LEONARDO
TECHNOLOGY FOR A SAFER FUTURE

THE ANTI-CORRUPTION SYSTEM OF LEONARDO S.P.A.

ISO 37001:2025 Certificate

Abstract

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Summary

- The Principles of Leonardo S.p.A.'s Anti-Corruption System
- The Anti-Corruption System of Leonardo S.p.A.
- Certification of the Anti-Corruption System
- Key Players in the Anti-Corruption System
- Risk Assessment and Audits
- Training
- Monitoring, Review, and Continuous Improvement of the Anti-Corruption System
- Internal Reports - The Whistleblowing System

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THE PRINCIPLES OF LEONARDO S.P.A.'S ANTI-CORRUPTION SYSTEM



All those acting on behalf of and in the interest of Leonardo are committed to observing and ensuring compliance with these principles within the scope of their duties and responsibilities. Furthermore, the Company requires that all parties with whom it maintains relationships, in any capacity, act in accordance with rules and procedures inspired by these same values.

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THE ANTI-CORRUPTION SYSTEM OF LEONARDO S.P.A. (1/2)

- The **Anti-Corruption System of Leonardo S.p.a.** (hereinafter referred to, respectively, as the “Anti-Corruption System” or the “System” and “Leonardo” or the “Company”) constitutes a **comprehensive set of principles, rules, and control processes aimed at preventing and combating corruption within the Company**.
- The System, structured in accordance with **the international Standard ISO 37001 “*Anti-bribery Management Systems*”** complements and reinforces the Company’s model of responsible business conduct and serves as one of the tools to foster a **Group-wide culture grounded in ethics, integrity, and a forward-looking vision of sustainable development**.
- Leonardo S.p.a.’s Anti-Corruption System was developed based on the **areas of corruption risk to which the Company is exposed**, with the goal of preventing and combating conduct that does not comply with applicable regulations, in accordance with the **“zero tolerance” principle**.



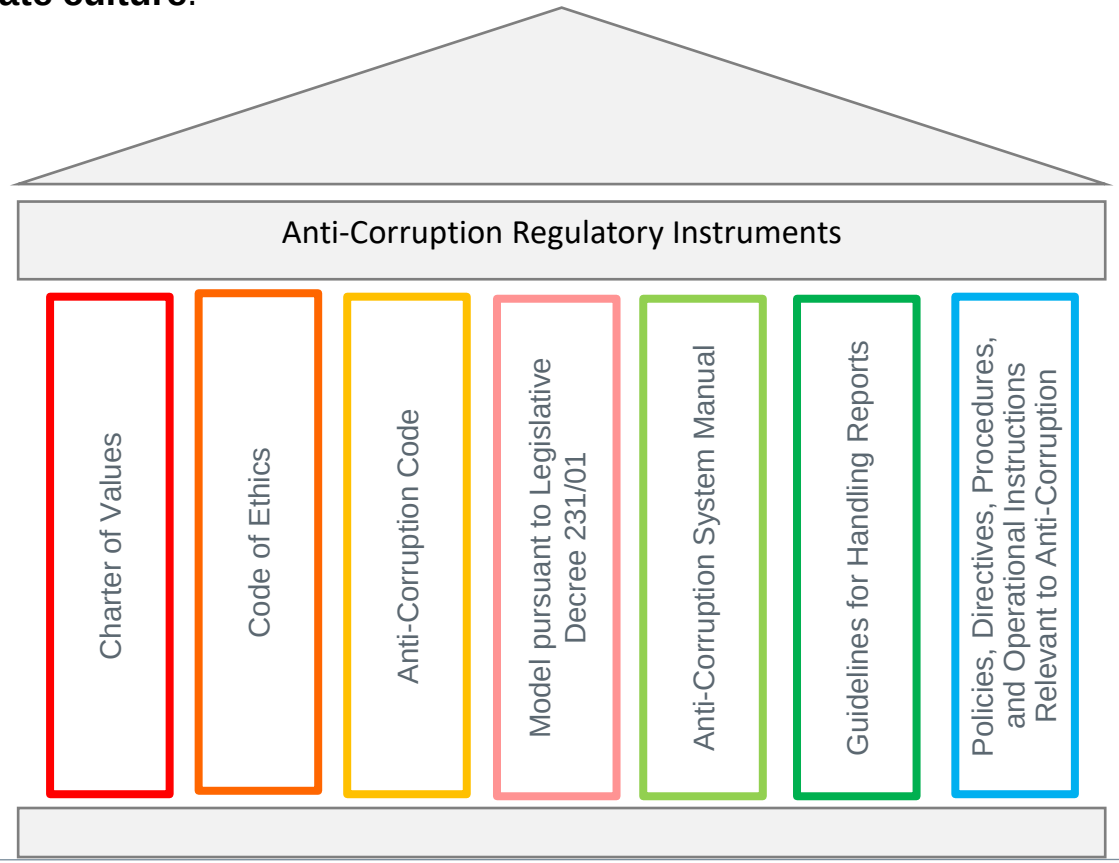
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THE ANTI-CORRUPTION SYSTEM OF LEONARDO S.P.A. (2/2)

