

# **ENAV GROUP**

## **2018 SUSTAINABILITY REPORT**

**Consolidated disclosure of non-financial information  
pursuant to Legislative Decree 254/2016**

## CONTENTS

LETTER TO STAKEHOLDERS.....	4
NOTE ON METHODOLOGY .....	6
1 THE ENAV GROUP .....	8
1.1. OVERVIEW.....	8
1.2. THE ACTIVITIES OF THE ENAV GROUP.....	9
1.3. OPERATING MODEL .....	11
1.4. RESEARCH AND INNOVATION.....	13
1.5. A SUSTAINABLE YEAR .....	15
2 ENAV LOOKS AHEAD .....	18
2.1 STAKEHOLDER ENGAGEMENT AND THE NEW MATERIALITY MATRIX .....	18
2.2 THE SUSTAINABILITY PLAN .....	23
3 PERFORMANCE IN 2018 .....	30
4 THE ENAV GROUP .....	31
4.1 GROUP PROFILE .....	31
4.2 GOVERNANCE .....	33
4.3 ESG RISK MANAGEMENT AND THE ENTERPRISE RISK MANAGEMENT SYSTEM.....	35
4.4 INTERNAL CONTROL AND RISK MANAGEMENT SYSTEM .....	38
4.5 INTERNAL AUDIT .....	40
4.6 BUSINESS MANAGEMENT SYSTEM.....	41
5 COMMUNITY.....	43
5.1 SAFETY .....	44
5.2 TECHNICAL OPERATIONAL TRAINING AND THE ROLE OF THE ACADEMY .....	48
5.3 THE FLIGHT INSPECTION AND VALIDATION SERVICE TO INCREASE SAFETY IN FLIGHT .	53
5.4 SECURITY.....	54
5.5 INVESTMENT.....	57
5.6 COOPERATION WITH ORGANISATIONS, INSTITUTIONS AND INDUSTRY ASSOCIATIONS .	59
5.7 QUALITY OF THE CUSTOMER RELATIONSHIP .....	63
5.8 RESPONSIBLE SUPPLY CHAIN MANAGEMENT .....	64
5.9 ANTI-CORRUPTION MEASURES.....	68
5.10 EXTERNAL COMMUNICATION.....	71
5.11 INVESTOR RELATIONS .....	72
5.12 BRAND DEVELOPMENT .....	73
5.13 WELFARE INITIATIVES FOR THE COMMUNITY.....	75
6 ENVIRONMENT .....	76
6.1 EFFICIENCY AND ENVIRONMENTAL PROTECTION: FLIGHT EFFICIENCY PLAN AND FREE ROUTE AIRSPACE .....	77
6.2 SIGNIFICANT SOCIAL AND ENVIRONMENTAL FUNDING .....	79
6.3 ENERGY CONSUMPTION.....	80
6.4 WASTE MANAGEMENT .....	83
6.5 ELECTROMAGNETIC EMISSIONS.....	85

7	PEOPLE.....	86
7.1	HIRING AND DEVELOPMENT OF NON-OPERATIONAL PERSONNEL.....	87
7.2	EQUAL OPPORTUNITIES .....	90
7.3	SOCIAL POLICIES AND COMPANY WELFARE.....	91
7.4	THE PROTECTION OF HUMAN RIGHTS .....	93
7.5	INTERNAL COMMUNICATION.....	95
7.6	LABOUR RELATIONS.....	97
7.7	REMUNERATION POLICIES .....	99
7.8	WORKPLACE HEALTH AND SAFETY .....	101
ANNEX 1	.....	103
	NON-FINANCIAL INDICATORS .....	103
ANNEX 2	.....	122
	TABLE: GRI CONTENT INDEX .....	122
	REPORT OF THE INDEPENDENT AUDITORS.....	130

## LETTER TO STAKEHOLDERS

*The general definition of sustainable growth is “growth that is aimed at satisfying the needs of the current generation without compromising the ability of future generations to meet their own needs.” In this sense, sustainability provides firms with an opportunity to reflect on how to make their business survive in a constantly changing environment, with the goal of guaranteeing efficient and high-quality service and, if possible, improving such service in the medium and long term.*

*ENAV’s mission is to guarantee safe and punctual flights to the millions of passengers that fly in Italian skies and to contribute to the growth of national and European air transport with efficiency and innovation.*

*Safety for us is synonymous with sustainability: we invest in safety, we produce safety and above all, we guarantee safety. But not only. ENAV is a strategic company for Italy, one with great potential, made up of people and technologies of the highest level, and is responsible for controlling and managing nearly two million flights a year in Italian skies.*

*In carrying out its functions, ENAV has long been seen as a leader in Europe. In fact, it is considered one of the main suppliers of air navigation services in terms of the size of the air space it controls and the number of flights it assists, as well as in terms of investment in new technology and research and development.*

*Thanks to state-of-the-art technology and platforms, and to excellent professional training for its operational personnel, ENAV has developed innovative projects and has obtained high marks for the quality of its service. Some examples include:*

- *The Free Route project, which makes it possible for airlines to save time and fuel with enormous benefits for the environment thanks to the possibility of flying a direct route across Italian air space. In 2018, airlines saved 43 million kg of fuel, equal to 135 million kg of CO<sub>2</sub>.*
- *Punctuality. ENAV is one of the best service providers in Europe in terms of safety and punctuality. In fact, according to international reports prepared by Eurocontrol, in 2018 ENAV reported only 0.024 minutes of delay in its Flight Services compared with the target of 0.11 minutes established by European regulators, registering the best performance among the main European countries.*

*In the future, a profound transformation is envisioned in Europe’s air transport system on account of a series of internal and external factors: a sharp increase in air transport at both national and international level; a change in the business model of all airlines, not only traditional carriers but low-cost carriers as well; and, most of all, sudden and unforeseen changes to the flow of air traffic. These factors are to be considered within a context of a highly regulated environment governed by a set of laws and rules mainly relating to the EC legislative framework on the Single European Sky, and which includes 5-year performance plans that are increasingly challenging, designed with four objectives in mind: safety, quality service, environment, and cost efficiency.*

*In order to proactively manage future scenarios, and in line with international technological advances in the sector, ENAV has developed a technical operational development plan in order to remain competitive at international level and to continue to be seen as a leader in innovative technology, consistent with the requirements of the Single European Sky. The industrial plan outlines the Group’s strategies in terms of projects and investments and represents an important technological and operational change that allows for the management of air traffic in the medium and long term under a new organisational model and with improved performance, quality and competitiveness, all while continuing to ensure the highest level of safety at lower costs for airlines*

*and, therefore, passengers. As a result, ENAV will benefit from a simplified, more agile organisational structure and from more flexible procedures which will encourage both the professional growth of ENAV's resources and more effective planning of its long-term investments.*

*ENAV's dedication to looking ahead, to acting preventatively and to responding to the needs of its stakeholders are the very elements that drive it in its approach to sustainability, consistent with its approach in previous years that recognised, in its materiality analyses, that safety, security, service quality and qualified human resources are the most significant themes (also taking into account the changes involving the company and the economic and social context in which it operates).*

*Even within the context of sustainability, ENAV strives to look ahead. In fact, it has embarked upon a path that seeks to make corporate social responsibility something other than just a system of indicators needed for compliance purposes but also a new and complementary approach to the creation of value in the short and medium term.*

*As a result, the Sustainability Plan was developed, through which ENAV can communicate to its stakeholders its short- and medium-term objectives.*

*The plan, which is inspired by the objectives of the United Nation's Sustainable Development Goals (SDGs), is one of the central elements in the shifting of sustainability from regulatory compliance to value generator. The plan outlines a series of actions borne out of a preliminary analysis which focused on a variety of areas: an analysis of ENAV's position with respect to the sustainability themes that are most significant to the Group, a study of the key issues in the sector, a survey of the market trends on the topic of sustainability, and guidelines on applicable best practices, taking account of the main expectations of the company's stakeholders.*

*With regard to the three-year plan, which covers the period 2018-2020, some projects have already been completed or launched. Among these are the integration of those non-financial risks not already included within the ERM, the fine-tuning of the anti-corruption compliance program, the development of additional instruments which harness talent and the creation of teams of sustainability ambassadors.*

*The projects included in the sustainability plan will allow ENAV to make a significant step forward in the transition of sustainability from compliance requirement to value generator, the ultimate objective, in a not too distant future, and in integrated reporting, that is, the full integration of sustainability and corporate strategies.*

The Chief Executive Officer

Roberta Neri

President

Nicola Maione

## NOTE ON METHODOLOGY

The ENAV Group has prepared the consolidated non-financial disclosure (hereinafter also referred to as "consolidated non-financial Statement" or "Statement") in accordance with the provisions of Article 5(3)(b) of Legislative Decree 254/2016 (hereinafter "Decree"), as amended. The document constitutes a separate report from the Report on Operations.

The Statement prepared pursuant to Articles 3 and 4 of the Decree, in accordance with the Decree, contains information on the company's impact on five thematic areas, namely the environment, personnel management, social impacts, human rights and the fight against corruption and bribery. The vast reporting boundary as well the quality of the reporting reflect the principle of relevance (or "materiality"), the element envisaged by the reference legislation and which characterises the GRI Sustainability Reporting Standards (hereinafter GRI Standards). The GRI standards require the Company to provide information based on the materiality analysis to identify relevant and priority topics to "the extent necessary for an understanding of the company, its performance, its results and the impact produced" or which is able to substantially influence the assessments and decisions of stakeholders (see section the "Stakeholder engagement and the new materiality matrix").

The Statement was drawn up in accordance with the GRI Standards published in 2016 by the Global Reporting Initiatives ("GRI Standards - GRI-referenced option"), the independent authoritative body which provides models for non-financial reporting. The disclosures and the indicators contained in the text are reported in the "GRI Content Index" (pp. 122-129).

It should be noted that where the Group considered it unnecessary to adopt policies related to the areas referred to in Legislative Decree 254/2016, this is linked to the existence of effective corporate practices which do not require it to adopt specific policies on the abovementioned areas. For this reason it should be noted that the term "Policy" refers to formalised documents, while the term "internal practices" applies to practices and praxes.

This document was approved by ENAV Board of Directors on 11 March 2019.

As Legislative Decree 254/2016 provides, the Statement was subject to a limited assurance as established by the International Standard on Assurance Engagements (ISAE 3000 Revised) principle. The assurance was carried out by the company EY S.p.A.

The 2018 Consolidated statement of non-financial information, as well as that for 2017, are available on the Group's website ([www.enav.it](http://www.enav.it)).

## **Scope of reporting**

The qualitative and quantitative information contained in the consolidated non-financial statement refers to the performances of the ENAV Group (hereinafter also referred to as "the Group") for the year ended on 31 December 2018. In addition, to help the reader better compare and contextualise the information herein, the data for the years 2017 and 2016 have been included and appropriately indicated, except in some cases in which the data is unavailable.

This non-financial statement includes data and information referring to the "the ENAV Group", namely the set of companies composed of the Parent Company, ENAV S.p.A. and its subsidiaries, consolidated on a line-by-line basis: Techno Sky S.r.l., ENAV Asia Pacific Sdn Bhd and ENAV North Atlantic LLC. Please note that the terms "ENAV" and "the Company" refer exclusively to the Parent Company ENAV S.p.A.

Any limitations in the reporting scope are indicated in the "Scope of identified material issues" table (page 20). In any case, these limitations do not impair the comprehension of the performance and representativeness of the information.

Furthermore, it should be noted that in November 2018 the company D-flight was formed as a single-person company with a simplified governance in anticipation of the entry of an industrial partner in its share capital and governance in 2019. Given that the company will start up operations in 2019, quantitative information regarding it has not been included.

# 1 THE ENAV GROUP

## 1.1.OVERVIEW

If one were to ask a passenger waiting to board a plane what his or her expectations were concerning their flight, the response would likely be “good inflight service and on-time arrival.” In fact, “landing safe and sound” is much more than an expectation, it’s an assumption that is taken for granted. In order for safety to be an intrinsic characteristic of air transport, it must be the result of hard work and dedication on the part of those who place safety at the centre of their daily activities. This assumption forms the basis of ENAV’s mission: to guarantee safety and punctuality to the millions of passengers that fly in Italian airspace and to contribute to the growth of national and European air transport through ongoing efficiency and innovation. This aspect, together with the activities relating to security and to the reduction in airlines’ environmental impact (which will be discussed in detail in the coming pages) makes ENAV a company that places sustainability and social awareness at the heart of its business.

ENAV’s controlling shareholder is the Ministry of Economy and Finance, which holds a 53% stake, and it is supervised by the Ministry of Infrastructure and Transport. ENAV is the only operator in Italy that handles civilian air traffic control.

With 4,114 employees, it offers safety and punctuality to nearly 1.96 million flights per year, 24 hours a day, providing all the services involved in air navigation to aircrafts that fly in Italy.

From its air traffic control towers at 45 airports, ENAV manages the take-offs, landings and ground movements of aircraft. From its 4 area control centres, it provides navigation assistance to all aircraft en route, whether for overflight or for landing at one of Italy’s airports.

Long considered to be among the "Big Five" in Europe for operational performance and innovation, the ENAV Group is a fundamental component of the international Air Traffic Management system (hereinafter, ATM). It participates in research and development in coordination with the national and international control bodies of the sector. It is also one of the main players in the implementation of the Single European Sky programme, the purpose of which is to harmonise air traffic management throughout the European Union with the aim of enhancing the safety and efficiency of continental air transport.

For years the ENAV Group has also been committed to protecting the environment thanks to its constant optimisation of routes to reduce the fuel consumption of aircraft and the use of innovative technologies that improve the efficiency of its own infrastructures.

**4 AREA CONTROL CENTRES**

**45 TRAFFIC CONTROL TOWERS**

**732,000 KM<sup>2</sup> OF MANAGED AIRSPACE**

**1.96 MILLION FLIGHTS HANDLED**

**PEAK OF 6,839 FLIGHTS MANAGED IN ONE DAY IN 2018**

**4,114 EMPLOYEES**



## **1.2. THE ACTIVITIES OF THE ENAV GROUP**

### **Air traffic control**

ENAV provides air navigation assistance to all aircraft en route, whether for overflight or for landing at one of Italy's airports, through the four Area Control Centres (ACC) of Rome, Milan, Padua and Brindisi; each has clearly defined airspace jurisdiction. In addition, it is responsible for air navigation services at 45 Italian civilian airports where it handles take-offs, landings and the ground movement of aircraft from its control towers.

### **Airspace design**

ENAV is responsible for supervising the organisation of the airspace under its control through the design of flight procedures, both conventional and satellite navigational, and the definition of a system of routes appropriate for the fulfilment of the objectives of safety, capacity, environment, flight efficiency and cost containment.

### **Meteorology**

Weather reports and forecasts of meteorological conditions are released in real time on international and telecommunications networks. Airport weather stations issue observational bulletins on an hourly or half-hourly basis and weather messages for the purposes of synoptic meteorology, in accordance with the guidelines of the World Meteorological Organisation (WMO).

### **Aeronautical Information**

ENAV provides aeronautical information services to pilots and flight crew by disseminating and updating information over the whole of Italy. Essential aeronautical information for navigators is released through the Integrated Aeronautical Information Package (IAIP), which is also available on ENAV's website: ENAV.it.

### **Flight Inspection**

Thanks to its air fleet, ENAV guarantees the continuous monitoring of the national radio aids that provide the pilot with information about the exact position of the aircraft. The continuous verification of the accuracy of the radio electric signals make it possible to fly with the highest levels of safety.

### **Engineering and Maintenance**

Planning, implementation and operation of the entire technological infrastructure necessary for flight assistance. The planning activities are integrated with standardisation and development processes at international level, and with numerous joint projects with other service providers. Techno Sky provides services related to the management and maintenance of air traffic control equipment and systems.

### **Research and Innovation**

Research and Innovation are centralised at European level within the SESAR programme (Single European Sky ATM Research). In close coordination with the European Commission, ENAV participates in multiple projects aimed at defining and verifying new operational concepts, technologies and systems, with the aim of improving the capacity and performance of the international system of air navigation services.

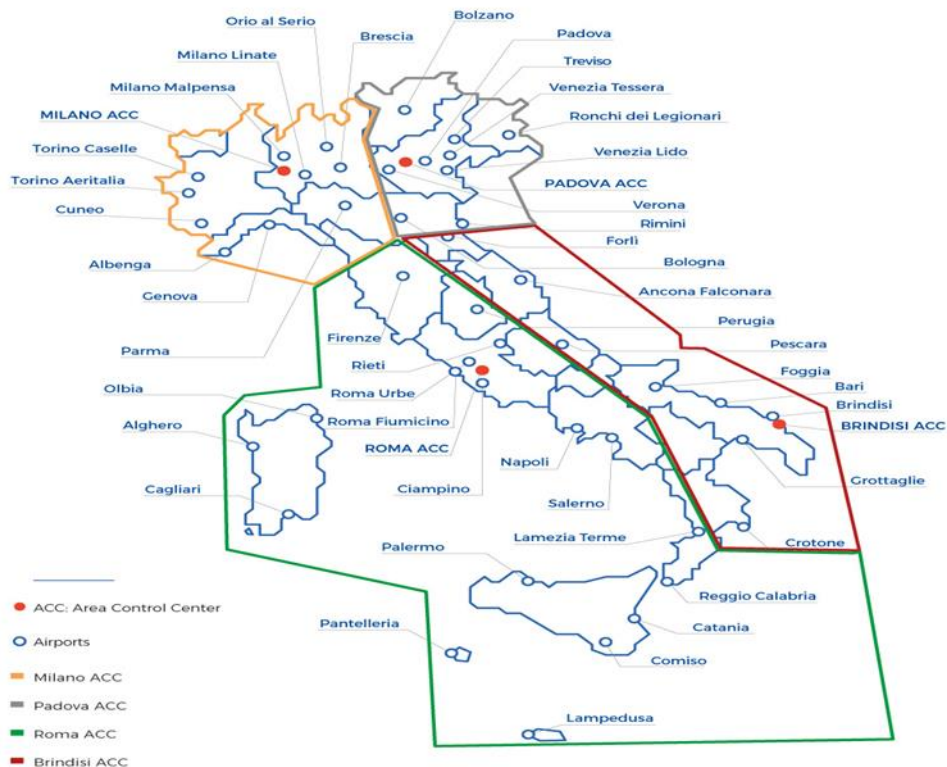
## **Training**

ENAV is the only company in Italy authorised to select, train and update the different professional profiles that operate in the civilian air traffic control services. ENAV Academy ensures a high-level of specialist training, providing both entry-level training and continuing professional education.

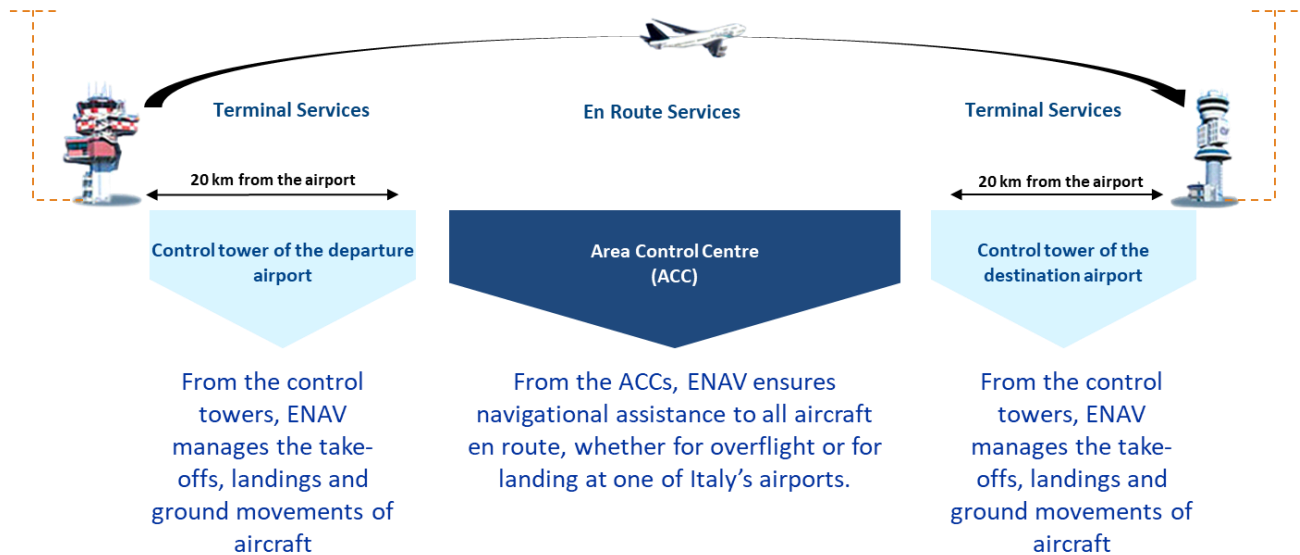
### 1.3. OPERATING MODEL

ENAV ensures navigational assistance to all aircraft, whether for overflight or for landing at one of Italy's airports, by means of:

- 4 Area Control Centres (ACC) in Rome, Milan, Padua and Brindisi for the en route phase;
- 45 air traffic control towers at 45 civilian airports in Italy for the take-off, landing, and ground movement of aircraft: Fiumicino, Malpensa, Linate, Venice Tesserà, Bari, Bologna, Catania, Ciampino, Naples, Olbia, Orio al Serio, Palermo, Turin Caselle, Verona Villafranca, Alghero, Brindisi, Cagliari, Florence, Genoa, Lamezia Terme, Rimini, Ronchi dei Legionari, Treviso, Parma, Turin Aerialia, Albenga, Cuneo, Brescia, Bolzano, Padua, Venice Lido, Perugia, Ancona Falconara, Forlì, Rome Urbe, Pescara, Rieti, Salerno, Reggio Calabria, Comiso, Pantelleria, Lampedusa, Grottaglie, Crotona, Foggia.



Air traffic control is guaranteed on a seamless basis starting from when the aircraft starts its engines to when it turns them off. The task of the air traffic controller, regardless of whether he or she operates from an air traffic control tower or from an area control centre, is in fact that of guaranteeing a minimum separation between aircraft of at least 5 miles on the horizontal plane and 1,000 feet on the vertical plane.



## 1.4. RESEARCH AND INNOVATION

Research and technological innovation are among the main drivers of a country's economic development. The capacity of an economic system to exploit new technologies and to adapt to services and scenarios undergoing rapid transformation is essential to ensure that people have the prospect of improved living standards.

Aviation is definitely a sector in which technology plays a key role, given the complexity of an aircraft, a radar sensor or an air traffic control system. We are living at a time when innovations are making profound changes to aeronautics, and flight management systems, drones, satellites and sub-orbital flights illustrate the breadth of the numerous initiatives under way. Finding solutions to these challenges requires new, effective, inexpensive, fast and flexible production processes. New technologies play a fundamental role in this journey towards the future, in which we will see new ways to set up and manage flights, electric engines, digitalised earth/air/earth communications, satellite technology for innovative navigation, communication and surveillance, cloud computing, remote and digitalised control towers, drones as important new aircraft operating in airspace and sub-orbital flights with spaceports and much more besides.

For these reasons and with the specific intention of providing air traffic users with an increasingly efficient set of services with safety standards that meet the needs and keep up with the pace of economic growth, ENAV has put investment in technological innovation and a new generation of digital technology in pride of place in its strategic development plans, in line with the regulatory and developmental framework defined by the Single European Sky.

These innovations as a whole will have a highly positive impact in terms of sustainability and making the best use of human capital, allowing ENAV to consolidate its position of leadership compared with the other European service providers, driving the technological evolution of air traffic management.

A significant amount of investment in technology is envisaged in the plan: roughly €650 million in the first five years.

The main projects include in particular:

- Data Link, which enables ground/air/ground communications such as digital messaging without needing to use traditional verbal communications via radio; it has been implemented in all the control centres and will be enhanced over the next few years as traffic increases;
- the Medium-Term Conflict Detection (MTCD) system which can help air traffic controllers detect potential traffic conflicts several minutes in advance, making it possible for them to re-plan flight trajectories with a reasonable margin and to make efficient choices;
- the new 4-Flight system will be the operational platform of the future and will be implemented using a new approach for both development and maintenance;
- the new E-NET 2 network with Multiprotocol Label Switching technology, which can make data transmission faster and more secure. This infrastructure is also preparatory to the implementation of remote-control towers.

At the same time, ENAV participates in the most important global research programmes, among which the European Commission's SESAR programme is undoubtedly one of the most significant. The programme began with SESAR 1 (2009-2016) and was then extended to a second phase called SESAR 2020 (2017-2024).

As a result of its active participation in SESAR and its recognised experience in air traffic control, ENAV is able to drive change at international level nowadays and to orient its strategic objectives in line with the development of the future European ATM system.

Today ENAV is therefore a leading participant in the innovation of the current European ATM system, as it has been over the last few decades, working to realise and implement new generation technologies and operating procedures, in order to guarantee services to an increasing number of flights in an efficient and safe way, at the same time respecting the environment.

## 1.5. A SUSTAINABLE YEAR

Guaranteeing the safety every year of the hundreds of millions of passengers taking off and landing in national airports is not only ENAV's mission but also its most important contribution to sustainability. ENAV invests over €85 million a year in safety alone, while training exceeds about 200,000 hours a year.

Alongside safety, ENAV's mission also includes the need to guarantee that airlines can fly on time and with efficient routes in order to reduce flight times and fuel consumption, and therefore to lower CO<sub>2</sub> emissions. Schemes such as the Flight Efficiency Plan (FEP), developed in Italy over the last 10 years, are heading in precisely this direction, namely to guarantee that airlines (and the general public) can benefit, with increasingly efficient flight profiles, direct routes with positive effects on costs, consumption and harmful emissions. Within this route efficiency plan, in December 2016, 5 years ahead of the term defined by the European regulation of the Single European Sky, ENAV implemented the Free Route Italy, a revolutionary project which made it possible for all aircraft flying over an altitude of 9,000 metres to cross Italian skies with a direct route, no longer referring to a pre-defined route network. Thanks to Free Route, in 2017, it was possible to generate an annual savings of about 30 million kg of fuel, equal to about 95 million kg of CO<sub>2</sub> that were not dispersed in the environment. The figures achieved in 2018 were even better: thanks to airlines being able to choose more efficient routes, the distance flown by planes last year decreased by 12 million km with a subsequent reduction of 43 million kg of fuel and about 135 million fewer CO<sub>2</sub> emissions.

All of these revolutionary operational innovations have been launched without compromising a record that ENAV has held for many years in Europe among the main ANSPs (Air Navigation Service Providers):<sup>1</sup> namely the capacity to reduce to a minimum the delays that are caused by air traffic control, with huge benefits for carriers, but also in general for all air transport users in Italy, as well as a significant impact on fuel consumption and the resulting CO<sub>2</sub> emissions.

The path undertaken by ENAV as part of its Corporate Social Responsibility has been a long one and focuses on these aspects, alongside which a system of indicators has been developed (available at the end of this document) which allows the company not only to be compliant with the rules (Legislative Decree 254/2016) but also to have a scorecard to show strengths and weaknesses in an objective way.

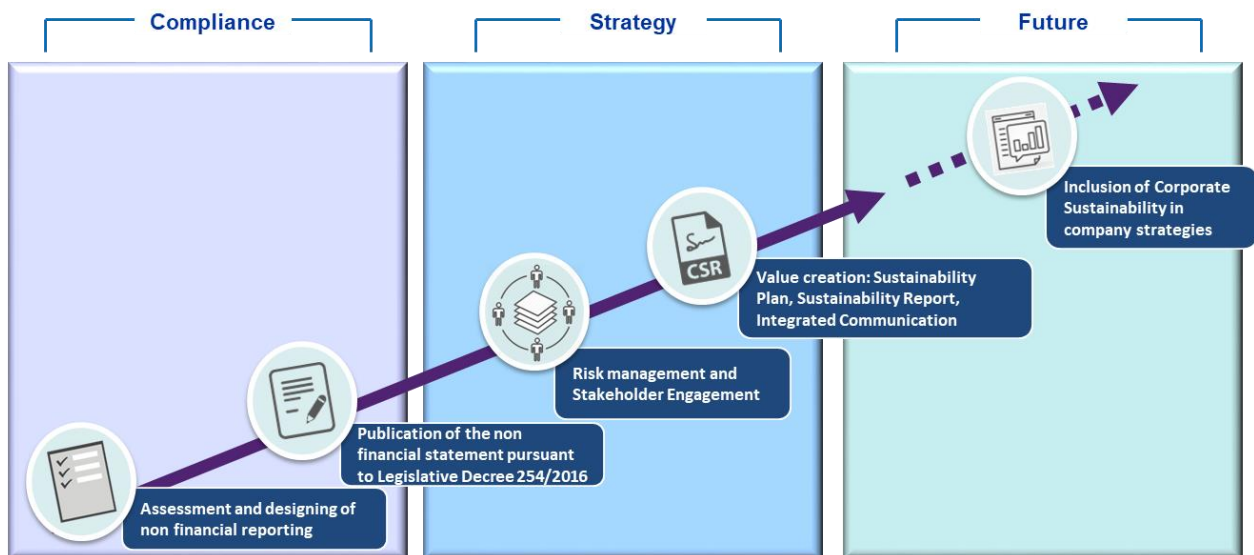
The work on the indicators has made clear the need to go beyond regulatory compliance and develop a virtuous approach to sustainability.

If the firm's ultimate objective is to create value, the underlying processes must be sustainable, that is to say long-lasting inasmuch as they can involve and reward the various stakeholders that contribute resources that enable the company to be successful over time. This means that the processes must consolidate the business by protecting the interests of the stakeholders from damage to the company's image or reputation that may be concealed in any organisation.

Based on these principles, a path has been undertaken that has been defined as **“from compliance to value creation”** whose ultimate objective, in a not too distant future, is total integration between sustainability and business strategies.

---

<sup>1</sup> The main ANSPs in Europe are: Germany, France, the United Kingdom, Spain and Italy.



This path has been developed on the basis of four main drivers: a clear and resolute commitment on the part of the top management, the creation of an organisational structure dedicated to the CSR (able to define objectives and follow the deployment of projects), the launch of a change management process that also focuses on a culture of sustainability, and the introduction of measurement and incentive systems dedicated to sustainability.

On the basis of these 4 lines of action and with the objective of achieving total integration between company strategies and sustainability, a series of initiatives and projects were developed during the year that allowed the company to redefine its approach to sustainability.

The following initiatives are worth mentioning:

- The creation of a **Sustainability Committee**, composed of 3 members of the Board of Directors, which is very useful not only because of the contribution it makes but because of the implicit message that the company pays close attention to this topic;
- **Stakeholder engagement** (which will be discussed in detail further on) which has involved all categories of company stakeholders in a wide-ranging and structured way since 2018 and which has allowed us to better define the **materiality matrix**;
- The expansion of the non-financial statement in the **Sustainability Report** (the subject of this document) through the transition from the GRI Referenced reporting system to the more comprehensive **GRI Core**;
- The inclusion of the missing **ESG risks** (identified by means of non-financial statement processing) in the company's Enterprise Risk Management system (which will be set out in the dedicated section);
- The **Sustainability Plan 2018-2020** (which will be described in detail in the following pages) which, also taking account of the objectives of the Business Plan, intends to set the objectives to be achieved by every area of the company and which will be updated every year;



- The first **Sustainability Day**, held in the auditorium at Rome Ciampino airport, involving the entire management of ENAV and in which the whole company at its various offices in Italy took part via streaming;
- The inclusion of **ESG indicators** in the **MBO**, planned in 2018 and which will be formalised in early 2019;
- **Sustainability Ambassadors**, a group of about 30 employees whose objective is to act as a “megaphone/loudspeaker” for a sustainable culture throughout the company and who are a reference point for the development of the projects included in the sustainability plan;
- The creation of a **web portal** entirely dedicated to sustainability (available at <https://sostenibilita.ENAV.it/en>) and the relative **film**, made as a short movie and focusing on ENAV’s contribution to passenger safety;
- The development of an internal and external communication plan dedicated to sustainability schemes;
- Participation in some of the main **networks** on sustainability (CSR Management network, Sustainability Exhibition, and so on).

