WHISTLEBLOWING

LEONARDO

WHISTLEBLOWING

1 WHY YOU SHOULD REPORT

- Integrity and transparency
- Reputation
- Responsibility

2 WHAT TO REPORT

Any fact or act in violation of laws and regulations, internal company rules (e.g. corruption acts, conflicts of interests, unlawful and/or fraudulent activities).

3 WHO CAN REPORT

Anybody who becomes aware of the existence of suspicious practices.

4 HOW TO REPORT

- Online platform: **https://whistleblowing.leonardocompany.com** (Google Chrome or Microsoft Edge are the recommended internet browsers)
- Email: **organismodivigilanza@leonardocompany.com**
- Mail: **Organismo di Vigilanza, Piazza Monte Grappa 4 - 00195, Rome, Italy**

5 WHO ANALYSES YOUR REPORT

The Surveillance Body and the Reports Committee with the support of the units Group Internal Audit and Security.

6 GUARANTEES AFTER YOU REPORT

- Protection of privacy and whistleblower's identity
- No retaliation or discrimination

Find out more in the Whistleblowing Management Guidelines



1 WHY YOU SHOULD REPORT

INTEGRITY

It is a fundamental corporate value for Leonardo.

REPUTATION

The sum of our behaviours determines the Company's credibility and reputation.

RESPONSIBILITY

Everyone's responsibility contributes to create value for Leonardo and for the society where we live.

2 WHAT TO REPORT

As an example, whistleblowing reports may include, but are not limited to, the following topics:

- acts of bribery put in place directly, indirectly or solicited by third parties (e.g.: suppliers, consultants, collaborators, customers and intermediaries);
- conflicts of interest or other violations of the Code of Ethics;
- unlawful acts among those set forth by Leonardo's Model 231, committed by the company's employees in the interest of, or for the benefit of, Leonardo Group;
- unlawful and/or fraudulent activities causing harm to customers or to the company assets;
- unlawful acts relating to the safety of employees.

If you have any doubts about other possible cases to be reported, please contact the **Secretariat of the Surveillance Body**

3 WHO CAN REPORT

Anybody who becomes aware of the existence of suspicious practices, including:

- Leonardo Group's employees (at any level), and those who in any case work within the organization;
- members of corporate bodies;
- third parties having business relations with Leonardo Group (customers, suppliers, consultants, etc.).



4 HOW TO REPORT

You can file a report through your preferred channel:

Online platform:
https://whistleblowing.leonardocompany.com
(Google Chrome or Microsoft Edge are the recommended internet browsers)

Email:
organismodivigilanza@leonardocompany.com

Mail:
Organismo di Vigilanza,
Piazza Monte Grappa 4 - 00195, Rome, Italy

It is important to supplement the reporting with detailed information and **documental evidences**, if available

5 WHO ANALYSES YOUR REPORT

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At first, your report will be analysed by the **Surveillance Body** ❯

- Independent majority.
- In charge of ensuring application and compliance to the Leonardo's (or other Group Company's) Organisational, Management And Control model (pursuant the Legislative Decree 231/2001)

B

Afterwards, by the **Whistleblowing Committee** ❯

- Composed by the heads of the Group Internal Audit, Legal, Corporate Affairs, Compliance, Criminal Law and Anti-corruption, Chief People Organization and Transformation Officer, Security, and Administration, Finance and Control.
- It performs a preliminary analysis of the report received, verifying the need to further investigate the reported facts and informing the competent bodies.
- It proposes action plan to strengthen the internal control and risk management system.

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By the O.U. **Group Internal Audit** and **Security** ❯

- If the Committee considers necessary to carry out further controls, it gives a mandate to the organisational units Group Internal Audit or Security.

6 GUARANTEES AFTER YOU REPORT

Protection of privacy and whistleblower's identity

The personal data of the whistleblower and the reported person are treated as confidential information; therefore, your identity is fully safeguarded.

No retaliation

Reporting crimes or irregularities demands integrity, courage and trust towards our Company. Therefore, in Leonardo you do not risk any reprisal if:

- you report in good faith a conduct that you consider against the law, the values and the Group's codes of conduct;
- you refuse to act against the law, the values and the Group's codes of conduct;
- you contribute to an internal investigation.

Anyone who retaliates within our Company will be subject to disciplinary actions.

Find out more in the **Whistleblowing Management Guidelines**



In accordance with the new law on Whistleblowing (law 179/2017), employees who report in good faith illegal conducts may not be punished, demoted, dismissed, transferred or subjected to any other organisational measure that may have negative effects on their career.



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