



Group Policy on Human Rights

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1. PURPOSE

The purpose of this Policy is to establish the reference principles and commitments adopted by the company for the protection and promotion of human rights in the conduct of business activities and in any context in which it operates.

Through this Policy, Leonardo renews its commitment to respect the human rights and standards recognized in the United Nations Universal Declaration, the Conventions of the International Labour Organization, in the OECD Guidelines, in the Charter of Fundamental Rights of the European Union and included in Leonardo's Code of Ethics, Charter of Values and Code of Conduct for Suppliers.

2. SCOPE

This Policy applies with immediate effect to Leonardo Spa and to its direct/indirect subsidiaries in Italy and abroad.

3. PRINCIPLES

Leonardo undertakes to respect and promote human rights, both through the strict observance of the law in all countries of activity, and through the adoption and application of its own internal codes of Conduct and procedures. In 2018, confirming its commitment, Leonardo joined the United Nations Global Compact - the world's largest initiative for business sustainability - promoting and endorsing the Ten Principles relating to human rights, labour, the environment and the fight against corruption. Leonardo strives to promote these standards, which are enshrined in international law and internal codes, for all employees, suppliers and business partners of the Group.

4. DUE DILIGENCE, RELEVANT AREAS AND RESPONSIBILITIES

With reference to its scope and following a specific analysis carried out on the basis of ISO 26000 guidelines, the Group's areas of activity and relevant human rights have been identified, potentially exposed to the risk of breach. The analysis identified three areas of activity:

- people management;
- relations with suppliers;
- sale and distribution of products.

Referring to the above mentioned relevant areas, the respect of founding principles and commitments of Leonardo are entrusted to the Units concerned:

- Human Resources for people management
- Procurement for business relationship with suppliers;
- Trade Compliance for the sale and distribution of products.

4.1 People Management

Refusal of forced or compulsory labor and child labor

Leonardo refuses to utilize any kind of forced or compulsory labor (as provided for in the International Labour Organization, Convention no. 29) and denies resorting to child labor in compliance with the applicable regulation in the Country of execution of the activity.

Freedom of association and collective bargaining

Leonardo acknowledges the right of its employees to establish and/or take part in organizations aiming to defend and promote its own interests, to be represented by labor unions or by other representatives chosen through legislations and practices in effect in the Country where they are employed.

Leonardo recognizes collective bargaining as a privileged instrument to determine contractual conditions of its employees.

Work environment and privacy protection

Leonardo safeguards human dignity, stated as not discrimination for race, color, gender, language, religion, political opinion, sex orientation, nationality, extraction and social status, unions membership, age or disability and every other form of discrimination or intolerance towards diversity. Leonardo refuses and sanctions, even through internal remedies, every kind of physical, verbal, sexual or psychological harassment, abuse, threats or intimidations at the workplace.

In pursuing its institutional purposes, Leonardo processes natural persons' data of employees, collaborators, visitors, customers, suppliers or any other person related to the company. Pursuant to the principles stated in its Code of Ethics, Leonardo regards the protection of natural persons with respect to the processing of personal data as a top priority of its management and organisation. Thus, Leonardo acknowledges and adopts the principles and regulations protecting natural persons, through the adoption of proper technical and organisational measures to respect their fundamental rights and freedoms, notably the right to the protection of personal data.

Moreover, Leonardo ensures dignity of workers through privacy protection of correspondence and relationships among workers, denying undue communication and/or dissemination of personal data without previous consent by the person concerned.

Health and Safety in the workplace

Leonardo, in compliance with current rules and regulations, is committed to safeguard health and safety of workers, preparing every necessary and appropriate measure to warrant compliance of workplaces to the best standard of safety and hygiene.

4.2 Business relationship with suppliers

Leonardo asks its suppliers to adhere to the Code of Ethics, the Organization, Management and Control Model and to the Supplier Code of Conduct, which deny forced labor and trade of humans and solicit safeguard of equal opportunity, health and safety in the workplace, as well as respect to the provisions for minimum salary, work conditions and working time.

Through its qualifying process, Leonardo evaluates reputational, ethics and legal, health and safety and environmental requirements of a Supplier.

4.3 Sales and distribution of products

Leonardo is committed to prevent illegal practices related to the sale and distribution of its products through the Trade Compliance Program, utilizing tools and processes of due diligence on counterparts and monitoring activities in Sensitive Countries.

The List of Sensitive Countries is edited on the basis of National and International rules, in particular:

- Countries engaged in armed conflicts in breach of clause 51 of the UN Charter;
- Countries acting in opposition to Art. 11 of the Italian Constitution;
- Countries subject to partial or total embargo regimes issued by EU, USA, UN;
- Countries whose Governments acted in breach of International Agreements on Human Rights;
- Countries of the Conflict Mineral Region.

The above mentioned list of Sensitive Countries is constantly updated and modified or confirmed every year.

Leonardo is not involved in any way in the production, development, warehousing, trading and/or sale of unconventional arms.

5. IMPLEMENTATION AND MONITORING

In accordance with the United Nations' Guiding Principles on Business and Human Rights, Leonardo will disseminate the contents of this Policy, including awareness-raising and training actions and monitoring their effective implementation. To this end, regular monitoring mechanisms will be developed to update areas of potential risk and to optimise the effectiveness of prevention and mitigation actions for negative impacts, with a view to continuously improving the protection of human rights.

6. WHISTLEBLOWING

With the aim of identifying and managing human rights violations, potential risks and negative impacts in a timely manner, Leonardo makes available reporting management mechanisms to all recipients of this policy, in a qualified or anonymous form.

For this purpose, the following reporting channel is available: humanrights@leonardocompany.com. For reports concerning Group Companies, the dedicated information channels provided by the respective Company Protocols remain valid.