In line with the “zero tolerance” principle, Leonardo has established **specific compliance controls** aimed at **preventing unlawful conduct in the performance of activities that are most exposed to the risk of corruption**, both in dealings with public administrations and in dealings with private entities.

Listed below are the **regulatory instruments relevant to the Anti-Corruption System**. These instruments work in synergy to foster a **transparent and responsible corporate culture**.



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CERTIFICATION OF THE ANTI-CORRUPTION SYSTEM (1/3)

In July 2018, Leonardo S.p.A. was among the first companies - ranking in the global top ten in the AD&S sector - to obtain **ISO 37001 *"Anti-bribery management systems"* certification**, the first international standard for anti-corruption management systems.

The certification was subsequently renewed in 2021 and 2024.

As further evidence of the Company's commitment to strengthening and continuously improving its measures to prevent and combat corruption, in **July 2026** Leonardo successfully completed the process of **migrating its certification to the new ISO 37001:2025 Standard**.

The Anti-Corruption System certification is **valid for three years** and is subject to an **annual surveillance program** conducted by an external certification body.

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THE ANTI-CORRUPTION SYSTEM CERTIFICATION (2/3)

The Anti-Corruption System of Leonardo S.p.a. is structured in accordance with the **requirements of the ISO 37001:2025 Standard**.



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CERTIFICATION OF THE ANTI-CORRUPTION SYSTEM (3/3)

Key New Features - ISO 37001:2025

SUSTAINABILITY AND CLIMATE CHANGE

The new Standard requires organizations to also consider the implications arising from **the environmental context** and **climate change** in their assessment of corruption risk

ANTI-CORRUPTION CULTURE

For the first time, the standard explicitly introduces the need to promote and strengthen a **culture of integrity** and **ethical conduct at all levels** of the organization as a key element for the effectiveness of the anti-corruption system

STAFF AWARENESS

The standard requires, among other things, that personnel:

i) contribute to the effectiveness of the anti-corruption system,

ii) be aware of the regulatory framework of the anti-corruption system

CONFLICTS OF INTEREST

ISO 37001:2025 provides more detailed guidelines for **identifying**, **reporting**, and **managing** conflicts of interest

INTEGRATION WITH OTHER STANDARDS

The standard highlights the importance of **aligning** the structure **with other** management system **standards** (e.g., ISO 9001, ISO 37002)

