


GROUP POLICY | LDO – PO – 001 | Rev. C

INTEGRATED HEALTH, SAFETY
AND ENVIRONMENT (HSE) POLICY

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EMISSIONS TABLE


Code	Description	Prepared by:	Approved by:	Signature
LDO-PO-001 Rev. C	Fourth issue Supersedes the document of the same subject issued on 03 October 2023	- People & Organisation OU	Chief Executive Officer and General Manager Roberto Cingolani	Chief Executive Officer and General Manager Roberto Cingolani

Date of issue:	
ITALIAN VERSION	26/06/2025
ENGLISH VERSION (True Copy)	18/12/2025

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CHANGE CONTROL TABLE

Code	Rev.	Changes introduced with the revision	Sections
Policy – 19/12/2016	00	First issue	-
LDO-PO-001	A	Second issue This document cancels and replaces Policy no. 02 on the same subject. It introduces the following main changes: <ul style="list-style-type: none"> • extension of the scope of application to direct and indirect Subsidiaries; • requirements of principles and regulations to guarantee the health and safety of workers abroad; • forecast indicators (KPIs) to evaluate HSE performance; • new document coding; • New document template. 	Entire document
LDO-PO-001	B	Third issue This document annuls and replaces the document of the same subject issued on 15/06/2022. It introduces the following main changes: <ul style="list-style-type: none"> • approval of the document by the new Company Management, with the same content. 	-

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Code	Rev.	Changes introduced with the revision	Sections
LDO-PO-001	C	<p>This document annuls and replaces the document of the same subject issued on 03/10/2023.</p> <p>References inserted to:</p> <ul style="list-style-type: none"> • Biodiversity policy and site risk assessment; • Climate change, as a physical and transitional risk; • ILO Convention 190/206 and DE&I Policy 	Entire document

In line with the Group's values, with its adherence to International Standards and with the Sustainability Operating Model, Leonardo promotes and manages in an integrated manner the health and safety of its workers and the protection of the environment according to principles of prevention, protection and continuous improvement, and is committed to guaranteeing sustainable development and the effective reduction of energy consumption and the environmental impact of production processes.

This Policy applies with immediate effect to Leonardo and to its direct and indirect Subsidiaries, in line with the specifics of its own business and the principles and commitments expressed in this document.

The main principles underpinning the work of Leonardo are:

- compliance with health, safety and environmental laws, rules and regulations and maintaining high industry standards;
- constant mitigation of risks and continuous improvement in performance through the promotion of responsible behaviour;
- promoting the development of integrated health, safety and environmental management processes and systems;
- development of sustainable strategies and practices with less environmental impact;
- attention to the expectations of stakeholders, including workers and workers' representatives, constantly involving and consulting them.

Leonardo also has the following objectives:

- **Compliance obligations**
 - ensure compliance with health, safety and environmental laws, rules and regulations in the conduct of its processes¹;
 - guarantee fulfilment of commitments to stakeholders by raising awareness and promoting the implementation and improvement of Environmental Management Systems (voluntary international standards UNI EN ISO 45001 and UNI EN ISO 14001²);
 - establish adequate measures to ensure that the Group supply chain (including suppliers, contractors and service providers) operates in line with adopted health, safety and environmental standards, following practices and procedures consistent with this Policy;
 - define appropriate organisations, invest in resources and establish clear responsibilities to achieve health, safety and environmental prevention objectives.

¹ This includes operations, facility management, distribution and logistics processes. In line with this objective, Leonardo promotes and is committed to compliance with the laws, rules and regulations on HSE matters, also with reference to due diligence activities connected to merger and acquisition operations that involve aspects related to these issues.

² These standards imply the proper conduct of internal audits and audits by third parties related to the maintenance of company management systems.

