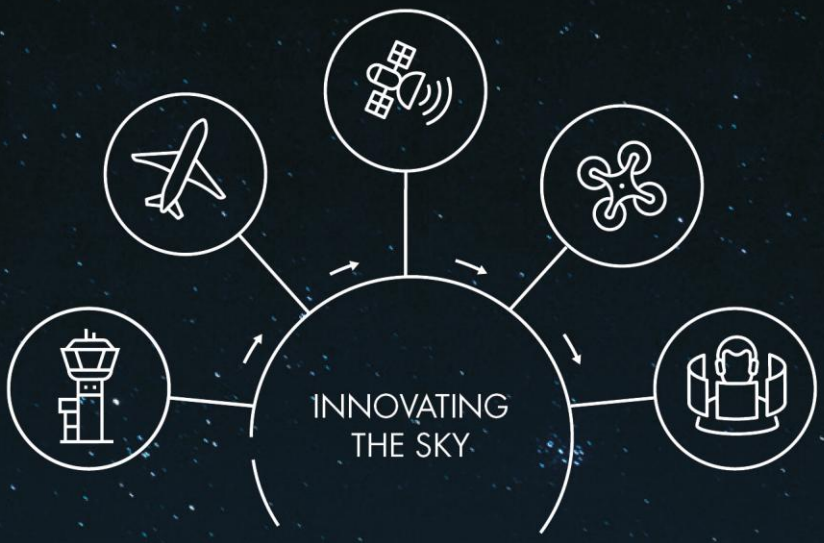
ANTI-BRIBERY POLICY



Approved by ENAV's Governing Body at its meeting of 12th November 2026

ANTI-BRIBERY POLICY

The ENAV Group recognizes that bribery fuels illegal markets, distorts competition, imposes an extremely high economic and social cost on society, and alters the mechanisms of competition between businesses and individuals by favouring some over others regardless of their actual entrepreneurial and professional merits. Bribery damages the economy, cultural and social development, and public trust in institutions and businesses, thereby undermining democratic and ethical values.

Accordingly, the ENAV Group considers it essential to conduct its domestic and international business with loyalty, fairness, transparency, honesty and integrity, in order to protect its reputation, the expectations of interested parties, its business associates, and the work of its personnel.

The ENAV Group adopts a governance model based on integrity, bribery risk management and the promotion of a robust anti-bribery culture. In this context, the ENAV Group adopts this Anti-Bribery Policy to define the systematic framework of values, principles and rules designed to mitigate and address bribery risks, with the following objectives:

- to prohibit all forms of bribery and, without exception, to prevent and address bribery or attempted bribery in all its possible forms, whether active or passive, public or private, direct or indirect;
- to ensure, in the conduct of business and corporate activities, compliance with applicable internal and external statutory, regulatory and voluntary requirements, and with national and international good practices on anti-bribery;
- to ensure, in relation to the activities carried out and the internal and external context in which the ENAV Group operates, the ongoing identification and assessment of bribery risks, with a view to adopting and implementing effective and proportionate mitigation measures to manage those risks;
- to identify, disclose, assess and manage actual, potential or perceived conflicts of interest that may affect the objectivity of decision-making processes or facilitate bribery;
- to pursue, while ensuring the availability of the necessary resources, the continual improvement of the Anti-Bribery Management System, business processes, and technical and organizational anti-bribery measures, also taking into account changes in the internal and external context;
- to ensure, through training, information and communication processes, that personnel and business associates are made aware of the ENAV Group's commitment to combating bribery and of their role within the Anti-Bribery Management System;
- to promote awareness among personnel and business associates of the activities and initiatives undertaken by the ENAV Group to establish, implement, maintain, review and improve the Anti-Bribery Management System;
- to promote and strengthen a culture of integrity and anti-bribery at all levels of the organization, encouraging ethical, informed and responsible conduct;
- to ensure that business associates are subject to appropriate due diligence processes proportionate to the level of risk.

In order to ensure the utmost transparency of its business processes and reduce the risk of bribery as far as possible, ENAV has appointed the Anti-Bribery Function (ABF).

The Head of the ABF is assigned the responsibility and authority to:

- oversee the design and implementation by the Company of the Anti-Bribery Management System;
- provide advice and guidance to personnel and interested parties on the Anti-Bribery Management System and on all matters relating to bribery;
- ensure that the Anti-Bribery Management System adopted by ENAV conforms to the requirements of ISO 37001;
- report on the performance of the Anti-Bribery Management System to the Governing Body, the Control and Risk, Sustainability and Related Parties Committee (CCRSPC), and Top Management;
- assess and verify on a continual basis that the Anti-Bribery Management System is effectively implemented and is adequate to prevent and address the bribery risks to which the Company may be exposed.

The Anti-Bribery Function operates with appropriate independence, status, professional competence and direct access to the Governing Body and Top Management, in order to ensure the effective operation of the Anti-Bribery Management System and contribute to the promotion of a culture of integrity throughout the Group.

All recipients of this Anti-Bribery Policy are required to report any attempted, suspected or actual bribery of which they become aware. The ENAV Group ensures that:

- no person will suffer retaliation of any kind for making a report in good faith or for refusing to engage in unlawful conduct, even where such refusal results in adverse consequences for the Group's business;
- all reports and events that may give rise to a reasonable suspicion of bribery will be subject to a prompt, transparent, independent and fair assessment conducted in accordance with internal company rules and, where necessary, with the support of independent professionals.

This Anti-Bribery Policy applies to ENAV and, within the framework of the direction and coordination activities exercised by ENAV, to its Subsidiaries, which are therefore required to acknowledge and adopt it and ensure its appropriate implementation and dissemination, so as to enable full compliance with it.

The Subsidiaries shall adopt all appropriate resolutions and measures necessary to implement this Policy within their respective organizations.

ENAV and the Subsidiaries undertake, to the extent practicable, to encourage and promote the adoption of anti-bribery controls similar to those set out in this Anti-Bribery Policy by companies in which they hold an interest, even where they do not exercise control and/or dominant influence over those companies.

Any violation of this Anti-Bribery Policy by ENAV Group employees may result in the relevant Group Company taking disciplinary action in accordance with the disciplinary system provided for under the applicable National Collective Labour Agreement.

Any violation by business associates of the principles or provisions of this Anti-Bribery Policy may result in the business relationship not being established or in the termination of the relevant contractual relationship.

By adopting an Anti-Bribery Management System conforming to ISO 37001 as a means of achieving and continually improving the identified strategic objectives, Top Management formally commits to communicating, publishing and periodically reviewing this Anti-Bribery Policy, and promotes awareness and shared understanding of it among all ENAV Group personnel and all those who, in any capacity, contribute to the achievement of the Group's business objectives.