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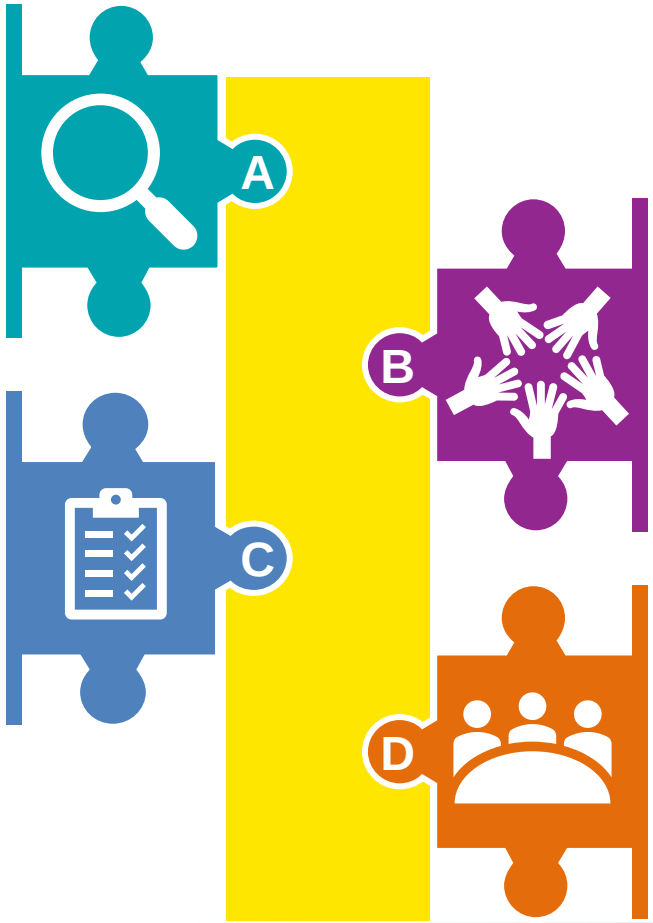
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KEY PLAYERS IN THE ANTI-CORRUPTION SYSTEM (1/2)

The **Anti-Corruption, Ethics & Integrity** organizational unit (“OU”) , under the direction of **the Chief Compliance Officer** and with the valuable support of the organizational units involved in their respective areas of expertise, is responsible for updating and strengthening the System, also taking into account the results of the dedicated monitoring program. In particular, **the Anti-Corruption, Ethics & Integrity Organizational Unit** is **responsible** for:

Oversee the Company’s **design and implementation** of the Anti-Corruption System

Ensure that the Anti-Corruption System **complies** with the requirements of ISO 37001



Provide advice and **guidance** to Personnel regarding the Anti-Corruption System

Report on the performance of the Anti-Corruption System to the Governing Body and Senior Management

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KEY PLAYERS IN THE ANTI-CORRUPTION SYSTEM (2/2)

Among the key players in the Anti-Corruption System of Leonardo S.p.a. are:

- Board of Directors
- Senior Management
- Coordination and Consultation Body for the Prevention of Corruption
- Supervisory Body
- Reporting Committee
- Anti-Corruption, Ethics & Integrity Unit
- Risk Management Unit
- Group Internal Audit Unit
- People & Organization Unit
- Security Unit

ROLE OF THE CHAIRMAN

The Chairman of Leonardo S.p.a. oversees the implementation of corporate governance rules regarding the integrity of corporate conduct and the fight against corruption. The Anti-Corruption, Ethics & Integrity Unit reports functionally to the Chairman and, through the Chief Compliance Officer, has direct access to Senior Management and the corporate bodies.

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RISK ASSESSMENT AND AUDITS

Leonardo verifies the ongoing adequacy and effectiveness of the Anti-Corruption System by monitoring areas exposed to corruption risk (the so-called **Anti-Corruption Risk Assessment**).

The assessment of corruption risk related to business and support processes is carried out by applying the **Enterprise Risk Management** (**ERM**) process and **methodology**, which involves **the identification**, **assessment**, and, where necessary, **treatment** of identified risks.



HOW THE RESULTS ARE USED

TREATMENT ACTIONS

Identify, with the support of the organizational units involved in their respective areas of expertise, **specific** risk mitigation **actions**

AREAS AT RISK

Identify and **update** the **risk areas relevant** to the Anti-Corruption System

CONTINUOUS IMPROVEMENT

Contribute to **the continuous improvement** and **strengthening** of the Anti-Corruption System

ERM activities are carried out in response to changes in identified risks, the outcome of defined mitigation actions, and the potential emergence of new risks related to changes in internal or external factors relevant to the Anti-Corruption System.