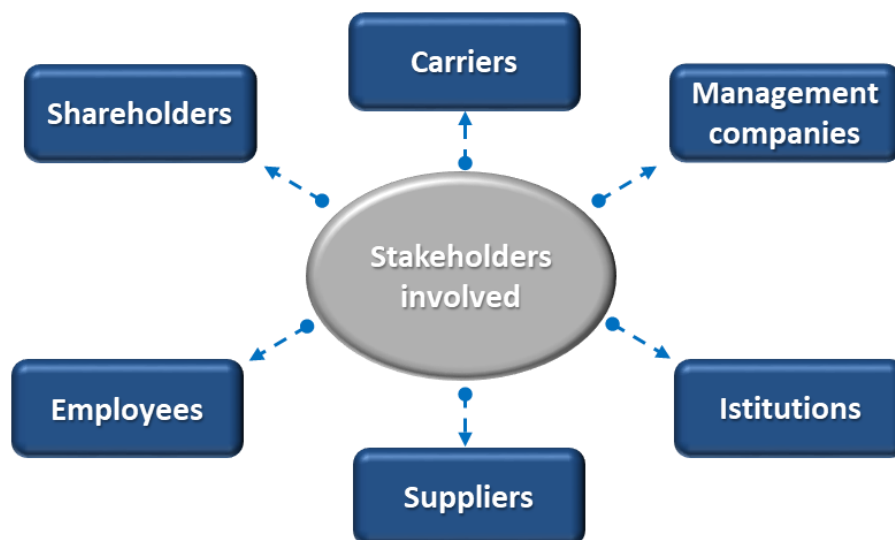
## 2 ENAV LOOKS AHEAD

### 2.1 STAKEHOLDER ENGAGEMENT AND THE NEW MATERIALITY MATRIX

The capacity to manage the expectations of all the stakeholders (shareholders, customers, employees, suppliers, institutions and so on) plays an important role in ensuring the durability of the company in the medium to long term. Up until recently, it was believed that creating value for shareholders was the most rational objective for the company, but nowadays it seems clear that simply looking at its economic results is no longer sufficient to provide a true and fair view of the quality of business management.

In this context, the voluntary adoption of higher social and environmental standards than those envisaged by the law and starting a dialogue with all of its interlocutors, in the belief that solutions are to be looked for through cooperation, in the age of globalisation and the drive towards sustainable development, are ways for companies to gain consensus and legitimisation. In other words, behaving in a socially responsible way means creating value for all stakeholders, including shareholders, and laying the foundations for long-lasting success.

In view of this principle, in which ENAV is a firm believer, and also because of its role as a strategic company for Italy, alongside customer relationship management, ongoing for several years, ENAV has launched its engagement with all its stakeholders



The opportunity to give a better structure to the process for listening to all the stakeholders and to their expectations vis-à-vis the company was sustainability and the development of the materiality matrix, or rather the Group issues held to be most important.

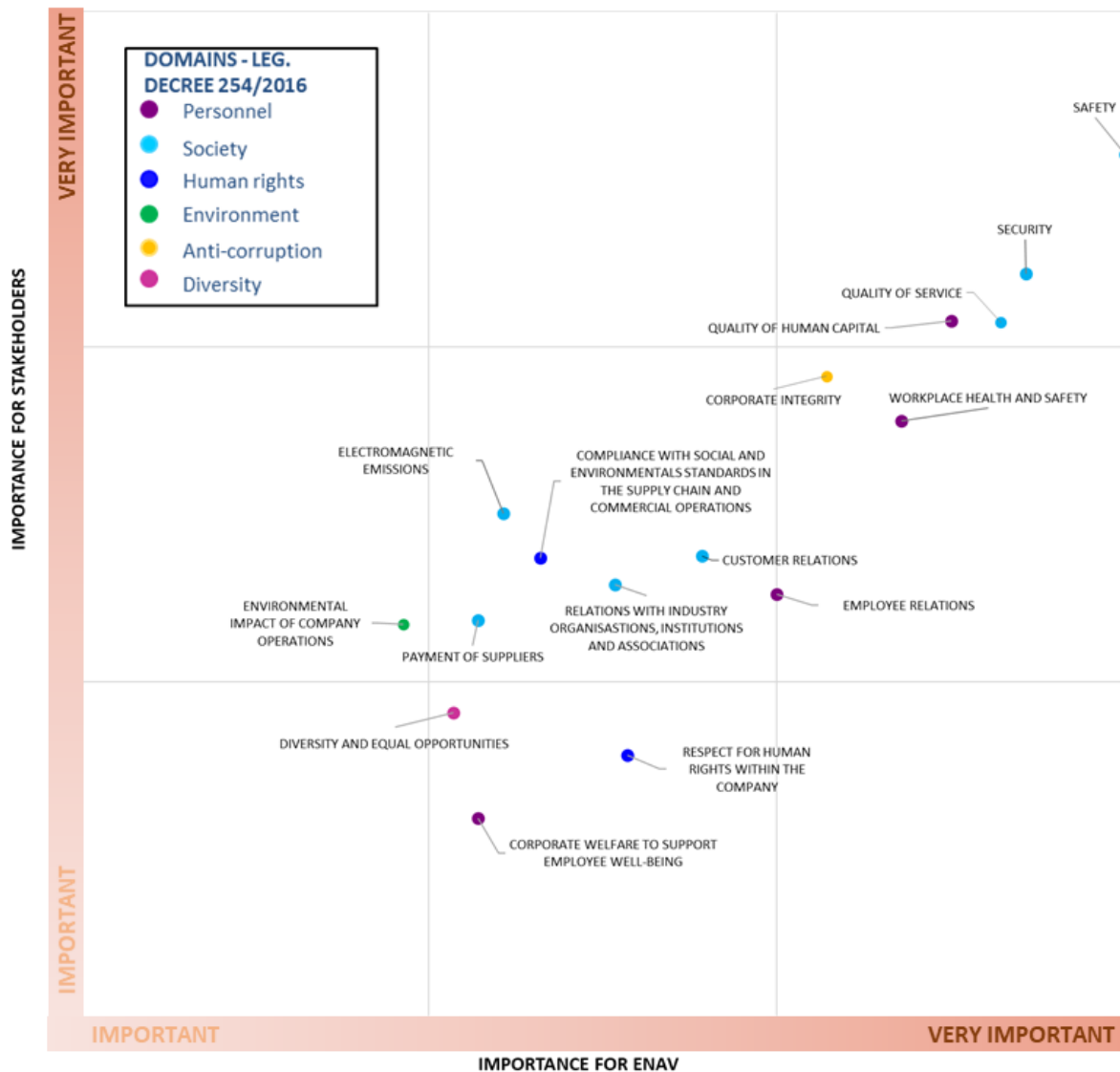
In order to define its materiality matrix, ENAV carried out a survey not only of its internal management, but also of all its stakeholders: airlines, shareholders, suppliers, airport management companies, the institutions, and all its employees. The marked involvement of the last category, by means of an online questionnaire, showed the extent to which the company wants to take part and give its opinion: over 1,300 employees took part in the survey, providing an interesting analysis of this internal opinion.

Stakeholder engagement has been divided into two parts: the first phase involved sending out a questionnaire, by email or through a survey, with 21 questions on important topics identified and assessed with a score from 1 to 5; the second phase saw the organisation of a multi-stakeholder

forum designed to set up a direct dialogue with each of them in order to understand their needs and satisfy their future expectations.

The company responded immediately to some of the indications given by the stakeholders, while other cases that envisage the development of wider-ranging projects have been included as objectives in the sustainability plan.

**Materiality Matrix**



The following table delineates the boundary of each material topic, specifying the internal (Group company) and external boundaries for the material topic. To date, no topics have been identified with material impacts on entities outside the Group. Where a topic does not regard the entire Group, it has been considered non-material for the excluded company or companies in consideration of the type of activity performed and/or the geographical areas in which they operate.

**Table: Perimeter of the material issues identified**

Domain of Legislative Decree 254/2016	No.	Topic	Boundary	GRI Standards
<b>Social</b>	1	Electromagnetic emissions	ENAV S.p.A. Techno Sky	GRI 413: Local communities
	2	Corporate integrity	ENAV Group	GRI 419: Socioeconomic compliance
				GRI 307: Environmental compliance
	3	Payment of suppliers	ENAV Group	-
	4	Quality of service	ENAV Group	GRI 102-43 - Approach to stakeholder engagement
	5	Customer relations	ENAV Group	GRI 102-43 - Approach to stakeholder engagement
	6	Relations with industry organisations, institutions and associations	ENAV Group	GRI 102-43 - Approach to stakeholder engagement
	7	Compliance with social and environmental standards in the supply chain and commercial operations	ENAV Group	GRI 308: Supplier environmental assessment
				GRI 414: Supplier social assessment
<b>Employees</b>	8	Safety	ENAV S.p.A. Techno Sky	GRI 416: Customer Health and Safety
	9	Security	ENAV S.p.A. Techno Sky	GRI 416: Customer Health and Safety
	10	Quality of human capital	ENAV Group	GRI 404: Training and education
	11	Diversity and equal opportunities	ENAV Group	GRI 405: Diversity and equal opportunities
			ENAV Group	GRI 401: Employment
	12	Employee relations	ENAV Group	GRI 402: Labour/management relations
	13	Health and safety of employees	ENAV Group	GRI 403: Occupational Health and Safety
	14	Corporate welfare to support employee well-being	ENAV Group	GRI 401: Employment
<b>Diversity in the management and control bodies</b>	15	Diversity and equal opportunities	ENAV S.p.A. Techno Sky	GRI 405: Diversity and equal opportunities

Domain of Legislative Decree 254/2016	No.	Topic	Boundary	GRI area
Corruption	16	Corporate integrity	ENAV Group	GRI 205: Anti-corruption
Human rights	17	Respect for human rights within the company	ENAV Group	GRI 406: Non-discrimination
			ENAV Group	GRI 412: Human Rights assessment
Environment	18	Environmental impact of the company's operations <sup>2</sup>	ENAV S.p.A. Techno Sky	GRI 302: Energy
				GRI 305: Emissions
				GRI 306: Effluents and waste

### The main results from the Multi-stakeholder Forum

During the forum, some of the topics included in the Materiality Matrix were obviously of greater interest and fuelled more discussion among the stakeholders present.

The most important of all is obviously safety. This is unanimously recognised as the most important topic and considered as fundamental for the very existence of the company and for the continuity of its business. The discussion, mainly involving the management companies and airlines present, resulted in the proposal to aim for “contamination” between pilots and air traffic controllers, to lead to greater sharing as regards their responsibilities and work methods (e.g. training courses or other opportunities for meetings that involve both categories) so as to increase the reciprocal knowledge of their activities, and improve the connection and fluidity of communications between the two figures during the various phases of flight. This aspect, along with many others that emerged from the meeting, has been included as an objective in the sustainability plan. The discussion also underlined the close correlation between safety and two other topics that emerged in the matrix as being among the most important: “Security and ‘Service quality”.

With regard to the quality of human capital, it has been pointed out, also by the investors, how this topic has become central to the process of building social value. Given the particular nature of its business, ENAV has an additional responsibility regarding the adequacy of human capital, namely to keep the skills of air traffic controllers at the highest levels at all times, in order to guarantee the efficiency in their service that over the years has earned it its current position as one of the world's highest performing providers. The importance of sound training schemes for the staff at headquarters was also underlined, as they need to be able to respond to changes outside the company and to develop new business.

Specifically, the institutions present at the discussion highlighted how important it is for the company to continue to pursue the “relations with bodies, institutions and industry associations” effectively. ENAV plays a strategic role here for Italy and devotes a great deal of attention to this aspect, which many other companies consider to be of secondary importance. Some stakeholders

<sup>2</sup> In relation to this aspect, ENAV Asia Pacific, given the company's characteristics (2 employees and 1 office) is not considered relevant in terms of environmental impact.

present also emphasised the importance of the partnerships and collaborations that the company has been pursuing in recent years with both business partners and suppliers and the need for a continuous and collaborative relationship as a fundamental element for creating useful innovations to improve the service provided and, ultimately, passengers' flight experience. It was also suggested that the company should continue with its plan to increase communications with SRI investors, via traditional and/or one-to-one meetings. As far as environmental impact is concerned, it is clear to everyone that ENAV, being a service company, does not have particularly significant impacts, but it is far more important for the company to take specific action by planning efficient routes and also reducing fuel consumption and CO<sub>2</sub> emissions for airlines. The opportunities contained in the Flight Efficiency Plan were reiterated, a project which is currently ENAV's biggest "sustainable" challenge, namely to guarantee an approach that can ensure not only that carriers fly safely, but that they do so via efficient routes that can shorten flight times and reduce fuel consumption. Again, in reference to indirect impacts, the importance of involving ENAV in projects for managing the noise emission from aircraft was underlined, in collaboration with management companies and airlines.

As regards human rights, diversity and equal opportunities, which are considered as being less of a priority than other topics, provided food for thought as regards reporting policies and methods. Although these aspects were not seen as being problematic in the survey, which was also carried out internally, in any case the company has decided to include them as objectives in the sustainability plan.

In conclusion, a clear alignment emerged from the Forum between the results of the materiality matrix and the point of view of the stakeholders present in the forum. This was made possible thanks to two main factors: transversal topics and the high degree of cohesion and cooperation between the parties. In this sense, the event laid the foundations for per a solid relationship between the various stakeholders based on the principle of continuity. The active participation and the contribution made by those present, as well as having prompted useful and interesting observations, further confirmed the invaluable opportunity for ENAV to continue with its policy of dialogue and to consolidate the idea that the feedback from its stakeholders should not just be taken into consideration, but actually included, as far as possible, in the development of strategic guidelines for corporate social responsibility.

## 2.2 THE SUSTAINABILITY PLAN

The development of any strategy, action plan or policy that regards corporate sustainability cannot ignore the 17 goals set by the United Nations. ENAV, too, has taken them as its starting point and has connected them to each action that it takes directly or indirectly in furtherance of its own sustainability.



To better plan its actions and its contribution to the Sustainable Development Goals (SDGs), the ENAV Group has developed a three-year sustainability plan (2018-2020) that, building on materiality analysis and ideas that emerged in the course of stakeholder engagement (in addition to analysis of market trends as they relate to sustainability and the indications of the major best practices in the area), has identified 5 Assets:

- 1 **Strategy and governance:** develop a set of initiatives for integrating sustainability within the Group through corporate strategies and the regulatory and management system;
- 2 **Policies:** plan a set of actions covering specific ESG topics in different areas of the ENAV Group's operations;
- 3 **Technological innovation:** establish a set of projects to achieve some of the ENAV Group's strategic objectives through technological innovation;
- 4 **Reporting and communication** refers to a set of actions chosen to strengthen the non-financial reporting and external communication process for conveying information on the principles that guide the ENAV Group's sustainability strategy and its performance;
- 5 **Corporate culture and dedicated projects:** the purpose of these it to spread within the organisation a culture, both individual and cross-company, based on sustainability principles.

Since the plan spans three years – from 2018 to 2020 – some of the projects listed have already been carried out or at least have been started:

## Strategy and Governance

### Strategy and Governance



- ☒ ESTABLISH A **SUSTAINABILITY COMMITTEE**
- ☒ DESIGNATE "**SUSTAINABILITY AMBASSADORS**" WITHIN THE DEPARTMENTS; THESE ARE PERSONS WHO SPREAD THE CULTURE OF SUSTAINABILITY AND WORK WITH THE *COMMUNICATIONS – CORPORATE SOCIAL RESPONSIBILITY* DEPARTMENT TO PLAN TARGETED INITIATIVES
- ☒ INTEGRATE INTO THE **ENTERPRISE RISK MANAGEMENT PROCESS** THE IDENTIFICATION, ASSESSMENT AND MONITORING OF **ESG** RISKS SET OUT IN THE NON-FINANCIAL STATEMENT/SUSTAINABILITY REPORT
- ☒ KEEP THE **CORPORATE GOVERNANCE** SYSTEM ALIGNED WITH BORSA ITALIANA'S CORPORATE GOVERNANCE CODE AND NATIONAL AND INTERNATIONAL BEST PRACTICES

- ☐ Actions to be evaluated
- ☒ Actions completed/begun

## Strategy and Governance

### Strategy and Governance



- ☐ INTRODUCE A **INCENTIVE MECHANISM** WITHIN THE REMUNERATION SYSTEM BASED ON THE HANDLING AND ACHIEVEMENT OF SPECIFIC ESG TARGETS FOR GROUP MANAGEMENT AND EMPLOYEES
- ☐ ENSURE THAT THE **GOVERNANCE DOCUMENTS APPROVED BY THE BoD** AS THEY RELATE TO RISK MANAGEMENT POLICIES (E.G. RISK APPETITE, RISK POLICIES) ARE ALIGNED WITH THE KEY ASPECTS OF THE SUSTAINABILITY PLAN
- ☒ CONTINUE TO HAVE THE BOARD OF DIRECTORS AND ITS COMMITTEES PERFORM **SELF-ASSESSMENTS OF THEIR OPERATIONS** AS WELL AS INDEPENDENT THIRD-PARTY ASSESSMENTS REGARDING THE PRINCIPLES SET OUT IN THE CORPORATE GOVERNANCE CODE THAT ENAV HAS ADOPTED (TAKING INTO ACCOUNT, AMONG OTHER THINGS, THE RECOMMENDED DIVERSITY CRITERIA)
- ☐ FORMALIZE THE **PROCESS FOR GENERATING THE DATA** FOR EACH NON-FINANCIAL STATEMENT IN THE SUSTAINABILITY REPORT INDICATING ANY CRITICAL ISSUES
- ☐ DEFINE A SET OF **QUALITATIVE AND QUANTITATIVE TARGETS** AND THE SCHEDULE FOR ACHIEVING TARGETS CONNECTED TO SUSTAINABILITY ISSUES THAT ARE IMPORTANT FOR THE GROUP (CONTAINED IN THE MATERIALITY INDEX)

- ☐ Actions to be evaluated
- ☒ Actions completed/begun



## Policies

### Policies



2



- ☐ FORMALIZE AND PUBLISH AN **ENVIRONMENTAL POLICY** TO SET THE GUIDELINES, COMMITMENTS AND OBJECTIVES THAT TOP MANAGEMENT PLANS TO PROMOTE, ENSURING LEGISLATIVE COMPLIANCE AND IMPROVEMENT IN ENVIRONMENTAL PERFORMANCE, PURSUING SUSTAINABLE DEVELOPMENT TARGETS
- ☐ INTRODUCE AN **ENVIRONMENTAL MANAGEMENT SYSTEM (EMS)** BASED ON INTERNATIONAL STANDARDS FOR THE SECTOR (E.G. ISO 14001) AND THAT IS SUBJECT TO INTERNAL AUDITING
- ☐ FORMALIZE AND PUBLISH A **HUMAN RIGHTS POLICY** BASED ON COMMON INTERNATIONAL PRINCIPLES (E.G. UN GUIDING PRINCIPLES ON BUSINESS AND HUMAN RIGHTS) FOR THE GROUP, ITS SUPPLIERS AND PARTNER COMPANIES IN COMMERCIAL TRANSACTIONS. THE OBJECTIVE OF THIS POLICY IS TO ESTABLISH THE PRINCIPLES FOR EVALUATING AND MONITORING RESPECT FOR HUMAN RIGHTS
- ☐ FORMALIZE AND PUBLISH A **DIVERSITY AND EQUAL OPPORTUNITY POLICY** IN ORDER TO PROTECT GENDER DIVERSITY WITHIN THE GROUP AND RESPECT FOR EQUAL OPPORTUNITY THROUGH THE VARIOUS STAGES OF THE PROFESSIONAL DEVELOPMENT PROCESS FOR EMPLOYEES

- ☐ Actions to be evaluated
- ☒ Actions completed/begun

## Policies

### Policies



2



- ☒ FORMALIZE AND PUBLISH AN **ANTI-CORRUPTION POLICY** (CODE OF CONDUCT TO COMBAT CORRUPTION) THAT GOVERNS, AMONG OTHER THINGS, SPONSORSHIPS AND DONATIONS, HANDLING COMMERCIAL RELATIONSHIPS AND ANY DIRECT AND INDIRECT POLITICAL CONTRIBUTIONS
- ☐ INTRODUCE A GROUP **ANTI-CORRUPTION MANAGEMENT SYSTEM** BASED ON INTERNATIONAL STANDARDS (E.G. ISO 37001)
- ☒ ADOPT A **WHISTLEBLOWING REGULATION**

- ☐ Actions to be evaluated
- ☒ Actions completed/begun

## Technological innovation



### Technological innovation



#### DIGITISATION AND AUTOMATION

- ☒ 4 ACC DATA LINK SYSTEM (DIGITISATION OF VOICE MESSAGING)
- ☐ NEW TWR DIGITISATION SYSTEM, BASED ON ELECTRONIC FLIGHT STRIPS AT MALPENSA (1 IN ITALY), LINATE AND FIUMICINO
- ☐ 4 ACC MEDIUM-TERM CONFLICT DETECTION DEVICE (AUTOMATION OF CONFLICT DETECTION PROCESS)
- ☐ INTRODUCTION OF NEW REMOTE MAINTENANCE MANAGEMENT SYSTEM (TOC/HAL): (DIGITISATION OF MAINTENANCE PROCESSES).

- ☐ Actions to be evaluated
- ☒ Actions completed/begun

## Technological innovation



### Technological innovation



#### SURVEILLANCE INNOVATION:

- ☐ COMPLETION OF GROUND SURVEILLANCE UPGRADING AT FCO, MXP, TO, BG, LIN WITH UPGRADES TO SURFACE MOVEMENT RADAR (SMR) OR MULTILATERATION SYSTEMS (MLAT) (2018-2020).

#### INFRASTRUCTURE INNOVATION:

- ☒ DEVELOPMENT OF PRIVATE CLOUD-BASED ATM SYSTEMS FOR TESTING
- ☐ DEVELOPMENT OF PRIVATE CLOUD-BASED ATM OPERATING SYSTEMS

- ☐ Actions to be evaluated
- ☒ Actions completed/begun

## Reporting and communication

4



### Reporting and communication



- ☐ PUBLISH A **SUSTAINABILITY REPORT "IN ACCORDANCE WITH GRI"** INCLUDING THE NON-FINANCIAL STATEMENT (LEG. DECREE 254/2016)
- ☐ PROVIDE TRAINING ON NON-FINANCIAL REPORTING AND THE USE OF THE NEW IT SYSTEM
- ☐ STRENGTHEN **EXTERNAL COMMUNICATION** ON SUSTAINABILITY ISSUES WITH THE DEVELOPMENT OF A DEDICATED WEB PORTAL AND A SOCIAL MEDIA PRESENCE

- ☐ Actions to be evaluated
- ☒ Actions completed/begun

## Reporting and communication

4



### Reporting and communication



- ☒ BROADEN COMMUNICATION WITH INVESTORS, DEVOTING MORE ATTENTION TO GROUP NON-FINANCIAL INFORMATION DURING TRADITIONAL OCCASIONS FOR MEETING AND, WHEN POSSIBLE, ORGANIZING/PARTICIPATING IN MEETINGS WITH "ETHICAL/RESPONSIBLE" INVESTORS
- ☒ PARTICIPATE IN EXTERNAL INITIATIVES ON SUSTAINABILITY PROPOSED BY THIRD PARTIES (E.G. ASVIS, CSR MANAGEMENT NETWORK, CSR EUROPE, NEDCOMMUNITY) AND ROUND TABLES FOCUSING ON SUSTAINABILITY ISSUES (E.G. DIVERSITY, HUMAN RIGHTS, ENVIRONMENT), BOTH IN THE ROLE OF SPEAKER AND OF AUDIENCE
- ☒ ENGAGE IN PERIODIC STAKEHOLDER ENGAGEMENT ACTIVITIES IN ORDER TO DISCUSS THE PATH TO SUSTAINABILITY THAT THE COMPANY HAS TAKEN AND ON SIGNIFICANT SUSTAINABILITY ISSUES SO AS TO SHARE POSSIBLE DEVELOPMENT AND PROJECT SCENARIOS TO CREATE SHARED VALUE WITH THE VARIOUS CATEGORIES OF STAKEHOLDERS

- ☐ Actions to be evaluated
- ☒ Actions completed/begun

## Corporate culture and dedicated projects

5



### Corporate culture and dedicated projects



- ☐ DEVELOP AND INTERNAL COMMUNICATION PLAN ON SUSTAINABILITY TO CREATE THE CULTURE OF SUSTAINABILITY AND RAISE EMPLOYEE AWARENESS OF THE POSITIVE SOCIAL AND ENVIRONMENTAL IMPACT OF SMALL DAILY ACTIONS TO FORM AWARENESS AND TO PROACTIVELY ENGAGE THE CORPORATE COMMUNITY
- ☐ PLAN FURTHER OCCASIONS FOR MEETINGS BETWEEN PILOTS AND AIR TRAFFIC CONTROLLERS TO INCREASE THE RECIPROCAL UNDERSTANDING OF THE TOOLS AND SERVICES EACH PROVIDES AND TO IMPROVE THE CONNECTION AND THE FLUIDITY OF COMMUNICATION DURING THE VARIOUS STAGES OF FLIGHT
- ☐ DEFINE SPECIFIC INITIATIVES TO DEVELOPMENT HUMAN CAPITAL THROUGH:
  - Tools for assessing technical/managerial skills with respect to business objectives and the relative development programmes
  - Start up a project to develop a specific tool for analyzing and evaluating people satisfaction

- ☐ Actions to be evaluated
- ☒ Actions completed/begun

## Corporate culture and dedicated projects

5



### Corporate culture and dedicated projects



- ☐ DEVELOPMENT OF WELFARE PROGRAMMES:
  - MONEY AND TIME SAVING
  - FORMS OF FLEXIBLE WORK
  - IMPROVEMENT IN WORK ENVIRONMENT (HEAD OFFICE)
  - MOBILITY AND SHARED SERVICES
- ☐ DEVELOPMENT OF STAFF PROTECTION - SECURITY AND HSE PROGRAMMES:
  - TRAVEL SECURITY

- ☐ Actions to be evaluated
- ☒ Actions completed/begun

# Corporate culture and dedicated projects



## Corporate culture and dedicated projects



- ☐ INITIATIVES TO PROTECT NATURAL CAPITAL THROUGH THE USE OF CONSUMABLES:
  - **ENERGY EFFICIENCY**
- ☐ DEVELOPMENT OF ADDITIONAL DIGITAL WORKPLACE TOOLS FOR WORK-LIFE BALANCE
- ☐ PARTICIPATION IN THE SCHOOL-WORK PROJECT ENTITLED “DESTINATION FUTURE: THE SCIENCE CONGRESS FOR YOUTH” FOR THE 2018-2019 ACADEMIC YEAR

- ☐ Actions to be evaluated
- ☒ Actions completed/begun

### 3 PERFORMANCE IN 2018

- 45 Traffic Control Towers
- 4 Area Control Centres
- 4,114 employees
- 1.96 million flights managed annually
- Peak of 6,839 flights managed in one day
- 732,000 km<sup>2</sup> of managed airspace

#### 2018 FINANCIAL DATA

- €889.7 million revenues (+0.9% on 2017)
- €114.4 million profit (+12.7% on 2017)
- €297.4 EBITDA (+4.9% on 2017)

#### 2018 COMMUNITY HIGHLIGHTS

- Leader among the main ANSPs in Europe in punctuality with 0.024 minutes of AFTM delay assigned en route<sup>3</sup>
- 69,843 hours of technical operational training
- €113 million in investment in infrastructure out of €116.9 million in total investment
- More than 1,900 flights hours for Flight Inspection and Validation aircraft

#### 2018 ENVIROMENT HIGHLIGHTS

- 135 million kg less CO<sub>2</sub> produced due to the Free Route Project
- 133 thousand kg less CO<sub>2</sub> produced thanks to the use of renewable energy

#### 2018 PEOPLE HIGHLIGHTS

- 100% employees on permanent contract
- 5.3% staff turnover rate
- 99,716 hours of classroom training and e-learning
- 190,996 hours of continuous training and operational unit training

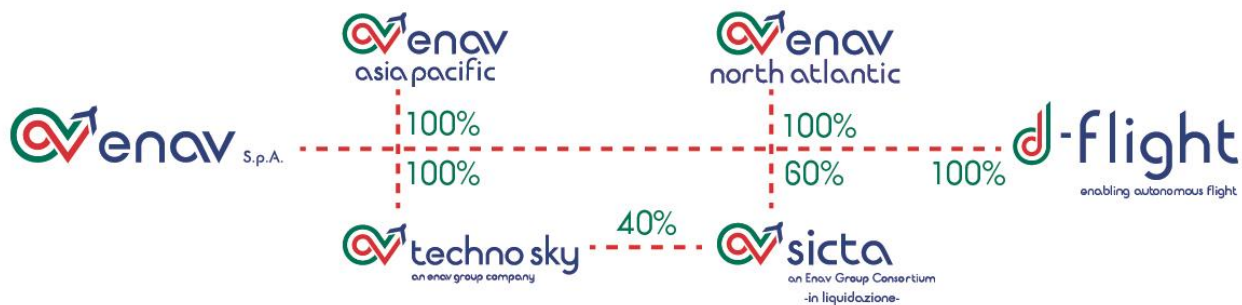
---

<sup>3</sup> The main ANSPs in Europe are: Germany; France, the United Kingdom, Spain and Italy.

## 4 THE ENAV GROUP

### 4.1 GROUP PROFILE

Safety and quality of service are the key words that inspire the ENAV culture, resulting in ENAV being recognised as one of the best service providers at international level. Its increasingly customer-oriented approach is also aimed at developing a strategy capable of generating constant value to the growth of air transport.



4

The ENAV Group also includes the subsidiaries Techno Sky SRL, ENAV Asia Pacific Sdn Bhd and ENAV North Atlantic LLC. Thanks to these, in addition to providing air navigation services pursuant to the law and articles of association, the Company is able to guarantee the installation, maintenance and constant monitoring of flight assistance systems and related hardware and software, to develop and test new technologies, and to be present abroad with business consultancy activities and the provision of services on international markets.

Specifically, Techno Sky, the logistics and maintenance company of the ENAV Group, ensures full, seamless operating efficiency and the availability of Italy's ATC (Air Traffic Control) installations, systems and software products. It manages and maintains:

### 4 AREA CONTROL CENTRES

### 45 AIRPORTS

### 46 RADAR SYSTEMS

### 123 TELECOMMUNICATION CENTRES

### 71 WEATHER SYSTEMS

### 249 NAVIGATIONAL AID SYSTEMS

<sup>4</sup> D-Flight is a company formed in November 2018 with its share capital fully subscribed by ENAV. Its purpose is to develop and deliver low-altitude air traffic management services for remotely piloted aircraft and all other types of aircraft that fall in the category of unmanned aerial vehicles.

