reports made for the sole purpose of harming or otherwise causing damage to ENAV, the Group or a Group company, the Reported Party or third parties.
- q) **Whistleblowers:** any persons who can and do submit a Whistleblowing Report, as better defined in para. 4.1.

- r) **Reported Parties:** persons who are the subject of a Whistleblowing Report, as better defined in para. 4.2.
- s) **MSPC:** Management System for the Prevention of Corruption in accordance with ISO 37001.
- t) **Senior management:** members of the Board of Directors, the Board of Statutory Auditors and the Supervisory Body of the companies of the ENAV Group.
- u) **Policy:** this whistleblowing policy.

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## 1. APPLICABLE REGULATIONS AND PROCEDURES

- EU Directive No. 2019/1937 - Directive on the protection of persons who report breaches of Union law.
- Italian Legislative Decree No. 24 of 10 March 2023 containing the provisions concerning the protection of persons who report breaches of national laws, implementing Directive (EU) No. 2019/1937.
- ANAC Guidelines on the protection of persons who report breaches of Union law and the protection of persons who report breaches of national laws, approved by Resolution No. 311 of 12 July 2023.
- ISO 37002:2021(E) - Guidelines for the establishment, implementation, management, evaluation, maintenance, and improvement of a robust and effective whistleblowing management system within an organisation.
- Italian Legislative Decree No. 165/2001 - General rules on labour law in public administration.
- Italian Legislative Decree No. 231/2001 – Administrative responsibilities of companies and other bodies.
- Italian Penal Code.
- Italian Legislative Decree No. 196/2003, on provisions for the protection of personal data.
- EU Regulation No. 2016/679 - General Data Protection Regulation (GDPR).
- Code of Ethics.
- Model 231.
- Corporate Governance Code (January 2020).
- Confindustria Guidelines for the preparation of the Organisation, Management, and Control Model pursuant to Italian Legislative Decree 231/2001 (June 2021).
- Confindustria - New regulations on whistleblowing - Handbook for private entities
- UNI ISO 37001 – Management systems for the prevention of corruption.
- ISO/IEC 27001 – Standard on how to manage information security.
- ENAV's policies, procedures, guidelines, regulations and operating instructions.

## 2. INTRODUCTION AND PURPOSE

Italian Legislative Decree 24/2023 transposed Directive (EU) 2019/1937 on the protection of persons who report breaches of Union law learned in the workplace (public or private) and which violate the public interest or the integrity of the public administration or the private body. Among other things, the WB Decree has extended the range of disclosable offences, reinforced the safeguards available for whistleblowers and contains more extensive regulations compared to the previous law, in terms of its subjective scope of application, by giving more detailed definitions of the notions of "public party" and "private party".

In particular, art. 2(1) of the WB Decree, in defining "*public sector entities*", now includes in letter p) companies which are under public control (or companies in which one or more public administrations exercise supervisory powers under art. 2359 of the Italian Civil Code), even if they are listed on a public market.

For the purposes of the WB Decree, therefore, ENAV S.p.A. is considered a public sector entity and is one of the parties required to implement the provisions of the WB Decree. On this basis the company has chosen to adapt its whistleblowing system by adopting this policy (which also applies to the Group Companies), in line with the provisions of Italian Legislative Decree 24/2023.

The purpose of the whistleblowing system is to give the ENAV Group awareness of situations of risk or harm, and to address the reported problem as promptly as possible. Whistleblowing helps to identify, prevent and combat the commission of offences and crimes, in order to protect ENAV, the Group and its shareholders from economic harm, to protect their image and reputation, to spread a culture of ethics, legality and transparency within the Group and to strengthen the system of internal controls and risk management.

Whistleblowing is therefore an instrument through which Whistleblowers can disclose to specific individuals or bodies any unlawful or irregular conduct that is relevant under the WB Decree.

By adopting this policy, the senior management of the ENAV Group intends to encourage and facilitate whistleblowing reports across the Group and within each corporate entity, to reduce the risk of crime and other offences, build and strengthen the relationship of trust with stakeholders, promote and develop a corporate culture based on transparency, integrity, sound governance and compliance.

The Policy:

- identifies the parties who can submit Whistleblowing Reports;
- outlines the conduct, events or actions which can be disclosed in Whistleblowing Reports;
- defines the appropriate channels of communication for the transmission, investigation and handling of Whistleblowing Reports;
- identifies the parties involved and defines the general principles and rules that govern the Whistleblowing Reporting management process, including the protection of the Whistleblower and the Reported Party.

This document, prepared by the Internal Audit Department (which is responsible for the management of *whistleblowing* within the Group, as per company policy), requires the contribution of the ABCF, as well as the Chairpersons of the Supervisory Body of each company in the Group. It takes into account the provisions of Italian Legislative Decree 24/2023 as well as the indications provided by ANAC in the relevant guidelines adopted by resolution No. 311 of 12 July 2023.

The Whistleblowing Policy is also an integral part of the 231 Model adopted by each ENAV Group Company.

### **3. OBJECT AND CONTENT OF WHISTLEBLOWING REPORTS**

#### **3.1 VIOLATIONS RELEVANT FOR THE PURPOSES OF THE WB DECREE**

Legislative Decree 24/2023 provides that the object of a whistleblowing report, public disclosure or complaint can include information about violations - including justified suspicions - of national and EU law, which harm the public interest, the integrity of the public administration or of a private entity, committed within the organisation of the entity with whom the complainant has one or more of the qualified legal relationships listed in clause 4.1 below.

The typification of these violations is broad and is listed below:

#### VIOLATIONS OF NATIONAL LAW

- ✓ Criminal offences;
- ✓ Civil offences;
- ✓ Administrative offences;
- ✓ Accounting offences;
- ✓ Unlawful conduct governed by Legislative Decree No. 231/2001;
- ✓ Violations of the 231 Models adopted by each ENAV Group Company.

