ESG Stakeholder Engagement Policy

Text approved by the Board of Directors of ENAV S.p.A. on September 23, 2025

Summary

Summary 2
INTRODUCTION AND PURPOSES 3
Application areas 4
ORGANISATIONAL MODEL 4
THE GROUP'S STAKEHOLDERS ENGAGEMENT PROCESS 4
Stakeholder mapping 4
Stakeholder engagement methods 6
Stakeholder interaction 7
Monitoring of activities and results 7
PRESENTATION OF RESULTS 8

INTRODUCTION AND PURPOSES

The ENAV Group (hereinafter also "the Group") plays a strategic role in the management of air navigation services at national and international level. Its activities, which include air traffic control and airspace planning, radio-assistance navigation measurement and control services, training and meteorological services, have a direct impact on people's mobility, territorial competitiveness, safety and environmental sustainability of the aviation sector.
As a key player in a highly complex and responsible context, the company recognises the importance of building and maintaining solid, transparent and long-lasting relationships with all the internal and external stakeholders, that is all those people who influence or are influenced by its decisions and activities.

In a constantly global scenario, characterised by increasingly significant environmental, social and regulatory challenges, structured and transparent stakeholders engagement on ESG (Environment, Social e Governance) issues is an essential lever for ensuring the resilience, sustainability and accountability of the Group's operations. At the same time, ESG-related dialogue with stakeholders provides a concrete opportunity for the Group to gather different perspectives, anticipate risks, identify emerging needs and create shared solutions.

Through this ESG Stakeholder Engagement Policy (hereinafter also "Stakeholder Engagement Policy"), the ENAV Group aims to formalize and reinforce a commitment that is already an integral part of its corporate culture, by providing structure and consistency to engagement practices that have been time-honoured. This commitment is part of a dynamic context, characterised by growing attention from regulators and international bodies towards effective engagements methods, already promoted by standards that inspire the company, such as the AA1000 Stakeholder Engagement Standard, and aligned with the regulatory framework outlined by instruments such as the Corporate Sustainability Reporting Directive (CSRD) and the Corporate Sustainability Due Diligence Directive (CSDDD), which encourage companies to systematically integrate stakeholder expectations into their governance models.

The Stakeholder Engagement Policy purpose is to define the guidelines, the organisational model, commitments and ESG-related strategies through which the Group intends to inform, consult and engage its stakeholders, in order to integrate their expectations and requests into strategic and operational decisions, contributing to the preservation of the Group's reputation and enhancing its brand awareness, knowing that only through open and constructive dialogue can shared and sustainable value be generated over time.

The document provides tools to ensure a systemic and consistent approach to stakeholder engagement across all relevant phases of corporate activities, in order to:

- establish criteria and guidelines for identifying and classifying the stakeholder categories most significant to the company;
- formalize consistent and structured engagement approaches, based on stakeholders' strategic relevance and the degree of influence they exert on the organisation's operations;
- identify, for each stakeholder category, the most efficient objectives, engagement strategies and interaction methods to build relationship based on mutual trust, collaboration and continuous improvement;
- gather stakeholder needs and expectations to incorporate them in the double materiality analysis and fulfil due diligence obligations;
- support the prevention and informed management of environmental, social and governance (ESG) risks through active stakeholders' engagement and contribution ;
- promote an organisational culture oriented toward transparent and proactive sharing of knowledge, resources and ideas, as a key driver for the company's growth through the development of innovative opportunities.

Application areas

This Policy applies to ENAV and, within the scope of its management and coordination activities, to its Subsidiaries, which are therefore required to acknowledge, adopt, and ensure its proper internal dissemination, in order to guarantee full compliance with its provisions.

ORGANISATIONAL MODEL

This policy defines the Group's ESG stakeholder engagement process shared with the relevant internal structures, to ensure a debate on the approaches identified and the expected outcomes.
The document is submitted to the attention of Chief Executive Officer and the relevant Committees in order to share the defined approaches and ensure consistency with the company's strategic direction.