Consorzio Sicta in liquidazione, placed in voluntary liquidation by resolution of its shareholders' meeting held on 3 March 2017 and effective as of 28 March 2017.

## **28 SOFTWARE SYSTEMS UNDER MAINTENANCE FOR A TOTAL NUMBER OF 22,159 AIR TRAFFIC MANAGEMENT (ATM) APPLICATIONS IN OPERATION**

Techno Sky operates through its network present throughout Italy in order to meet each technical, implementation and management requirement in an effective and prompt manner.

As ENAV's mission critical systems integrator, Techno Sky controls the full value chain, i.e. research and development, system engineering, design, ATM software development, weather system development, installation, integration, training, logistics, maintenance, calibration of measurement instruments, spare part management and repair management.

Techno Sky has a wealth of knowledge, technologies and expertise gained over more than forty years of activity as a market leader in ATM systems at ENAV's service. This has also been made possible through its partnerships with major global ATM, ICT, meteorological and security system manufacturers. It markets its own services and is also involved in the development of projects on behalf of Italian and international organisations (ATM providers, agencies, institutions and airport managing authorities).

ENAV Asia Pacific and ENAV North Atlantic, respectively established in 2013 and 2014, are based abroad.

ENAV Asia Pacific (EAP) is wholly-owned by ENAV. It was established as a private company limited by shares with a head office in Kuala Lumpur, Malaysia, in March 2013. ENAV Asia Pacific provides air traffic control management and consultancy services, as part of its marketing and sales activity, as well as other essential air navigation services. ENAV's committed presence in the region makes it a reliable partner for all local companies, organisations and institutions. ENAV Asia Pacific aims to build long-term relationships with its clients by meeting all their needs in a structured, efficient and effective manner.

ENAV North Atlantic, also wholly-owned by ENAV, was established on 29 January 2014 as a limited liability company under US law. Its main objective is to manage ENAV's investment in the share capital of Aireon LLC, a limited liability company established under US law whose corporate purpose is the provision of instrumental services for the surveillance of air navigation through a global satellite surveillance system.

ENAV is one of Aireon's shareholders, holding a stake of about 11%, along with the service providers for Canada, Great Britain, Ireland and Denmark and its industrial partner, Iridium, owner of the satellite constellation. Note that ENAV North Atlantic, due to the activity it carries out, has no employees.

ENAV also has a significant stake (16.6%) in the French company ESSP s.a.s. which provides the GPS satellite signal enhancement service called EGNOS. Together with ENAV, ESSP's shareholders are six other major European air navigation service providers: DFS, DGAC-DSNA, ENAIRE, NATS, NAV-Portugal and Skyguide.



## **4.2 GOVERNANCE**

### **The governance system**

ENAV's corporate governance system, which is composed of a series of bodies, principles, rules and procedures that comply with the principles set out in the Corporate Governance Code for Italian Listed Companies, promoted by the Committee for Corporate Governance established by Borsa Italiana S.p.A., with the recommendations formulated by Consob on this subject and, more generally, with international best practices. ENAV's corporate governance system, also taking into account the social significance of the Company's operations, pursues the main objective of creating value for its shareholders over the medium to long term and adequately balancing and fostering all relevant interests.

ENAV's corporate governance system is structured according to the traditional Italian model and consists of the Shareholders' Meeting, the Board of Directors and the Board of Auditors.

With regard to the composition and responsibilities of the governance and control bodies, please see the detailed description contained in the Report on Corporate Governance and Ownership Structure found in the 'Governance' section of ENAV's website: [www.enav.it](http://www.enav.it).

### **Diversity policies for the appointment of members of the governance bodies**

With regard to the diversity criteria applied to the composition of the Board of Directors, ENAV applies the general appointment and selection criteria for members of the administrative body as described in detail in the Report on Corporate Governance and Ownership Structure. As an overview, pursuant to Article 11-bis 1 of ENAV's Articles of Association, directors must be chosen according to criteria of professionalism and competence from among persons who have experience of at least three years in activities involving administration or control or management within companies, professional activities or the teaching of legal, economic, financial or technical-scientific subjects at university level, or other subjects that are relevant or in any case functional to the operations of the Company, or managerial functions in public entities or public administrations, operating in sectors which are related to the company's sector, or entities or public administrations that are not related to the aforementioned sectors provided the functions involve the management of economic and financial resources. Moreover, with regard to gender representation in the Board of Directors, Article 11-bis.3 of ENAV's Articles of Association requires that the composition of the administrative body complies with the current regulations regarding gender balance. The substitution and integration mechanisms of the Board of Directors are consistent with such criteria.

### **The criteria for appointing governing bodies**

Pursuant to Article 21 of the Articles of Association, the Shareholders' Meeting shall appoint the Board of Auditors which shall be composed of three standing Auditors, amongst which it elects the Chairman, and two alternate auditors. Standing and alternate Auditors shall be appointed by the Shareholders' Meeting based on a slate submitted by the Shareholders, in which the candidates must be listed with a progressive number and the number of candidates proposed must not exceed the number of members to be elected. The auditors will maintain office during three financial years that shall expire on the date of the Shareholders' Meeting convened for the approval of the financial statements of the third financial year of their term. The members of the Board of Auditors will be selected from among those that possess the requirements of professionalism and integrity indicated in the applicable laws and regulations. As regards the composition of the Board of Auditors, with reference to the situations of non-eligibility and the limitations to accumulation of offices that can be covered by the members of the Board of Auditors, the applicable provisions of law and the regulations shall apply. The composition of the Board of Auditors must comply with the

provisions of the law and the regulations regarding gender balance, where applicable. If during the course of the term, one or more of the standing auditors are no longer available, the alternate auditors will replace them in an order that will ensure compliance with the aforementioned provisions of the law and the regulations regarding gender balance.

### **The Sustainability Committee and other committees**

In exercising its powers and responsibilities, the Board of Directors relies on the support of internal committees with proposal and consultative functions. Specifically, in accordance with the requirements of the Corporate Governance Code for Italian listed companies produced by Borsa Italiana S.p.A., which ENAV has adopted, the Board of Directors established the Control, Risks and Related Parties Committee and the Remuneration and Appointments Committee. Both committees were established within the Board itself. More information on the composition and responsibilities of these committees can be found in the Report on Corporate Governance and Ownership Structure.

In addition to the above, ENAV's Board of Directors established a Sustainability Committee composed of three non-executive members, the majority of whom are independent, including the Chairman. This committee, established by the board resolution of 27 June 2018, is tasked with assisting the Board with its investigative and advisory functions and with the development of proposals. It also assists the CEO with matters regarding sustainability.

### **4.3 ESG RISK MANAGEMENT AND THE ENTERPRISE RISK MANAGEMENT SYSTEM**

The ENAV Group employs an Enterprise Risk Management System through which it monitors and manages risks, in terms of threats and vulnerabilities, in relation to approximately twenty different financial and non-financial domains.

Periodic risk assessment activities make it possible to assess risk exposure both in qualitative and quantitative terms, to define specific propensity and tolerance thresholds and, as a result, to draw up the related remedial actions.

Enterprise Risk Management complies with the guidelines on the Internal Audit and Risk Management System (SCI GR) and is assisted by the Risk Control and Related Parties Committee.

The various organisational, operational and internal standards are accompanied by a constant commitment to spreading the culture of risk and risk-based management throughout the various levels of the company.

In consideration of the materiality analysis on sustainability issues, the Enterprise Risk Management System identifies and manages non-financial risks related to the following areas:

- social
- employees
- environmental
- governance and compliance
- human rights.

The main non-financial risks are reported below. The manner in which they are managed will be discussed in more detail in the sections addressing those specific risks.

#### **Risks associated with air navigation services**

The Group is constantly committed to guaranteeing the highest level of security in the services it offers by systematic management of safety (flight safety) and security (information security and physical security) and through the continuous development of innovative technology and infrastructure.

In the provision of air navigation services, ENAV is subject to requirements to ensure safety and security. The international, European and national standards governing safety and security require the Company to establish standards and objectives to mitigate the risk associated with breaches of security and to take measures to restore safety levels.

In view of the foregoing and taking account of the fact that impacts that can be generated by the occurrence of risk events associated with the provision of air navigation services also affect the image and the reputation of the ENAV Group, all the necessary actions for achieving and maintaining the intrinsic level of risk inherent in the nature of the services we provide, in other words the level of risk that cannot be mitigated further through preventive actions, must be considered as a priority.

Furthermore, through its services, which are characterised by the application of the most innovative operating concepts, ENAV aims to meet airlines' needs in terms of flight affordability (punctuality, fuel economy, etc.), cultivating the relationships through its Customer Relationship Management Unit.

## **Risks associated with personnel**

For the ENAV Group, human and organisational capital are one of the key factors for maintaining levels of excellence, in terms of safety, operational capacity and environmental impact, in the provision of regulated and unregulated services, and serve as strategic assets in cementing the Group's status a top performer at international level.

Therefore, the Group's priority is to ensure that, over time, its human resources are always appropriate in relation to the internal operating model. This translates into a commitment to ensure that the skills of operational and non-operational personnel are constantly aligned with the operating models adopted, in order to guarantee the achievement of institutional and business objectives. The new leadership model is defined with specific reference to the assessment and development of resources, the cultivation of talent and the involvement and alignment of personnel.

Workplace health and safety is managed at Group level in compliance with the requirements set out in Legislative Decree 81/2008 as amended, through organisational<sup>5</sup> and procedural safeguards (e.g. the operational control activities envisioned within ENAV's and Techno Sky's certified<sup>6</sup> SGSSL management systems) that make it possible to adequately manage all the potential risks to which the Group's employees are exposed (e.g. depending on the type of working activity, risks may include noise, electromagnetic fields, ionizing radiation, fire, working at high elevations and work-related stress).

Another aspect covered by workplace health and safety relates to travel security, or the management of the professional and security risks of ENAV personnel working abroad. This risk is managed both in relation to security awareness for personnel working abroad, and in relation to workplace health and safety (job responsibilities, medical and epidemiological aspects).

The ENAV Group mitigates the risk of trade union disputes through a dedicated labor relations department. In particular, all the necessary measures for mitigating the impact of any strikes are adopted, based mainly on regulatory and legislative instruments and with the coordination with external stakeholders.

## **Risks associated with environmental protection**

The non-industrial nature of the Group means that the environmental protection controls are mainly focused on the management of special waste, electromagnetic pollution and radiogenic sources, with a systemic management approach that looks beyond regulatory compliance.

Environmental principles are also taken into account in the supply chain through organisational and operational controls (e.g. assessments of the services provided by suppliers, requiring that the principles of ENAV's code of ethics be adopted by suppliers, etc.).

## **Risks associated with governance and compliance issues**

The current national and international regulatory landscape offers a particularly complex picture accompanied by a constant and rapid increase in regulation, requiring investments in resources and processes in order to monitor relevant issues. This context envisages a series of obligations and requirements for the directors and managers of companies, including those deriving from Legislative Decree 231/01 on corporate administrative liability, Legislative Decree 81/08 on workplace health and safety, Law 262/05 on the protection of savings and the regulation of

---

<sup>5</sup> A single Group unit was created to handle HSE issues

<sup>6</sup> In conformity with BS OHSAS 18001:2007

financial markets, Legislative Decree 152/06 on the definition of the system of powers of attorney and the delegation of functions in environmental matters, Regulation (EU) 2016/679 on data protection, Legislative Decree 254/16 on the disclosure of non-financial information, the regulations governing market abuse introduced with Legislative Decree 107/18 amending the Consolidated Law (Legislative Decree 58/98), Legislative Decree 50/16 on public contracts for works, supplies and services, with regard to the adoption and implementation of an anti-bribery management system.

ENAV constantly monitors developments in the regulatory framework in order to ensure timely and effective compliance with the legislative and regulatory framework, adopting best practices in this field and adjusting responsibilities, processes and organizational, governance and control systems as necessary.

The Group maintains a collaborative dialogue with national and European institutions and with the governing and regulatory bodies of the sector.

In particular, the Group has identified the risk of corruption among those to which it is exposed, both in relation to the operating context in which it operates at national level, and in relation to business development initiatives in foreign countries.

The Board of Directors approved the “Code of Conduct for the prevention of corruption” (the Anti-Corruption Code). The implementation of this Code is obligatory both for ENAV and for all the companies it controls and is part of a structured internal body of law consisting of policies, procedures, guidelines and regulations that govern the individual reference areas in more detail and to which internal personnel must comply.

### **Risks associated with safeguarding human rights**

Given the nature of the activities carried out by the Group, there are no particularly significant risks relating to human rights violations, as defined in the United Nations’ Universal Declaration of Human Rights of 1948. However, there are other risks which fall within the broader definition of human rights and are typically inherent in business activity (managed according to regulatory requirements or dedicated initiatives). Such risks may concern discrimination in the workplace (addressed under the initiatives of the Equal Opportunities Committee) and the violation of the right to privacy and worker safety of the worker. However, much attention is paid to compliance with social criteria in the supply chain and in commercial operations, in consideration of the international activities in which the Group is engaged.

## 4.4 INTERNAL CONTROL AND RISK MANAGEMENT SYSTEM

The guidelines of the internal control and risk management system (“ICRMS”) describe the internal control system adopted by ENAV to cover all of the Company’s activities.

ENAV’s ICRMS is composed of a set of rules, procedures and organisational units designed to enable the identification, measurement, management and monitoring of the main risks to which the Group is exposed and implementation of controls to ensure achievement of the corporate objectives of:

- ✓ preserving corporate assets;
- ✓ implementing effective and efficient corporate processes;
- ✓ ensuring the reliability of financial reporting;
- ✓ complying with the law, regulations, the Articles of Association and internal Company rules.

The ICRMS, which reflects the recommendations of the Corporate Governance Code and takes account of national and international best practice, is divided into three separate levels of internal control:

<b>“first level controls” or “line controls” (risk ownership)</b>	The set of control activities that the individual organisational units of the Group perform for their own processes in order to ensure that operations are conducted correctly. These control activities are carried out under the primary responsibility of management and they are considered an integral part of every corporate process. The corporate units are therefore the primary entities responsible for the internal control and risk management process. In the course of their regular operations, these units are required to identify, measure, evaluate, manage, monitor and report the risks arising from ordinary business operations in accordance with applicable law, regulations and internal procedures.
<b>“second level” controls</b>	These are entrusted to units specifically responsible for these duties (such as Integrated Compliance and Risk Management, the Financial Reporting Officer, Planning and Control, Safety, Security) which are hierarchically and functionally independent of the “first level” corporate units, with specific control duties and responsibilities for different areas/types of risk. They monitor the corporate risks pertaining to their specific areas, propose guidelines for the associated control systems, verify their adequacy in order to ensure the efficiency and effectiveness of risk control and management operations and support the integration of the risks related to their specific areas of responsibility.
<b>“third level” controls</b>	These are performed by the Internal Audit Department, which provides independent and objective assurance on the adequacy and actual operation of the first and second level controls and the ICRMS in general. This level of control is therefore responsible for verifying the structure and operation of the overall ICRMS, including through monitoring the line controls and second-level controls, for ENAV and the Group as a whole.

The following chart summarises the players of the SCIGR of ENAV, with evidence of the architecture based on the three levels of control.



\* also, in the CEO's capacity as director responsible for the ICRMS

The director in charge of the SCIGR is responsible for supervising the operation of the internal control and risk management system, with the duties referred to in Application Criterion 7.C.4 of the Corporate Governance Code (the "Director in Charge"):

- (i) identifying the main corporate risks, taking account of the characteristics of the business areas in which the Company and the Group operate, bringing those risks to the attention of the Board of Directors for periodic review;
- (ii) executing the guidelines of the ICRMS, handling the planning, implementation and management thereof and verifying its ongoing adequacy and effectiveness;
- (iii) adapting the system to developments in operating conditions and the legislative and regulatory environment;
- (iv) in consultation with the Chairman of the Board of Directors, submits to the Board of Directors proposals regarding the appointment, termination and remuneration of the Internal Audit Officer, ensuring that the latter has appropriate resources for the discharge of his/her responsibilities;
- (v) in consultation with the Chairman of the Board of Directors, examines the plan of activities prepared by the Internal Audit Officer, submitting an assessment in this regard to the Board of Directors, which is called upon to approve this plan;
- (vi) may ask the Internal Audit Department to perform checks of specific operational areas, as well as checks of compliance with internal rules and procedures in the performance of business operations, informing the Chairman of the Board of Directors, the Chairman of the Control, Risks and Related Parties Committee and the Chairman Board of Auditors;
- (vii) promptly reporting to the Board of Directors on any problems or critical issues that have emerged in the performance of his/her duties, or that were otherwise brought to his/her attention, so that the Board of Directors may take the necessary measures.

## **4.5 INTERNAL AUDIT**

Internal Audit (which functions pursuant to a mandate approved by the Board of Directors) shall have access to all information required for the performance of its duties and shall prepare periodic reports containing adequate information on its activities, the procedures through which risks are managed and compliance with plans for containing them. The periodic reports will contain an assessment of the appropriateness of the SCIGR, with regard to the audit activities established in the audit plan and any additional verifications that are requested.

Internal Audit is not responsible for any operational area and reports to the Board of Directors (through the coordination of the Chairman of the Board of Directors). It shall prepare timely reports on events of particular significance, transmitting its periodic reports and those on particularly significant events to the Chairmen of the Board of Auditors, the Risk and Related Parties Control Committee, the Board of Directors, the Director in charge of the Internal Control and Risk Management System (SCIGR), and to the Financial Reporting Manager to the degree in which the matter involves his/her responsibility. Moreover, the audit plan will be used to verify the reliability of the Company's information systems, including its accounting systems.

The Internal Audit Officer, who is also an internal member of the Supervisory Body, is responsible, among other things, for verifying that the internal control and risk management system is functioning and adequate; in particular:

- (i) verifying, on an ongoing basis and in relation to specific needs and in compliance with international standards, the operations and appropriateness of the ICRMS, through the audit plan and by conducting specific, unscheduled audits;
- (ii) preparing, at least annually, an audit plan, based on a structured process of analysis and identification of the priorities inherent in the main risks, to be submitted for the approval of the Board of Directors;
- (iii) conducting specific verifications, where deemed appropriate or at the request of the Board of Directors, the Control, Risks and Related Parties Committee, the Director in Charge or the Board of Auditors.

The Internal Audit Officer also ensures that the Group has adequate safeguards in place to prevent corruption and combat fraud, including monitoring reports that arrive through the whistleblowing system and verify the facts reports.

With the entry into force of the General Data Protection Regulation (Regulation (EU) 2016/679), the Internal Audit Officer was made the Data Protection Officer (DPO) for the ENAV Group.



## **4.6 BUSINESS MANAGEMENT SYSTEM**

Starting from the first certification in the area of quality, obtained in 2007, the scope of the Group's Management Systems has gradually increased over time, now covering almost all of its business processes. In parallel, the description of the procedures became more detailed and in-depth, providing precise descriptions of the dynamics among the various organisational roles within the individual departments and envisioning new controls.

The expansion in the number of business processes managed by dedicated management systems and their integration makes it possible to view the set of procedures adopted by the ENAV Group as an actual Business Management System, understood as a uniform system of rules and procedures for regulating and guaranteeing the proper performance of the Group's business activities.

### **The management systems**

Below is a list of the management systems adopted by the Group:

- ENAV Quality Management System (216 documents, of which procedures, guidelines and operating instructions);
- ENAV Security Management System (35 documents, of which procedures, guidelines and operating instructions);
- ENAV Safety Management System (17 documents, of which procedures and guidelines);
- ENAV Occupational Health and Safety Management System (13 documents, of which procedures, guidelines and operating instructions);
- Techno Sky Quality Management System (129 documents, of which procedures, guidelines and operating instructions);
- Techno Sky Occupational Health and Safety Management System (13 documents, of which procedures, guidelines and operating instructions);
- ENAV ASIA PACIFIC Quality Management System (3 procedures).

### **Group Certifications**

Over the years, ENAV Group companies have obtained a number of certifications in various business areas. Specifically:

- ISO 9001:2015 Certification for the ENAV Quality Management System issued by an accredited certification body;
- ISO 9001:2015 Certification for the Techno Sky Quality Management System issued by an accredited certification body;
- OHSAS 18001:2007 Certification for the ENAV Occupational Health and Safety Management System issued by an accredited certification body;
- OHSAS 18001:2007 Certification for the Techno Sky Occupational Health and Safety Management System issued by an accredited certification body;
- ISO/IEC 27001:2014 Certification for the ENAV Safety Management System, issued by an accredited certification body for the part relating to information security;

- Certification of ENAV as an air navigation service provider, issued by ENAC pursuant to Regulation (EU) No. 1035/2011 for ANS services (ATS, AIS, MET, CNS);
- Certification of ENAV as a training organisation for air traffic controllers, issued by ENAC pursuant to Commission Regulation (EU) 2015/340;
- Certification of ENAV as a training organisation for flight information service operators, issued by ENAC under ENAC Regulation 'Flight Information Service Operator License';
- Certification of ENAV as a training organisation for personnel providing meteorological services for air navigation, issued by ENAC under ENAC Regulation 'Requirements for personnel in the provision of meteorological services for air navigation';
- Certification of ENAV as an organisation for the planning of instrumental flight procedures, issued by ENAC under ENAC Regulation 'Instrumental Flight Procedures';
- Certification in Capability Maturity Model Integration for Development (CMMI-DEV) for Techno Sky for the development of products and services (maturity level 2 in software development);
- AQAP 2110/160 Certification for Techno Sky's Quality Management System, issued by the Ministry of Defence;
- Certificate of Conformity with Regulation (EC) No. 303/2008 (F-GAS) for the 'Installation, maintenance, or repair of fixed equipment for refrigeration, air-conditioning and heat pumps containing fluorinated gases with greenhouse effects' awarded to Techno Sky;
- Accreditation of Techno Sky's LAT Centre No. 15 as calibration laboratory pursuant to the international standard UNI CEI EN ISO/IEC 17025:2005, issued by Accredia.

## **Regulatory compliance**

The complex governance structure that the ENAV Group has developed over the years involves a considerable amount of effort in terms of organisation and compliance with each of the provisions introduced. This effort is rewarded with the lack of legal actions against the Group regarding anti-trust and competition matters, as well as the absence of monetary and non-monetary sanctions for legislative and regulatory violations concerning economic, social and environmental matters. The Group decided not to equip itself with a dedicated centralised compliance department. Therefore, the individual organisational units, as first or second reporting departments to the Chief Executive Officer or the General Manager, are directly responsible and organise themselves internally to ensure regulatory compliance, regarded by the Group as being an essential element of its business.

## 5 COMMUNITY

The ENAV Group's most significant contribution to the community is inherent in its mission: to guarantee maximum safety and punctuality to the millions of passengers flying in Italian skies, thus contributing to the growth of domestic and international air transport through an increasingly customer-oriented strategy.

Our direct customers are the airlines, but indirectly our customers are all the passengers, the airports, the companies that manage the air transport supply chain and, since 2016, also the private shareholders who have become part of the stakeholders by virtue of the Company's stock market listing.

ENAV, for example, is Europe's leader in punctuality among the main ANSPs<sup>7</sup> (0.024 minutes of delay AFTM allocated en route) and this contributes not only to a savings in fuel and consequently emissions for the airlines but also to the reduction of waiting for passenger embarkation.

The community to which ENAV refers is therefore particularly heterogeneous, and the activities developed for the benefit of it, despite having safety as its fulcrum, are delivered through various initiatives that are described below.

---

<sup>7</sup> The main ANSPs in Europe are: Germany, France, the United Kingdom, Spain and Italy.

## **5.1 SAFETY**

The safety processes defined are mainly intended to prevent air safety incidents and accidents, especially those involving the direct/indirect contribution of ATMs, by correcting and controlling the conditions leading up to unwanted events and by reducing the risk factors so as to achieve and maintain an acceptable level of risk exposure.

ENAV considers the operational safety level of air navigation services an essential priority. In pursuing its institutional objectives, it reconciles the interdependencies of the different performance areas with the achievement of the paramount objectives of safety.

### **Safety policy**

The Safety Policy is the ENAV Group's formal statement regarding the high priority it gives to the level of operational safety of air navigation services.

It is this policy to which the ENAV Group requires the commitment of all its personnel, starting from its management, for the implementation of transparent and responsible actions in the field of safety. This policy is also the official act that mandated the establishment of a Safety Management System which, in compliance with the applicable laws and best practices in the sector, serves as a fundamental tool in the proactive and systematic management of safety.

### **Just Culture Policy**

The Just Culture Policy approved by the Group's senior management is a further evidence of the priority the Group places on safety. This policy states that human resources are fundamental to ensure the safe management of air traffic and that its skills are the best answer to unforeseen and unforeseeable situations. For this reason, ENAV accepts that an honest error, even when associated with an unintended consequence, should not be sanctioned if connected to human fallibility or when committed honestly.

The policy also states that failure to report an event that jeopardises or may jeopardise safety is unacceptable, and wilful violations and gross negligence that lower the level of safety and/or increase the level of risk will not be tolerated and will be punished.

The active participation of personnel is a critical factor in the successful and effective implementation of the Safety Management System. As a result, ENAV fosters a climate of trust and of information sharing and encourages the reporting of facts and information that are useful in preventing aeronautical incidents and accidents.

In this context, the Just Culture Policy is a fundamental and enabling element of the occurrence reporting system, implemented pursuant to international standards and current regulations, adopting the "no blame" approach.<sup>8</sup>

### **Safety management system**

ENAV has implemented the "common requirements" for the provision of air navigation services established with the context of the Single European Sky. It also has its own Safety Management

---

<sup>8</sup> The "no blame" approach is the non-punitive approach associated with the Just Culture Policy adopted in accordance with Regulation (EU) No. 376/2014. It refers to the manner in which the organisation manages mistakes and sanctions. In contrast to the "blame culture," the "no blame" approach and the adoption of the principles of the Just Culture Policy support the reporting culture by opting not to punish honest mistakes and by elevating the analysis of individual behaviours to an analysis of systemic and/or organisational fallibility, therefore restricting the scope of sanctionable acts to cases of unacceptable behaviour (i.e. acts that are intentional, malicious and illegal that aim to reduce the level of safety).

Manual (SMM) which complies with all the requirements contained in Commission Implementing Regulation (EU) No. 1035/2011.

In accordance with EASA Decision 2013/032/R on the Implementation and Measurement of Safety Key Performance Indicators, specifically the Acceptable Means of Compliance (AMC) and the Guidance Material (GM), the effectiveness of ENAV's Safety Management System is measured and validated by ENAC on an annual basis.

Given the importance of the Safety Management System, the effectiveness of safety management (EoSM) is one of the most important indicators in the performance scheme for air navigation services and network functions, established pursuant to Commission Implementing Regulation (EU) No. 390/2013. As specified in the regulation, "the performance scheme should provide for indicators and binding targets in all key performance areas with required safety levels fully achieved and maintained." For this reason, the effectiveness of the Safety Management System is measured by means of an assessment process in which the European Commission and the Performance Review Body are assisted by EASA.

The EoSM assessment process is based on the Eurocontrol Safety Framework Maturity Survey (SFMS) and assess the level of implementation and maturity of 5 management objectives. The management objectives linked to the targets provided for by the performance scheme for air navigation services are associated with the management objectives (MO). Specifically, on an ascending scale ranging from Level A to Level E, the expected objectives are as follows:

- 1 MO "Safety Policy and Objectives", Level D;
- 2 MO "Safety Risk Management", Level D;
- 3 MO "Safety Assurance", Level D;
- 4 MO "Safety Promotion", Level D;
- 5 MO "Safety Culture", Level C.

#### **YEAR 2018**

**126,031 HOURS OF OPERATING UNIT TRAINING<sup>9</sup>**

**WITH 1,729 PARTICIPANTS**

**64,965 HOURS OF CONTINUING TRAINING<sup>10</sup>**

**WITH AROUND 1,890 PARTICIPANTS**

---

<sup>9</sup> The operating unit training refers to the fact that each air traffic controller, in order to be able to exercise license privileges at a specific area facility, must train and reach a minimum level of theoretical and technical knowledge that allows the controller to operate independently in the operational position for which the controller is trained.

<sup>10</sup> Refers to continuing professional education aimed at maintaining the skills of all the air traffic controllers employed in the operational line as well as the FISO (Flight Information Service Officer) employed at the AFIUs (Airdrome Flight Information Unit) or at the FICs (Flight Information Centre) of the ACCs (Air Control Centre).

## Continuous safety monitoring

Safety monitoring is one of the essential activities of the Safety Management System. The measurement of specific indicators makes it possible to have updated information on the state of safety and allows for the timely identification of possible measures to ensure that an acceptable level of safety is maintained.

The state of safety within the various organisational structures is further assessed through safety surveys, i.e. specific assessment activities carried out by the safety division.

### The main safety activities

The number of company activities and projects related to safety is of undoubted importance. This is also due to the fact that the activities aimed at improving services, i.e. those regarding environmental sustainability and improving ENAV's economic efficiency (respectively addressed in the essential performance areas of Capacity, the Environment and Cost-Efficiency) are closely related to the essential performance area of safety. It is now established practice that investment programs that intend to make the most of technological innovations, the modernisation of the ATM/CNS and MET infrastructures, the review of the selection, recruitment, use and verification processes of personnel, as well as changes in organisational and production processes, must take into account the aspects and, above all, the pre-eminent objectives of safety.

In order to provide some quantitative and qualitative evidence, we would like to note that in relation to plans, modifications and/or activities related to the supply of air navigation services deriving from the business plan, from the European convergence plan (LSSIP), from the need to maintain and modernise the technological infrastructures (rather than from the reorganisation of the delivery methods for operational services and the optimisation of configurations and layouts), in 2018, in accordance with the SMS\_P07 procedure 'Safety assessment of changes to the ATM/ANS functional system and to the training activities' of the Safety Management System, the following activities were carried out:

Type	Operations	Technology	Other	Total	Change 2018 - 2017
					%
<b>Modifications</b>	526	6	1	533	+ 231%
<b>Minor simplified changes</b>	632	13	1	646	+ 162%
<b>Minor changes</b>	18	11	0	29	+ 38%
<b>Major changes</b>	1	0	0	1	0%
<b>Total</b>	<b>1,177</b>	<b>30</b>	<b>2</b>	<b>1,209</b>	<b>+ 181%</b>

The following activities highlight the transversal nature of safety with respect to the business activities as a whole:

- **Activities in the context of FAB BLUE MED:** Participation in the Safety Aspect Working Group, established under the auspices of the ANSP Committee of BLUE MED FAB.
- **Technical roundtables at international organisations;**
- **Cooperation and coordination with airport operators;**
- **Cooperation with other Air Navigation Service Providers;**
- **Cooperation with the airlines;**
- **Membership and cooperation with CANSO;**

- **Memoranda of understanding and agreements with the National Agency for Flight Safety and the Flight Safety Inspector of the Italian Air Force;**
- Membership in the **Italian Flight Safety Committee (IFSC);**
- **Participation in promotional and informative events on aeronautics,** with Aero Club d'Italia (AeCI), Volare Sicuri, Centro Studi STASA, ANACNA, ERMin, ISAERS, Comando delle Capitanerie di Porto and with national and international academic organisations;
- the provision of **specialised training.**

## **5.2 TECHNICAL OPERATIONAL TRAINING AND THE ROLE OF THE ACADEMY**

In order to keep the quality standards of the service at the highest level, ENAV cannot but view investment in training as a priority. As the only company in Italy authorised to select, train and update the various professional profiles operating in civilian air traffic management (air traffic controllers, FIS personnel, meteorologists and flight inspection pilots), over the years ENAV has been able to put operational training more and more at the centre of its strategic choices, reaching the highest levels among the international service providers for quantity and quality of service provided.