#### VIOLATIONS OF EUROPEAN UNION LAW

- ✓ Unlawful acts committed in breach of EU law or of national enacting provisions, in relation to the areas indicated by the legislator<sup>1</sup>;
- ✓ Acts or omissions which affect the financial interests of the European Union;
- ✓ Acts or omissions concerning the internal market, which compromise the free movement of goods, persons, services and capital;
- ✓ Acts or behaviours that defeat the object or purpose of the provisions of EU law.

The disclosures may also relate to offences that have not yet been committed but which, based on concrete elements, may be committed within the organisation. These elements may include irregularities or anomalies (indications) which the complainant considers may give rise to one or more of the violations referred to above.

Examples of potential acts or circumstances to report include:

- a person has not complied, is not complying or is likely not to comply with a legal obligation they are subject to, for example in the field of public procurement, financial services, consumer protection, protection of privacy and personal data; or
- the health or safety of an individual has been, is or may be endangered; or
- a corruption practice has occurred or is likely to occur or has occurred; or
- has been committed, is in the process of being committed or a criminal offence may be committed; or
- information proving that a matter covered by any of the above points has been, is being or is likely to be deliberately concealed.

### **3.2 PROHIBITED AND/OR EXCLUDED DISCLOSURES <sup>2</sup>**

The following types of disclosure are prohibited or excluded from the scope of the Whistleblowing Policy (they are archived without further investigation):

- **reports made in "bad faith",** or which are abusive and/or offensive;
- reports with purely defamatory or libellous purposes;
- complaints that only relate to aspects of an individual's private life that have no direct or indirect bearing on the work carried out by the Reported Party within the company.

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<sup>1</sup>Public procurement; financial services, products and markets, prevention of money laundering and the financing of terrorism; product safety and compliance; transport safety; environmental protection; radiation and nuclear safety; safety of food, animal feed and animal health and welfare; public health; consumer protection; privacy and personal data protection and security of networks and IT systems.

<sup>2</sup> The reports listed in this paragraph are archived as described in paragraph 6 relating to the "WHISTLEBLOWING REPORTS MANAGEMENT PROCESS".

- complaints which are discriminatory as they relate to sexual, religious or political orientation, or racial or ethnic origin;
- complaints relating to **remonstrances, requests, retaliation or to the complainant's personal grievances** or issues relating exclusively to their individual workplace relationships or relations with more senior figures within the organisation.
- reports containing information that is clearly unfounded, already public-domain or only obtained through leaks or unreliable rumours (workplace gossip).

Whistleblowing Reports made in bad faith or which are abusive, offensive, defamatory, libellous, or discriminatory may result in **civil and/or criminal action against the Whistleblower and lead to the imposition of sanctions, as indicated in paragraph 7.9 below.**

### 3.3 ADMISSIBILITY AND MINIMUM CONTENT OF WHISTLEBLOWING REPORTS

If the reports fall within the categories provided for in the WB Decree (as indicated in the previous paragraph 3.1), and are therefore **technically "actionable"**, an **admissibility assessment will be undertaken**<sup>3</sup>.

For a complaint to be used profitably, it must contain all the information required to verify its legitimacy. In particular, it must include all the following basic elements:

- **object:** a clear and complete description of the facts detailed in the Whistleblowing Reports, with an indication (if known) of the circumstances of time and place in which the reported facts were allegedly committed or omitted (by way of example only: contract, transaction, location);
- **any other documentation:** details of any documents that may confirm the validity of the reported events, or other information to assist with the gathering of relevant evidence;
- **the reported person, and any other people involved:** personal data and/or any other detail (e.g. role/position in the company) to assist in easily identifying the alleged perpetrator(s) of the reported behaviour, and details of any other person who may know about the reported events and who could give information about the facts in the complaint;
- **the company involved:** the ENAV Group company affected by the Whistleblowing Report.

It is not necessary for the Whistleblower to be certain of the veracity of the facts reported, or the identity of the perpetrator. However, it is necessary that:

- the Whistleblowing Report is substantiated and based on precise and corroborating facts that suggest there is a possibility that an event relevant to the purpose of the report may have occurred;
- the Whistleblower has reasonable grounds - in view of the circumstances and information available to them at the time they made the Whistleblowing Report - to believe that the facts reported are true, or that they have direct or sufficient knowledge of such facts, based on their role in the company.

**In any event, Whistleblowing Reports must always be made impartially and in good faith.**

### 3.4 ANONYMOUS REPORTS

With limited exceptions, the ENAV Group does not accept anonymous complaints, i.e. reports made without any details that would allow the author to be identified.

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<sup>3</sup> See CONFINDUSTRIA: *New regulations on Whistleblowing - Handbook for private entities (October 2023)*

Any anonymous reports received by the company will be stored and kept according to the general rules applicable to record-keeping. However<sup>4</sup>, they will be archived immediately, without further investigation, **except in cases where they fall within the objective scope of Legislative Decree 24/2023** (see para. 3.1) **and are sufficiently substantiated and/or adequately documented, or where they relate to potential offences or irregularities considered particularly serious** (in the context of the ENAV Group's compliance system). The factors considered in assessing the admissibility of anonymous reports include: the credibility of the facts as presented and the possibility of validating the information given about the breach, based on reliable sources (on this point, see the previous paragraph 3.3. - *Admissibility and minimum content of whistleblowing reports*). In such cases, anonymous reports will be treated in the same way as ordinary reports.

As **the complaint has been made anonymously, it is not subject to the provisions of the WB Decree or of this policy**. In such cases, if the complainant (among those listed in para. 4.1.) did not initially give their name and made an anonymous complaint under Legislative Decree 24/2023 that was considered admissible and was not archived, but later reveals their identity or their identity becomes known, the individual will have the benefit of the non-retaliation safeguards provided for in the WB Decree and this policy, (see clause 7.4, last paragraph).

## 4. PERSONS INVOLVED

### 4.1 THE WHISTLEBLOWERS

Whistleblowing Reports can be made either by personnel from one of the Group companies, or by an external person, as identified in the WB Decree.