The Stakeholder Engagement Policy is approved by the Board of Directors of ENAV.

The principles and guidelines outlined in this document must be progressively adopted and updated over time, in line with the evolving internal and external context in which the Group operates and approved by the Board of Directors of ENAV.

Each corporate structure is responsible for implementing stakeholder engagement activities related to its area of competence, with the support of the Sustainability Structure, which coordinates the process and carries out the initiatives under its responsibility.

THE GROUP'S STAKEHOLDERS ENGAGEMENT PROCESS

In order to give concrete implementation to the commitments outlined in this Policy, the Group has adopted a structured and shared process for identifying, analysing and engaging with its stakeholders. This approach enables the development of transparent, ongoing relationships based on the creation of mutual value.

The Group promotes accessible, appropriate and safe engagement for stakeholders, identifying and removing potential barriers to the engagement of those in vulnerable positions.

The process is structured into the following phases:

- Stakeholder mapping;
- Stakeholder engagement methods;
- Stakeholder interaction;
- Monitoring of activities and outcomes.

Stakeholder mapping

Stakeholder mapping activities are aimed at identifying and analysing stakeholders who are involved and/or impacted by the Group's ESG-related activities, with the purpose of obtaining a clear up-to-date overview of existing relationships, in order to define engagement priorities. The Sustainability Structure coordinates the mapping process and provides methodological support to the Group's structures directly responsible for stakeholder engagement.

Stakeholders are analysed based on the following drivers:

- Business relevance – assesses the level of impact and connection of the stakeholder with the Group's business activities and the context in which it operates:
    - Very high: the relationship with the stakeholder is crucial for business development;
    - High: the relationship with the stakeholder is significant for business development;
    - Medium: the relationship with the stakeholder has a limited impact on the business;
    - Low: the relationship with the stakeholder does not have a significant impact on the business.

- Quality of the relationship – considers the level of trust, transparency, dialogue and reciprocity:
    - Very high: excellent, mutually beneficial relationship;
    - High: constructive and well-established relationship, with room for further development;
    - Medium: consolidated relationship that requires strengthening/improvement;
    - Low: weak or poorly structured relationships.

- Type of relationship – defines the nature of the relationship between the stakeholder and the company and the role that the stakeholder plays in it. A single stakeholder may fall under multiple relationship types. The classification includes:
    - Interdependence: a mutual relationship between the company and groups or individuals it depends on to operate effectively, and who, in turn, are influenced by the organisation's strategies and actions;
    - Influence: the ability of groups or individuals to affect the company's strategic or operational decisions, shaping its direction, priorities and actions;
    - Development: contribution to the company's growth through the sharing of knowledge, resources, ideas or relationships useful for identifying and realizing new innovative opportunities;
    - Pressure: the ability to significantly influence public perception and the social legitimacy of the organisation.

The main stakeholders categories, both internal and external, at national and international levels, identified by the ENAV Group and involved in ESG stakeholder engagement activities, include:

- People in the group and Top management;
- Airport operators;
- Carriers;
- Financial community;
- Organisations and Institutions.

Additional stakeholder categories are involved, when appropriate, in engagement activities depending on the ESG topics addressed on specific needs. The updated list of all stakeholders is reported annually in the "Consolidated Sustainability Statement".

These categories are periodically reviewed and, if necessary, integrated and/or updated in line with changes in the internal and external context in which the Group operates.

Stakeholder engagement methods

Based on the results of the stakeholder mapping, the Group defines the most appropriate engagement strategies for each stakeholder type (internal and external, local and international):

Engagement strategy		Potential interaction methods
Inform	One-way communication to stakeholders	Group's Intranet and Internet portal Social media channels Media relations activities Conferences/events/webinars Sustainability Reporting Newsletter
Consult	First level of two-way communication to collect stakeholderperspectives and needs.	Discussion tables Consultations on specific issues Dedicated reporting channel Support and service channels Dedicated survey Roadshow
Engage	Second level of two-way communication to foster stakeholder collaboration	Regular meetings Focus groups on specific topics Joint Training sessions One-to-one meetings Direct contact via e-mail/phone Multistakeholder forum
Co-create	Interactive process for co-design shared initiatives	Working tables Coordination meetings Thematic meetings Cooperation and partnership agreements