The Academy is a national and international centre of excellence for training in air traffic management. Its mission is to design and implement learning solutions for the development of technical and managerial skills for air traffic management. It is located in Forlì in the heart of an aeronautical community that includes the University of Bologna (Aerospace and Mechanical Engineering Degree Programmes), the Aviation High School "Francesco Baracca", and other flight schools and training institutes for aviation maintenance technicians. The Academy offers its participants an environment dedicated to learning, with classrooms that seat up to 30 students, simulators and support services. The following simulators are used at the Academy for training activities:

- ✓ 1 radar simulator (24 work stations in 12 suites)
- ✓ 5 3D 270° tower simulators
- ✓ 1 CRJ flight simulator
- ✓ 1 laboratory for rapid prototyping and scenario validation
- ✓ 1 meteorology operations room simulator for observatories
- ✓ 4 part-task trainer work stations

### **Internal training of technical and operational personnel**

The geometrical figure of reference for an air traffic controller is a parallelepiped. It is inside that space that every airplane in flight must move without ever trespassing another aircraft's space: 1,000 feet on the vertical plane (about 330 metres) and 5 miles on the horizontal plane (about 9 km). It is inside that space that air traffic controllers, seated in front of a monitor full of glowing symbols, demonstrate their ability and their capacity to make sure that the pilots, with whom they are in radio contact, comply with their instructions.

Being an air traffic controller is not a job like any other: it requires taking on great responsibility, the ability to manage stress and a strong teamwork ethic. It is a job that springs from a great passion and for which only the best are chosen.

For these reasons, special focus is placed on developing skills through classroom and on-the-job training, factors that play a decisive role in achieving the objectives and in performing the delicate role that the company is called to play.

Therefore, the preparation of air traffic controllers guaranteed by the ENAV Academy is essential. The Academy's mission is to oversee the training needed for Company and Group staff, as well as those of external customers, to enable them to provide air navigation services. The Academy adapts its training courses to the educational standards of sector, national and international regulations, especially those relating to the Single European Sky. Because of this, the Academy must design its certificate and non-certificate training programmes to meet certain general



requirements, in order to make it of the highest level of quality. ENAV therefore defines specific targets to achieve in developing its training, such as:

- to clearly define the general goals and specific objectives that the training aims to achieve
- to break down the objectives of skills development in terms of knowledge, ability and behaviour
- to define the process conditions and the teaching methods necessary to conduct the training and the system of verification of the objectives.

Each training programme must therefore always provide information on the structure and duration of the training, the methods of delivery, the characteristics and needs of the target population, the teaching objectives and the applicable reference legislation.

In line with the previous year, 2018 confirmed the trend of a shift in the Academy's programmes from basic training to continuing training. The emphasis of training thus shifts from stability in the delivery of long programmes with a stable design over time (typical of initial training) to the fragmentation of continuing training, characterised by short durations, low numbers of participants and the ever-present necessity to design and redesign it to ensure that it fully meets present needs. This change in the way training is provided is the result of an increasingly closer collaboration between the Operational & Technical Training department and the Group's other operations departments.

During the year, the training provided by the ENAV Academy covered various environments, managed by the following structures:

- **En Route Training:** guarantees the process of designing and delivering training for operational personnel involved in providing route and approach services
- **Airport Training:** guarantees the process of designing and delivering training for operational personnel involved in providing airport services
- **ATSEP Training:** guarantees the process of designing and delivering training for ATSEP involved in the functioning, maintenance and installation of communications, navigation, surveillance and air traffic control systems
- **Local Training Design and Harmonisation:** guarantees the process of designing continuing training, providing specialist input to the competent operational structures to harmonise local training;
- **Human Factor Training:** oversees the processes of designing and delivering human factor training and ensures that human factor principles are integrated in operational technical and training processes to improve performance and awareness of safety among line staff;
- **Instructional Design and Training the Trainers:** supervises the instructional design process, providing the Corporate Academy and line operational structures with the methodological support for designing training courses and on-the-job training.

In the course of the year, the ENAV Academy organised the OJTI Refresher programme, in accordance with Commission Regulation (EU) 2015/340. The programme held over two days and

intended for on-site operations instructors, incorporated activities focusing on the human factor. In addition, in 2018 the Academy launched training programmes on Abnormal and Emergency Situations (ABES) in accordance with Commission Regulation (EU) 2015/340.

**52,345 HOURS OF ACADEMY TRAINING IN 2018**

**(INCLUDING 1,657 HOURS OF E-LEARNING)**

**1,145 PEOPLE INVOLVED <sup>11</sup>**

**(INCLUDING 174 INVOLVED IN E-LEARNING)**

In 2018, there were two Basic APP/ADI/ADIRAD beginner training courses and two ACS courses, characterised by long duration and high number of hours/pupil, were offered. This feature led to a significant increase in hours of beginner training provided during the year compared with 2017 (+34%), although the number of people involved decreased (-36% compared with 2017).

There are young people who occasionally are called on to help out with the basic and continuing advanced training courses, serving as “pseudo pilots”, that is they pretend to be pilots in simulations. They are mainly students who ENAV hires under fixed-term contracts, the duration of which varies case by case. In 2018 there were 126 pseudo pilots (equal to about 50 full-time equivalent positions) while in 2017 there were 102 (equal to about 48 full-time equivalent positions).

Techno Sky also provides technical operational training through specific course for air traffic safety engineering personnel (ATSEP) involved in the functioning, maintenance and installation of communications, navigation, surveillance and air traffic control systems. More specifically, in 2018 Techno Sky carried out the following training activities:

- ATSEP Qualification Training, to understand the various domains in the CNS/ATM environment
- ATSEP Type Rating Training, to develop the skills needed to operate the CNS/ATM systems used by ENAV for air traffic control
- ATSEP Continuation Training, Conversion Training, Refresher Training and Emergency Training, to maintain the professional skills of ATSEP
- ATSEP Developmental Training, for the career development of ATSEP.

In addition, during the year Techno Sky conducted a technical training course for technical and engineering staff in order to develop the skills of those working in Operations and Technology areas.

### **Third-party training**

The training provided by the Academy is for professional positions closely related to air traffic control and for people working in various areas of the aeronautical sector, who require special

---

<sup>11</sup> This refers to the total number of persons who attended all courses (obviously the same employee could have attended more than one course and for this reason reference is not made to number of employees trained).

training courses in flight navigation (e.g. airlines, airport management companies, air traffic management services, aeronautical industries and government bodies in the air transport sector).

Thanks to its ability to develop scenarios and operational specifications that are adaptable according to the objectives of the courses, even building airport scenarios and personalised service areas, the ENAV Academy can also tailor training courses to the customer's specific logistical and organisational needs.

In developing training programmes for third parties, the Academy has the same objectives of excellence that characterise internal training for Group staff, with the addition of the great care taken in handling the relationship with the customer. For each training activity there are defined:

- the general goals and specific objectives that the training aims to achieve
- the objectives of skills development in terms of knowledge, ability and behaviour
- the process conditions and the teaching methods necessary to conduct the training and the system of verification of the objectives.

During the year the Academy developed special training programmes for ANSPs to train their operational staff, for aeronautical technical institutes (including "Fabio Besta" in Ragusa), to familiarise them with ATCs and specialists in the design of air spaces. The training programmes are designed to respond to a wide range of needs, such as:

- ✓ ADI TWR APS ACS training: training aimed at the acquisition/reinstatement of certification in the Tower and Radar environment
- ✓ FISO & MET AFIS course: training aimed at obtaining the FISO licence (Flight information Service Officer) and MET AFIS specialisation (enabling the provision of meteorological services for air navigation)
- ✓ Apron management: training on apron management for personnel of the management companies
- ✓ Meteo: training on meteorological observation and/or forecasting techniques
- ✓ ATM Seminars (ITAER students): familiarisation on ATM and meteorological topics for students of technical institutes studying Transport and Logistics (formerly ITAER).

In 2018 the training of the FIS operators, with two FISIO courses and activities carried out for the customer Croatia Control, for which ENAV conducted an ADI RAD course of 10 air traffic controllers, were particularly noteworthy.

Activities also continued in favour of customers who use the Academy's simulation environments as a way of developing managerial skills: within the tower, radar and flight simulators provide interactive experiences to improve the ability to communicate, to manage stress, and to work in groups.

## **21,573 HOURS OF EXTERNAL TRAINING (INCLUDING 430 HOURS OF E-LEARNING)**

### **The role of the Academy for the Aerospace Technological Centre and for the territory**

The ENAV Academy collaborates with local institutions, particularly with those engaged in the training system: the Aviation High School "Francesco Baracca", the Faculty of Engineering of the

University of Bologna and ISAERS (a consortium company which promotes and develops training and research activities in aeronautics and aerospace within the Aerospace Technological Centre of Forlì).

The Academy's presence in Forlì has had a significant impact on local development over the years, such as:

- improvement in education levels owing to the presence of new training opportunities
- cooperation with local businesses and support for innovation processes
- contribution to the development of the Aerospace Technological Centre, which has had a positive effect in making the area more attractive
- greater visibility of the territory in the media.

In addition, during the 2018/2019 academic year, Academy staff taught courses on air traffic control at the University of Bologna.

Lastly, it should be noted that ENAV Academy's effect on the Forlì area does not end with its relationship to education. In the context of relations with institutional stakeholders, the Academy cooperates with businesses such as Unindustria and the Fondazione Cassa dei Risparmi of Forlì.

### **5.3 THE FLIGHT INSPECTION AND VALIDATION SERVICE TO INCREASE SAFETY IN FLIGHT**

In line with the objective of putting airlines in the condition of flying in compliance with the highest levels of safety, ENAV, through its own fleet, carries out a detailed check of the quality and accuracy of radio-electric signals for national and international radio aids (Radar, VOR - VHF Omnidirectional Radio Range, DME - Distance Measuring Equipment, VDF - VHF Direction Finder, ILS - Instrument Landing System, GNSS - Global Navigation Satellite System, etc.). It also validates flight instrument procedures, thus providing pilots with the assurance of having safe and efficient navigation thanks to ENAV's Flight Inspection and Validation Service.

#### **General objectives:**

- ✓ *to fulfil the obligations of diligence and the guarantees imposed by international, European and national regulations to safeguard the goods and interests of primary rank involved in the provision of air navigation services;*
- ✓ *to protect personnel, infrastructures, and technological systems from acts of illicit interference and actions or events, whether or not deliberate, that may interfere with the availability and integrity of information.*

The control activity is carried out by 14 pilots and 7 technicians on board (FIO) through a fleet of Piaggio Aero P180 Avanti II aircraft owned by ENAV. The crew is usually composed of 2 pilots and 1 FIO, averaging more than 1,900 flight hours per year. These specially equipped aircraft can perform in-flight checks without the need for ground-based apparatus, obtaining results in real time and always as per international norms.

ENAV's Flight Inspection and Validation Service is also involved in research: the aircraft in the fleet are used as technologically innovative laboratories where tests are carried out on the experimentation and validation of new ATM projects.

The high level of performance achieved by the Flight Inspection and Validation Service is also evidenced by the fact that in 2017/2018, about half of the flight activity produced was sold to external customers, of which almost 80% were foreign.

**MORE THAN 1,900 FLIGHT HOURS IN 2018**  
**THE AVERAGE RESPONSE TIME FOR SPECIAL INTERVENTIONS WAS 24 HOURS**

## **5.4 SECURITY**

In order to ensure the security and regularity of the provision of air navigation services, ENAV is fully aware of the fact that the protection of personnel, infrastructure and the security of the information it receives, produces, uses and transfers is a crucial and essential element in protecting the community which directly and indirectly makes use of its services and one that contributes to defending public safety and the security of civilian aviation.

There is a strong interdependence between the concepts of safety and security relating to the risk of an aeronautical accident and aspects of continuity.

In the traditional conceptual model, safety deals with the measures to be taken to mitigate the risk of an aeronautical accident due to unintentional acts while security deals with the measures to be taken to mitigate the risk of an aeronautical accident due to intentional acts.

This model is progressively evolving with the recognition that user's unintentional negligence, imprudence (such as an involuntary failure to implement a precautionary security measure) or inexperience (incorrect configuration of systems, a deficiency in the security measures) are elements that fall under Security, as they can result in vulnerabilities in the ATM system that can be exploited by third parties, generating a potential impact on safety.

### **Security Policy**

The Security Policy expresses ENAV's commitment to ensuring the security of its facilities, personnel and systems, including the data and information contained therein, to prevent any undue interference in the provision of air navigation services, and, in general, the unavailability or compromised integrity or confidentiality of corporate information, also in the interest of the financial community.

### **Security management system**

For the purpose of guaranteeing the highest level of security possible in its corporate processes, ENAV has developed its own Security Management System, certified according to the UNI EN ISO 27001:2014 standard. The system consists of technical and organisational measures implemented in order to increase the overall ability to prevent and mitigate the negative effects of unlawful interference in the provision of air navigation services. The system also aims at protecting ENAV's employees and information assets, with direct effects on ENAV's institutional activity. The system manages the entire security life cycle and its defining point is in the activities of the Security Operation Centre, which serves as the operating engine of the processes of prevention, detection, containment, response and recovery assistance in the event of a security threat.

ENAV participates in setting the national cyber security strategy and the protection framework of national security and defence interests, in its capacity as critical infrastructure and provider of essential services.

A brief description of the main processes that make up the security management system is provided below.

- **Risk Management**

The process is aimed at identifying the risks associated with possible situations that may threaten ENAV's security and, specifically, the security of ENAV's equipment, personnel and the information that it receives, produces or uses. This process also plans and implements the security countermeasures needed to reduce these risks to levels deemed acceptable by ENAV. Risk management is expressly extended to staff working abroad.

- **Information Classification**

The purpose of the information classification process is to assist in the correct application, within the context of the business as a whole, of the rules and principles pertaining to the confidentiality of information by means of defining the confidentiality classification level and determining the persons authorised to process information, both within the organisation and on the outside.

- **Physical security management**

The physical security management process aims at avoiding unauthorised access, damage and interference to ENAV's staff, technological infrastructures and property by means of protective measures that are commensurate with the nature of the structures themselves, the type of services performed therein, the personnel it houses and, more generally, the risk analyses carried out on the specific location.

- **Management of logical accesses and data backup and recovery**

The management processes responsible for logical accesses, in relation to both the operational and managerial contexts, are tasked with preventing unauthorised access to ENAV's IT resources.

The data backup and recovery activities are carried out both for operational and managerial data in order to guarantee their availability and integrity. These activities are planned with a view toward guaranteeing the continuity of institutional services as well as those that are related to the corporate mission.

- **Security event monitoring and ICT security audits**

The Security Operation Centre, in collaboration with all of ENAV's line functions, continuously monitors the security level of the ICT infrastructures in ENAV's operational and management networks, in order to identify any abnormal behaviour and, in the event of an attack or threat, to activate the security incident management process.

On the other hand, the ICT security audits verify whether the ICT assets comply with the mandatory rules, the "ICT Security Policy", the Rules of the Security Management System and the applicable security standards.

The process, inspired by a logic of continuous improvement, aims at constantly monitoring threats and at identifying and resolving vulnerabilities in a timely manner, operating in constant contact with the threat intelligence processes. It is provided with information from the bodies responsible for national security and defence.

- **Reporting and managing security incidents**

The main objectives of the incident reporting and handling process are the timely identification of security incidents, the provision of what is necessary to prevent security-related incidents from causing greater effects in terms of extent and/or intensity of damage, the elimination of the causes of the original incident, and the resumption of normal operations as soon as possible. This activity is crucial in protecting the Group's interests and the core values contained in its constitutional architecture. This responsibility is the task of the Security Operation Centre, as the point of reference for physical, personnel and information security.

## **The main activities carried out for security**

The security activity is based on a risk analysis process built on the ISO 31000 standard which, on an annual basis, covers the three security domains (physical, personnel and information security) by means of a constantly evolving process. Risk management is developed through the principles of “security by design” and “security through lifecycle” and is carried out through procedures that are continuously updated, and that take into account the issuance of technical-operational requirements, metrics and indicators aimed at strengthening the culture and awareness of security, both with training programmes and exercises carried out for all personnel, at different levels.

During the year, the evolution of ENAV’s Security Operation Centre continued, based on open source instruments, some of which were developed internally, for the purposes of consolidating competencies in the field of threat intelligence and to acquire the certification of important institutions at international level, among which Carnegie Mellon University. The activities aimed at guaranteeing the safety of staff working abroad also continued in 2018 as did those pertaining to the overall adjustments for full compliance with the European General Data Protection Regulation (GDPR).

Cooperation with the national institutions tasked with infrastructure and cybernetics security continued, following the signing of an agreement with the Department of Public Safety at the Ministry of the Interior for the protection of the physical security of ENAV's infrastructure and personnel, which is added to the conventions on the security of information and data with the same National Authority of Public Safety and with the national Cybernetic Authority (DIS), for the complete and effective fulfilment of the duty of diligence enshrined in the Security Policy. In implementing the principles of the Security Policy, ENAV continued its campaign to promote the culture of security by offering an on-line training course and by publishing informational pamphlets on security in order to achieve the expected levels of value-sharing. A further development in ENAV's operational continuity plans, in compliance with ISO 22301 Standard, also involved the Group's systems management and maintenance processes. Lastly, approval was granted for extending the procedures and rules on internal security management in ENAV’s Security Management System to the subsidiaries Techno Sky and ENAV Asia Pacific.



## 5.5 INVESTMENT

ENAV invests heavily to ensure that assets supporting air traffic management services in the national territory are consistent with the objectives of technical, financial and performance requirements, and that they comply with quality and performance standards established at national and international levels.

In line with technological changes that are occurring internationally in the sector, ENAV has crafted a technical operations development plan with the aim of remaining competitive on an international stage and maintaining its leadership in technological innovation, in keeping with the Single European Sky requirements.

The business plan envisages investment in innovative technological platforms and systems for air traffic control for the 2018-2022 period in order to maintain high levels of performance and to ensure maximum safety.

Some of the main projects are:

- the Data Link Project, enabling ground-air-ground connectivity without the use of verbal or radio communication, will be implemented at all control centres
- the Medium-Term Conflict Detection (MTCD) system, capable of supporting air traffic control in detecting possible traffic conflicts many minutes in advance, making it possible to re-plan flight trajectories in adequate time
- the new 4-Flight system, a new-generation operational platform that will be implemented following a new approach to development and maintenance
- the new E-NET 2 network with multiprotocol label switching technology, capable of making data transmissions faster and more secure. This infrastructure forms part of the foundation for the establishment of remote-control towers.

On the basis of the development strategies, having as their primary objective the support of air traffic management services in the national territory, in 2018 the ENAV Group invested €113 million in infrastructure (out of total investment of €116.9 million) through implementation and maintenance projects for operational technological infrastructures, evolution of the ATM technology platform with new operational concepts, infrastructure, equipment and management information systems.

During the year investments were made to carry out numerous projects, including:

- development of the new ATM platform (4-Flight) for automating the Italian Area Control Centres in order to replace those currently in operation and that incorporates the flight data processor Coflight as a base component
- reinforcing the Olbia and Alghero APP service at the Rome ACC
- activation of the Data Link system at the Group's 4 ACCs, through which Controller Pilot Data Link Communications (CPDLC) at the national ACCs has been introduced
- activation of a new SMR system and airport tracker at Milan Linate airport
- upgrading of communication and navigation systems connected with transit through the military airports covered by ENAV

- upgrading and implementation of routing and airport radio aid
- upgrading of airport weather observation systems in accordance with the latest ICAO/WMO standards
- construction of the new Technical Block at the Genoa airport
- extension of the free route flight level to 305
- completion of the new building at the Academy in Forlì
- completion of Service Centre 2 at the Rome Area Control Centre

## **5.6 COOPERATION WITH ORGANISATIONS, INSTITUTIONS AND INDUSTRY ASSOCIATIONS**

ENAV's attention to the civil aviation community not only takes the form of the air traffic control services it offers, but also active collaboration with and participation in national and international bodies and institutions.

At national level, ENAV coordinates its activity with the relevant ministries (Ministry of Economy and Finance and Ministry of Infrastructure and Transport) and with ENAC (National Civil Aviation Authority), which is responsible for the technical regulation, certification, control and supervision of civil aviation in Italy. It also collaborates on an ongoing basis with other industry institutions such as ANSV (National Agency for Flight Safety), AMI (Italian Air Force) and other organisations and players in the aviation sector (e.g. airport management companies and airlines).

In Europe, ENAV is party to a number of cooperation agreements, and is actively involved in partnerships and multilateral programmes; it also plays a key role in the Single European Sky initiatives promoted by the European Commission, EASA, Eurocontrol and other European bodies and organisations. At international level, both globally and regionally, it is also engaged in a number of important activities within the International Civil Aviation Organisation (ICAO) and Civil Air Navigation Services Organisation (CANSO). To better understand the key role of these industry associations, it is worth specifying that:

- ✓ ICAO is an autonomous agency of the United Nations which aims to define the principles and techniques of international air navigation, routes and airports and to promote the design and development of international air transport, in order to make it safer and more efficient
- ✓ CANSO is the association of air navigation service providers (ANSPs) and represents their interests. The ANSP members of CANSO manage over 85% of world air traffic and through its working groups, its members share information and develop new policies, with the aim of improving air navigation services. ENAV is a member of CANSO and participates in its governance and technical activities
- ✓ EASA is the European Aviation Safety Agency, a control body that defines the highest common safety levels for the civil aviation sector of the European Union
- ✓ Eurocontrol is an intergovernmental organisation, the main purpose of which is to support the development and maintenance of an efficient air traffic control system at European level. To achieve this, it provides support to the national civil aviation authorities, the ANSPs and civilian and military airspace users, the industrial sector, professional organisations and the relevant European institutions. It also holds the important role of Network Manager assigned to it by the European Commission in 2011.

ENAV is full member of EUROCAE, an organisation which is responsible for the standardisation activities of highly advanced technological systems and participates in its governance through the annual General Shareholders' Meeting. ENAV is very active in the thematic working groups that are of particular interest to the Company, such as those related to new technologies, including remote towers, drones, and airport and satellite surveillance.

Given the objectives established by the European Commission with the creation of the Single European Sky, and the consequent requirement to define a common view on the modernisation of the air traffic management system, ENAV has taken on a strategic role in all Single European Sky activities, such as: the Functional Airspace Block BLUE MED (whose members include Cyprus, Greece and Malta in addition to Italy), the European Network Manager and, participating directly as a full member, the SESAR Joint Undertaking (SJU) and the SESAR Deployment Manager.

The SESAR Joint Undertaking (SJU) is the public-private partnership established in 2008 and renewed in 2016 for the deployment of the SESAR European Research and Development Programme (Single European Sky ATM Research) with an activity time horizon of 2024. The entire aviation community is represented in the SJU partnership, confirming the significant modernisation process that is underway: Eurocontrol and the European Commission as founding members and 19 Full Members (including ENAV) representing the entire European ATM industry, for a total of more than 110 companies and 3,000 experts involved in SESAR projects. ENAV has been an SJU member since August 2009 and has played a leading role in all of SJU's design and governance activities, contributing with its own resources to driving the change and modernisation processes of the European ATM system.

For ENAV, membership in the SESAR Joint Undertaking not only represents a confirmation of its authority in the ATM field at European level but also provides a valuable opportunity to directly participate in guiding the direction of strategic choices related to the design, development and management of new-generation ATM systems, thus safeguarding the significant investments already made to guarantee a cutting-edge service to its international and national community of users.

The SESAR Deployment Manager was established by the European Commission with the task of synchronising and harmonising, at European level, the implementation of ATM systems and procedures.

ENAV plays a major role within the A6 Alliance formed by the leading European ANSPs. Its aim is to guide the modernisation of the European ATM network in line with SESAR's objectives, for the benefit of airspace users. The A6 Alliance partners, united by a Memorandum of Cooperation, are full members of the SJU and their primary role is to represent the interests of the ATM industry and to implement SESAR-defined technologies and concepts.

The A6 actively participates in SESAR-related programmes, concentrating its activities on the operational deployment of technologies that were defined in SESAR 1. The A6 Alliance is part of the governing bodies of the SESAR Deployment Alliance (SDA), the legal entity established under Belgian law to handle the Deployment Manager programme, which became operational on 1 January 2018. Moreover, the A6 has expanded its partnership with the addition of the Swiss provider Skyguide through a consortium with DSN, for activities in the SESAR 2020 framework. ENAV participates in the A6 activities in governing groups and in technical working groups, contributing with its experts to the process of modernising the European ATM infrastructure. In 2018 the A6 Alliance also began to collaborate with Eurocontrol to develop the SES Digital Backbone to underpin the shared data exchange infrastructure. Finally, during the year, ENAV confirmed and strengthened its commitment to supporting the objective of A6 Alliance to contribute proactively to the process of modernising the European ATM infrastructure through the appointment of Roberta Neri, CEO of ENAV, as the alliance's chairperson; her appointment was recently extended to the end of 2019.

ENAV also coordinates the FAB BLUE MED project, aimed at creating a Functional Airspace Block in the centre/south-east of the Mediterranean, with the primary involvement of EU States (Cyprus, Greece and Malta as well as Italy) and non-EU countries, such as Albania, Tunisia and Egypt, and promoting the involvement of other countries in the area such as Israel and FYROM.

ENAV is therefore a standing member of some of the most important international organisations and initiatives. This allows it to play an active role in their governance, also through participation in meetings and shareholders' meetings. ENAV holds the chairmanships of many important decision-making bodies and working groups (especially in the context of A6, ICAO, Eurocontrol and CANSO) which, on matters of direct interest for air traffic control, allows it to pursue those company values which, as mentioned, tend first and foremost to protect the interests of the civil aviation community.

For the period covered by this analysis, the year 2018, the following initiatives were carried out by ENAV in the aforementioned organisations:

Organisation	Activity
ESSP	Provision was made and continues of the EGNOS satellite navigation service.
AIREON	The set-up for the satellite surveillance infrastructure has been initiated and is under way, with the operational launch of the service on the horizon. As part of this, ENAV, which hosts at its Ciampino Technical Centre one of the first Aireon Service Delivery Points (SDP), validates data and contributes to the certification process.
SESAR JU	The activities envisaged in the SESAR framework have been deployed. In particular, in 2018 the SESAR1 activities were strengthened further. This is the first series of coordinated R&D activities at a European level. ENAV participated in a series of exercises that demonstrated the feasibility of innovative operational concepts within the main domains of air traffic control: at airport level, during the approach phase and during overflight. These activities are now included in the in the "SESAR Solutions" catalogue, reading for implementation at the local or European-wide level. In addition, project activities are under way in the SESAR2020 activity framework. These will prove the practicality of innovative strategic technologies and concepts for ENAV, and will introduce important improvements (economic, safety, and environmental) for the benefit of the civil aviation community. The ENAV Group is involved in carrying out more than 20 validations, of which 14 were completed in 2017 and in 2018. The contract negotiation stage of the second phase of the programme (Wave 2) is under way, with the programme expected to begin near the end of 2019.
SESAR DM	The project activities envisaged in the European deployment programme have been initiated and are under way. At present SDM coordinates 350 projects, of which more than 100 were completed, substantially benefitting performance. It is estimated that the 350 projects, once completed, will result in more than 7 million tonnes less CO <sub>2</sub> thanks to more efficient flights, and an improvement in network capacity with over 300 million fewer minutes of ATFM delay. In particular, ENAV is carrying out 30 implementation projects that have

	recently been put into operation, bringing significant benefits to the civil aviation community, in terms of punctuality, improvement of airline performance, as well as important improvements for passengers, in terms of cost reduction, environmental sustainability and safety.
A6	The A6 Alliance has coordinated the activities of the main European ANSPs on the key topics involving the European traffic management system. More specifically, in 2018 ENAV coordinated with Eurocontrol to develop an infrastructure to support shared data exchange.
ICAO	In 2018 ENAV chaired the ICAO's largest decision-making body in Europe, which encompasses 56 member states, including the Russian Federation and those located in Eurasia and in North Africa.

## 5.7 QUALITY OF THE CUSTOMER RELATIONSHIP

Among the stakeholders with whom ENAV maintains relations, customers obviously have a very important role. For airlines, ENAV has developed, with ever greater commitment and attention, an efficient customer relationship management system (supported by an internal procedure) aimed at involving customers and measuring their level of satisfaction with the supply of air traffic services. More specifically, for airlines, ENAV has developed, with an increasing commitment and attention, an efficient system of customer relationship management, supported by internal procedures, aimed at directly involving customers and in measuring their level of satisfaction regarding the provision of ATS (Air Traffic Services). Every year ENAV conducts an online customer survey in which the various users can express their level of approval, on a scale from 1 (highly dissatisfied) to 5 (highly satisfied); ENAV's minimum objective is to receive a customer satisfaction level equal to or greater than 3.

In 2018, satisfaction with the services provided to airlines (CNA) scored 4 on a scale of 5 (4.0 in 2017 and 3.8 in 2016).

The survey completion rate was 67%, basically the same as in 2017, while it was 22% in 2016.

CRM activities are obviously not limited to the customer satisfaction survey but are divided into a set of initiatives targeted at stakeholder involvement and active participation in the evolution of the various processes (often associated with the implementation of new operational processes). As a rule, in carrying out its CRM activities, ENAV encourages one-on-one meetings, plenary sessions, open day demonstrations and thematic workshops related to the activities of the Air Navigation Services Directorate (DSNA). ENAV's customer-oriented approach is thus based on integrated courses of action that are able to satisfy the expectations of airspace users, and to ensure the availability of those processes that are required to deliver increasingly effective and efficient services, while at the same time promoting constant improvement.

The following diagram summarises the early customer engagement process in defining and sharing the requirements associated with the provision of air navigation services.



## **5.8 RESPONSIBLE SUPPLY CHAIN MANAGEMENT**

In order to fully understand and characterise the concept of "supply chain" in the ENAV Group it is necessary to emphasise that ENAV and Techno Sky's procedures for awarding contracts are subject to the regulatory requirements set forth in Legislative Decree 50/2016 (the "Public Contracts Code"). Failure to comply with these mandatory regulations may in fact lead to serious penalties, ranging from fines to criminal charges.

Compliance with the provisions of the Code therefore significantly limits the Group's ability to voluntarily include binding criteria in supplier selection and qualification processes. This is because, according to the law, these processes must fully comply with the principles of competitiveness and openness to the market, as well as guarantee access even to micro-enterprises. In this sense, procurement activities must primarily focus more on the objective elements of the competitors' bids rather than on subjective requirements for them that could be considered as limit on participation.

In other words, in order to pursue green procurement policies, the reference context requires action that focuses more on the services to be tendered than on the requirements imposed on participants and the "supply chain" must interpret itself not so much and not only as certifications held by possible suppliers but rather with reference to the environmental characteristics of the services and products.

Furthermore, it should be pointed out that the ENAV Group is composed of companies that provide highly specialised services that are of strategic importance for the country, in an area subject to a series of mandatory regulations in the ATM sector and therefore it should be kept in mind that there is a need for operational specificity of products subject to specific international reference regulations.