In addition to the employees of Group companies, internal personnel include:

- shareholders and persons with functions of administration, direction, control, supervision or representation, even if these functions are exercised on an interim or stand-in basis;
- persons whose employment contract has not yet started, in cases where information about a violation was obtained during the recruitment process or at another stage of the pre-contract negotiations, or during the probationary period;
- volunteer workers;
- apprentices, paid and unpaid.

By way of example only, external parties may include:

- shareholders of ENAV Group companies;
- suppliers, consultants, agents, partners and brokers;
- any person working under the supervision and direction of contractors, subcontractors or suppliers;
- persons whose employment contract has already been terminated, if information about the violations was obtained during the term of the contract.

### 4.2 THE REPORTED PARTIES

Whistleblowing Reports may concern Key Personnel, *senior management*, employees, external contractors, non-permanent workers employed by Group companies, trade *partners*, suppliers, consultants, brokers and any other person undertaking relations with the Group; the reports may relate to any type of illegal or irregular conduct of which a person may gain knowledge due to their role.

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<sup>4</sup>ANAC Guidelines – 2.2 Anonymous reports and their treatment



If the reports concern one or more members of the Whistleblowing Committee or other persons involved in managing whistleblowing reports, these persons will be excluded from the process of investigating and handling the report in question.

#### **4.3 WHISTLEBLOWING REPORTS MANAGER: THE WHISTLEBLOWING COMMITTEE**

For the purpose of receiving and managing Whistleblowing Reports, the ENAV Group has specifically set up a committee (the "**Whistleblowing Committee**"), composed of internal members and which, overall, meets the requirements of independence and professionalism necessary to ensure that reports are managed adequately in conformity with the Whistleblowing Decree and this Policy.

Whistleblowing Committee members receive appropriate training on the handling of Whistleblowing Reports, the conduct of internal investigations, and privacy requirements.

The Whistleblowing Committee receives the financial and organisational resources necessary to enable it to carry out the activities provided for in these Regulations correctly.

##### **4.3.1 Members**

The Whistleblowing Committee is composed of the following members of ENAV:

- Internal Audit Manager
- Whistleblowing Officer
- Head of Legal and Corporate Affairs
- Head of Compliance and Risk Management
- Head of People and Corporate Services

The Whistleblowing Officer also acts as Secretary of the Committee.

##### **4.3.2 Objectives and tasks**

The Whistleblowing Committee is responsible for assessing the admissibility of Whistleblowing Reports received, based on the existence of subjective and objective requirements as provided for in Legislative Decree 24/2023 and the criteria set out in this policy, in para. 3.3 - *Admissibility and minimum content of whistleblowing reports*. The committee is also responsible for the management and follow-up of admissible whistleblowing reports, assisted by the relevant company functions (specifically the Internal Audit Department).

##### **4.3.3 Convocation**

The Whistleblowing Committee meets at the request of the Whistleblowing Officer when a Whistleblowing Report is received through the appropriate internal channels.

When the notice of meeting is sent, usually by *email* containing details of the date, time and place of the meeting, the Whistleblowing Committee will be informed of the object of the report and any other information useful in contextualising the complaint. Where possible, the meeting will also be given details of the pre-analysis carried out by the Whistleblowing Officer, assisted by Internal Audit if necessary, following pre-authorisation in writing (see para. 7.3).

The meeting will be called with adequate notice, normally no less than three working days in advance, and the relevant documentation will also be provided. In urgent cases the meeting may be called more quickly.

#### 4.3.4 Meetings

In order for meetings of the Whistleblowing Committee to be valid, the majority of the committee members must be present. Resolutions will be passed with the vote in favour of the majority of the attendees.

Remote attendance at meetings is also possible, using technologies such as videoconferencing or streaming. Other persons, external or internal to the ENAV Group, may be authorised to attend meetings, without the right to vote, if their presence is considered useful to support the Committee's activities. These persons are required to provide written authorisation for the processing of data (see para. 7.3).

#### 4.3.5 Minuting of meetings

The minutes of Committee meetings will be taken by the Whistleblowing Officer, and will contain details of the discussions and the decisions taken.

The minutes are kept by the Whistleblowing Officer on the Group's centralised web platform (Sharepoint). Access is restricted to the Internal Audit Manager and the Whistleblowing Officer.

#### 4.4 OTHER RECIPIENTS OF WHISTLEBLOWING REPORTS

If a Whistleblowing Report concerns (i) the commission, attempted commission, or reasonable risk of the commission of a crime (and/or administrative offence) covered by Legislative Decree 231/2001; and/or (ii) potential or actual breaches of Model 231, the Code of Ethics and/or 231 Group Procedures, by virtue of its leading role in the compliance systems, the Supervisory Body of the Group Company concerned (if present) or the Supervisory Body of ENAV will be promptly informed, through the Whistleblowing Officer, in such a way as to protect the identity of the Whistleblower and of the other parties involved.

In addition, if the Whistleblowing Report relates to attempted, alleged and actual acts of corruption, the FCPC will be promptly informed by the Whistleblowing Officer, in a way that assures protection of the identity of the Whistleblower and of the other parties involved.

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If the report is made to a person other than the Whistleblowing Committee (or to the persons identified above and/or through channels other than those described in the following paragraph 5.1), it must also be sent to the Whistleblowing Committee, **within seven days** of receipt. The Whistleblower, if not anonymous, must also be informed of the transmission at the same time.

If the Whistleblower expressly states that they intend to benefit from the safeguards available to whistleblowers, or if that intention can be deduced from the report, it will be treated as a Whistleblowing Report. If the Whistleblower does not expressly declare their intention to benefit from the safeguards or if that intention cannot be inferred from their report or from conclusive behaviours, the report will be treated as an anonymous report (see para. 3.4).

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With regard to subsidiaries, Whistleblowing Reports are managed centrally based on infragroup agreements, which involve the parent company as an "external entity" and introduce the protections necessary to ensure that the reports for individual subsidiaries are collected and managed separately.