In order to ensure proper oversight of the expectations of the stakeholder most relevant to the Group and to define engagement priorities, ESG stakeholder engagement activities focus on stakeholders with medium to very high relevance. In line with the level of relevance and the nature of the relationship, the engagement strategy allows for the adoption of targeted approaches, tailored to the identified needs, as outlined below:

Type of relationship	Strategic target	Relevance		
		Medium	High	Very high
Interdependence*	Maximize mutual benefits and opportunities and minimize and/or mitigate potential risks		Inform Consult Involve	Inform Consult Involve Co-create

Influence	Anticipate stakeholder needs, trends, requirements, etc.	Inform	Inform Consult	Inform Consult Involve
Development	Identify growth and business opportunities	Inform Involve Co-create	Inform Involve Co-create	Involve Co-create
Pressure	Assess stakeholder needs to understand the causes of potential issues	Inform Consult	Inform Consult	Inform Consult Involve

* *Due to the characteristics of this type of relationship, stakeholders are not classified under the medium relevance category*

The ESG stakeholder engagement strategies, which apply to all the Group operations, are carried out by the relevant corporate structures, each within its area of competence.

Stakeholder interaction

ESG-related Engagement activities are carried out throughout the year by the relevant corporate structures, under the overall coordination of the Sustainability structure, in accordance with this Policy. The Group is committed to ensuring the availability of clear and comprehensive information and highest transparency regarding objectives, timelines and interaction methods.

With a view to continuous stakeholders listening (internal and external, local and international), the ENAV Group also makes available a dedicated communication channel through a specific email address sostenibilita@enav.it, to collect reports, feedback and proposals to ESG topics and the impacts generated by corporate activities, in addition to the whistleblowing channel, available through a dedicated section on the company website, to receive requests for information, suggestions and various types of instances. These channels guarantee privacy and the protection of the reporting party.

The contributions collected through engagement activities are systematically documented and support the identification of potential improvement actions, as well as the integration of stakeholder instances into corporate decision-making processes.

Monitoring of activities and results

The ENAV Group monitors ESG stakeholder engagement activities and carries out periodic evaluations of the effectiveness of the strategies adopted, with the aim of highlighting the results achieved. Based on these results, the company is committed to implementing, where necessary, improvement actions aimed at strengthening dialogue and interaction with its stakeholders. Monitoring ensures that the commitments undertaken are respected over time, helping to build a solid, transparent and trust-based relationship.
The evidence collected through the monitoring and results analysis process also contributes to identifying impacts, risks and opportunities relevant to the double materiality analysis, as well as serving as a key element

for the periodic update of the Sustainability Plan and the preparation of the annual Consolidated Sustainability Statement, drafted in accordance with recognized international standards.

The results of the engagement activities are periodically shared with the relevant structures and illustrated to the Sustainability Committee in order to provide an overview of stakeholder relations and identify potential areas for improvement.
The Chief Executive Officer is responsible for implementing the Policy and ensures an organizational structure that supports the achievement of its goals.

PRESENTATION OF RESULTS

The Group recognizes the importance of maintaining a constant, open and transparent dialogue with all stakeholders, both directly and indirectly involved, and the internal and external sharing of the results achieved through the engagement process.

The Group is committed to communicating the results of stakeholder engagement within its annual Consolidated Sustainability Statement, while ensuring the highest confidentiality in the use of the information collected. Furthermore, all ESG-related information is made available to stakeholders on the company's website: enav.it. Depending on the specific engagement methods adopted, additional communication tools may also be considered, in order to enhance the value of the insights gathered and foster collaboration.

In the spirit of transparency and collaboration, this Policy is published on the ENAV Group’s institutional website and made available to all stakeholders.