Taking into account the binding constraints that mainly consist of compliance with the EU rules incorporated into the Public Contracts Code, ENAV and the Group have pursued a procurement policy based on maximum openness to the market, both national and international, also opening up to competition sectors with very high technological specificity. The advantages of this are considerable both in terms of technical solutions with high design value, and in terms of financial savings.

It should be noted that the suppliers have responded extremely positively, rewarding processes based on a reciprocal knowledge that leads to effective collaboration based on fairness both in the pre-contract and contract stages. This is also demonstrated by the number of requests for remedies in 2018, for which there was only one appeal to the bodies empowered to deliver administrative law decisions in 2018.

### **Green procurement**

Over the last few years more and more attention has been paid to the environmental sustainability of provisioning through the implementation of a green procurement practice. This choice was made based on the desire of ENAV to reduce the environmental impact of the goods and services that its purchases and of the works that are carried out in accordance with Article 34 of Legislative Decree 50/2016, as amended by Legislative Decree 56/2017.

The ENAV Group therefore undertakes to purchase goods and services that during their life cycle:

- ✓ Promote the use of renewable energy sources
- ✓ Reduce greenhouse gas emissions



- ✓ Reduce the consumption of natural resources
- ✓ Reduce the production of waste
- ✓ Contribute to the spread of responsible production and consumption model

The ENAV Group has also undertaken action to make its green procurement practice fully visible to enable its suppliers of reference to adapt to the requirements of a more sustainable demand and to any new interlocutors to respond proactively, proposing innovative solutions that meet the renewed needs.

The *green procurement practice* represents, in fact, a substantial change, that is developing in a gradual and continuous way through a series of key actions:

- ✓ the selection of priority goods and services to develop environmental criteria for inclusion in the purchasing procedures
- ✓ the definition of a communication programme aimed at current and potential suppliers
- ✓ the implementation of an internal awareness and training plan

Aware of the impact that the introduction of the new internal practices would have on a whole series of business processes, ENAV performed a risk-benefit analysis related to the introduction of environmental criteria, relating to ENAV's purchase of goods and services and works.

Based on the results of this analysis, numerous activities were carried out during the year to strengthen and enhance green procurement actions. In particular, ENAV has promoted the introduction of specific environmental requirements, whenever possible, in tenders in order to identify and encourage sustainable purchases. In this context, ENAV has, in collaboration with the various company departments, defined the technical characteristics and environmental criteria that the products, services and works purchased must satisfy in order to be considered "green".

Techno Sky as well, in selecting its suppliers, pays close attention to their sustainability records, considering such factors as:

- ✓ the purchase of products and services that have a lower impact on the environment based on the method of realisation (e.g., stationery, PPE, furnishings)
- ✓ CE certified products
- ✓ verification of suppliers' records in terms of human rights and workplace health and safety.

In line with the Parent Company's internal practices, Techno Sky has launched a Green Public Procurement project in order to integrate environmental and social aspects into supplier selection/contracting activities, and an e-procurement project, in order to dematerialise the management of all stages of supplier selection/contracting.

The use of digital signatures in Group contract awarding procedures and the dematerialisation of documents significantly contributed to the reduction of direct and indirect costs (e.g., paper, printing, toner), while generating an improvement in organisational efficiency (sustainability, security, authenticity, compliance with deadlines). Furthermore, these practices are considered to be a measure against corruption, guaranteeing transparency and information security

## Supplier management

In 2018, without prejudice to the regulatory constraints mentioned above, a process was launched to "evaluate" certain categories of provisioning based in part on environmental criteria. More specifically, as regards the civil works sector, ENAV defined the "sustainable construction sites" objective to make the critical activities of construction and maintenance of ENAV's infrastructure increasingly incorporate the ideas of environmental protection, the rational use of resources, attention to the use of materials, the health and wellbeing of the workers employed and, not least, the ENAV personnel who use the facilities and the end users of the services provided by ENAV.

The Group places emphasis on environmental requirements with regard to suppliers in drawing up the list of providers of civil works and of services and goods. Owing to this, in 2018 the Group submitted to 176 companies included in these categories a special questionnaire that enable it to get a better understanding of the suppliers' commitment to environmental issues and to evaluate whether ISO 14001 environmental certifications they hold.

The survey, to which 128 suppliers responded, found that 21% of the companies included in the pool of qualified suppliers are in possession of an environmental certification.

In drawing up the list, ENAV identified these categories as the best in terms of creating and maintaining qualifications systems, based on its in-depth regulatory and management analysis.<sup>12</sup>

If we consider the total value of the contracts awarded in 2018, excluding intercompany awards, amounted to €91,842,875.85, the value of the contracts awarded in the aforementioned categories through qualification systems came to €5,968,240.72. Therefore, it amounts to 6.5% of the total value of new contracts in 2018.

Finally, during the year, new clauses were inserted in the procurement contracts to encourage suppliers to comply with ENAV's sustainability criteria. Specifically, in the contracts the company requires its suppliers to consent to be audited in part to verify, where necessary, compliance with environmental and social requirements connected with the specific performance obligations in each contract. In 2018, it was not felt necessary to perform audits involving these issues.

The ENAV Group also pays attention to identifying the main risks associated with failure to comply with regulations concerning social aspects by suppliers and sub-suppliers. In order to mitigate potential problems in this area, ENAV has included warrant clauses, countersigned by the supplier, in its contracts.

Therefore, in all the contracts signed, the supplier declares that it is aware of, accepts and complies with the Compliance Model provided for by Legislative Decree 231/2001 as well as the ENAV Code of Ethics. Furthermore, in 2018, additional contractual clauses relating to combating all forms of irregular work were introduced, including the use of child labour and the use of forced labour. In the event of failure to comply, the contract can be terminated for cause.

With regard to the assessment of supplier performance, in 2018 ENAV and Techno Sky implemented a comprehensive supplier performance assessment system, making it possible to analyse and assess, for each individual contract, the quality of the service performed and compliance with the contractual requirements.

---

<sup>12</sup> The creation and maintenance of qualification systems seems reasonable for procurements that are repeated over time, in cost/benefit terms it would not be worthwhile to use such instruments for purchases that must, by law, be put to tender and are made with contracts of at least three-years duration. For example, it would make no sense to have a qualification system for contracts for technological devices (radar, flight services, etc.) for which open tender procedures must be carried out every four years or more.

The results of these assessments, carried out in a structured and formalised manner, entail the possible suspension of the supplier and/or withdrawal/termination of existing contracts in the event of non-compliance.

During the year, Techno Sky's Purchasing Department modified its standard contracts, adding specific clauses relating to the carrying out of audits, while contracts are being performed, to verify that suppliers meet environmental requirements (e.g. ISO 14001) and those for respect for human rights. For example, in verifying respect for human rights, Techno Sky requires certified proof of compliance with the right of disabled people to work (Law 68/99) and where necessary it carried out controls on compliance with international environmental standards (e.g. ISO 14001 requirements). In 2018, it was not felt necessary to perform audits involving these issues.

ENAV Asia Pacific requires its suppliers to comply with the Group's Code of Ethics, particularly in terms of sustainability and respect for human rights. The company has also planned to adopt in 2019 a supplier verification system, using the World Check One platform, regarding issues related to human rights and forced and child labour.

On the payment of suppliers, the objective that the ENAV Group has established consists in meeting the contractually defined deadlines, subject to the verification of the regularity of all legally required documentation and in application of Legislative Decree 231/2002, which implements in Italy the Directive 2000/35/EC on the fight against late payments in commercial transactions. The Group companies pay special attention to the observance of payment terms, aware of the difficulties that delays can generate, financially, for their suppliers. In order to meet the needs of the suppliers, the Group has concluded a factoring agreement with a financial institution which allows suppliers to submit issued invoices with recourse; in addition, payment advances may be made if properly justified.

In terms of management, approved payment orders are processed by the Treasury sector and are authorised based on the current delegation system. The accounting system adopted by the Parent Company and by the subsidiary Techno SKY to handle payment orders is the PITECO system, which is perfectly integrated with the ERP accounting system, SAP.

#### **AVERAGE LENGTH OF TIME FOR SUPPLIER PAYMENT**

**ENAV: 23.04 DAYS**

**TECHNO SKY: 30 DAYS**

**ENAV ASIA PACIFIC: 5 DAYS**

## 5.9 ANTI-CORRUPTION MEASURES

The ENAV Group opposes and does not tolerate in any way acts of corruption, fraudulent behaviour and, more generally, illegal or irregular conduct, however committed, whether by or against its employees or third parties.

Following the best practices and recommendations of the main position papers (including the Confindustria Guidelines for the construction of organisation, management and control models pursuant to Legislative Decree 231/2001) and the ISO 37001 standard, ENAV has established its practices according to the CoSO Framework (Committee of Sponsoring Organisations), creating a risk management model based on the Internal Control and Risk Management System Guidelines approved by the Board of Directors, in line with Borsa Italiana's Corporate Governance Code.

The establishment of an effective anti-corruption model, part of the Group's programme involving the Supervisory Body and the Whistleblowing & Fraud Audit sector, specifically regards:

- the periodic risk assessment to identify areas where the risk of corruption could most significantly arise;
- the establishment of regulations and procedures for those areas most exposed to the risk of corruption;
- the establishment of first- and second-level anti-corruption controls;
- the development of training programmes for employees on preventing and combatting corruption;
- the implementation of a reporting system (whistleblowing) and a process for investigating reports;
- periodic reporting to upper management concerning areas at risk, the status of policies and procedures, the results of anti-corruption controls performed, reports received and investigations made.

The internal departments conduct a periodic risk assessment incorporating internal and external analysis. They are also regularly updated to identify the necessary actions to strengthen the internal control and risk management system, with particular reference to procedures and organisational safeguard.

As for regulation, on 16 March 2017, the ENAV Board of Directors updated the Group's Code of Ethics and the Organisation. Management and Control Model pursuant to Legislative Decree 231/2001 ("Model 231"). Subsequently the Techno Sky Board of Directors also updated its Model 231 and adopted the Group's Code of Ethics.

In addition, on 2 August 2018, ENAV's Board of Directors approved the "Code of Conduct for Combatting Corruption" ("Anti-Corruption Code"), which must be implemented by all Group companies. This code adds to a well-developed body of internal rules consisting of policies, procedures, guidelines and regulations that internal regulatory corpus consisting of policies, procedures, guidelines and regulations that regulate in more detail the individual areas of reference and with which staff must comply.

With regard to the adoption of specific regulations for the main processes to combat corruption, during the year the Group approved the policy to combat corruption in the case of brokerage contracts and the Group regulation for the management of gifts and hospitality.

There was also great emphasis on classroom training in the area of anti-corruption with focus on topics such as: regulatory developments, the principles on which the need to combat corruption is based, the results of the Transparency International report, several case studies and the representation of corrupt practices through the analysis of domestic and international court decisions.

Through classroom training and e-learning training modules, the Group was also to offer its employees 5,030 hours of training on anti-corruption topics, reaching over 3,600 persons, including executives, middle managers and office staff. During the year 12 directors (9 from ENAV S.p.A.'s Board and 3 from Techno Sky's board) underwent anti-corruption training, as did the CEO of ENAV Asia Pacific.

Furthermore, ENAV published a report specifically on anti-corruption topics in the in-house magazine, *Cleared*, available to all Group employees. It also published the new Anti-Corruption Code on its website.

Finally, even persons less exposed to anti-corruption matters were given explanatory material on the issue.

A number of activities were carried out in connection with monitoring and managing reports. In particular, the verification plans of the Supervisory Bodies (of ENAV and Techno Sky), which use the Internal Audit Department to conduct their investigations, and the Internal Audit Department's multi-year plan, call for examining corruption from a variety of viewpoints in the context of the processes subject to verification. The Group has also established two other safeguards: a communication channel for whistleblowing and a channel for the receipt of information flows of the Supervisory Body. As for the first channel, in 2018 the Group implemented a computerised system for reporting illegal acts that guarantees the anonymity of the reporter and complies with new legislative requirements (Law No. 179/2017). Along with implementing this system, the Group issued its Whistleblowing Regulation which identifies the persons who can "whistleblow", defines the scope of behaviours; explains the events or actions that could be subject to whistleblowing; sets out the principles and general rules for the "whistleblowing process", including protection of the reporter and the reported party.

The reports received through these channels were evaluated by the competent structures and those deemed significant underwent further investigation via auditing in addition to the steps envisaged in the plan. During the year the Group did not uncover situations of fraud or corruption.

Finally, the Model 231 envisages specific periodic information flows to the Board of Directors, the Control, Risks and Related Parties Committee and the Board of Auditors, integrated with the safeguards guaranteed by the Supervisory Body and the Internal Audit Department. These flows, defined on a periodic basis, include the work plans of the Supervisory Body and the Internal Audit Department, as well as a summary of the results of the activities carried out, and a detailed summary of the reports received and the remedial actions undertaken. In addition to these flows, ENAV has established specific coordination procedures for the internal player, such as, for example, the Risk Manager, the Financial Reporting Officer responsible for drafting the company's accounting documents, the heads of the Security Department and Internal Audit to ensure, in

accordance with their roles, timely information about how to manage the risks and their recovery plans.

**IN 2018 100% OF THE ENAV GROUP PROCESS WERE ASSESSED WITH REGARD TO THE RISKS ASSOCIATED WITH CORRUPTION**

## **5.10 EXTERNAL COMMUNICATION**

The press office of the Group ensures external communication through relations with national, local and international media and the correct dissemination of corporate messages to the target audience, in order to protect the reputation of the different ENAV Group activities. It also closely monitors both traditional and social media in order to identify any information of interest to the Group.

The Press Office, in addition to the company's social profiles on Twitter, Instagram and LinkedIn that globally have around 12,000 followers, also manages the company's financial communications, assuring and overseeing all the communication processes provided by the Consolidated Law on Financial Intermediation and the best practices in terms of communication and transparency adopted by listed companies.

Specifically, the work of external communication by the Group consists of two fundamental pillars:

- a regulatory and service part that requires a communication to the stakeholders and the public of the information envisaged by legislation and the indications of the various authorities (e.g., Consob);
- a proactive part aimed at enhancing the work and professionalism of the Group's employees and the Company's core business on all the information channels (national and local channels);

### **19 NATIONAL RADIO/TV REPORTS**

### **94 NATIONAL/INTERNATIONAL ARTICLES IN THE PRESS AND ON THE WEB**

### **12,000 FOLLOWERS ON SOCIAL MEDIA**

Since ENAV is a business-to-business company, it does not have the same opportunities to raise its visibility as do business-to-consumer companies. The Company's external communication policies, given its institutional role and the services it provides, do not envisage purchasing editorial space for the "controlled" publication of articles or radio/TV reports. All published reports are therefore the fruits of the labour of staff working to get out the news and of established relationships with journalists based on the Company's credibility and prestige.

## 5.11 INVESTOR RELATIONS

ENAV has consistently placed great deal of attention on its relations with shareholders, the financial analysts and the financial community in general, establishing shortly before its listing on the Mercato Telematico Azionario operated and managed by Borsa Italiana on 26 July 2016, the Investor Relations department in order to manage, in a continuous and effective way, these relations.

The opportunities for dialogue are many: conference calls, meetings, financial conferences and *roadshows*. In these events, the *management* team (typically the Chief Executive Officer and the Finance and Procurement Officer, together with the Head of Investor Relations) present to the financial community the main results for the period (quarterly, half-yearly, annual), business trends and strategy guidelines and is available to answer the questions received from the individual participants.

A dedicated mailing list is also available to the financial community through which the company periodically communicates its relevant financial news, as well as a dedicated e-mail address, through which it answers questions asked by investors or financial analysts in the event of new business activities or particular market trends. All the economic and financial information related to the Group, as well as the main share performance indicators and the analysts' opinions, are published in a dedicated Investor Relations section of the site [www.enav.it](http://www.enav.it).

In the period January – December 2018, ENAV had over 300 interactions with institutional investors, mostly during roadshows organised both at the ENAV premises (headquarters, ACC and control towers), and at the locations of individual investors in Italy, in Europe, in Australia and in the United States. The remaining contacts were held through the company's participation in financial conferences and through conference calls with investors. In addition to investor relations, ENAV maintains frequent contacts with financial analysts covering the stock (so-called "sell-side"). The 10 analysts who covered ENAV stock in 2018 come from major Italian and foreign brokerage firms, some of whom specialise in infrastructure firms, and periodically publish reports and updated analysis of ENAV's activities, performance and financial position.

Finally, the year 2018 was one in which many investors demonstrated active interest for the first time in ENAV's Corporate Social Responsibility (CSR), based on the principle of the long-term sustainability of the Company's business, with a specific focus on social, environmental and governance matters. ENAV has been proactive in this area, involving investors in its stakeholder engagement initiatives and participating in Environmental, Social & Governance (ESG) conferences and financial events.

For 2019, ENAV aims to further expand opportunities for interaction and meeting with the financial community using various occasions such as roadshows, participation in financial conferences and conference calls, in line with the best market practices. During 2019, the company also aims to broaden its investor base by focusing on investors based in geographical areas not reached during the IPO and on investors with a medium-long term investment perspective, including in terms of ESG sustainability or focused on the infrastructure sector.



## 5.12 BRAND DEVELOPMENT

Several years, the Group launched a number of actions designed to renew the corporate image and increase the image of its brand with stakeholders, shareholders and the general public, both national and international. These activities led to a general renewal of corporate identity through the launch of new logos: “ENAV Middle East”, “D-Flight” and “Sustainability ENAV”.

In particular, a number of projects were carried out to enhance the Group’s institutional, commercial and international activities, leading to the launch of a variety of digital communication campaigns, the release of publications and multimedia products and the development of advertising. During the year, the Group was also involved in organising events on the most important issues for the sector, including conducting guided visits of facilities for national and international delegations.

To further advance its commercial offerings, ENAV developed new marketing communication strategies to strengthen its image and promote the Group’s products and services in new markets, particularly the United Arab Emirates, Malaysia and Libya. Promotional activities centred around the new company specialising in air traffic control for drones, D-Flight, for which ENAV’s Brand Management developed a communications campaign to spread information about the new company in the relevant institutional and commercial markets.

In further support of its communications activities, ENAV took part in numerous national and international exhibitions and events, including the World ATM Congress in Madrid, the IFIS International Flight Inspection Symposium in Monterey, the ATC Forum in Dubai, the Met World EXPO in Amsterdam and the Meteorology Festival in Rovereto. The first national conference on “Air transport: flying for the country’s development”, proved to be an enormous success; it focused on the topics of air traffic control, passenger services, aerospace design and construction and, finally, strategic activities that make the air travel sector one of the cornerstones for Italy’s development. The Minister of Infrastructures and Transport and all the major representatives of sector institutions and industries were among the attendees.

On the international front, a number of activities were pursued to enhance ENAV’s role in decision-making and institutional settings with a significant strategic or operational impact on it, including with the European Commission, CANSO, ATCA, Eurocontrol, SESAR, A6, COFLIGHT, AIREON, ESSP, RACOON, BLUEMED and BLUEGNSS. Of these, the “CANSO – SSC Collaborative Safety Workgroup Meetings 2018”, sponsored by CANSO and organised by ENAV, during which the major international providers discussed the critical issue of safety, was particularly important.

Institutional, commercial and international activities were also enhanced during the year through the release of 34 new publications, including ENAV’s “SafeBull”, devoted to the issue of safety.

Finally, an important development in the area of web communication was the creation of a new **platform dedicated entirely to sustainability** (<https://sostenibilita.ENAV.it/en>).

The ENAV.it website was also highly successful in terms of consultation, with 1,684,546 page views and 419,258 visitors during the year. Finally, ENAV’s YouTube channel was unveiled, with more than 300 videos, 1,187 subscribers and over 211,000 views.

**CORPORATE WEBSITE**

**20,200,427 PAGES VISITED BY 697,186 VISITORS THROUGHOUT THE YEAR**

**ENAV'S YOUTUBE CHANNEL: 300 VIDEOS WITH 1,187 SUBSCRIBERS AND OVER  
211,000 VIEWS**

**41 INSTITUTIONAL, COMMERCIAL AND PROJECT-BASED EVENTS, NATIONAL AND  
INTERNATIONAL**

**34 VIDEOS MADE AND 61 PUBLICATIONS ISSUED TO PROMOTE INSTITUTIONAL,  
COMMERCIAL AND INTERNATIONAL ACTIVITIES**

### **5.13 WELFARE INITIATIVES FOR THE COMMUNITY**

With regard to social initiatives aimed at improving community wellbeing, ENAV sponsored two main projects called: "Send them to school" and "Welcome to Onlus".

"Send them to school" is a project which ENAV joined at the initiative of the Equal Opportunities Committee, aimed at promoting women's education through the long-distance support of forty Tibetan nomadic girls. With this project ENAV wanted to support the education of the girls who in the Tibetan community would be destined to work at home and in the fields without being able to access to schooling.

The awareness that educating a nomadic child means raising the quality of life of her future children and her family, and therefore of the whole of the nomadic community in Tibet, as well as safeguarding a civilisation that threatens to disappear daily, was the defining factor in ENAV's decision. The support provided allows these girls to temporarily leave their families to stay far from home in facilities where they can live and study, thus enabling them to obtain primary education and covers room and board, basic health care and the necessary teaching materials. The project ended in 2018 when almost all the girls succeeded in obtaining their diplomas.

The project "Welcome to Onlus" invites some non-profit organisations into ENAV's own offices to give them the opportunity to raise funds and spread awareness among Group employees, who can demonstrate their solidarity with and provide support for the projects of each organisation.

## 6 ENVIRONMENT

Protecting the environment and natural resources, battling climate change and contributing to sustainable economic development are, for ENAV, key drivers of technological innovation; this approach has helped, especially over the last few years, to make the Company an example for the world's ANSPs.

Although safety has remained and will remain an essential prerequisite, the real challenge that ENAV has been tackling in recent years is that of combining it with an approach that can guarantee that airlines not only to fly safely, but to also be able to do it with efficient routes, significantly shorter flying times and, therefore, lower consumption of fuel and CO<sub>2</sub> emissions (1 kg less fuel also means 3 kg less CO<sub>2</sub> released into the environment).

Through its Flight Efficiency Plan (FEP), a plan that allows airlines to benefit from increasingly efficient routes, with positive effects on costs, consumption and harmful emissions, and through Free Route (discussed in more detail further on) ENAV is now considered by air transport companies to be a standard bearer, even as to improving the quality of the air that we breathe.

However, the ENAV Group's contribution to the environment does not stop with initiatives just for airlines, but also includes projects developed in collaboration with airport management (to protect the environment and local communities) and its approach to improving the efficiency of its consumption and its own virtuous practices.

Even though ENAV, as a service company, has operations that do not have a particularly significant impact on the environment, it has nonetheless taken a virtuous course that, by progressively adjusting its internal rules, seeks to keep a constant eye on environmental best practices.

In this regard, the Group is preparing to issue an environmental policy (as indicated in one of the points of the Sustainability Plan) which establishes the guidelines, commitments and objectives that the company plans to promote, not only to reinforce legislative compliance, but also to improve environmental performance and pursue the principle of sustainable development. In anticipation of the formalisation of this policy, the Group, continues to be committed to specifically safeguarding various aspects relating to the environment, such as containment of energy consumption, waste management and protection of biodiversity.

## **6.1 EFFICIENCY AND ENVIRONMENTAL PROTECTION: FLIGHT EFFICIENCY PLAN AND FREE ROUTE AIRSPACE**

The Flight Efficiency Plan (FEP), aimed at creating an airspace structure geared towards satisfying the needs of airlines in planning increasingly shorter routes and with a vertical profile of continuous ascent and descent that reduces fuel consumption, is a plan that summarises the long-term efforts of the Group aimed at optimising the structure of the airway network, specifically to reduce flight time and aircraft fuel consumption and carbon dioxide emissions. The Group therefore works to implement solutions that, in addition to ensuring the maintenance of safety levels, are oriented towards flight efficiency with the aim of helping to reduce operating costs, minimise the environmental impact, and introduce a cutting-edge navigation system into Italian airspace.

The plan contains both planned interventions in terms of airspace planning (implementation of new routes or improvement of existing ones, as well as the removal, when feasible, of constraints on the availability and usability of airspace for all phases of flight) and interventions at the level of automation of airport collaboration for efficiency in the movement of aircraft on the ground (reduction in times for taxiing and waiting for take-off).

In order to provide a practical solution to the objectives defined in the Flight Efficiency Plan, the ENAV Group carries out route rectification, defines an airspace structure that ensures fulfilment of the requirements envisaged by the plan, implements updates and technological adaptations, and sees to the progressive implementation of the Airport Collaborative Decision Making (A-CDM) programme at major airports.

Also fundamental to achievement of the objectives envisaged by the plan is the continuous training of personnel involved in operations, which begins with training courses for students at the ENAV Academy and continues with acquisition of the skills need to work at the Company's various sites. In this regard, the Group also provides for specific training of personnel for each of the actions taken to make the airspace structure more efficient.

Within the scope of the objectives of the FEP, in December 2016 (roughly 6 years ahead of the deadline set by European regulation for the Single European Sky defined in implementing regulation no. 716/2014) ENAV implemented Free Route Airspace Italy (FRAIT). The project has made it possible for all aircraft flying above an altitude of 11,000 metres to cross Italian airspace along a direct route while no longer making reference to a precise route network, which has consequently been eliminated. Furthermore, in May 2018, the airspace reserved for FRA operations was further expanded, lowering the lower limit to 9,000 metres, in line with the provisions of Regulation 716/2014.

The ENAV Group was the first, among the 5 major European service providers<sup>13</sup>, to implement Free Route Airspace (FRA) and, with it, completed the plan for the reorganisation of Italian airspace that started in 2014 and which ensures the achievement of maximum flight efficiency, thereby generating benefits for both airlines and the environment.

Free Route Airspace is a revolutionary project for Italian and European air transport in that it allows airlines to plan the shortest possible route, flying directly from an entry point to an exit point in Italian airspace, thereby saving fuel and reducing harmful emissions and, consequently, costs, while maintaining safety levels in line with the requirements set by the ENAV Group for each development project.

---

<sup>13</sup> Germany, France, the United Kingdom, Spain, and Italy.

In terms of results, comparative analyses have shown that, from December 2016 to December 2018, the program has resulted in saving approximately 75 million kg of fuel, with a simultaneous reduction in CO<sub>2</sub> emissions of around 236 million Kg.

**THE "FREE ROUTE AIRSPACE ITALY" PROJECT HAS REDUCED THE IMPACT OF CO<sub>2</sub> BY  
AROUND 95 MILLION KG IN 2017 AND 135 MILLION KG IN 2018**

Given these results and in order to benefit from the advantages of Free Route Airspace, airlines have changed their flight schedules to increase routes flown within Italian airspace. The reduction of travel times associated with a structure of airspace oriented towards flight efficiency has, in fact, driven many customers to plan routes in Italy, for significant increases both in frequencies of city pairs (i.e. departure and destination) that were already of interest in Italian airspace and in flights for city pairs that had not been planned before Free Route Airspace.

## **6.2 SIGNIFICANT SOCIAL AND ENVIRONMENTAL FUNDING**

By “significant funding” we mean all funding capable of bringing benefits to ENAV and to the European Union, thereby helping to create a more sustainable European Community.

This sustainability is being pursued at the European level in part through an assessment, by various entities that provide funding, of the effects on society and the environment related to the project proposals presented by the various candidates.

ENAV is particularly attentive to these aspects, which are assessed from the preparation stage of each funding proposal. At this stage, all the preordained activities are put in place to assess the potential effects that the project, in the event of approval of the proposal, could have both on the environment and on society. These activities include examining and implementing European and Italian legislation as well as ensuring the faithful application of company procedures.

## 6.3 ENERGY CONSUMPTION

As mentioned, although ENAV is a service company that does not, therefore, have a particular direct impact on the environment, various steps have been taken to reduce consumption and consequent impact in terms of greenhouse gas emissions, electromagnetic pollution, etc.

Our environmental policy, which is to be published in the coming months of 2019, will aim to establish policies that take into account all the forms of pollution that directly and indirectly concern the company in order to develop an overall action strategy substantiated, in part, by a system of quantitative and qualitative performance indicators.

In the meantime, as specified in the Code of Ethics, *the Group, in full compliance with current environmental legislation, pays particular attention to the promotion of activities and processes that are as compatible with the environment as possible through the use of advanced technologies and standards in the areas of environmental protection and the sustainable use of resources.* The Group, therefore, undertakes, within the scope of operations and business initiatives, to consider essential environmental needs and to minimise the negative impact that our business activities have on the environment.

### **CONSUMPTION BY THE ENAV GROUP IN 2018**

**FUEL FOR OFFICES AND OTHER FACILITIES: 28,433 GIGAJOULES  
(DOWN 14,5% COMPARED WITH 2017)**

**ELECTRICITY FOR OFFICES AND OTHER FACILITIES: 253,567 GIGAJOULES  
(1% INCREASE COMPARED WITH 2017)**

**AIR FLEET FUEL: 27,010 GIGAJOULES  
(3.7% INCREASE COMPARED WITH 2017)**

**CAR FLEET FUEL: 7,035<sup>14</sup> GIGAJOULES  
(3.4% INCREASE COMPARED WITH 2017)**

### **ENAV GROUP EMISSIONS IN 2018**

**RELATED TO FUEL FOR OFFICES AND OTHER FACILITIES: 1,513 T CO<sub>2</sub> E  
(DOWN 15.3% COMPARED WITH 2017)**

**RELATED TO ELECTRICITY FOR OFFICES AND OTHER FACILITIES: 25,224 T CO<sub>2</sub> E  
(DOWN 3.1% COMPARED WITH 2017)**

**RELATED TO AIR FLEET FUEL: 1,858 T CO<sub>2</sub> E  
(3.8% INCREASE COMPARED WITH 2017)**

**RELATED TO CAR FLEET FUEL: 464 T CO<sub>2</sub> E  
(4.2% INCREASE COMPARED WITH 2017)**

---

<sup>14</sup> Figure does not include company cars for business and personal use



ENAV has two positions within the organisation who work to manage consumption more efficiently and minimise environmental impact, the energy manager and the mobility manager, who are responsible for identifying the actions, and procedures necessary to promote a rational use of energy and fuel.

It must be remembered that all the sites of the ENAV Group, the towers (TWR) and control centres (ACC), the radar sites, the TBT radio centres, the runway lighting systems, and the radio-navigation aids are powered by electricity and, in the event of power outages, by diesel-fuelled backup generators. Therefore, for several years now, the ENAV Group has taken care to ensure that all generators are included in the list of equipment that generates little pollution (listed under Annex I to DPR 25/07/91).

During the year, ENAV defined a new Energy Audit Plan, compliant with Article 8 of Italian Legislative Decree 102/2014, which concerns the airports of Genoa, Olbia, Bari, Florence, Malpensa, Orio al Serio, Lamezia Terme, Catania, Linate and Lampedusa, the two ACCs of Milan and Brindisi, and the radar/TBT centre at Poggio Lecceta. Energy analysis will enable the Group to plan new projects and actions to improve energy efficiency and consequently reduce CO<sub>2</sub> emissions.