### 5. WHISTLEBLOWING CHANNELS

Whistleblowing Reports can be submitted via the channels described below.

Whistleblowers are strongly encouraged to use the internal reporting channels: external reporting channels may only be used where the conditions for making an External Report or public disclosure are met (see paragraphs 5.2 and 5.3).

## 5.1 INTERNAL REPORTING CHANNELS

### Whistleblowing Channel – The preferred channel

The ENAV Group has set up a Whistleblowing Channel to guarantee the anonymity of the Whistleblower, using computerised communication tools as described in detail below.

The application can be accessed by employees and external parties through a dedicated page on the ENAV website, which can be found at the following *link*: <https://whistleblowing.enav.it/#/>

The Whistleblower can access the application using credentials which are generated automatically and are separate from their personal account. These credentials can also be used to receive messages and requests for clarification from the Whistleblowing Officer.

The app is also used as a confidential communication tool, offering the opportunity for feedback, discussion and support, and is intended to create an understanding of how to recognise the offences, remove doubts and fulfil requests for information. To allow further investigation of the reported events while assuring confidentiality of the user, the app also creates a "dialogue" with the option to send electronic attachments (even after the Whistleblowing Report has been made).

The system sends notifications to the Whistleblower advising them that the Whistleblowing Report has been received; that they may be contacted to obtain further information for the investigation, and asking them to send any other information that they may have, in support of their complaint. The app is also used to notify the Whistleblower that the investigation has been completed. Whistleblowers are required to access the Platform to check the status of their report and receive the notifications.

The information collected is stored electronically on the platform, with defined access profiles, mandatory authentication, and automatic tracking of all operations<sup>5</sup>. The platform also acts as an electronic register of Whistleblowing Reports, for which the key data is readily available.

On accessing the platform, the Whistleblower can decide whether to make a **written or verbal complaint**.

If the Whistleblower wants to make a **verbal complaint**, they will be redirected to the platform where they can record a voice message and answer a short questionnaire.

### Alternative (secondary) internal reporting channel

A Whistleblowing Report can also be made using the following methods, which **should be considered secondary** to the preferred channel (the online platform):

- By post to the company address: **Via Salaria No. 716, 00138 Rome**.

In this case, the Whistleblowing Report must be placed in two sealed envelopes: the first with the Whistleblower's identification data together with a photocopy of an ID document<sup>6</sup>; the second containing the report, in order to separate the Whistleblower's ID data from the Report. Both these envelopes must

<sup>5</sup>Only the operations carried out by the persons receiving the reports. On the contrary, all activities carried out by the whistleblower on the platform are only traceable or accessible by the whistleblower himself.

<sup>6</sup>These data are stored in a secure location with limited access, in compliance with the organisational and physical security measures required under art. 32 of EU Regulation 679/2016 (GDPR) and according to the terms provided for in the Privacy Policy, available at: <https://www.enav.it/privacy>

then be placed in a third sealed envelope, to be marked "*Confidential/For the attention of the ENAV Whistleblowing Committee*" on the outside.

If these formal requirements are not met, the report may be archived without further investigation, unless it is sufficiently substantiated and/or adequately documented and relates to potential offences or irregularities considered to be serious.

## 5.2 EXTERNAL WHISTLEBLOWING

In certain circumstances, the Whistleblower may – in the cases provided for by Legislative Decree 24/2023 (see para. 3.1) – send an External Report to the online reporting platform set up by the National Anti-Corruption Authority (ANAC)<sup>7</sup>. The conditions under which an External Report can be made are the following:

- a) the Whistleblower has already made an Internal Whistleblowing Report and it has not been *followed up*<sup>8</sup>;
- b) the Whistleblower has "*reasonable grounds*"<sup>9</sup> to believe that, if they were to make an Internal Whistleblowing Report, it would not be effectively followed up, or that the Report might give rise to the risk of retaliation;
- c) the Whistleblower has "*reasonable grounds*" to believe that the breach may constitute an imminent or obvious danger to the public interest.

It is important to point out that the "*reasonable grounds*" referred to above must be reasonably based on concrete circumstances for which evidence and information can be provided or obtained. They cannot be based on mere supposition.

More details about the methods of communication, reception and management of Whistleblowing Reports, submitted through the external reporting channel, are available in the relevant section on the ANAC website.

## 5.3 PUBLIC DISCLOSURE

Legislative Decree 24/2023 has introduced a further reporting method - public disclosure - which is only to be used in the situations described below. Public disclosure requires that information about violations – if they refer to the cases provided for by the WB Decree (see para. 3.1.) – can be placed in the public domain through print or electronic media or by any other form of distribution capable of reaching a large number of people.

The circumstances (mandatory, concrete and documentable) in which the use of public disclosure is allowed are the following:

- a) an Internal Whistleblowing Report, to which the ENAV Group has not responded within the set deadlines, resulted in an external report being sent to ANAC which, in turn, did not respond to the whistleblower within a reasonable period of time;
- b) the Whistleblower has already made an External Whistleblowing Report directly to ANAC (in the only cases in which this is allowed), but ANAC did not respond to the Whistleblower in response to the measures planned or adopted to follow up the Whistleblowing Report within a reasonable period;
- c) the Whistleblower has reasonable grounds to believe, on the basis of concrete circumstances and therefore not on mere allegations, that the breach may pose an imminent or obvious danger to the public interest;

<sup>7</sup> <https://www.anticorruzione.it/-/whistleblowing>

<sup>8</sup>A "*failure to follow up*" has occurred, if even a single activity out of those listed in the following paragraph has been omitted (verification of admissibility, investigation, communication of outcome).

<sup>9</sup>Any conflicts of interest, destruction of evidence, or previous acts of retaliation will be considered "*reasonable grounds*".

- d) the Whistleblower has reasonable grounds to believe that an External Report would carry a risk of retaliation or would not be effectively followed up.

