



ENAV GROUP DIVERSITY, EQUITY AND INCLUSION POLICY

Introduction

With this policy the ENAV Group is committed to encouraging the adoption and support of Diversity, Equity and Inclusion (DEI) policies, with the aim of guaranteeing equal rights and opportunities for all people, regardless of differences in gender, age, political orientation, religion, nationality, ethnicity, language, disability, or different social, geographical or educational-professional backgrounds.

The ENAV Group adopts the management system in accordance with the UNI/PdR 125:2022, reference guideline for Gender Equality Certification, committing to obtain and maintain the certification while striving for continuous improvement in the areas relevant to gender equality.

The driver behind an organisation's development is represented by the value and the centrality given to its human resources and the intention of this policy is to set out the approach that the Group adopts to Diversity, Equity and Inclusion, in order to create a working environment in which everyone behaves in a non-discriminatory manner, with the aim of recognising and leveraging DEI as a crucial element for an organisation committed to increase innovation and improving its effectiveness, sustainability and reputation.

This policy represents a step towards achieving the Sustainable Development Goals of the 2030 Agenda, with a particular reference to Goal 5 on gender equality, Goal 8 on decent work and economic growth and Goal 10 on reduced inequalities.

The policy is based on national and international DEI principles and values, including the Sodalitas Foundation "Charter for Equal Opportunities and Equality at Work", the UN Global LGBTI Standards of Conduct, the UN Women and UN Global Compact - Women's Empowerment Principles and the United Nations Equal Pay International Coalition (EPIC), as well as the principles of international standard ISO 30415:2021 "Human Resource Management – Diversity and Inclusion". The policy was developed in accordance with the Guidelines drawn up by the D&I Observatory of the UN Global Compact Network Italy (2023), in partnership with the ILO (International Labour Organisation) and AIDP (Italian Association of Personnel Management).

This policy applies to all Group companies and covers all areas of the employment relationship recruitment, remuneration policies, promotion, conduct at work, disciplinary proceedings, etc.; this is a dynamic document that evolves over time, as it adopts an intersectional approach to Diversity, considering the interrelations that may exist among the observed social dimensions, and engaging in dialogue with the social and professional changes affecting work communities. It involves and holds accountable all individuals present in the work environment, including those who are only occasionally involved (employees, fixed term contracts, interns, customers, suppliers, etc.) and gives them responsibility for behaving in such a way as not to undermine anyone's personal dignity.

The ENAV Group is committed to developing initiatives aimed at identifying, analysing and managing any form of discrimination, through the use of cognitive tools (such as periodic surveys or focus groups on specific targets) and the integration of its internal procedures, as well as making adequate resources available for the development of activities to support DEI.

Principles

The DEI Policy is based on the following principles:

1. Non-discrimination. All ENAV Group employees are to be considered exclusively in relation to their professional skills and expertise. Any form of direct and indirect discrimination concerning political opinions, religion, nationality, ethnicity, language, disability, gender, age, and different social, geographical or educational-professional backgrounds is therefore prohibited, as are all forms of discrimination on the grounds of personal characteristics such as beliefs, sexual orientation, enrolment in Trade Unions with their associated activities and all forms of social discrimination. Mobbing or sexual harassment is not tolerated either.

2. Equal opportunities and equal dignity. Diversity is a value that must be acknowledged in the ENAV Group and equal treatment, and opportunities must be assured for any type of diversity. Furthermore, personal circumstances arising from the balance between private and professional life (pregnancy, maternity, paternity, part-time, flexible working, etc.) may not constitute conditions for discrimination.

3. Work-life balance. The ENAV Group is committed to launching fresh initiatives to support the balance between private and working life (agile working, flexible working hours, solidarity leave, planning of activities compatible with balancing family and personal life etc.), in order to acquaint itself with its employees' actual needs and to foster respect of and care for a person in any situation in which they may find themselves during their working life, with particular reference to employees with parental and caregiving responsibilities.

4. Creation of an inclusive working environment. The ENAV Group undertakes to implement initiatives, adopt practices and provide services for employees, customers or suppliers. Everyone must have the opportunity of taking part in corporate processes without any form of implicit or explicit barrier based on unit, function, country of origin, gender, religion, culture, personal beliefs, viewpoints, disabilities, age or any other form of diversity, thus creating an environment that encourages the expression of each person's individual and "unique" potential and uses this potential as a strategic lever for the attainment of the organisational objectives, promoting intergenerational and cross-company exchange.

5. Commitment to achieving gender equality. The ENAV Group pursues gender equality in the composition of its workforce, remuneration policies, language and institutional representation: following the principles and objectives outlined in the Guidelines for Gender Equality Certification, in accordance with the reference standard UNI PdR 125/2022, the ENAV Group has set up a "Gender Equality Steering Committee", established by Senior Management, to pursue the effective adoption and continuous application of the Diversity, Equity and Inclusion Policy. The Steering Committee, composed by top management, adopts

its own operating regulations and draws up the Strategic Plan: the formal document in which the organisation defines the targets to be achieved, establishes resources, responsibilities, methods and monitoring frequencies, with the ultimate goal of committing to the promotion of equality and balance between people of all genders at all levels of the organisation, supporting the career advancement for women as the underrepresented gender, and promoting a culture free from prejudice and bias in the selection, evaluation or performance management and career advancement processes, also including specific mentoring and skills development projects; lastly, incorporating gender pay gap control mechanisms.

ENAV Group commitments

Within a framework that values diversity and promotes inclusion, the company, with the aim of improving employee well-being and corporate productivity, adopts the provisions of this policy and reaffirms its commitment to:

- to actively cooperate, including its social partners, in putting the above principles into actual practice;
- to make all staff members, regardless of gender aware of the DEI themes by means of campaigns that inform and explore the topics covered by this policy;
- to continue the dialogue with all internal stakeholders through listening, information sharing, consultation and orientation so that the culture of diversity becomes part of the Group's culture and the existing differences are enhanced in accordance with established principles;
- to promote measures, including organisational measures, to remove any obstacles that may exist to achieve full inclusion and appreciation of diversity;
- to promote equal gender representation among speakers at round tables, events, conferences or other specific events, including scientific events;
- to promote the use of a language that is sensitive and respectful of diversity in internal and external communications;
- to support initiatives chosen by the competent Group's offices and the Equal Opportunities and Sustainability Commission, aimed at promoting a culture of inclusion and respect for people, also including special training sessions;
- to translate all the initiatives into "practical actions" aimed at supporting equal opportunities within the Group, promoting work-life balance and family-friendly services;
- to identify and carry out specific measures that, with a view to redressing the balance in any situations of disparity that are ascertained, restore fairness and equal treatment for affected individuals;
- define and implement measures to increase awareness of the values conveyed in this policy and sensitivity to these values;
- to check corporate rules, processes and practices for conformity to the contents of this policy and the Code of Ethics;
- to review and amend the policy as necessary in order to ensure that it always takes a suitable approach to DEI.

Executives and Middle Managers are responsible for implementing DEI policies and for promptly dealing with any conduct that comes to their attention which breaches the provisions of the policy. For this reason, the ENAV Group integrates its personnel assessment system (“Performance Management”) with DEI targets, giving specific targets to Top and Middle Management to be assessed for; at the same time, it invests in the development of leadership skills, defined as the ability to develop and innovate the company’s resource.

In drawing up this policy, the ENAV Group intends to continue the process of cultural and organisational change that, with the support of strategies for raising awareness on DEI issues and policies, daily achieves respect and promotion of diversity, equity and inclusion with the goal of creating a working environment able to attract people with different cultures, outlooks and experiences and developing and retaining the best talents.