The most significant investment for the procurement of renewable energy by the Group over the years concerns the use of the “Photovoltaic Control Towers” of the ENAV Group. Within this context, in 2018 ENAV completed the construction of the photovoltaic plants at the lighting substation in Genoa and at the systems block at the Genoa airport. Four new 20 KWp photovoltaic sites are also being planned for construction at Lampedusa Airport, Brindisi Airport, the Masseria Orimini (TA) radar/TBT site, and the Brancasi radio/TBT centre.

## **ENAV Group’s photovoltaic systems**

### **Photovoltaic tower at Bari Airport**

All the operating systems of the Bari TWR are powered, during the day, by a photovoltaic plant positioned on the roof of a large car park. The 100KWp system meets about 1% of the daily needs of the structure and receives an incentive on the production of energy of €0.202/kwh for an estimated production of about 100,000 KWh/yr. Primary energy savings is 26 TOE/yr with a reduction of 76 tCO<sub>2</sub>/yr.

### **ENAV Headquarters in Rome**

The building that houses the headquarters has a photovoltaic plant with a power output of 80 KWp, which is located on the roof. The system consists of 336 modules of 240 W each in polycrystalline silicon with an estimated production of over 88,000 KWh/yr and primary energy savings of about 0.3%. Primary energy savings is 20 TOE/yr with a reduction of 60 tCO<sub>2</sub>/yr.

### **Photovoltaic tower at Ancona-Falconara Airport**

The tower at Ancona-Falconara Airport produces clean and subsidised energy. The roof-top system was built in 2008 with a power output of 43 KWp. It was the first airport photovoltaic installation, and it receives an incentive of the second energy account issued by the Electricity System Operator (ESO) in the amount of €0.36 per KWh produced, in addition to roughly €0.20/kWh for the savings in the consumption of electricity produced and not drawn from the grid. Primary energy savings is 11 TOE/yr with a reduction of 32 tCO<sub>2</sub>/yr.

## **Brindisi ACC**

The ACC photovoltaic plant contributes to powering all operating systems for air traffic control using clean energy. It has a peak power output of 63.36 kWp with an estimated production of about 88,700 KWh/yr. The photovoltaic modules have been installed on the roof and on a covered car park. In this case, too, ENAV receives an incentive from the ESO on the energy produced. Primary energy savings is 16 TOE/yr with a reduction of 48 tCO<sub>2</sub>/yr.

## **Bitonto Non-Directional Beacon (NDB)**

This plant was constructed near the non-directional beacon (NDB) at the Bari Airport, in Bitonto, with a power output of 100KWp. It was built to power the NDB site, and the electricity produced in excess of its power needs is added to the power grid on a net-metering contract. Primary energy savings is 26 TOE/yr with a reduction of 76 tCO<sub>2</sub>/yr.

In 2017, the 77 KWp photovoltaic plant was completed for the Naples C.A. for self-consumption, and the 5.5 KWp photovoltaic plant for the C.A. lighting substation was built, in accordance with Legislative Decree No. 28 of 3 March 2011 for new buildings. Finally, in 2018, two 5 KWp photovoltaic plants at the lighting substation in Genoa and one 11 KWp plant at the new utilities block at Genoa airport are currently being activated.

## **CO<sub>2</sub> EMISSIONS AVOIDED AS A RESULT OF RENEWABLE ENERGY GENERATION EQUAL TO ROUGHLY 133 T CO<sub>2</sub>**

Although a snapshot of all fuel consumption is provided below by means of a list of the GRI Standard indicators, the policies and initiatives concerning the impact of the ENAV Group's air fleet deserve special attention here. In recent years, in fact, a major process of fleet renewal and an adjustment of operating procedures were completed with an investment of approximately EUR 35 million.

In 2018, jet fuel consumption of the Flight Inspection and Validation air fleet was 732,000 litres, with a consequent emission of 1.9 million KgCO<sub>2</sub>.

## 6.4 WASTE MANAGEMENT

As stated in the Group's Code of Ethics, ENAV promotes waste management policies that reconcile the needs of economic development and value creation with those of respecting and protecting the environment.

Within the context of their respective operations, both ENAV and Techno Sky have adopted specific procedures, which, in line with relevant legislation, regulate the management of waste (e.g. waste oil and generator filters, batteries, toner, electronic components) with the aim of mitigating the associated risks through proper recovery/disposal of waste according to principles of efficiency and cost-effectiveness.

The general objectives pursued by the Group to protect the natural environment and to manage related risks are: the standardisation of the process of managing hazardous and non-hazardous special waste; the general and technical assessment of environmental management; and, for ENAV only, supervision of proper fulfilment, by in-house maintenance personnel, of obligations established by law and by internal waste management procedures, in accordance with company procedures, and management of the transport of x-ray materials.

The activities carried out by ENAV in 2018 aimed at achieving these objectives concerned, among other things: the performance of 37 audits at the subsidiary Techno Sky in order to assess the proper execution of maintenance services specified in the in-house agreement, including the management of waste produced within the scope of those maintenance activities; the formalization of a survey of temporary waste depots; the performance of 32 audits at ENAV and Techno Sky to verify the proper implementation of environmental procedures; the review of company procedure SGQ-P-ENV.1.1 "Waste Management"; the definition of a system of responsibilities and delegation of functions to grant powers and responsibilities throughout Italy with regard to the environment; the provision of two sessions of the course on regulatory compliance in the field of environmental protection for those responsible for these functions, for safety and prevention personnel, and for other personnel concerned; and the execution of a survey of temporary waste depots.

With regard to Techno Sky, the most significant activities during 2018 concerned:

- ✓ Issue of the company procedure TS-SGQ-P-RU.1.1 "Special waste management" and of the instructions TS-SGQ-I-RU.1.1-01 regarding compilation of the stock-in/stock-out register and waste identification form";
- ✓ Preparation of guidelines for setting up temporary waste depots;
- ✓ Identification of personnel to be assigned specific responsibilities (and related duties) for the fulfilment of obligations arising from Legislative Decree No. 152/2006 and Legislative Decree No. 4/2008 as amended, in practical terms with specific reference to the activities carried out by Techno Sky:
  - protection of soil and resources (Part III of Legislative Decree 152/2006);
  - waste management (Part IV of Legislative Decree 152/2006 Title I, II, III);
  - site reclamation (Part IV of Legislative Decree 152/2006);
  - compliance with the regulations concerning air quality and the management of atmospheric emissions;
- ✓ Provision of a training course on waste management;
- ✓ Execution of a survey of temporary waste depots;

- ✓ Dedicated analyses to identify potential optimisation measures relating to the operating methods for the management of special waste generated by maintenance activities;
- ✓ Management of systems containing fluorinated gas (f-gas) in compliance with the requirements of Regulation (EU) No. 517/2014 and the corresponding Italian law (Presidential Decree No. 43/2012).

**ENAV GROUP 2018**

**ROUGHLY 56 TONNES OF HAZARDOUS WASTE RECOVERED**

**(40 TONNES OF WHICH PRODUCED BY TECHNO SKY).**

**ROUGHLY 4 TONNES OF HAZARDOUS WASTE SENT FOR DISPOSAL**

**(2 TONNES OF WHICH PRODUCED BY TECHNO SKY)**

## **6.5 ELECTROMAGNETIC EMISSIONS**

The ENAV Group, as specified in the Code of Ethics, considers protection of the environment and the sustainable development of the territory in which it operates to be of primary importance in consideration of the rights of the community and of future generations. In the knowledge that some of the activities that it performs (e.g. radio navigation assistance, ground-air-ground communications, surveillance) require a certain number of systems that generate electromagnetic fields to varying degrees, ENAV maintains a detailed mapping of these systems and of sites that border on protected areas.

The general objective pursued, during both installation and operation, is that of adopting all the technical-functional measures that make it possible to keep electric and electromagnetic field values, resulting from the emission of electromagnetic radiation, below the thresholds set by applicable legislation, while also working towards constant improvements in the Group's overall environmental performance.

More specifically, following definition of the Group's Environmental Policy, which will establish the principle of ensuring compliance with the established emission limits for non-ionizing radiation through appropriate environmental impact assessments, a project is to be launched aimed at standardising the process of analysing and monitoring non-ionizing electromagnetic emissions, in compliance with applicable regulations, using quantitative and/or qualitative indicators for measuring the related environmental performance.

In particular, in the case of NDB air navigation systems, for which it should be noted that a decommissioning plan has been launched that is to be completed within the next three years, provisions have already been issued to maintenance technicians, and efforts to consolidate the protections limiting access to the site, including notices, fencing and other protection along with an access door and adequate signage, are being completed.

## **7 PEOPLE**

For a company with a primary objective of flight safety and the preservation of passengers' lives, there is only one path to follow in order to achieve this purpose: that of developing people and their skills, both for operational personnel and management. In line with this view, as stated in the Group's Code of Ethics, each manager is called upon to oversee the professional growth of his or her employees. The success and reliability of the ENAV Group comes not only from constant, structured training programmes, but also from the ability to create a collaborative and motivating working environment that is able to enhance the potential of each individual and to take advantage of their specific skills.

**ENAV GROUP 4,114 EMPLOYEES**

**(3,320 ENAV + 792 TECHNO SKY + 2 ENAV ASIA PACIFIC)**

**100% PERMANENT EMPLOYEES**

**5.3% EMPLOYEE TURNOVER**

**3.6% NEW-HIRE RATE**

## **7.1 HIRING AND DEVELOPMENT OF NON-OPERATIONAL PERSONNEL**

The knowledge and skills of people at the ENAV Group represent one of the key factors in maintaining the highest levels of excellence in terms of safety, operational capacity, cost efficiency, and environmental impact. It is therefore vital to take concrete action to attract talented people to the company and provide them with ongoing training and career growth.

### **Hiring**

ENAV has established a structured process for the hiring of personnel based on the principles of diversity and equal opportunities, which makes it possible to fully assess and appreciate the skills and value of each candidate without discrimination.

In particular, the selection process is governed by an ISO 9001 certified Quality Procedure, which ensures candidates are treated with maximum transparency, equal opportunity, uniformity and objectivity in the assessment criteria, and confidentiality in any personal information provided to the company.

The search and selection process therefore enables the Group to find job seekers who have the skills and experience needed in order to meet the needs expressed by the various company functions and to face the Group's present and future challenges.

Furthermore, ENAV has an internal hiring process that enables Group employees to apply to open positions within the company that are more in line with their skills and professional profile.

### **Employee training and change management**

In addition to the hiring of new talent to join the company, it is fundamental for the Group, in line with the objectives of the Business Plan, to promote the continuous improvement of the knowledge, capabilities and technical skills of its employees with the aim of supporting continuous ENAV growth and responding effectively to future technological and business developments.

In terms of the continuous development of skills, the Group involves its employees in managerial and specialist training based on the role held by each person within the company and on the new challenges to be faced in the marketplace. More specifically, during the year the training of employees mainly concerned dissemination of the Project Management Integration (PMI) model, the increase and maintenance of knowledge of the English language, improvement of communication techniques, updates on laws and regulations concerning procurements for employees of the Service Centre unit, the start of a coaching program for the Finance & Procurement unit, and the general development of skills for new hires in order to facilitate their entry into the ENAV organisation.

During the year, the Group designed training courses and activities aimed at achieving the objectives set for the development of employee skills. As regards training for newly hired employees, ENAV and Techno Sky have defined a specific pathway for induction, which is aimed at disseminating the corporate culture and supporting people to better integrate into their new working environment. With a view to disseminating the PMI model, the Group has activated specific courses to prepare for the Project Management Professional (PMP) certification exam for the project managers of the Engineering area and involved the staff of the Audit, Operations and Technology units in project management literacy activities. For personnel within the Communications unit, ENAV has activated a course of communication and video production through the use of commonly used tools such as smartphones and tablets. One-to-one meetings in English also continued during the year for senior management, as well as multimedia courses for office staff and middle management and cross-functional, theme-based workshops. Finally, the

Group has set up a coaching program, divided into 4 team coaching meetings and 4 individual meetings for Finance & Procurement managers.

The entire training process is regulated within the scope of ENAV's Quality Management System. In accordance with procedures, ENAV verifies achievement of objectives by way of evaluation questionnaires – typically within 5 days of the end of the training activity – provided to all the participants in the classroom and catalogue courses. Moreover, for certain courses selected during the planning phase, performance questionnaires are provided to the participants' supervisors roughly 6 months after the training activity.

As regards Techno Sky, management and specialist training includes: training on occupational health and safety issues in compliance with the requirements of Italian Legislative Decree 81/08; updates on laws and regulations through the Procurement course and training on ISO/IEC regulations; technical training for certain types of activities, including certification for refrigeration engineers and the issue of F-GAS certification; conducting professional training for technical areas; and, finally, English language training.

### **ENAV GROUP**

#### **1,451 PARTICIPANTS INVOLVED IN NON-OPERATIONAL TRAINING<sup>15</sup>**

#### **10,935 HOURS OF NON-OPERATIVE TRAINING DELIVERED, 5,323 HOURS OF WHICH AS E-LEARNING**

The transformation of the ENAV Group, along with the dynamics of the industry and the public listing of the company's stock in 2016, have made it necessary, alongside the training activities that the company continues to provide, to begin a process of change aimed at the introduction of suitable management and leadership models.

The quality of management is, in fact, one of the most important non-financial indicators for institutional investors. Today, the management team must have the right mix of experience and expertise, while also expressing a high level of cohesion and integration and proving very effective in the short term but with a long-term vision. All these qualities must coexist because the management team is called upon to lead a corporate transformation that aims to combine the traditional values of the company that underlie the performance achieved with the need to adapt quickly to new landscapes.

At the same time, this transformation affects all levels of the organisation. As such, it is necessary to develop widespread awareness among the people working at the company of the need to implement changes with a view to creating value for customers, for shareholders, and for the employees themselves.

During this phase of the company's development, it is therefore necessary to have people who are increasingly motivated and competent, who know how to work with autonomy and initiative, and who are able to collaborate on tight-knit teams. Engagement, trust in people, shared responsibility for results, recognition of the results achieved, the perception of a rewarding job, and trust in management are essential prerequisites for an environment that promotes personal commitment and is characterised by a sense of belonging.

For this reason, over the course of 2018, the Group has placed increasing emphasis on change management and has implemented a significant reorganisation process within the context of the

---

<sup>15</sup> Non-operational training includes legal training, language training, and management and specialist training.



management of human capital and of change, which has led to the creation of a dedicated Human Capital and Change Management unit.

During the year, the Group also defined and consolidated approaches to managing the management review process for the key roles within the organization, while also defining a succession plan concerning, first and foremost, the senior managers in roles of strategic importance.

As for the experience and knowledge of management, the Group has established a process of periodic analysis of the capabilities of middle management and subsequent definition of appropriate development strategies, which include the introduction of a preliminary assessment, training for new managers, and coaching efforts for employees that show good potential for growth.

## 7.2 EQUAL OPPORTUNITIES

Among the general principles listed in the Group's Code of Ethics, there is *the promotion of equality, according to which Group companies must operate in a manner that ensures equal opportunities while avoiding any discrimination based on political or religious views, trade union affiliation, race, nationality, age, gender, sexual orientation, state of health, or any other private, personal characteristic.*

Based on these considerations, it is evident that both the internal practices focusing on equal opportunities and on anti-discrimination practices are important values of the ENAV Group. Indeed, both these areas are seen as important factors in internal cohesion and contribute to the creation of a stimulating working environment. A heterogeneous workforce is seen as an asset capable of generating progress and improving performance.

In line with its commitment, ENAV has established an Equal Opportunities Committee, which, in collaboration with the Human Resources unit, engages in activities that are aimed at promoting a culture and policies of equality in the workplace, while also bringing attention and support to potential situations of discrimination that call for specific action. To accomplish this goal, the committee, in part by way of interaction with other Committees, stays abreast of new laws and regulations and of projects and initiatives concerning the issue with the aim of engaging the company and its employees in a process of building a culture of equality. The Equal Opportunities Committee also acts as an intermediary with the Human Resources unit in the handling of reports from employees concerning problems of a personal or professional nature, with the aim of finding the best solution to these issues, while reconciling personal and business needs.

In order to best manage this crucial issue of equal opportunities in a more integrated manner, in 2018 the goal was set to issue a policy on diversity and equal opportunities (as also found in the sustainability plan) in 2019. Meanwhile, numerous initiatives have been developed to promote a culture of equal opportunity. First and foremost, there is the adoption of a *charter for equal opportunities and equality in the workplace*, with which the Group has sought to make a practical contribution to the fight against all forms of discrimination in the workplace. By adopting this charter, the Group is committed to promoting diversity within the organization, including the definition of company policies aimed at overcoming gender stereotypes and preventing all forms of discrimination, in the awareness that the creation of an environment capable of ensuring equal opportunities for all and of recognising and enhancing the potential and skills of every individual is a fundamental factor in increasing the competitiveness and success of the company. The Group is also preparing to join the framework agreement signed by the European social partners concerning harassment and violence in the workplace, which is aimed at protecting against the sort of harassment that *occurs when one or more individuals are repeatedly and deliberately mistreated, threatened and/or humiliated in the workplace.*

The protection of diversity and equal opportunities is also achieved by way of the numerous training and information efforts promoted by the Group. Within this context, ENAV promotes the training of all employees on the principles expressed in the Code of Ethics with the goal of increasing awareness of the rules of coexistence and non-discrimination to be followed by all employees of Group. Furthermore, the e-learning course "Introduction to Equal Opportunities" has been available to employees for a number of years.

### **7.3 SOCIAL POLICIES AND COMPANY WELFARE**

Company welfare is generally understood as the set of services and benefits provided by the company to its employees in order to improve their personal and working life through forms of support for study, training, parenting, healthcare, recommendations for leisure activities, and promotions of a commercial nature.

Within this context, ENAV designs numerous initiatives that are the result of a careful, strategic analysis of the needs of its people. In addition to having created a specific unit dedicated to the development of welfare policies, a socio-demographic analysis has also been conducted of employees aimed at highlighting the stratification of the workforce (through the use of indicators related to age, gender and income) in order to understand what welfare initiatives may be the most appropriate.

Of particular importance within the scope of social policies was the establishment of the Prevaer Supplemental Pension Fund, which calls for a contribution by the company of 3% of the salary of the participating employee in addition to the 2% paid by the employee. In addition to this, there is the supplementary health insurance policy, paid for entirely by the company, which is particularly advantageous in terms of protections and coverage limits and is oriented to targeted prevention based on the gender and age of the employee.

ENAV has also promoted various initiatives aimed at improving work-life balance for its employees. First and foremost is maternity or paternity leave, during which the company provides its employees with the full amount of their salary, thereby going beyond the provisions of current legislation. With regard to parental leave, it is possible to take up to 6 months' leave up to the age of six of the child, receiving 80% of one's salary for the first two months and 40% for the remaining four months (current legislation provides for 30% of one's salary for the entire period of leave). Important support mechanisms for parents also concern paid leave in the event of child illness (specifically, the company grants partial compensation up to the first 30 days) and for the performance of specialist medical services.

During the year, the institution of "solidarity holidays" also continued, by virtue of which employees can assign a portion of their holidays to the benefit of co-workers who find themselves in particularly challenging family situations. ENAV has gone beyond the scope of the law regarding solidarity holidays, establishing that such solidarity initiatives can also be activated in favour of employees who, within their own families, need to assist a parent, spouse, companion, or adult child. In 2018, the community of workers responded pro-actively to the requests of colleagues in need, with 23 people willing to give up their holidays, for a total of 58 days donated.

In terms of supporting education and training, the company provides incentives not only to support the training of its employees, but also for the education and training of their children. Within this context, OPEN is an important project aimed at supporting the children of ENAV and Techno Sky employees enrolled in the last year of the secondary school in the selection of their university studies and in the construction of a professional, informed plan that is the best fit possible for their interests, attitudes and personality characteristics. The project, aimed at supporting the process of choosing an academic and career path, is organised into two parts:

- An initial phase of online tools for measuring cognitive potential (general, verbal, mathematical, perceptive and spatial skills) and questionnaires to assess interests and personality traits; during this phase, preferences regarding future university and/or career preferences or declared interests are also noted;

- A second phase dedicated to an individual feedback interview. The activity is structured around discussion of a report prepared on the basis of the answers provided in the first phase; the report is provided to and shared with the student. The purpose of the interview is to raise awareness about one's areas of strength and development in order to gather information in support of an autonomous, informed academic/professional choice.

Also, during the year, in partnership with the Intercultura Foundation, support continued for the children of employees for international training through the provision of scholarships for annual and quarterly study trips abroad. Furthermore, with a view to engaging with internal stakeholders, surveys have been issued as an active listening tool aimed at establishing clear objectives that also take into account the needs and requests of employees, on the basis of which improvement plans and other new projects are defined and implemented.

Finally, by way of Time & Money Saving initiatives, ENAV annually renews agreements with partners of various types in order to provide numerous incentives and promotions concerning things such as: banking promotions; insurance policies; vehicle incentives; holiday deals; cultural events; mobility management; and fitness incentives.

## 7.4 THE PROTECTION OF HUMAN RIGHTS

Although the Group, by virtue of its business and geographical location, is not exposed to particularly significant risks related to human rights violations, there are areas within the Group in which, given the nature as a critical infrastructure nature and sensitive objectives, specific efforts are aimed at maintaining high standards of safety for employees (without sacrificing the need to protect the rights of the individual, in fulfilment of employer obligations established under Article 2087 of the Italian Civil Code). This applies both to the protection of the life and the safety of employees and of others who may occasionally find themselves on ENAV premises (in light of the “criminal risk” to be taken into account in the analytical considerations of Legislative Decree 81/2008, in which an employer must prevent, eliminate, or mitigate any risk that could hinder the constitutional values of human life and safety) and to the protection of employees of the Group who travel for work to potentially dangerous countries (such as due to political instability, the actions of terrorist groups, or particularly critical health and sanitation conditions).

The other particularly sensitive area concerns the handling of personal information and the safeguarding of the rights of confidentiality in the workplace in accordance with the framework of data protection policies established at the national and European levels, the founding principles of which are fully adopted and expressed in Group policies at the highest levels. Within this context, particular attention is placed on legislative compliance with the prohibition of direct or indirect monitoring of workers, as defined by Italian Law No. 300/1970 (the “Workers’ Charter”), in particular with regard to the remote monitoring of workers by way of video surveillance and the use of security guards. For the former, this is achieved by way of broad-based, transparent dialogue with the trade unions and the use of the tools in a fair, transparent manner; for the latter, it is achieved with an express prohibition as an integral part of the special specifications that govern the procurement of the security services. Moreover, systems of computer protection, which can include forms of verification and monitoring, are consistent with the principles of Article 4 of Italian Law No. 300/1970, as also stated under Article 23 of Legislative Decree No. 151/2015, with regard to which ample and transparent information is provided to employees and to the trade unions.

One important aspect is the coordination efforts carried out with the authorities. Indeed, because of the delicate nature of the role played by employees of the ENAV Group, there is a need to reinforce protection of workers from any external factors that could be considered a risk inherent in the job or in the workplace. In this regard, the systems of prevention and protection from criminal risk are supplemented by specific agreements with the Ministry of the Interior – Department of Public Safety and translated into special procedures aimed at the protection of life, safety and dignity of the worker, including in relation to any conflicts that may arise within the workplace.

With regard to specific safety risks to employees travelling abroad, there is a specific procedure that ensures the prior assessment of risk for this type of activity, supplemented by interaction with the Crisis Unit established within the Ministry of Foreign Affairs and International Cooperation.

ENAV’s attention to the issue of human rights is evident, not only in the constant monitoring of the Human Resources unit, but also looking at the application of what is stated in the Code of Ethics, which expressly stipulates that “relations between employees are based on the values of civil co-existence and on respecting the rights and freedoms of the individual and the fundamental principles that affirm equal social dignity without discrimination on the grounds of nationality, language, gender, race, religious belief, political or union affiliation, or physical or mental conditions”.

With regard to Techno Sky, the protection of human rights is applied through some general principles (guaranteeing the freedom of association, equal opportunities, prohibiting behaviours that have discriminatory content in both internal and external relations, protecting the right to life both of its employees and of third parties, emphasising the protection of health and safety in the workplace, etc.), which are monitored carefully through constant and constructive interactions with employees.

**IN 2018, THE RISKS ASSOCIATED WITH HUMAN RIGHTS  
WERE ASSESSED IN 100% OF ENAV GROUP PROCESSES**

## 7.5 INTERNAL COMMUNICATION

In recent years, the Group has developed a sustainable process of internal communication through projects and actions aimed not only at informing but also, and above all, at engaging people in the organisational and strategic dynamics of the company through:

- The involvement of all employees in the analysis of communication processes in order to create the conditions for the sharing of knowledge, of culture, and of values;
- The use of internal communication as a lever in promoting individual engagement;
- A vision of the company not as a closed system, but open to the countless interactions and repercussions with the environment that surrounds it;
- Online and off-line press, publishing, and social media 2.0;
- The promotion of a perception of the internal communication tools as a fundamental part of telling the organisation's story and creating a shared identity and culture.

By way of this strategy, internal communication aims to play an increasingly central role in the organisation and to build a system capable of ensuring the widespread and timely provision of information to each segment of the Group's workforce.

In order to achieve these objectives, numerous tools have been provided, including:

- *The Group Intranet, "Follow Me";*
- *The monthly house organ, "Cleared";*
- *The newsletter;*
- Video messages by senior management;
- The video tutorials in *Motion Graphic* supplemented by charts and graphs;
- Editorial products;
- Photography contests;
- Communication questionnaires for the assessment and satisfaction of employees.

### **The Group intranet portal, "Follow Me"**

The Follow Me portal is the main internal communication tool for the employees of the ENAV Group, through which it is possible to share corporate news, events and press reviews, while ensuring full compliance with the needs of the Company in terms of organisation, content and usability.

Follow Me is an integral part of ENAV's Digital Workplace, a smart-working tool adopted by the Group to enable people to remain connected with their teams and working environment at all times. Based on a participatory communication model, the portal promotes the central importance of employees and their profiling while also providing them with a new information architecture based on dynamic, social content.

The intranet platform, inaugurated in 2018 in line with the Digital Strategy of the ENAV Group, stands as one of the technological foundations underlying Group communication. The portal has a dynamic, modular interface in which all tools can be reached with great simplicity and usability. To ensure greater accessibility of content and create a true corporate community, the intranet site can be reached remotely at any time, including from personal devices, and employees have the

opportunity to express their appreciation for what is published or contribute to various discussion forums. Follow Me has also been enhanced with the introduction of My Page, a space that employees can personalize based on their needs and the services they use most.

### **The house organ, *Cleared***

*Cleared* is the monthly magazine of the ENAV Group for information and training purposes and represents the first internal publishing project promoted by the Group. This magazine is open to contributions by all employees and aims to give visibility to the efforts of all company functions.

The magazine contains editorial content of importance to the Group, drawn up in collaboration with the various departments responsible for the subjects dealt with. *Cleared* is written by employees of Group companies and provides an overview of the world of air traffic management (ATM) and the evolution of platforms and projects connected to it, with a particular look into the programs and international contexts in which ENAV operates. This house organ is available in both print and digital formats, and the latest version has been enriched with video and photo galleries.

Since the creation of the publication since 2004, the Group has published over 150 editions of the magazine, and, after numerous modifications to its graphical appearance and content, it can now be said to have reached a level of maturity. *Cleared* today is a product that enhances the contribution and engagement of everyone in the Group and allows to spread the corporate culture and increase a sense of belonging among the employees.

### **The newsletter *e-Cle@red***

*E-Cle@red* is the multimedia newsletter for employees of the ENAV Group that summarises the news of company life and provides updated information on topics of common interest and in-depth analysis.

Created in 2013 to offer new content in various formats, not just text based, the newsletter provides news, information, and documentation on activities, projects and company life, thereby contributing to spreading awareness of ATM issues thanks to insights that generate multimedia content viewable on the company's and other websites.



## 7.6 LABOUR RELATIONS

During 2018, inspired by the principles of maximum fairness, impartiality and independence, as specified in the Group's Code of Ethics, discussions with the trade unions worked toward the goal of supporting implementation of the new 2018-2022 Business Plan and managing renewal of the remuneration section of the national collective bargaining agreement.

With regard to implementation of the business plan, the first actions envisaged by the Group were taken during 2018. In view of the role of human capital and their financial impact, these activities led to disputes and union strikes during the year. In relation to renewal of the remuneration section of the national collective bargaining agreement, numerous implementation, clarification and planning meetings were held with the Ministry of Infrastructure and Transport beginning in the second half of 2018.

In terms of strikes, in 2018 ENAV experienced 3 national strikes for a total of 16 hours, with an average participation rate of 49%.

These strikes were announced by the trade unions in conjunction with the negotiations that took place during the year for renewal of the remuneration section of the collective bargaining agreement.

The total of 2,295 employees were members of the union, representing 70% on the total workforce. The collection of data regarding the number of members is done on 31 December of each year. Memberships to or withdrawals from the union, requested by employees in writing, are collected monthly then processed and transmitted to the competent office that records the request. The data is then stored in special file cabinets in order to guarantee the confidentiality of the information.

It should also be noted that the collective bargaining agreement applies to 100% of ENAV employees.

With regard to labour grievances, in 2018 there were 11 new disputes brought against the Company concerning certain aspects of the employment relationship, such as demotion, unlawful redundancy, hiring practices, and salary differences. Of the total of cases concluded in 2018, 66% were resolved by rulings that were favourable to ENAV (64% in 2017), while out-of-court settlements were reached for 17% of them (13% in 2017).

With regard to Techno Sky, during the year, thanks to the agreement signed on 26 October 2018, negotiations were successfully concluded for the transition of employees hired on the national bargaining agreement for engineering workers to that for air transport workers, in the specific complementary services section of the air transport agreement.

The general objectives pursued by Techno Sky are the maintenance of a good company climate through dialogue and meetings with the trade unions and the improvement of the management and productivity of the workforce. The actions taken to achieve these objectives consist in the development of collaborative, ongoing relationships in the form of specific meetings to illustrate organizational changes. Annual informative meetings are also held to discuss the business plan, the present and future activities of the company, financial performance, and the foreseeable trends in employment.

In 2018, at Techno Sky there were a total of 373 employees registered with the union, equal to 47.7% of the workforce, in line with the figure for 2017.

In 2018, there was an increase in the number of national strikes, for a total of 4 days of strike, compared with the one strike that occurred in 2017. As a result, during the year the number of hours of strike increased to 76, for a worker participation level of 11%.

There was a significant reduction in the number of disputes with employees, for a total of 4 during 2018 (as opposed to 20 in 2017), due, in part, to the end of the collective dispute that involved 15 employees in 2017.

Finally, the number of employees covered by collective bargaining agreements of various levels is 782, equal to 100% of non-executive employees. Senior managers (10) are covered exclusively by the collective bargaining agreement for the senior management of companies that produce goods and services.

For ENAV and Techno Sky, significant organisational changes are communicated with appropriate advance notice as required by the national collective bargaining agreement.

## 7.7 REMUNERATION POLICIES

The remuneration policies of the Parent Company, ENAV, vary based on the classification of the personnel involved, i.e. “non-management” personnel; and “management and supervisory” personnel.

With regard to non-management personnel, the performance evaluation process is conducted annually in order to report on the performance of all staff operating on the 36h schedule and who have worked for more than 6 months during the year.

Starting in November 2018, the lists of employees to be evaluated are created by the Compensation and Performance Management unit. The employees concerned and their evaluators are selected on the basis of the following requirements:

- 36h working schedule;
- an employee for more than 6 months.