#### 5.4 REPORT TO A JUDICIAL AUTHORITY

Finally, the WB Decree, as with the previous law, allows protected persons to take action through legal channels in order to report unlawful conduct of which they have received knowledge within their working environment, in relation to one of the situations covered by the law (see para. 3.1).

### 6. WHISTLEBLOWING REPORTS MANAGEMENT PROCESS

ENAV guarantees the systematic, accurate, transparent, impartial, objective and timely management of Whistleblowing Reports, and the documentability and traceability of the entire process.

The whistleblowing management process is based on the principles of trust, impartiality and protection of the Whistleblower, and consists of the following steps:

- a) receipt and checking ("*triage*") of the eligibility and admissibility of the report;
- b) management of the Whistleblowing Reports through investigation;
- c) conclusion of the case and communication of the results.

In managing Whistleblowing Reports, the Whistleblowing Committee is assisted by the Internal Audit Department of ENAV, at all times assuring the anonymity of the Whistleblower with whom it works to carry out the following activities, except where the whistleblowing report relates to the Internal Audit Department itself. ENAV's Internal Audit Department works for the benefit of the other Group Companies under intra-group agreements.

If the violations or alleged violations concern processes at risk of 231 offences and/or violations of the Company Code of Ethics, these activities will be carried out in coordination with the Supervisory Body of the Group Company concerned (where present), or with the Supervisory Body of ENAV. The Supervisory Board will also be informed of the outcomes of the management process, consulted during the investigation and also when deciding on the corrective measures to be taken.

Likewise, if the Whistleblowing Report is relevant to potential acts of corruption (committed, attempted or alleged) or to violations of or deficiencies in the anti-corruption system, the Whistleblowing Committee will also provide adequate information to the ABCF and report to the relevant Supervisory Bodies as necessary.

If the reported conduct concerns a member of the Whistleblowing Committee, the Whistleblower may forward the Whistleblowing Report directly to the Supervisory Body of the Group Company concerned (where present), or to the Supervisory Body of ENAV, by ordinary mail sent to the Company's address: Via Salaria n. 716, 00138 Roma. In this case, the Whistleblowing Report must be placed in two sealed envelopes: the first containing the Whistleblower's identification data together with a photocopy of an ID document; the second containing the report, in order to separate the Whistleblower's ID data from the Report. Both these envelopes must then be placed in a third sealed envelope, to be marked "Confidential /For the attention of the Supervisory Body" on the outside.

In addition, if the Whistleblowing Report concerns a member of the Key Personnel of a Group Company, the Whistleblowing Committee (see para. 4.3.1), having pre-investigated the reported events, will then inform the chairmen of the ENAV Risks, Control and Related Parties Committee, the Board of Statutory Auditors and the Supervisory Body, in a way that ensures the anonymity of the Whistleblower. In these cases, the chairmen of these bodies will assist the Whistleblowing Committee in their subsequent activity of investigating the

Whistleblowing Report, in order to provide a higher level of objectivity, professionalism and independence during the procedure. If the Whistleblowing Report relates to one or more of these persons, they will be excluded from the reporting process and the subsequent investigation activity.

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In general, where the management of the Whistleblowing Report requires the involvement of other company functions, the Whistleblowing Officer will arrange this, subject to written authorisation to process the data (see para. 7.3) or otherwise assuring the anonymity of the Whistleblower, the Reported Party and the other parties involved in the Whistleblowing Report (e.g. by anonymised communication) and provided that the persons to be involved are not in any way connected to the Report.

## 6.1 RECEIPT AND VERIFICATION OF THE ADMISSIBILITY OF WHISTLEBLOWING REPORTS

On receipt of a Whistleblowing Report, the Whistleblowing Officer will:

- accept the report and log it on the system with an identifier or code, to ensure traceability and correct archiving of the documentation also in the subsequent phases;
- if necessary and appropriate, carry out a preliminary investigation and gather information to be submitted to the WB Committee for examination;
- send the Whistleblower confirmation of receipt of the Whistleblowing Report **within 7 working days**. It should be noted that this feedback does not imply any evaluation of the content of the report but is solely aimed at informing the whistleblower of safe receipt;
- convenes the Whistleblowing Committee, which:
  - ✓ carries out a preliminary check on the eligibility and admissibility of the report in accordance with the provisions of paragraph 3.3.
  - ✓ decides whether to proceed with the investigation or whether to file the report without further activity;
- take minutes of the meeting called to track the decisions taken (both where there is a full investigation, or in cases where the report is archived); this will be sent to the committee members for record-keeping and information purposes.

In support of the WB Committee, and to assure that a standard, uniform methodology is followed, the company uses a classification system with two-digit notation to rank the reports in terms of reliability of source, and trustworthiness of the information received<sup>10</sup>. The approach set out below is based on the NATO system, which has been suitably adapted (in terms of complexity and applicability), to the history of past ENAV reports (number, known or anonymous sources, subject of the reports):

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<sup>10</sup>In general, the system is loosely based on the criteria for classifying the reliability of the information and its sources, as used in the NATO system (*Standards for Evaluating Source Reliability and Information Credibility in Intelligence Production - NATO Assessment and Communication of Uncertainty in Intelligence to Support Decision-Making*).

			RATING OF INFORMATION SOURCE		
			A	B	X
			Authenticity, reliability and competence of the source confirmed	There are doubts about the reliability or adequacy of the source	The source is anonymous
RATING OF INFORMATION	1	Extremely detailed information whose accuracy is not in doubt	A1	B2	X1
	2	Information that is credible and/or consistent with other information already held	A2	B2	X2
	3	There is no basis for assessing the validity of the information	A3	B3	X3

ENAV will investigate all reports classified A or B; reports X1 and X2 can be investigated by the WB Committee under the conditions set out in paragraph 3.4.

The X3 classified reports are archived immediately without further investigation.

## 6.2 INVESTIGATION OF A WHISTLEBLOWING REPORT

Having verified the necessary prerequisites, the Whistleblowing Committee, assisted by Internal Audit, will conduct a full investigation of the report, with all the related checks and assessments, in order to assess its relevance and validity.