- recognise and promote the principles of ILO Convention No. 190 and its Recommendation No. 206 on the elimination of violence and harassment in the world of work, in line with its Diversity, Equity and Inclusion policy.
- **Health, Safety and Environmental Risk Assessment and Mitigation**
 - adopt safe and healthy working conditions for the prevention of work-related injuries and illnesses, including through the application of internal rules and procedures³;
 - adopt dedicated prevention and training programmes;
 - promote awareness of the risks involved and the adoption of responsible behaviour by all employees and/or contractors;
 - ensure constant risk assessment as well as the identification and elimination of dangers to the environment and to the health and safety of workers in every company context;
 - take risk mitigation and emergency response actions;
 - adopt physical and transition risk assessment tools for the Group's activities, people, processes and assets, integrating these analyses into mitigation and adaptation strategies;
 - identify and implement continuous improvement actions in order to minimise the risks related to the performance of work activities, prevent accidents, occupational diseases, incidents and 'near misses' and verify the causes when they occur;
 - ensure the health and safety of all workers abroad, protecting their safety in the event of business travel, relocation and secondments.
- **HSE Processes, Products, Services and Performance**
 - define and pursue objectives for continuous improvement of health and safety performance and reduction of environmental impacts;
 - promote the harmonisation and coordination of the processes and management systems applied to facilitate the pursuit of the Group's (measurable) improvement objectives;
 - integrate environmental aspects with the sustainability, profitability and long-term competitiveness objectives;
 - evaluate HSE performance through a system of indicators - relating to accidents, injuries, environmental impacts and energy consumption - monitored and reviewed periodically and shared with all stakeholders, taking into account sustainability objectives and defining priorities and action plans for their pursuit;
 - innovate the production model by adopting precautionary principles when designing new methodologies and implementing programmes, products, services and processes in line with the main HSE performance objectives.

³ In addition to the information published each year in the Integrated Financial Statements, the following regulatory documents on the subject are to be considered: Regulations on HSE, Travel, Health and Safety Policy, Transfer Management Procedure, Reach Management Operating Instructions, etc.

- **Protection of resources and ecosystems**

- strengthen the commitment to the protection of biodiversity by implementing the commitments expressed in the Group Biodiversity Policy, facilitating the integration of the issue in decision-making processes and the implementation of tools for assessing the biodiversity risk of the Group's sites;
- guide business and process strategic choices:
 - with a view to careful management and sustainable use of natural raw materials, water resources and energy sources⁴ with the aim of promoting business growth by aiming to reverse the trend in the use of natural resources;
 - minimising the impact produced by the activities, protecting the soil, water bodies, subsoil, air quality and biodiversity of ecosystems, in particular for activities carried out near sensitive or protected natural areas, including through technological innovation;
 - promoting, from the design phase of products and services, approaches focused on circularity, eco-design and life cycle assessment of the same;
 - fostering value creation processes towards new circular economy models⁵.

- **Communication and involvement of stakeholders**

- involve workers, suppliers and clients in the constant observance of health and safety and environmental principles, objectives and criteria in order to improve standards;
- ensure communication with and provision of information for stakeholders and the training and instruction of workers to ensure the transfer of skills and the proper operation of processes;
- work with third-party organisations (e.g. universities, research centres, business partners, institutions, networks) including through partnerships, initiatives and projects aimed at promoting HS issues.

Leonardo, in order to implement this Group Policy, in line with its own Governance Model and with the system of delegated authorities and powers of attorney in place, has equipped itself with company structures dedicated to the management and supervision of the relevant issues, identifying those responsible⁶ for safeguarding the health and safety of workers and protecting the environment, in accordance with the national and international regulations in force and the best practices of the countries in which the Leonardo Group operates.

⁴ In order to minimise and control emissions of climate-altering gases and other emissions into the atmosphere, the production of hazardous and non-hazardous waste facilitating its recycling, the use of hazardous substances, the exploitation of forest resources also through the adoption of compensatory measures.

⁵ In order to extend the useful life of products, reduce their energy requirements during use and facilitate the upcycling of materials once their initial life cycle has ended.

⁶ Ex. Pursuant to Italian Legislative Decree No. 81/08, the identification of Employers and persons responsible for the obligations deriving from the environmental regulations by the Boards of Directors of the Companies.