Subsequently, by way of a dedicated computer application, the process of evaluating technical skills and performance is initiated by the employee’s supervisor, directed and approved, where necessary, by a higher-level manager. Upon completion of the process and based on the reported results, the Employee and Industrial Relations unit initiates the merit recognition process in line with the financial resources specifically provided for in the budget for the applicable year.

As for middle and senior management, the variable component is anchored to a top-down Management By Objectives (MBO) system by which the determination of objectives is based on the strategic guidelines established in the Business Plan, and then a deployment of these activities/pillars is carried out according to the various levels of responsibility according to a cascade approach from senior management down to the lower levels of the hierarchy. The objectives are linked to financial indicators and to specific areas linked to the individual positions within the organisation based on the various levels of responsibility. For the line functions, there are objectives that focus on operational performance (e.g. reduction of delays and operating efficiency), along with the implementation of projects related to service quality, in part through the introduction of innovative technologies and projects in the field of air traffic control that improve operating performance, mitigating the environmental impact of air travel.

At the subsidiary Techno Sky, the evaluation of non-management personnel is carried out by each supervisor based on performance, followed by validation by a higher-level manager. Following these evaluations, the Human Resources unit starts the merit-recognition process, based on the financial resources specifically provided for in the budget for the relevant year. The process ends with approval of the list of measures by the Company’s CEO.

For senior and middle management, the variable component is anchored, for the Parent Company, to a Management by Objectives (MBO) system of incentives. The MBO is assigned to all middle managers, including area managers, plant managers, and unit managers. The objectives are defined by the relative supervisor according to a top-down process, and recognition of the variable bonus is currently tied to achievement of the individual goals.

As regards the MBO for senior management, the objectives are defined within the scope of Group policies and are, therefore, often in line with those of the ENAV executives themselves.

Determination of the variable incentive is, in any event, subject to the achievement of the Group's financial targets ("hurdle" levels).

## **7.8 WORKPLACE HEALTH AND SAFETY**

ENAV and Techno Sky, as established in their Codes of Ethics, give great importance to the physical and moral integrity of their employees and partners, to promoting working conditions that respect individual dignity, and to safe and healthy working environments. The companies take care, therefore, to disseminate and consolidate a culture of health and safety in the workplace, while developing risk awareness and promoting responsible behaviour by all employees.

In order to ensure the proper management of the issue, both ENAV and Techno Sky have implemented an Occupational Health and Safety Management System (OHSMS), which was the subject of in-depth assessments during the year by way specific certification audits by DNV GL – Business Assurance. The positive outcome of these assessments led, in November 2018, to obtaining certification for the OHSMSs of both companies in accordance with OHSAS 18001:2007.

In October 2018, the new “Health and Safety” unit (subsequently renamed “Health, Safety and Environment”) was established to supervise compliance with the obligations established with Legislative Decree 81/08 (the Consolidated Workplace Health and Safety Act) and the Group Prevention and Protection Service.

Furthermore, in line with the provisions of OHSAS 18001, ENAV and Techno Sky published their Occupational Safety Policy during the year, which expresses the commitment of both companies to continuously improve performance in terms of health and safety and defines the main objectives related to this issue. In addition to these policies, there is also the manual for the Occupational Health and Safety Management System (ver. 1.0) and related procedures.

Also in the area of operational management of health and safety in the workplace, the employers, in compliance with relevant requirements and with the support of the Prevention and Protection unit, carry out the assessment of all risks of the various local facilities, including the risk related to working abroad, preparing a Risk Assessment Report (RAR) for each. Furthermore, this assessment is supplemented by periodic environmental audits related to micro-climate, lighting, noise, indoor air quality, electromagnetic fields, and natural sources of ionizing radiation (x-rays, radon gas, and cosmic radiation). In particular, in relation to the many activities performed as a contractor, Techno Sky also prepares, based on the specifics of the contract, an operational safety plan and carefully monitors plant and equipment in order to verify compliance with applicable laws and regulations regarding health and safety in the workplace.

With regard to training, ENAV provides courses on the subject of occupational health and safety, both with specific activities in the classroom and via video-conferencing and by way of e-learning.

The types of courses provided in the classroom or by video-conferencing mainly concern:

- First aid, introductory and advanced coursework;
- Fire prevention, introductory and advanced coursework;
- Senior management, introductory and advanced coursework;
- Supervisors, introductory and advanced coursework;
- Worker safety representatives, introductory and advanced coursework.

In particular, ENAV employees involved in training include all personnel designated as emergency management personnel for the first and second course, while the remaining courses are provided to all those who have been designated as senior and middle managers or designated as worker safety representatives.

The courses provided via e-learning are focused on:

- General employee training;
- Training on specific workplace risks;
- Refresher courses for employees;
- Travel safety.

The first two e-learning courses involved all newly hired non-management personnel, while the third involved the remaining non-management personnel. Finally, the travel safety course is provided to all employees who work abroad, regardless of position within the company.

Techno Sky training, on the other hand, concerns the development of a culture of occupational accident prevention and the policies adopted to safeguard worker health and safety.

#### **ENAV 2018**

**2,059 EMPLOYEES INVOLVED IN OHS TRAINING**

**12,498 HOURS OF OHS TRAINING  
(OF WHICH 1,326 HOURS OF E-LEARNING)**

#### **TECHNO SKY 2018**

**703 EMPLOYEES INVOLVED IN OHS TRAINING**

**5,624 HOURS OF OHS TRAINING**

#### **ENAV GROUP**

**13 INJURIES IN THE WORKPLACE IN 2018  
(A DECREASE OF ROUGHLY 32% COMPARED WITH 2017)**

**RATE OF HOURS LOST 0.2**

**INJURY RATE 2.3**

# ANNEX 1

## NON-FINANCIAL INDICATORS

The following tables show the main non-financial data relating to Chapter 4:

### THE ENAV GROUP

Table 1: Group Size [GRI 102-7]

Organisation size	units	2018	2017	2016
Net revenues	€000	889,740	881,824	865,271
Total liabilities and equity		<b>2,045,684</b>	2,003,454	2,006,315
Liabilities		908,125	883,489	886,489
Equity		1,137,559	1,119,965	1,119,826

Table 2: Total number of individuals within the governing bodies<sup>16</sup> of the companies by age group and gender [GRI 405-1]

Members of the governing bodies (head count)	2018						2017						2016					
	Male		Female		Total		Male		Female		Total		Male		Female		Total	
	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%
<i>less than 30 years old</i>	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
<i>between 30 and 50</i>	4	<b>36.4</b>	0	-	4	<b>36.4</b>	5	<b>41.7</b>	0	<b>0</b>	5	<b>41.7</b>	4	<b>40</b>	0	<b>0</b>	4	<b>40</b>
<i>over 50</i>	3	<b>27.3</b>	4	<b>36.4</b>	7	<b>63.6</b>	3	<b>25</b>	4	<b>33.3</b>	7	<b>58.3</b>	3	<b>30</b>	3	<b>30</b>	6	<b>60</b>
<b>Total</b>	<b>7</b>	<b>63.6</b>	<b>4</b>	<b>36.4</b>	<b>11</b>	<b>100</b>	<b>8</b>	<b>66.7</b>	<b>4</b>	<b>33.3</b>	<b>12</b>	<b>100</b>	<b>7</b>	<b>70</b>	<b>3</b>	<b>30</b>	<b>10</b>	<b>100</b>

Note: Following the resignation of the Chairman and member of the Board of Directors, Roberto Scaramella, on 8 November 2018, the ENAV Board of Directors now has 8 members.

Table 3: Total number of individuals within the control bodies<sup>17</sup> of the companies by age group and gender. [GRI 405-1]

Members of the control bodies (head count)	2018						2017						2016					
	Male		Female		Total		Male		Female		Total		Male		Female		Total	
	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%
<i>less than 30 years old</i>	0	-	0	-	0	-	0	-	0	-	-	-	0	-	0	-	-	-
<i>between 30 and 50</i>	3	<b>50</b>	2	<b>33.3</b>	5	<b>83.3</b>	3	<b>50</b>	2	<b>33.3</b>	5	<b>83.3</b>	3	<b>50</b>	2	<b>33.3</b>	5	<b>83.3</b>
<i>over 50</i>	1	<b>16.7</b>	0	<b>0.0%</b>	1	<b>16.7</b>	1	<b>16.7</b>	0	<b>0</b>	1	<b>16.7</b>	1	<b>16.7</b>	0	<b>0</b>	1	<b>16.7</b>
<b>Total</b>	<b>4</b>	<b>66.7</b>	<b>2</b>	<b>33.3</b>	<b>6</b>	<b>100</b>	<b>4</b>	<b>66.7</b>	<b>2</b>	<b>33.3</b>	<b>6</b>	<b>100</b>	<b>4</b>	<b>66.7</b>	<b>2</b>	<b>33.3</b>	<b>6</b>	<b>100</b>

<sup>16</sup> Board of Directors of ENAV and Techno Sky

<sup>17</sup> Board of Auditors of ENAV and Techno Sky

Table 4: Sanctions assessed for the violation of laws and regulations regarding the environment and personnel management [GRI 307-1 and 419-1]

In 2016, 2017 and 2018, there are no significant monetary or non-monetary sanctions assessed for the violation of environmental laws and regulations.

In 2016, 2017 and 2018, there are no significant monetary or non-monetary sanctions assessed for the violation of social or financial laws and regulations.

Note: Significant monetary sanction means a sanction of more than €20,000.

The following tables show the main non-financial data relating to Chapter 5:

## COMMUNITY

Table 5: Number of flight hours carried out by the air fleet broken down by domestic and foreign contracts.

Flight hours	units	2018	2017	2016
<b>Domestic</b>	Hours	<b>1,041.52</b>	<b>881.68</b>	<b>982.1</b>
<b>International</b>		<b>883.42</b>	<b>945.62</b>	<b>913.2</b>
<i>Saudi Arabia</i>		650.67	703.25	615.55
<i>Kenya</i>		74.25	73.66	95.55
<i>Eritrea</i>		14.75	0	12.2
<i>Uganda</i>		21.08	38.66	18.25
<i>BLUE GNSS</i>		19.42	16.66	4.4
<i>Seneca</i>		0	0	16.3
<i>Portugal</i>		0	0	0
<i>Albania</i>		11.00	21.16	28.5
<i>Lithuania</i>		24.42	23.58	21
<i>Abu Dhabi</i>		0	37.58	101.45
<i>Beyond</i>		0	2.41	0
<i>ONDA (Morocco)</i>		0	20.25	0
<i>Phoenic (Romania)</i>		0	8.41	0
<i>INEA</i>		1.58	0	0
<i>Cyprus</i>		15.67	0	0
<i>Croatia</i>		50.58	0	0
<b>Total</b>		<b>1,924.94</b>	<b>1,827.30</b>	<b>1,895.30</b>

Table 6: Average response time for extraordinary interventions thanks to the Flight Inspection and Validation service.

Average response time for extraordinary interventions	units	2018	2017	2016
Average response time	Hours	24	24	24



Table 7: Number of hours of third-party training in the classroom by category of recipient

Training hours by category	units	2018	2017	2016
Private Customer	<i>Hours</i>	15,043	12,565	3,484
Business Customer		6,100	16,008	2,782
<b>Total</b>		<b>21,143</b>	<b>28,572</b>	<b>6,266</b>

Table 8: Number of third parties involved in third-party classroom training by category of recipient

Number of third parties involved by category	units	2018	2017	2016
Private Customer	<i>No.</i>	54	88	25
Business Customer		183	178	103
<b>Total</b>		<b>237</b>	<b>266</b>	<b>128</b>

Table 9: Number of hours of third-party e-learning training in the classroom by category of recipient

Training hours by recipient category	units	2018	2017
Company	<i>Hours</i>	16	1264
University		414	720
<b>Total</b>		<b>430</b>	<b>1,984</b>

Note: Figures for outside e-learning for 2016 are not available.

Table 10: Number of third parties involved in e-learning training by category of recipient

Number of third parties involved by recipient category	units	2018	2017
Company	<i>No.</i>	4	434
University		23	40
<b>Total</b>		<b>27</b>	<b>474</b>

Note: Figures for outside e-learning for 2016 are not available.

Table 11: Results of training carried out in 2018 to promote local development

Activities carried out	Days	Attendees
Flight simulation for students of the University of Bologna	2	44
Instruction at the University of Bologna in the field of Air Traffic Control	24	44
<b>Total</b>	<b>26</b>	<b>88</b>

Table 12: Results of training for local development carried out in 2018

Activities carried out	Days of attendance	Attendees
Apprenticeship Training	1,630	326
Teaching visits	1,312	1,312
Intercultura (initiative for the benefit of the children of employees)	3,510	25
<b>Total</b>	<b>6,452</b>	<b>1,663</b>

Table 13: Internal cost to conduct the training for local development

Training costs	units	2018	2017	2016
Cost for apprenticeship training	€000	217	266	249
Cost for teaching visits		37	44	35
Intercultura		165	165	166
<b>Total</b>		<b>419</b>	<b>475</b>	<b>450</b>

Table 14: Investments in infrastructure

Investment	units	2018	2017	2016
Infrastructure	€000	113,000	105,000	101,000
a) implementation and maintenance of operational technology infrastructures		64,000	51,000	54,000
b) Upgrading the ATM platform with new operational concepts		29,000	34,000	32,000
c) Infrastructures and systems		15,000	14,000	7,000
d) Management Information Systems		5,000	6,000	8,000

Note: 2018 capex of €116.9 million

Table 15: Relationship with the customer: Average system availability. (Scope: Techno Sky)

Average system availability	units	2018	2017	2016
Percentage of average system availability	%	99.98	99.98	99.98

Table 16: Relationship with the customer: Percentage of anomaly resolution on first attempt (Scope: Techno Sky)

Resolution of anomalies on first attempt	units	2018	2017	2016
Percentage of anomaly resolution on first attempt	%	92.00	90.57	89.83

Table 17: Relationship with the customer: Hours for repair and restoration. (Scope: Techno Sky)

Repair and restoration	units	2018	2017	2016
Average times for repair and restoration	Minutes	33.86	33.59	45.461

Table 18: Processing days for measurement confirmation (Scope: Techno Sky)

Processing for measurement confirmation	units	2018	2017	2016
Average processing time for measurement confirmation of weather sensors	Days	13.77	11.43	13.02

Table 19: Degree of stakeholder engagement [GRI 102-43]

Degree of stakeholder engagement	units	2018	2017	2016
Stakeholder engagement initiatives	No.	7 sessions dedicated to individual customer and 1 plenary session	11 one to one, 1 plenary and 2 workshops	6 one to one, 1 plenary session and 1 Open Day
Number of stakeholders involved		more than 20	more than 20	more than 20
Other		Involvement in the development of future projects and monitoring of existing implementations. Visits to control centres and familiarisation flights.	Cooperation Agreements	

Table 20: Percentage of new suppliers assessed based on social aspects [GRI 414-1]

Percentage of new suppliers	units	2018	2017	2016
Percentage of new suppliers assessed based on social aspects (ENAV)	%	100	100	100
Percentage of new suppliers assessed based on social aspects (Techno Sky)		100	100	100
Percentage of new suppliers assessed based on social aspects (ENAV Asia Pacific)		0	0	0

Table 21: Average payment period for suppliers

Number of days for payment of suppliers (ENAV)	units	2018	2017	2016
Average payment period for suppliers	Days	23.04	34.01	29.75
Average advance/(delay) in relation to contractual conditions		6.96	-	-
Number of days for payment of suppliers (Techno Sky)	units	2018	2017	2016
Average payment period for suppliers	Days	30	30	60
Average advance/(delay) in relation to contractual conditions		10	10	19
Number of days for payment of suppliers (ENAV Asia Pacific)	units	2018	2017	2016
Average payment period for suppliers	Days	5	5	5
Average advance/(delay) in relation to contractual conditions		-	-	-

The following tables show the main non-financial data relating to Chapter 6:

## ENVIRONMENT

Table 22: Consumption of electricity, fuel for the operation of offices and other facilities (e.g. control towers) and of the car and aircraft fleets (by renewable/non-renewable) [GRI 302-1]

Consumption	units	2018	2017	2016
Electricity	GJ	<b>253,566.80</b>	<b>251,347.82</b>	<b>254,504.07</b>
<i>from non-renewable sources</i>		252,236.20	250,162.12	253,658.69
<i>from renewable sources</i>		1,330.60	1,185.69	845.38
Fuel for offices and other facilities		<b>28,432.56</b>	<b>33,257.65</b>	<b>38,734.89</b>
<i>Diesel</i>		3,374.84	5,041.55	4,764.63
<i>Natural gas</i>		25,057.72	28,216.10	33,970.26
Fuel for car fleet – Company cars		<b>7,035.33</b>	<b>6,805.17</b>	<b>6,549.72</b>
<i>Diesel</i>		3,897.42	4,051.52	4,802.72
<i>Petrol</i>		2,683.35	2,154.50	1,747.00
<i>CNG</i>		370.36	496.54	38.33
<i>LPG</i>		84.2	102.60	153.07
Fuel for car fleet – Mixed-use cars*		<b>3,295.07</b>		-
<i>Diesel</i>		3,095.26		-
<i>Petrol</i>		169.63		-
<i>CNG</i>		-		-
<i>LPG</i>		30.18		-
Fuel for Air Fleet		<b>27,010.49</b>	<b>26,035.00</b>	<b>27,594.29</b>
<i>Jet fuel</i>		27,010.49	26,035.00	27,594.29
<b>Total</b>		<b>319,340.25</b>	<b>317,445.64</b>	<b>327,382.97</b>

\*In accordance with the provisions of Article 51, paragraph 4(a), of the Consolidated Income Tax Law, fuel consumption relating to company cars for mixed business and personal use is measured at 70% of the total. For 2016, figures on consumption by mixed-use cars is not available.

Table 23: Emissions resulting from consumption of electricity and of fuel for the operation of offices and other facilities (e.g. control towers) and the car and aircraft fleets [GRI 305-1 and 305-2]

Emissions	units	2018	2017	2016
Electricity* (Scope 2)	<i>t</i> CO <sub>2</sub> e	<b>25,224</b>	<b>26,063</b>	<b>26,425.45</b>
Fuel for offices and other facilities		<b>1,512.90</b>	<b>1,787.06</b>	<b>2,053.83</b>
<i>Diesel</i>		232.3	343.62	324.84
<i>Natural gas</i>		1,280.60	1,443.44	1,728.99
Fuel for car fleet – company cars		<b>463.86</b>	<b>445.25</b>	<b>438.81</b>
<i>Diesel</i>		268.27	276.14	327.43
<i>Petrol</i>		171.64	137.6	111.37
<i>CNG</i>		18.93	25.4	1.96
<i>LPG</i>		5.02	6.11	9.12
Fuel for car fleet – mixed-use cars**		<b>225.71</b>		
<i>Diesel</i>		213.06		-
<i>Petrol</i>		10.85		-
<i>CNG</i>		-	-	-
<i>LPG</i>		1.8		-
Fuel for Air Fleet		<b>1858.35</b>	<b>1,791.06</b>	<b>1,897.34</b>
<i>Jet fuel</i>		1858.35	1,791.06	1,897.34
<b>Total</b>		<b>29,284.82</b>	<b>30,086.25</b>	<b>30,815.43</b>

\*Scope 2 emissions related to electricity consumption are calculated using the location-based approach. The calculation of CO<sub>2</sub> emissions using the market-based approach is equal to: 33,386

\*\*In accordance with the provisions of Article 51, paragraph 4(a), of the Consolidated Income Tax Law, emissions relating to company cars for mixed business and personal use is measured at 70% of the total. For 2016, figures on consumption by mixed-use cars is not available.

Table 24: Emissions avoided due to electricity supplied by current photovoltaic systems [GRI 305-5]

Reduction of emissions	units	2018	2017	2016
Reduction of CO <sub>2</sub> e	<i>t</i> CO <sub>2</sub> e	133.06	123.51	88.06

Table 25: Emissions generated by type of vehicle [GRI 305-3]<sup>18</sup>

Emissions	units	2018	2017	2016
<b>Train</b>	<i>t</i> CO <sub>2</sub> e	<b>10</b>	<b>10</b>	<b>11</b>
<b>Aircraft</b>		<b>1,296</b>	<b>1,363</b>	<b>1,319</b>
Short-haul flights (<3700 km)		890	841	868
Long-haul flights (>3700 km)		463	522	451

<sup>18</sup> These are emissions associated with business travel.

Table 26: Reductions in routes and related impact the Italian Flight Efficiency Plan (FEP) project, highlighting the result since the beginning of the FEP project.

Main results achieved	units	2018	2017	2016	Total 2016-2018
Reduction of routes	km	-11,744,451	-8,724,172	-813,024	-21,281,647
Reduction of fuel used	kg	-44,103,000	-30,952,500	-3,332,000	-78,387,500
Reduction of emissions of CO <sub>2</sub>	kg CO <sub>2</sub>	-138,924,450	-97,500,500	-10,495,750	-246,920,700

Note: Starting from this NFS, the data including the benefits of the FEP project as a whole are published for the entire three-year period

Table 27: Total weight of hazardous and non-hazardous waste, by type of disposal [GRI 306-2]

Total weight of hazardous waste	units	2018	2017	2016
Landfill disposal (Code D15 - Preliminary storage pending one of the disposal operations)	t	4.091	3.347	N/A
Recovery (Code R13 - Accumulation of material pending one of the recovery operations)		56.156	69.958	N/A
<b>Total</b>		<b>60.247</b>	<b>73.305</b>	<b>65.419</b>
Total weight of non-hazardous waste	units	2018	2017	2016
Landfill disposal (Code D15 - Preliminary storage pending one of the disposal operations)	t	34.421	33.911	N/A
Recovery (Code R13 - Accumulation of material pending one of the recovery operations)		176.035	128.919	N/A
<b>Total</b>		<b>210.456</b>	<b>162.830</b>	<b>87.639</b>
Other non-hazardous waste, measured in litres	units	2018	2017	2016
Sent for disposal	Litres	0	7,000	0
<b>Total</b>		<b>0</b>	<b>7,000</b>	<b>0</b>

Note: In 2016, a breakdown of waste produced by the ENAV Group by disposal or recovery is not available.

The following tables show the main non-financial data relating to Chapter 7:

## PEOPLE

Table 28: Total number of employees by Group company [GRI 102-8]

Total number of employees in the Group	units	2018	2017	2016
ENAV	No.	3,320	3,364	3,395
Techno Sky		792	815	793
ENAV Asia Pacific		2	2	2
SICTA Consortium		-	-	44
ENAV North Atlantic		-	-	-
<b>Total</b>		<b>4,114</b>	<b>4,181</b>	<b>4,234</b>

Table 29: Employees by age, gender and level. [GRI 405-1]

Employees (head count)	2018						2017						2016					
	Male		Female		Total		Male		Female		Total		Male		Female		Total	
	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%
<b>Senior management</b>	<b>55</b>	<b>1.7</b>	<b>4</b>	<b>0.5</b>	<b>59</b>	<b>1.4</b>	<b>58</b>	<b>1.7</b>	<b>4</b>	<b>0.5</b>	<b>62</b>	<b>1.5</b>	<b>59</b>	<b>1.7</b>	<b>5</b>	<b>0.6</b>	<b>64</b>	<b>1.5</b>
<i>less than 30 years old</i>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
<i>between 30 and 50</i>	11	0.3	3	0.4	14	0.3	19	0.6	3	0.4	22	0.5	19	0.6	3	0.4	22	0.5
<i>over 50</i>	44	1.3	1	0.1	45	1.1	39	1.2	1	0.1	40	1	40	1.2	2	0.2	42	1
<b>Middle management</b>	<b>350</b>	<b>10.7</b>	<b>54</b>	<b>6.5</b>	<b>404</b>	<b>9.8</b>	<b>359</b>	<b>10.8</b>	<b>55</b>	<b>6.5</b>	<b>414</b>	<b>9.9</b>	<b>370</b>	<b>10.9</b>	<b>55</b>	<b>6.4</b>	<b>425</b>	<b>10</b>
<i>less than 30 years old</i>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
<i>between 30 and 50</i>	103	3.1	21	2.5	124	3.0	147	4.4	28	3.3	175	4.2	149	4.4	28	3.3	177	4.2
<i>over 50</i>	247	7.5	33	4	280	6.8	212	6.4	27	3.2	239	5.7	221	6.5	27	3.2	248	5.9
<b>Office staff</b>	<b>2830</b>	<b>86</b>	<b>777</b>	<b>93.1</b>	<b>3607</b>	<b>87.7</b>	<b>2,868</b>	<b>86</b>	<b>787</b>	<b>93</b>	<b>3,655</b>	<b>87.4</b>	<b>2,901</b>	<b>85.8</b>	<b>794</b>	<b>93</b>	<b>3,695</b>	<b>87.3</b>
<i>less than 30 years old</i>	107	3.3	22	2.6	129	3.1	205	6.1	40	4.7	245	5.9	218	6.4	40	4.7	258	6.1
<i>between 30 and 50</i>	1,726	52.6	444	53.2	2170	52.7	1,805	54.1	476	56.3	2,281	54.6	1,828	54.1	479	56.1	2,307	54.5
<i>over 50</i>	997	30.4	311	37.2	1308	31.8	858	25.7	271	32	1,129	27	855	25.3	275	32.2	1,130	26.7
<b>Blue collar</b>	<b>44</b>	<b>1.3</b>	-	-	<b>44</b>	<b>1.1%</b>	<b>50</b>	<b>1.5</b>	-	-	<b>50</b>	<b>1.2</b>	<b>50</b>	<b>1.5</b>	-	-	<b>50</b>	<b>1.2</b>
<i>less than 30 years old</i>	-	-	-	-	-	-	1	0	-	-	1	0	1	0	-	-	1	0
<i>between 30 and 50</i>	25	0.8	-	-	25	0.6	30	0.9	-	-	30	0.7	34	1	-	-	34	0.8
<i>over 50</i>	19	0.6	-	-	19	0.5	19	0.6	-	-	19	0.5	15	0.4	-	-	15	0.4
<b>Total</b>	<b>3,279</b>	<b>100</b>	<b>835</b>	<b>100</b>	<b>4,114</b>	<b>100</b>	<b>3,335</b>	<b>100</b>	<b>846</b>	<b>100</b>	<b>4,181</b>	<b>100</b>	<b>3,380</b>	<b>100</b>	<b>854</b>	<b>100</b>	<b>4,234</b>	<b>100</b>

Table 30: Total number of employees by contract type, geographical area (in which they are employed), and gender [GRI 102-8]

Employees (head count)	units	2018			2017			2016		
		Male	Female	Total	Male	Female	Total	Male	Female	Total
<b>Fixed-term contract</b>	No.	-	-	-	-	-	-	19	3	22
<i>Italy</i>		-	-	-	-	-	-	19	2	21
<i>Americas</i>		-	-	-	-	-	-	-	-	-
<i>Asia</i>		-	-	-	-	-	-	-	1	1
<i>Other - Europe</i>		-	-	-	-	-	-	-	-	-
<b>Permanent contract</b>		3,279	835	4,114	3,335	846	4,181	3,361	851	4,212
<i>Italy</i>		3,279	833	4,112	3,335	843	4,178	3,358	848	4,206
<i>Americas</i>		-	-	-	-	-	-	-	-	-
<i>Asia</i>		-	2	2	-	2	2	3	2	5
<i>Other - Europe</i>		-	-	-	-	1	1	-	1	1
<b>Total</b>		3,279	835	4,114	3,335	846	4,181	3,380	854	4,234

Note: in Asia, the 2016 figure includes seconded personnel.

Table 31: Total number of employees by type of employment and gender [GRI 102-8]

Employees (head count)	units	2018			2017			2016		
		Male	Female	Total	Male	Female	Total	Male	Female	Total
Full-time employees	No.	3,271	802	4,073	3,327	801	4,128	3,358	835	4,193
Part-time employees		8	33	41	8	45	53	22	19	41
<b>Total</b>		3,279	835	4,114	3,335	846	4,181	3,380	854	4,234



Table 32: Number of new hires by age group, gender, and geographical area [GRI 401-1]

Number of new hires	units	2018			2017			2016		
		Male	Female	Total	Male	Female	Total	Male	Female	Total
<b>Italy</b>	No.	<b>131</b>	<b>18</b>	<b>149</b>	<b>117</b>	<b>29</b>	<b>146</b>	<b>148</b>	<b>27</b>	<b>175</b>
<i>less than 30 years old</i>		114	18	132	84	19	<b>103</b>	134	24	<b>158</b>
<i>between 30 and 50</i>		12	-	12	31	8	<b>39</b>	12	2	<b>14</b>
<i>over 50</i>		5	-	5	2	2	<b>4</b>	2	1	<b>3</b>
<b>Americas</b>		-	-	-	-	-	-	-	-	-
<i>less than 30 years old</i>		0	0	-	0	0	-	0	0	-
<i>between 30 and 50</i>		0	0	-	0	0	-	0	0	-
<i>over 50</i>		0	0	-	0	0	-	0	0	-
<b>Asia</b>		-	-	-	-	-	-	-	<b>2</b>	<b>2</b>
<i>less than 30 years old</i>		0	0	-	0	0	-	0	0	-
<i>between 30 and 50</i>		0	0	-	0	0	-	0	1	<b>1</b>
<i>over 50</i>		0	0	-	0	0	-	0	1	<b>1</b>
<b>Other - Europe</b>		-	-	-	<b>1</b>	-	<b>1</b>	-	-	-
<i>less than 30 years old</i>		0	0	-	0	0	-	0	0	-
<i>between 30 and 50</i>		0	0	-	1	0	<b>1</b>	0	0	-
<i>over 50</i>		0	0	-	0	0	-	0	0	-
<b>Total</b>		<b>131</b>	<b>18</b>	<b>149</b>	<b>118</b>	<b>29</b>	<b>147</b>	<b>148</b>	<b>29</b>	<b>177</b>
<i>less than 30 years old</i>		114	18	132	84	19	<b>103</b>	134	24	<b>158</b>
<i>between 30 and 50</i>		12	-	12	32	8	<b>40</b>	12	3	<b>15</b>
<i>over 50</i>		5	-	5	2	2	<b>4</b>	2	2	<b>4</b>

Note: The calculation of the number of new hires also includes employees with a fixed-term pseudo pilot contract (126 for 2018; 102 for 2017).