The internal investigation is conducted in confidence and impartially, to preserve the confidentiality of the Whistleblower, the Reported Party, and of the content of the report.

During these activities, the Whistleblowing Committee, assisted by Internal Audit, may (i) request further information and/or documentation from the Whistleblower; (ii) contact the competent company bodies to acquire information and documents; (iii) make use of the support of external professionals, to provide specialist expertise and ensure impartiality and independence during the assessment process.

The investigations must not interfere, directly or indirectly, with any judicial investigation, and it is necessary to cooperate with the prosecuting authorities.

The Whistleblowing Committee, assisted by the Whistleblowing Officer, will send the Whistleblower feedback on the activities carried out, their progress, on the actions planned or taken by the Company to follow up on the Whistleblowing Report and on the possible outcome of the investigations. This will be done within a reasonable timeframe defined on a case-by-case basis, based on the characteristics of the report in question, the complexity of the investigations to be carried out, and the time available. This period may not in any case exceed **three (3) months** from the date of receipt of the Whistleblowing Reports or, if no notice has been sent to the Whistleblower, three (3) months after the expiry of the period of seven (7) days from the receipt of the Whistleblowing Report<sup>11</sup>.

Without affecting this deadline, replies and progress reports may be provided earlier. On completion of the investigations, the Whistleblower will be promptly notified of the final outcome<sup>12</sup>.

<sup>11</sup>The response period may be extended in certain specific cases (for example, due to the nature or complexity of the subject of the complaint).

<sup>12</sup>See ANAC - Guidelines on the protection of persons who report breaches of Union law and the protection of persons who report breaches of national laws of 12/07/2023

### 6.3 CONCLUSION OF THE CASE AND COMMUNICATION OF THE OUTCOME

At the end of the investigation, the Whistleblowing Committee, assisted by Internal Audit, will prepare a written report containing the results of the investigations, the recommendations considered and any protective measures and/or actions suggested to fill any organisational or control gaps. The report in question was drawn up in accordance with paragraph 7.2 (Confidentiality and Privacy).

For Whistleblowing Reports which are **justified** (in whole or in part), the report will be sent to the CEO and to the Chairmen of the Board of Directors, the Control and Risk Committee and Related Parties, the Board of Statutory Auditors and – where the Report concerns processes at risk of 231 crimes and/or violations of the Company Code of Ethics – the Supervisory Body of the parent company and/or the competent subsidiaries.

The recommendations and corrective actions will be monitored by Internal Audit, with the support (where appropriate), of the Group Companies' Supervisory Board and the FCPC.

On conclusion of the investigations and the above-mentioned activities, the Whistleblowing Committee, with the support of the Internal Audit Body, will inform the Whistleblower of the outcome or status of the investigation.

### 6.4 REPORTING

Every six months, the Whistleblowing Committee, with the support of Internal Audit, prepares a summary report of all the Whistleblowing Reports received, indicating whether they are justified or not and giving brief details of the results of the investigations.

The report is then forwarded to:

- Control, Risks and Related Parties Committee and the Board of Directors of ENAV.
- Board of Statutory Auditors of ENAV and – for Whistleblowing Reports under their respective jurisdiction – of the Group Companies.
- Supervisory Body of Group Companies, in respect of the Whistleblowing Reports for which they are responsible.
- FCPC of ENAV, for Whistleblowing Reports concerning issues related to corruption.

## 7. GENERAL PRINCIPLES AND PROTECTIONS

The proper management of the whistleblowing process helps to promote a culture of ethics, transparency and legality within the ENAV Group. This can only be achieved if whistleblowers have the appropriate reporting channels available to them, and are secure in the knowledge that they will not be subject to any retaliation by colleagues or superiors, and that their Whistleblowing Report will not be ignored.

In addition, the technological system and its management process fall within the scope of the guarantees provided by the information security protection system (which is ISO 27001 certified). The following principles are also guaranteed: i) segregation of duties, ii) transparency and traceability of operations, and iii) management of line processes and controls at the various levels, as well as the highest levels of information classification and related protection measures.

The principles and protections guaranteed by the ENAV Group are detailed below.

### 7.1 TRACEABILITY AND ARCHIVING

The information and documentation pertaining to each Whistleblowing Report will be stored confidentially by the Whistleblowing Officer, for the time necessary to complete the investigation activities. It will not be stored for longer than the maximum time permitted under the laws applicable to whistleblowing.



For more information about the timeframe for retaining documentation produced in connection with whistleblowing reports, see the data processing policy available on the whistleblowing portal.

## **7.2 CONFIDENTIALITY AND PRIVACY**

The ENAV Group guarantees the confidentiality of the Whistleblowing Report, its contents and the identity of the Whistleblower.

The identities of the Whistleblower, and of the other persons involved with the Whistleblowing Report in various capacities, are protected at every stage of the whistleblowing procedure. Therefore, the above information cannot be disclosed to anyone who is not directly involved in the assessment or investigation process. All those who receive or are involved in the management of Whistleblowing Reports (including external consultants) are required to treat the information as confidential.

This protection also applies to the Company's senior management, who may not start investigations or request information that would allow them to trace the identity of the Whistleblower. Accordingly, if the Whistleblowing Report is sent to other departments, bodies or third parties for investigation, the Supervisory Board and the ABCF will only forward the content of the Whistleblowing Report itself, erasing all references that could lead directly or indirectly to the identity of the Whistleblower. Where necessary for the management of Whistleblowing Reports, the Whistleblowing Committee may involve other persons, subject to written authorisation to process the data (see para. 7.3) and provided that such persons are not in any way connected to the Report.