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TRAINING (1/3)

Training is an essential element in **reducing the company's exposure to the risk of corruption.** Recognizing the fundamental role of training, Leonardo has invested in:

MANDATORY TRAINING

Sessions for **all employees**, focusing on the fight against corruption, applicable regulations, and internal procedures.

WORKSHOPS THEMATIC

Specific sessions to analyze high-risk situations and best practices.

AWARENESS CAMPAIGNS

Awareness-raising activities aimed at promoting a corporate culture based on integrity and transparency.



In recent years, increasingly **interactive** formats have been used, designed to actively engage participants through **participatory activities**, **multimedia content,** and opportunities for **continuous feedback**.

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TRAINING (2/3)

The training program is structured into the following levels:

SENIOR MANAGEMENT AND SENIOR MANAGEMENT	OTHER STAFF
Introductory brochures, meetings with first-line managers, or in-person workshops with Group executives most exposed to the risk of corruption.	Orientation for new hires; e-learning training course delivered via computer-based platforms (to be completed by new hires within three months of their hire date).

Awareness-raising and training take place on **a regular basis** and at **scheduled intervals**.

Training is conducted in the **languages** of Leonardo's **main national markets** .

The online course is available to all employees with access to a **computer**; otherwise, **in-person** sessions are organized .

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TRAINING (3/3)

The effectiveness of training activities is monitored, with the support of the People & Organization Unit, through periodic assessments of trained staff.



EFFECTIVENESS MONITORING

periodic evaluations of trained staff, with the support of the relevant organizational units

FEEDBACK COLLECTION

User **comments** and **feedback** are systematically **collected** and and **analyzed** to refine the content and improve usability

ANALYSIS AND IMPROVEMENT

Periodic quality surveys identify areas for improvement and ensure that training remains relevant

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MONITORING, REVIEW, AND CONTINUOUS IMPROVEMENT OF THE ANTI-CORRUPTION SYSTEM

The Anti-Corruption, Ethics & Integrity Unit is responsible for **monitoring the Anti-Corruption System**. Specifically, this activity focuses on:

- Operation of the Anti-Corruption System
- Adequacy in relation to risks
- Effective implementation of the Anti-Corruption System

Changes regarding:

- Applicable regulations
- Corporate organization
- Other relevant internal and external factors

As part of **the annual Anti-Corruption Plan**, drafted by the Anti-Corruption, Ethics & Integrity Unit, the methods and timelines for monitoring activities are defined, among other things. Regulatory, organizational, and training monitoring is conducted periodically to systematically collect data and information useful for evaluating the effectiveness of the Anti-Corruption System.

The Company is committed to continuously improving the suitability, adequacy, and effectiveness of the Anti-Corruption System.

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INTERNAL REPORTING – THE WHISTLEBLOWING SYSTEM

Whistleblowing is the mechanism implemented by Leonardo through which internal reports can be submitted, including anonymously.

The scope of reportable conduct includes not only the violations provided for by Legislative Decree 24/2023, but also violations of the internal rules adopted by the Leonardo Group, including **the Code of Ethics, the Anti-Corruption Code, Model 231, Company policies and procedures**, as well as other irregular conduct related to the conduct of business activities.

WHO CAN FILE A REPORT 01

Anyone may, in good faith, submit a written report or, alternatively, request an oral hearing.

HOW TO REPORT 02

Whistleblowing Platform

Go to the dedicated page and submit your report:

Leonardo's Hub Intranet - Whistleblowing

WHO WILL REVIEW YOUR REPORT 03

An independent, specially trained team will review your report with the utmost confidentiality.

Remember!

It is important to provide precise and detailed facts, supported by documentary evidence where available.

To learn more, consult the ***Guidelines for Handling Reports*** and the informational materials available on **Leonardo's HUB** and at **leonardo.com** – Ethics & Compliance section

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