Table 33: Number of employees who left the Group, by age, gender, and geographical area [GRI 401-1]

Employees who left the Group	units	2018			2017			2016		
		Male	Female	Total	Male	Female	Total	Male	Female	Total
<b>Italy</b>	No.	<b>188</b>	<b>28</b>	<b>216</b>	<b>127</b>	<b>28</b>	<b>155</b>	<b>148</b>	<b>29</b>	<b>177</b>
<i>less than 30 years old</i>		112	16	128	86	18	<b>104</b>	106	18	<b>124</b>
<i>between 30 and 50</i>		21	4	25	7	1	<b>8</b>	4	3	<b>7</b>
<i>over 50</i>		55	8	63	34	9	<b>43</b>	38	8	<b>46</b>
<b>Americas</b>		<b>0</b>	<b>0</b>	<b>0</b>	-	-	-	-	-	-
<i>less than 30 years old</i>				0	0	0	-	0	0	-
<i>between 30 and 50</i>				0	0	0	-	0	0	-
<i>over 50</i>				0	0	0	-	0	0	-
<b>Asia</b>		<b>0</b>	<b>0</b>	<b>0</b>	-	-	-	-	-	-
<i>less than 30 years old</i>				0	0	0	-	0	0	-
<i>between 30 and 50</i>				0	0	0	-	0	0	-
<i>over 50</i>				0	0	0	-	0	0	-
<b>Other - Europe</b>		<b>0</b>	<b>0</b>	<b>0</b>	<b>1</b>	-	<b>1</b>	<b>1</b>	-	<b>1</b>
<i>less than 30 years old</i>				0	0	0	-	0	0	-
<i>between 30 and 50</i>				0	1	0	<b>1</b>	1	0	<b>1</b>
<i>over 50</i>				0	0	0	-	0	0	-
<b>Total</b>		<b>188</b>	<b>28</b>	<b>216</b>	<b>128</b>	<b>28</b>	<b>156</b>	<b>149</b>	<b>29</b>	<b>178</b>
<i>less than 30 years old</i>		112	16	128	86	18	<b>104</b>	106	18	<b>124</b>
<i>between 30 and 50</i>		21	4	25	8	1	<b>9</b>	5	3	<b>8</b>
<i>over 50</i>		55	8	63	34	9	<b>43</b>	38	8	<b>46</b>

Note: The calculation of the number of who left the Group also includes employees with a fixed-term pseudo pilot contract (126 for 2018; 102 for 2017).

Table 34: Turnover rate [GRI 401-1]

Turnover rate	units	2018			2017			2016		
		Male	Female	Total	Male	Female	Total	Male	Female	Total
<b>Italy</b>	%	5.7	3.4	5.3	3.8	3.3	<b>3.7</b>	4.4	3.4	<b>4.2</b>
<b>Americas</b>		-	-	-	-	-	-	-	-	-
<b>Asia</b>		-	-	-	-	-	-	-	-	-
<b>Other - Europe</b>		-	-	-	-	-	<b>100</b>	-	-	<b>100</b>
<b>Total</b>		<b>5.7</b>	<b>3.4</b>	<b>5.3</b>	<b>3.8</b>	<b>3.3</b>	<b>3.7</b>	<b>4.4</b>	<b>3.4</b>	<b>4.2</b>

Table 35: Rate of new hires [GRI 401-1]

Rate of new hires	units	2018			2017			2016		
		Male	Female	Total	Male	Female	Total	Male	Female	Total
Italy	%	4.0	2.2	3.6	3.5	3.4	3.5	4.4	3.2	4.1
Americas		-	-	-	-	-	-	-	-	-
Asia		-	-	-	-	0	0	0	66.67	33.33
Other - Europe		-	-	-	-	0	100	-	0	0
Total		4.0	2.2	3.6	3.5	3.4	3.5	4.4	3.2	4.1

Table 36: Number of hours of classroom and e-learning technical/operational training by gender and category.

Training hours by gender and level	units	2018			2017			2016		
		Male	Female	Total	Male	Female	Total	Male	Female	Total
Senior management	Hours	20	-	20	53	-	53	-	-	-
Middle management		1,988	60	2,048	1,874	105	1,979	1,032	158	1,190
Office staff		61,822	5,762	67,583	32,450	2,814	35,264	89,087	10,939	100,025
Blue collar		193	-	193	362	-	362	309	-	309
Total		64,022	5,821	69,843	34,738	2,919	37,657	90,427	11,097	101,524

Note: For 2016, the figures for ENAV e-learning are not available.

Table 37: Number of employees involved in classroom and e-learning technical/operational training by gender and category

Number of employees involved by gender and level	units	2018			2017			2016		
		Male	Female	Total	Male	Female	Total	Male	Female	Total
Senior management	No.	3	0	3	11	-	11	-	-	-
Middle management		120	6	126	190	11	201	138	21	159
Office staff		2,173	149	2,322	1,441	166	1,607	2,265	298	2,563
Blue collar		15	0	15	9	-	9	7	-	7
Total		2311	155	2466	1,651	177	1,828	2,410	319	2,729

Note: For 2016, the figures for ENAV e-learning are not available.

Table 38: Number of hours of classroom and e-learning management and specialist training by gender and category, including anti-corruption training

Training hours by gender and level	units	2018			2017			2016		
		Male	Female	Total	Male	Female	Total	Male	Female	Total
Senior management	Hours	633	96	729	1,797	171	1,968	514	40	554
Middle management		1,094	408	1,502	3,202	630	3,832	3,734	468	4,202
Office staff		6,107	2,553	8,659	6,518	2,732	9,250	8,772	3,826	12,598
Blue collar		45	-	45	-	-	-	-	-	-
Total		7,879	3,056	10,935	11,517	3,533	15,050	13,020	4,334	17,354

Note: For 2017 training hours have been reallocated, considering language training, mandatory training and management and specialist training as non-operational.

Table 39: Number of participants in classroom and e-learning non-operational training by gender and category, including anti-corruption training

Number of employees involved by gender and level	units	2018			2017			2016		
		Male	Female	Total	Male	Female	Total	Male	Female	Total
Senior management	No.	38	5	43	71	7	78	79	6	85
Middle management		169	30	199	134	34	168	512	73	585
Office staff		885	297	1,182	619	253	872	2,166	654	2,820
Blue collar		27	-	27	-	-	-	-	-	-
<b>Total</b>		<b>1,119</b>	<b>332</b>	<b>1,451</b>	<b>824</b>	<b>294</b>	<b>1,118</b>	<b>2,757</b>	<b>733</b>	<b>3,490</b>

Note: For 2017 the number of participants has been reallocated, considering language training, mandatory training and management and specialist training as non-operational.

Table 40: Number of hours of classroom and e-learning health and safety in the workplace training by gender and category

Training hours by gender and level	units	2018			2017		
		Male	Female	Total	Male	Female	Total
Senior management	Hours	244	-	244	26	-	26
Middle management		1,944	113	2,057	2,224	254	2,478
Office staff		13,279	1,718	14,997	15,224	4,553	19,777
Blue collar		824	-	824	-	-	-
<b>Total</b>		<b>16,291</b>	<b>1,831</b>	<b>18,122</b>	<b>17,474</b>	<b>4,807</b>	<b>22,281</b>

Note: The 2016 figures are not complete, and the source of the data is not objective. For 2017, with issuance of the procedure "SGSSL-P. 6.1 Management of Training for Occupational Health and Safety", the HSE function was able to carry out the reporting on OSH training provided and to report on the course attended by each type of worker (e.g. first responders, fire fighters, worker safety representatives, etc.), broken down by introductory or advanced, or in low, medium or high risk. The figure for 2018 also includes the training provided at Techno Sky.

Table 41: Number of employees involved in classroom and e-learning occupational health and safety training by gender and category

Number of employees involved by gender and level	units	2018			2017		
		Male	Female	Total	Male	Female	Total
Senior management	No.	30	-	30	3	-	3
Middle management		317	20	337	394	47	441
Office staff		1,996	296	2,292	3,133	799	3,932
Blue collar		103	-	103	18	-	18
<b>Total</b>		<b>2,446</b>	<b>316</b>	<b>2,762</b>	<b>3,548</b>	<b>846</b>	<b>4,394</b>

See the note to the previous table

Table 42: Number of hours of environmental training in the classroom and via e-learning

Training hours by gender and level	units	2018		
		Male	Female	Total
Senior management	<i>Hours</i>	72	-	72
Middle management		120	16	136
Office staff		608	-	608
Blue collar		-	-	-
<b>Total</b>		<b>800</b>	<b>16</b>	<b>816</b>

Table 43: Number of employees involved in environmental training in the classroom and via e-learning

Number of employees involved by gender and level	units	2018		
		Male	Female	Total
Senior management	<i>No.</i>	9	0	9
Middle management		12	1	13
Office staff		46	0	46
Blue collar		0	0	0
<b>Total</b>		<b>67</b>	<b>1</b>	<b>68</b>

Table 44: Average hours of training [GRI 404-1]

Average hours of training (classroom and e-learning)	units	2018			2017			2016		
		Male	Female	Total	Male	Female	Total	Male	Female	Total
Total number of training hours provided to employees	Hours	88,992	10,725	99,716	70,185	12,382	82,567	109,818	16,166	125,984
Total number of employees	No.	3,279	835	4,114	3,335	846	4,181	3,380	854	4,234
Average employee training hours	Hours/No.	27	13	24	21	15	20	32	19	30
Total number of training hours provided to senior management	Hours	969	96	1,065	2,471	195	2,666	599	40	639
Total number of senior managers	No.	55	4	59	58	4	62	59	5	64
Average training hours provided to senior management	Hours/No.	18	24	18	43	49	43	10	8	10
Total number of training hours provided to middle management	Hours	5,146	597	5,743	7,509	1,097	8,606	4,999	690	5,689
Total number of middle managers	No.	350	54	404	359	55	414	370	55	425
Average training hours provided to middle management	Hours/No.	15	11	14	21	20	21	14	13	13
Total number of training hours provided to office staff	Hours	81,816	10,032	91,848	59,578	11,090	70,668	103,862	15,436	119,297
Total number of office workers	No.	2,830	777	3,607	2,868	787	3,655	2,901	794	3,695
Average training hours provided to office staff	Hours/No.	29	13	25	21	14	19	36	19	32
Total number of training hours provided to blue collar workers	Hours	1062	0	1062	628	-	628	359	-	359
Total number of blue-collar workers	No.	44	0	44	50	-	50	50	-	50
Average training hours provided to blue collar workers	Hours/No.	24	-	24	13	-	13	7	-	7

Table 45: Number of ongoing training hours by gender

Ongoing training hours by gender and category	units	2018			2017			2016		
		Male	Female	Total	Male	Female	Total	Male	Female	Total
Employees	Hours	58,468	6,497	<b>64,965</b>	68,309	7,590	<b>75,899</b>	64,929	7,215	<b>72,144</b>

Table 46: Number of employees involved in ongoing training by gender

Number of employees involved by gender and category	units	2018			2017			2016		
		Male	Female	Total	Male	Female	Total	Male	Female	Total
Employees	No.	1,700	190	<b>1,890</b>	1,710	190	<b>1,900</b>	1,720	191	<b>1,911</b>

Table 47: Number of hours of ongoing operating unit training by gender

Hours of operating unit training by gender and function	units	2018			2017			2016		
		Male	Female	Total	Male	Female	Total	Male	Female	Total
Employees	Hours	113,428	12,603	<b>126,031</b>	75,296	8,367	<b>83,663</b>	110,060	12,229	<b>122,289</b>

Table 48: Number of employees involved in ongoing operating unit training by gender

Number of employees involved by gender and category	units	2018			2017			2016		
		Male	Female	Total	Male	Female	Total	Male	Female	Total
Employees	No.	1,612	180	1,792	445	50	<b>495</b>	570	63	<b>633</b>

Table 49: Number of incidents of discrimination and actions taken [GRI 406-1]

Incidents of discrimination	units	2018	2017	2016
Number of incidents of discrimination reported	No.	0	0	0
Number of incidents examined by the company		0	0	0
Number of remediation plans defined		0	0	0
Number of remediation plans implemented		0	0	0
Number of incidents no longer subject to remediation		0	0	0

Table 50: Percentage of supply contracts that include clauses for the respect of human rights [GRI 412-3]

Percentage of supply contracts in which provisions for the respect of human rights or human rights assessments have been included	units	2018	2017	2016
ENAV	%	100	100	100
Techno Sky	%	100	100	100
ENAV Asia Pacific	%	0	0	0

Table 51: Number of grievances with employees

Number of grievances pending with employees	units	2018	2017	2016
Number of grievances with employees	No.	49	93	103

Table 52: Number of new grievances with employees

Number of new grievances with employees	units	2018	2017	2016
Number of grievances with employees	No.	11	11	12

Table 53: Percentage of employees covered by collective bargaining agreements [GRI 102-41]

Percentage of employees covered by collective bargaining agreements	units	2018	2017	2016
Percentage of employees covered by collective bargaining agreements	%	100	100	100

Note: Senior management is excluded from the calculation.

Table 54: Percentage of employees registered with a union

Percentage of employees registered with a union	units	2018	2017	2016
Percentage of employees registered with a union	%	65	65	64

Note: Senior management is excluded from the calculation.

Table 55: Number of strikes

Number of strikes	units	2018	2017	2016
Number of strikes	No.	7	4	11

Table 56: Number of strike hours

Number of strike hours	units	2018	2017	2016
Number of strike hours	No. of hours	92	36	92



Table 57: Types of injury, injury rate (IR), occupational disease rate (ODR), rate of lost workable hours, absenteeism rate (AR) and deaths at work, all employees [GRI 403-2]

Employees	units	2018			2017			2016		
		Male	Female	Total	Male	Female	Total	Male	Female	Total
<b>Injuries</b>	No.	<b>12</b>	<b>1</b>	<b>13</b>	<b>14</b>	<b>5</b>	<b>19</b>	<b>14</b>	<b>2</b>	<b>16</b>
Italy		12	1	13	14	5	19	14	2	16
Americas		0	0	0	0	0	0	0	0	0
<b>Cases of occupational disease</b>	No.	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
Italy		0	0	0	0	0	-	0	0	-
Americas		0	0	0	0	0	-	0	0	-
<b>Number of hours lost due to injury</b>	hours	<b>840</b>	<b>245</b>	<b>1,085</b>	<b>2,207</b>	<b>461</b>	<b>2,668</b>	<b>2,601</b>	<b>365</b>	<b>2,966</b>
at work		840	245	1,085	2,207	461	2,668	2,601	365	2,966
<b>Rate of hours lost</b>	%	0.2	0.1	0.2	0.4	0.4	0.4	0.5	0.3	0.5
<b>Occupational disease rate (ODR)</b>		0	0	0	0	0	0	0	0	0
<b>Injury Rate (IR)</b>		3.0	0.6	2.3	2.8	4.4	3.1	2.9	1.8	2.7

Note: For **non-payroll** personnel, no injuries or deaths were recorded in 2017 or 2018. In 2016, 1 death among non-payroll personnel was recorded. The indices are calculated as follows: Rate of hours lost: (No. of hours lost due to injury /No. of hours worked) x1,000; Occupational disease rate (ODR): (No. of cases of occupational disease/No. of hours worked) x 200,000; Injury rate (IR): (No. of injuries /No. of hours worked) x 1,000,000. The calculations only take account of injuries to employees in the workplace.

Table 58: Absenteeism rate by type and region [GRI 403-2]

Absenteeism rate by type and region	units	2018			2017			2016		
		Male	Female	Total	Male	Female	Total	Male	Female	Total
Italy	no. of days	<b>0.035</b>	<b>0.046</b>	<b>0.038</b>	<b>0.033</b>	<b>0.055</b>	<b>0.038</b>	<b>0.024</b>	<b>0.043</b>	<b>0.028</b>
Illness		0.035	0.046	<b>0.038</b>	0.032	0.055	<b>0.037</b>	0.022	0.042	<b>0.026</b>
Injury		0.001	0.001	<b>0.001</b>	0.001	0.001	<b>0.001</b>	0.001	0.001	<b>0.001</b>
Stress		0	0	<b>0</b>	0	0	<b>0</b>	0	0	<b>0</b>
Asia	no. of days	0	0.016	<b>0.012</b>	0	0	<b>0</b>	0	0	<b>0</b>
Illness		0	0.016	<b>0.012</b>	0	0	<b>0</b>	0	0	<b>0</b>
Injury		0	0	<b>0</b>	0	0	<b>0</b>	0	0	<b>0</b>
Stress		0	0	<b>0</b>	0	0	<b>0</b>	0	0	<b>0</b>

Note: The index is calculated as follows: Absenteeism rate (AR): (total number of days lost in the period/total number of days worked in the period)

## ANNEX 2

**TABLE: GRI CONTENT INDEX**

GRI STANDARDS	Disclosure	Reference page	Omission
General Disclosure			
GRI 102: General Disclosures 2016	102-1 Name of the organization	7	
	102-2 Activities, brands, products, and services	8 – 12, 31-32	
	102-3 Location of headquarters	The ENAV Group's registered office is in Rome, in Via Salaria 716	
	102-4 Location of operations	8, 11, 31, 32	
	102-5 Ownership and legal form	7-8, 31, 33	
	102-6 Markets served	8-12, 31-32, 43	
	102-7 Name of the organization	8, 30-31, 103	
	102-8 Information on employees and other workers	86, 110, 112	
	102-9 Supply chain	64 - 67	
	102-10 Significant changes to the organization and its supply chain	7, 31-32	
	102-11 Precautionary Principle or approach	35-39	
	102-12 External initiatives	59-62, 90	
	102-13 Membership of associations	59-62	
	102-14 Statement from senior decision-maker	4-5	
	102-15 Key impacts, risks, and opportunities	35-37	
	102-16 Values, principles, standards, and norms of behaviour	8, 15, 66-67, 68-70, 80, 83, 85, 86, 90, 93, 97, 101	
	102-18 Governance structure	33-34, 103	
	102-24 Nominating and selecting the highest governance body	33-34	
	102-40 List of stakeholder groups	18	
	102-41 Collective bargaining agreements	97, 98, 120	

	102-42 Identifying and selecting stakeholders	18	
	102-43 Approach to stakeholder engagement	18 – 22, 107	
	102-44 Key topics and concerns raised	19, 21-22	
	102-45 Entities included in the consolidated financial statements	7	
	102-46 Defining report content and topic boundaries	18-21	
	102-47 List of material topics	19-21	
	102-48 Restatements of information	6, 7	
	102-49 Changes in reporting	6, 7	
	102-50 Reporting period	6, 7	
	102-51 Date of the most recent report	6, 7	
	102-52 Reporting cycle	Reporting is annual	
	102-53 Contact point for questions regarding the report	For information or comments on this document, submit a request to <a href="mailto:sostenibilita@ENAV.it">sostenibilita@ENAV.it</a>	
	102-54 Claims of reporting in accordance with the GRI Standards	6	
	102-55 GRI content index	122-129	
	102-56 External assurance	130-132	
<b>GRI STANDARDS</b>	<b>Disclosure</b>	<b>Reference page</b>	<b>Omission</b>
Anti-corruption			
GRI Management Approach 2016	103-1 Explanation of the material topic and its Boundary	19-21	
	103-2 The management approach and its components	36-37, 38-40, 68-70	
	103-3 Evaluation of the management approach	36-37, 38-40, 68-70	
GRI 205: Anti-corruption 2016	205-1 Operations assessed for risks related to corruption	70	

	205-3 Confirmed incidents of corruption and actions taken	From the analyses and investigations conducted, no acts of corruption (active or passive) were discovered in 2016-2018	
<b>GRI STANDARDS</b>	<b>Disclosure</b>	<b>Reference page</b>	<b>Omission</b>
Energy			
GRI Management Approach 2016	103-1 Explanation of the material topic and its Boundary	19-21	
	103-2 The management approach and its components	36, 76, 80-82	
	103-3 Evaluation of the management approach	76, 80-82	
GRI 302: Energy 2016	302-1 Energy consumption within the organization	80-82, 108	
<b>GRI STANDARDS</b>	<b>Disclosure</b>	<b>Reference page</b>	<b>Omission</b>
Emissions			
GRI Management Approach 2016	103-1 Explanation of the material topic and its Boundary	19-21	
	103-2 The management approach and its components	36, 76, 80-82	
	103-3 Evaluation of the management approach	76, 80-82	
GRI: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	80, 81, 109	
	305-2 Energy indirect (Scope 2) GHG emissions	80, 81, 109	
	305-2 Energy indirect (Scope 2) GHG emissions	109	
	305-5 Reduction of GHG emissions	82, 109	
<b>GRI STANDARDS</b>	<b>Disclosure</b>	<b>Reference page</b>	<b>Omission</b>
Effluents and Waste			
GRI Management Approach 2016	103-1 Explanation of the material topic and its Boundary	19-21	
	103-2 The management approach and its components	36, 76, 83-84	
	103-3 Evaluation of the management approach	76, 83-84	

GRI: 306 Effluents and Waste 2016	306-2 Waste by type and disposal method	84, 110	
<b>GRI STANDARDS</b>	<b>Disclosure</b>	<b>Reference page</b>	<b>Omission</b>
Environmental Compliance			
GRI Management Approach 2016	103-1 Explanation of the material topic and its Boundary	19-21	
	103-2 The management approach and its components	36, 42, 76	
	103-3 Evaluation of the management approach	36, 42, 76	
GRI: 307 Environmental Compliance 2016	307-1 Non-compliance with environmental laws and regulations	42, 104	
<b>GRI STANDARDS</b>	<b>Disclosure</b>	<b>Reference page</b>	<b>Omission</b>
Supplier Environmental Assessment			
GRI Management Approach 2016	103-1 Explanation of the material topic and its Boundary	19-21	
	103-2 The management approach and its components	36, 64-67	
	103-3 Evaluation of the management approach	36, 64-67	
GRI 308: Supplier Environmental Assessment 2016	308-2 Negative environmental impact in the supply chain and actions taken	66-67	
<b>GRI STANDARDS</b>	<b>Disclosure</b>	<b>Reference page</b>	<b>Omission</b>
Employment			
GRI Management Approach 2016	103-1 Explanation of the material topic and its Boundary	19-21	
	103-2 The management approach and its components	36, 86-87, 91-92	
	103-3 Evaluation of the management approach	36, 86-87, 91-92	
GRI 401 Employment 2016	401-1 New employee hires and employee turnover	86, 113-115	

GRI STANDARDS	Disclosure	Reference page	
Labour/Management Relations			
GRI Management Approach 2016 103:	103-1 Explanation of the material topic and its Boundary	19-21	
	103-2 The management approach and its components	36; 97-98	
	103-3 Evaluation of the management approach	36; 97-98	
GRI Labor/Management Relations 2016 402:	402-1 Minimum notice periods regarding operational changes	98	
GRI STANDARDS	Disclosure	Reference page	Omission
Occupational Health and Safety			
GRI Management Approach 2016 103:	103-1 Explanation of the material topic and its Boundary	19-21	
	103-2 The management approach and its components	36-37, 41-42, 101-102	
	103-3 Evaluation of the management approach	36-37, 41-42, 101-102	
GRI Occupational Health and Safety 2016 403:	403-2 Types of injury and rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities	102, 121	
	403-3 Workers with high incidence or high risk of diseases related to their occupation	Group personnel is exposed to the occupational health and safety risks that are reported in the section "Main non-financial risks". There are, however, no work activities which expose the worker to risks for specific diseases, or which have a high incidence of exposure to risk.	

GRI STANDARDS	Disclosure	Reference page	Omission
Training and Education			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	19-21	
	103-2 The management approach and its components	36, 48-52, 87-89, 101, 102	
	103-3 Evaluation of the management approach	36, 48-52, 87-89, 101, 102	
GRI 404: Training and Education 2016	404-1 Average hours of training per year for employee	115-118	
	404-2 Programs for upgrading employee skills and transition assistance programs	48-52, 87-89	
GRI STANDARDS	Disclosure	Reference page	Omission
Diversity and Equal Opportunity			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	19-21	
	103-2 The management approach and its components	37, 90-92	
	103-3 Evaluation of the management approach	37, 90-92	
GRI: 405 Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	103, 111	
GRI STANDARDS	Disclosure	Reference page	Omission
Non-discrimination			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	19-21	
	103-2 The management approach and its components	37, 90, 93-94	
	103-3 Evaluation of the management approach	37, 90, 93-94	
GRI 406: Non-discrimination 2016	406-1 Incidents of discrimination and corrective actions taken	119	

GRI STANDARDS	Disclosure	Reference page	Omission
Human Rights Assessment			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	19-21	
	103-2 The management approach and its components	37, 93-94	
	103-3 Evaluation of the management approach	37, 93-94	
GRI 412: Human Rights Assessment 2016	412-1 Operations that have been subject to human rights reviews or impact assessments	94	
GRI STANDARDS	Disclosure	Reference page	Omission
Local Communities			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	19-21	
	103-2 The management approach and its components	36, 85	
	103-3 Evaluation of the management approach	36, 85	
GRI 413: Local Communities 2016	413-2 Operations with significant actual and potential negative impacts on local communities	85	
GRI STANDARDS	Disclosure	Reference page	Omission
Supplier Social Assessment			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	19-21	
	103-2 The management approach and its components	37, 64-67	
	103-3 Evaluation of the management approach	37, 64-67	
GRI 414: Supplier Social Assessment 2016	414-1 New suppliers that were screened using social criteria	66-67, 107	



GRI STANDARDS	Disclosure	Reference page	Omission
Customer health and safety			
GRI Management Approach 2016 103:	103-1 Explanation of the material topic and its Boundary	19-21	
	103-2 The management approach and its components	35, 41-42, 43, 44-47, 54-58	
	103-3 Evaluation of the management approach	35, 41-42, 43, 44-47, 54-58	
GRI 416: Customer health and safety 2016	416-1 Assessment of the health and safety impacts of product and service categories	All activities carried out by ENAV and Techno Sky	
GRI STANDARDS	Disclosure	Reference page	Omission
Socioeconomic Compliance			
GRI Management Approach 2016 103:	103-1 Explanation of the material topic and its Boundary	19-21	
	103-2 The management approach and its components	36-37, 41-42	
	103-3 Evaluation of the management approach	36-37, 41-42	
GRI Socioeconomic Compliance 2016 419:	419-1 Non-compliance with laws and regulations in the social and economic area	104	
MATERIAL TOPIC		Reference page	Omission
Payment of suppliers			
GRI Management Approach 2016 103:	103-1 Explanation of the material topic and its Boundary	19-21	
	103-2 The management approach and its components	66-67	
	103-3 Evaluation of the management approach	66-67	

## **Independent auditors' report on the consolidated disclosure of non-financial information in accordance with Article 3, par. 10, of Legislative Decree 254/2016 and with Article 5 of CONSOB Regulation adopted with Resolution n. 20267 of January 18 2018 (Translation from the original Italian text)**

To the Board of Directors of  
ENAV S.p.A.

We have been appointed to perform a limited assurance engagement pursuant to Article 3, paragraph 10, of Legislative Decree 30 December 2016, n. 254 (hereinafter "Decree") and article 5 of CONSOB Regulation adopted with Resolution 20267/2018, on the consolidated disclosure of non-financial information of ENAV S.p.A. and its subsidiaries (hereinafter the "Group") for the year ended on 31<sup>st</sup> December 2018 in accordance with article 4 of the Decree approved by the Board of Directors on 11<sup>th</sup> March 2019 (hereinafter "DNF").

### **Responsibilities of Directors and Board of Statutory Auditors for the DNF**

The Directors are responsible for the preparation of the DNF in accordance with the requirements of articles 3 and 4 of the Decree and the "Global Reporting Initiative Sustainability Reporting Standards" defined in 2016 by GRI - Global Reporting Initiative ("GRI Standards") identified by them as a reporting standard.

The Directors are also responsible, within the terms provided by law, for that part of internal control that they consider necessary in order to allow the preparation of the DNF that is free from material misstatements caused by fraud or not intentional behaviors or events.

The Directors are also responsible for identifying the contents of the DNF within the matters mentioned in article 3, par. 1, of the Decree, considering the business and the characteristics of the Group and to the extent deemed necessary to ensure the understanding of the Group's business, its performance, its results and its impact.

The Directors are also responsible for defining the Group's management and organization business model, as well as with reference to the matters identified and reported in the DNF, for the policies applied by the Group and for identifying and managing the risks generated or incurred by the Group.

The Board of Statutory Auditors is responsible, within the terms provided by the law, for overseeing the compliance with the requirements of the Decree.

### **Auditors' independence and quality control**

We are independent in accordance with the ethics and independence principles of the Code of Ethics for Professional Accountants issued by the International Ethics Standards Board for Accountants, based on fundamental principles of integrity, objectivity, professional competence and diligence, confidentiality and professional behavior. Our audit firm applies the International Standard on Quality Control 1 (ISQC Italia 1) and, as a result, maintains a quality control system that includes



documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable laws and regulations.

## **Auditors' responsibility**

It is our responsibility to express, on the basis of the procedures performed, a conclusion about the compliance of the DNF with the requirements of the Decree and of the GRI Standards. Our work has been performed in accordance with the principle of "International Standard on Assurance Engagements ISAE 3000 (Revised) - Assurance Engagements Other than Audits or Reviews of Historical Financial Information" (hereinafter "ISAE 3000 Revised"), issued by the International Auditing and Assurance Standards Board (IAASB) for limited assurance engagements. This principle requires the planning and execution of work in order to obtain a limited assurance that the DNF is free from material misstatements. Therefore, the extent of work performed in our examination was lower than that required for a full examination according to the ISAE 3000 Revised ("reasonable assurance engagement") and, hence, it does not provide assurance that we have become aware of all significant matters and events that would be identified during a reasonable assurance engagement.

The procedures performed on the DNF were based on our professional judgment and included inquiries, primarily with company's personnel responsible for the preparation of the information included in the DNF, documents analysis, recalculations and other procedures in order to obtain evidences considered appropriate.

In particular, we have performed the following procedures:

1. analysis of the relevant matters in relation to the activities and characteristics of the Group reported in the DNF, in order to assess the reasonableness of the selection process applied in accordance with the provisions of article 3 of the Decree and considering the reporting standard applied;
2. analysis and evaluation of the criteria for identifying the consolidation area, in order to evaluate its compliance with the provisions of the Decree;
3. comparison of the economic and financial data and information included in the DNF with those included in the ENAV Group's consolidated financial statements;
4. understanding of the following aspects:
  - Group's management and organization business model, with reference to the management of the matters indicated in the article 3 of the Decree;
  - policies adopted by the Group related to the matters indicated in the article 3 of the Decree, results achieved and related key performance indicators;
  - main risks, generated or suffered related to the matters indicated in the article 3 of the Decree.

With regard to these aspects, we obtained the documentation supporting the information contained in the DNF and performed the procedures described in item 5. a) below.

5. understanding of the processes that lead to the generation, detection and management of significant qualitative and quantitative information included in the DNF.

In particular, we have conducted interviews and discussions with the management of ENAV S.p.A. and with the personnel of Techno Sky S.r.l. and we have performed limited

documentary evidence procedures, in order to collect information about the processes and procedures that support the collection, aggregation, processing and transmission of non-financial data and information to the management responsible for the preparation of the DNF.

Furthermore, at group level, for significant information, considering the Group activities and characteristics:

- at Group level:
  - a) with reference to the qualitative information included in the DNF, and in particular to the business model, policies implemented and main risks, we carried out inquiries and acquired supporting documentation to verify its consistency with the available evidence;
  - b) with reference to quantitative information, we have performed both analytical procedures and limited assurance procedures to ascertain on a sample basis the correct aggregation of data.
- for the companies ENAV S.p.A. and Techno Sky S.r.l., that we have selected based on their relevance to the consolidated performance indicators, we have carried out site visits during which we have had discussions with management and have obtained evidence about the appropriate application of the procedures and the calculation methods used to determine the indicators.

## Conclusion

Based on the procedures performed, nothing has come to our attention that causes us to believe that the DNF of the Group for the year ended on 31<sup>st</sup> December 2018 has not been prepared, in all material aspects, in accordance with the requirements of articles 3 and 4 of the Decree and the GRI Standards.

## Other Information

The comparative information presented in the DNF for the year ended on 31<sup>st</sup> December 2016 has not been examined.

Roma, 26<sup>th</sup> March 2019

EY S.p.A.

Mauro Ottaviani  
(Partner)

*This report has been translated into the English language solely for the convenience of international readers.*