The identity of the Whistleblower may only be revealed when:

- disciplinary action has been taken, based in whole or in part on the Whistleblowing Report, knowledge of the Whistleblower's identity is indispensable for the defence of the Reported Party, and there is the express consent of the Whistleblower to the disclosure of their identity. Without this consent, the Report cannot be used for the purposes of disciplinary proceedings;
- there may be criminal liability for defamatory or libellous content; in this case ENAV has to the right carry out the necessary investigations against the Whistleblower and to take the measures deemed appropriate;
- the anonymity is not legally enforceable, and the Whistleblower's identity must be made known for the purposes of carrying out the investigations, or is required by the judicial authorities in connection with investigations (criminal, tax or administrative investigations, inspections by regulatory bodies).

In accordance with the WB Decree, a Whistleblowing Report<sup>13</sup> is exempt from the access provided for in Articles 22 et seq. of Law No. 241 of 7 August 1990 and Articles 5 et seq. of Legislative Decree No. 33 of 14 March 2013. With regard to limits on the exercise of rights under the GDPR in connection with a Whistleblowing Report, see paragraph 7.3.

## **7.3 PROCESSING OF PERSONAL DATA**

The personal data of the Whistleblowers, the Reported Parties and all the other people involved in the Whistleblowing process, are processed in compliance with the current legislation on the protection of personal data. In particular, ENAV guarantees that personal data will be processed in compliance with the

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<sup>13</sup>More specifically, they are exempt from the access provided for in articles 22 et seq. of Law No. 241 of 7 August 1990 and articles 5 et seq. of Legislative Decree No. 33 of 14 March 2013: the Whistleblowing Report, the attached documentation, the investigation file and any other document from which the identity of the Whistleblower could be deduced.

parties' fundamental rights and freedoms, and with respect for the dignity/honour of the data subjects, with particular reference to privacy and data security. All the information processed for the purposes of this document must also comply with the provisions of the Security Management System. In particular, it should be noted in this context that:

- the privacy policy is available on the whistleblowing portal, which is an integral and substantial part of this document. The privacy policy specifies the purposes and methods of the processing of personal data, identifies the Data Controller and the person in charge of processing personal data, the internal data processors, the categories of data and the offices to which the reported data can be sent in connection with the Whistleblowing Reporting process, the data conservation periods, and the rights of the Whistleblower in relation to their personal data;
- the whistleblowing process allows the processing of personal data only when the data are strictly necessary and relevant to the purposes for which they were collected. Whistleblowing Reports considered not relevant for the purposes of this procedure will be archived and not processed further;
- appropriate technical and organisational measures will be put in place to ensure the security of personal data, in accordance with current legislation; in particular, all data residing on the whistleblowing report information systems is encrypted;
- all the persons involved in the management of Whistleblowing Reports have been appointed in writing as authorised to process, in accordance with Article 2-*quaterdecies* of Legislative Decree No. 196 of 30 June 2003 as amended ("**Privacy Code**").

In the context of a Whistleblowing Report, the Reported Party (the alleged perpetrator of the offence) may be subject to limitations (delays) or preclusions (non-acceptance by Controllers) with regard to the exercise of their rights as provided for in articles 15-22 GDPR, with reference to their personal data processed by ENAV or by another Group company. This is in accordance with article 2-*undecies* of the Privacy Code and with the data protection policies of ENAV and its Group Companies. These limitations apply in cases where the exercise of such rights may result in actual and specific harm to the anonymity of the Whistleblower or of persons treated as such, and/or where it may prejudice the carrying out of investigations or the exercise of a right in court by the Company. The Reported Party may still exercise their rights by requesting the intervention of the Italian Data Protection Authority, as provided for in art. 160 of the Privacy Code.

#### **7.4 PROTECTION OF THE WHISTLEBLOWER**

The ENAV Group intends to strengthen the relationship of trust between the Company and its stakeholders. For this reason, ENAV protects the Whistleblower (in good faith) against any retaliatory, damaging, discriminatory or otherwise unfair conduct, threatened or actual, direct or indirect (without prejudice to any other form of protection provided by law) that may arise as a result of the Whistleblowing Report and which occurs during the whistleblowing process or after its conclusion. The Whistleblowing Report may not be prejudicial to the continuation of an employment contract.

Therefore, a retaliatory or discriminatory dismissal, transfer or change of role, or any other retaliatory or discriminatory measure taken against the whistleblower, including but not limited to the following, will be considered null and void:

- a) suspension or equivalent measures;
- b) demotion or failure to promote;
- c) a cut in pay;
- d) a change in working hours;
- e) a suspension of training;
- f) negative assessments or references;
- g) the imposition or administration of unjustified disciplinary measures;
- h) coercion, intimidation, harassment or ostracism;

- i) discrimination, unfair or disadvantageous treatment;
- j) the failure to convert a fixed-term employment contract into a permanent employment contract, where the employee had legitimate expectations of being offered permanent employment;
- k) non-renewal or early termination of a fixed-term employment contract;
- l) damage, including harm to a person's reputation, particularly on social media, or financial losses, including loss of financial opportunity and loss of income;
- m) the inclusion on any *black list*, based on a formal or informal sectoral or industrial agreement, which may make it impossible for the person to find employment in that sector or industry in the future;
- n) the termination of a contract for goods or services;
- o) the cancellation of a licence or permit;
- p) being subjected to psychiatric or medical examination.

Retaliation also includes a demand to achieve results which are impossible to reach within the indicated times and conditions; a deliberately negative performance appraisal; an unjustified revocation of duties; an unjustified assignment of duties which are then given to another person; the repeated refusal of requests (for holidays or leave); the unjustified suspension of patents, licences or similar.

These protective measures also apply when:

- 1) at the time of the Whistleblowing Report or the report to the judicial or accounting authorities, or at the time of the Public Disclosure, the Whistleblower has reasonable grounds to believe that the information about the reported breaches is true, and falls within the objective scope of this policy;
- 2) an External Whistleblowing Report has been made, where permitted by law;
- 3) the Whistleblowing Report has been the subject of a Public Disclosure, where permitted by law.

The adoption of discriminatory measures against the Whistleblower may be reported to ANAC, for measures within its remit. Attempted or threatened retaliation may also be reported, as long as it is supported by evidence from which it can be inferred that the threat or attempt at retaliation is real.

