

What is whistleblowing?

Whistleblowing is about raising concerns relating to violations (behaviours, acts or omissions) of laws or company protocols, which damage the public interest or the integrity of Leonardo Group, through the filing of an internal report (written or oral).

When is it appropriate to file a report?

In order to promote the culture of transparency and correctness in the company context and in daily operations, Leonardo Group encourages anyone who becomes aware of violations (behaviours, acts or omissions) of laws or company protocols, even potentially harmful to the interests public or the integrity of the Group, to file a report in good faith via the Internal Reporting Channel ([Whistleblowing Platform](#)).

How is whistleblowing regulated within Leonardo Group?

In compliance with current legislation on the protection of whistleblowers, the Leonardo Group *Whistleblowing Management Guidelines* set forth the whistleblowing management process for the Group. In particular, the *Guidelines* establish both protection of the confidentiality of the identity of the whistleblower, of the person involved or otherwise mentioned in the report and protection from any act of retaliation, direct or indirect, against the whistleblower for reasons related, directly or indirectly, to the report.

Who can report?

Pursuant to the current regulatory framework, the whistleblower is the individual who reports violations known within his/her work context, and in particular:

- employees or former employees (any type of contract) of Leonardo Group and those who in any case operate on the basis of relationships that determine their inclusion in the company organisation, even in a form other than an employment relationship;
- self-employed workers, collaborators, freelancers, and consultants who work for Leonardo Group;
- volunteers and interns, paid and unpaid, who work for Leonardo Group;
- shareholders and people with administrative, management, control, supervisory or representation functions, even if these functions are exercised on a purely *de facto* basis, at Leonardo or another Group company;
- workers or collaborators of third parties having relationships and/or business relationships with Leonardo Group (for example customers, suppliers, intermediaries, and partners in Joint Ventures).

FAQ

Can I submit a report anonymously?

Yes, you can report anonymously through the Whistleblowing Platform. Anonymous reports fall within the scope of “Ordinary Reports”, as better described in Leonardo Group *Whistleblowing Management Guidelines*.

Can a report be oral?

Reports can be submitted both in written and oral form. For oral reports, the whistleblower shall, alternatively, attach an audio file or request a direct meeting with the Office of Internal Investigations through the Whistleblowing Platform.

What types of violations can I report?

The following violations may be reported:

- administrative, accounting, civil and/or criminal offences;
- illegal conduct pursuant to Italian Legislative Decree 231/01;
- violations of Leonardo “Model 231” and other company protocols (e.g., Code of Ethics, Anti-Corruption Code, etc.), including but not limited to:
 - any form of corruption towards public officials;
 - any form of corruption between private individuals;
 - any situations of conflict of interest;
 - psychological violence at work (*mobbing*);
 - sexual harassment and sexual extortion;
 - violations regarding personnel selection and management;
 - violations regarding the selection and management of suppliers, agents or commercial promoters;
 - any retaliation against the whistleblower perpetrated in connection with his/her whistleblowing report;
 - violations of human rights.
- breaches falling within the scope of the European Union or Italian acts relating to the following sectors:
 - public procurement;
 - financial services, products and markets and prevention of money laundering and terrorist financing;
 - product safety and compliance;
 - transport safety;
 - environmental protection;
 - radiation protection and nuclear safety;

FAQ

- food safety;
- public health;
- protection of privacy and protection of personal data and security of networks and information systems;
- acts or omissions detrimental to the financial interests of the Union;
acts or omissions concerning the internal market.

What kind of evidence do I need to file a report?

In order to facilitate an effective investigation, **whistleblowing** reports must include information or evidence to support a reasonable belief that misconduct, or violation of law (or of internal protocols), occurred. For example:

- a detailed description of the events that occurred;
- date and place of the events reported;
- names and roles of the people involved or elements that may allow their identification;
- names of any other individual who can provide information on the facts being reported;
- documentary evidence that can confirm the facts reported.

Who investigates whistleblowing reports?

Whistleblowing reports are investigated by the *Management Audit & Whistleblowing* O.U., incorporated within the Group Internal Audit O.U. (GIA) of Leonardo S.p.a., acting as the dedicated Office of Internal Investigations pursuant to Sections 4 and 5 of the Italian Legislative Decree 24/23.

Some phases of the investigation process are shared with collegial bodies of Leonardo Group (i.e., Supervisory Body / Monitoring Body and Whistleblowing Committee). In particular, the Supervisory Body of the involved Group Company governed by Italian law (or the Monitoring Body of the involved Group Company governed by foreign law), on the basis of a preliminary investigation carried out by the Office of Internal Investigations, decides whether to dismiss the report or to request further investigations; the Whistleblowing Committee, among other things, on the basis of the investigation report, evaluates the adequacy of the results of the investigations carried out, identifying any corrective and/or improvement actions to be implemented.

How is the confidentiality of the identity of the whistleblower guaranteed?

In order to protect and guarantee the confidentiality of the whistleblower's identity as well as any other information from which such identity can be inferred, directly or indirectly, Leonardo ensures discretion and confidentiality along the entire investigation process. The same forms of protection are also guaranteed in favour of the person involved. Furthermore, the Whistleblowing Platform is an IT tool that,

FAQ

also thanks to an encryption system, guarantees the confidentiality of the whistleblower's identity, the person involved, and the person mentioned in the report, as well as the content of the report and the related documentation.

As a whistleblower, will I be protected from retaliation?

Leonardo Group guarantees protection from any retaliation, discrimination, or penalisation, direct or indirect, against the whistleblower for reasons connected, directly or indirectly, to the report.

What can happen if I defame someone?

Defamatory reports are not allowed and are censored. In this regard, when the criminal liability of the whistleblower for the crimes of libel or slander or his civil liability, for the same reason, in cases of wilful misconduct or gross negligence is ascertained by a sentence, even if not definitive, of the first degree, the protections from retaliation do not apply and a disciplinary measure is imposed on the whistleblower.