Even if the facts reported prove to be unfounded and/or inconsistent based on the assessments and investigations carried out, any Whistleblower who has made the Whistleblowing Report in good faith will not be prosecuted.

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As mentioned above, protection from retaliation also applies to anonymous whistleblowers who report cases under the WB Decree, when they subsequently reveal their identity or it otherwise becomes known.

## 7.5 PROTECTION OF OTHER PERSONS INVOLVED

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

- (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, 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;

(iii) legal entities<sup>14</sup> linked to the Whistleblower or to the persons referred to in (i) or (ii) above.

## 7.6 REVERSAL OF THE BURDEN OF PROOF

The legislator has provided for a reversal of the burden of proof, by establishing that where the Whistleblower is shown to have made a report, complaint, or a public disclosure pursuant to Legislative Decree 24/23 and has suffered retaliation as a result, the burden of proof shifts to the person who carried out the alleged retaliation. It is the latter, therefore, who must then demonstrate that the alleged retaliation is in no way connected to the whistleblowing report, complaint or public disclosure. This applies both in judicial or administrative proceedings and in out-of-court disputes. Even in the event of a claim for compensation to the judicial authority, the person is only required to show that they have made a report, complaint or public disclosure and have suffered harm, which is automatically assumed to derive from the report, complaint or public disclosure.

It should be noted that not everyone who has protection against retaliation can benefit from the reversal of the burden of proof: the law excludes from this benefit the **persons indicated in para. 7.5 - Protection of Other Persons Involved**.

## 7.7 LIMITATIONS OF LIABILITY FOR PERSONS MAKING A WHISTLEBLOWING REPORT, COMPLAINT OR PUBLIC DISCLOSURE

The protections for whistleblowers (in good faith) as recognised by the WB Decree also include limitations of liability relating to the disclosure or circulation of certain categories of information, such as:

- Disclosure and use of professional secrecy (art. 326 of the Penal Code);
- Disclosure of professional secrets (art. 622 of the Penal Code);
- Disclosure of scientific and industrial secrets (art. 623 of the Penal Code);
- Breach of duty of loyalty and allegiance (art. 2105 of the Civil Code)

These limitations operate on the basis of two conditions, in the absence of which there would be consequences in terms of criminal, civil and administrative responsibility; in particular, the conditions are met where:

- ✓ at the time of disclosure or circulation, there were reasonable grounds to believe that the information is necessary in order for the breach to be discovered;
- ✓ the report, public disclosure or complaint was made in accordance with the conditions provided for by Legislative Decree 24/2023 in order to benefit from protection against retaliation.

## 7.8 PROTECTION OF THE REPORTED PARTY

In order to prevent any abuse of whistleblowing and to prevent slander, defamation, discrimination, retaliation or other disadvantages and/or the disclosure of sensitive personal data of the Reported Party, which could imply harm to their reputation, pending the ascertainment of responsibility the Reported Party may not be disciplined in any way on the basis of the contents of the Whistleblowing Report, without objective evidence and without the facts being investigated.

Without prejudice to the obligation to maintain the anonymity of the Whistleblower during internal and external whistleblowing processes, the Reported Party may be interviewed, or, at their request, consulted through a paper-based procedure involving the collection of written observations and documents.

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<sup>14</sup>Legislative Decree 24/2023; art. 3, paragraph 2 (d): "entities owned by the whistleblower or by the person who has made a complaint to the judicial or accounting authorities or who has made a disclosure or for whom the same persons work, as well as to the entities operating in the same work environment"

## 7.9 DISCIPLINARY SANCTIONS

ENAV considers the following persons **to be liable** for disciplinary sanctions:

- any Whistleblower who makes, with malicious intent or gross negligence, Whistleblowing Reports that prove to be groundless or to have been made in "bad faith";
- a corporate entity that has taken discriminatory or retaliatory measures against the Whistleblower or persons treated as such under the WB Decree;
- anyone who obstructs or attempts to obstruct the filing of a Whistleblowing Report;
- the person responsible for checking, in the event that checking and investigation activities are not carried out;
- anyone who does not adhere to the general principles of protection, with particular reference to the anonymity of the Whistleblower;
- following the outcome of the checks carried out by ENAV, any Reported Party found to have committed unlawful or irregular acts, or activities not in compliance with the Code of Ethics, 231 Model, the MSPC or the system of corporate Procedures, also in accordance with the provisions of the company disciplinary system as set out in the collective labour agreement.

In particular, the disciplinary system adopted by the ENAV Group Companies is applied to these persons, including the disciplinary system provided for by the 231 Model of each company.

Lastly, if the outcome of the investigations carried out as a result of the Whistleblowing Report reveals evidence that an offence has been carried out, the Company may file a complaint through the courts, and avail itself of other legal remedies and measures such as dismissal, termination of contract or sanctions. Similarly, if the results of the investigation reveal unlawful conduct by a third party (e.g. a supplier), the company may, without prejudice to any further powers provided for by law and by contract, suspend the third party or remove it from the company books.

Finally, ANAC has responsibility for ascertaining whether the actual or alleged retaliation, communicated to the same Authority by the persons involved, is a result of the whistleblowing report, complaint or public disclosure. If the Authority finds that actions, measures, behaviours or omissions by public or private entities were retaliatory, even if they were only attempted or threatened, such actions will be null and void. An **administrative penalty** of between 10,000 and 50,000 euros will be imposed.

## 8. COMMUNICATION AND PUBLICATION

This policy is sent to all interested parties (i.e. the Whistleblowers) by appropriate means, including email, either by the Whistleblowing Committee or by the department or office requesting the assistance of a person external to the ENAV Group to whom this document will be communicated.

The Whistleblowing Policy is also posted and clearly visible in the workplace and on the company *intranet*. It can also be accessed by any person who has a legal relationship with the company in one of the forms listed above, even if they do not work at the company's offices. The policy is also published in the relevant section of the ENAV website.

