Whistleblowing Management Guidelines

Annex 1
Phase 1: Receiving and analyzing reports

**Group Company Surveillance Body** (if affected by the report)

1b Receiving and registering reports
Reports are categorized and registered for the Surveillance Body’s archive

Is the report prima facie meritless?

YES

1a Receiving and registering reports
Reports are categorized and registered for the Surveillance Body’s archive

Leonardo Surveillance Body

Is the report prima facie meritless?

YES

Report dismissal
Permanently archives the report along with an explanatory note, and sends it to the Reports Committee for information purposes

3a Preliminary investigation phase
Analysis to determine the need for further investigation on the reported facts

NO

Further investigation needed?

NO

Reports Committee

Communication for report archiving
Prepares an explanatory note with the analysis performed and reasons for archiving, and send it to the competent Surveillance Body or Board of Statutory Auditors

YES

5a Report archiving
Acknowledges the audit’s outcome and archives the report

5b Report archiving
Acknowledges the audit’s outcome and archives the report

2b Report dismissal
Permanently archives the report along with an explanatory note, and sends it to the Reports Committee and the Board of Statutory Auditors for information purposes

Sends the reports to the Board of Statutory Auditors for information purposes

3a

Receives information about the report archiving
Receives information about the report archiving related to the Group Company

4b Appointment of the competent o.u. to carry out further investigation
Request for in-depth analysis with identification of the scope of the investigation

4a

5b

Legend
- O.U. involved
- Performed activities
- Question Mark
- End of process
- Alternative flow

* Simultaneous transmission to Leonardo Surveillance Body, for informative purposes.
**Phase 2: Audit and reporting**

**Group Company Surveillance Body**
(if affected by the report)

**Leonardo Surveillance Body**

**Competent o.u. (GIA or Security)**

**Reports Committee**

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**Phase 1** (follows)

6. Audit

- Prepares the Scope of Work and performs all related activities

7. Preparation of the Audit Report

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8. Report analysis

- Analyzes the contents of the report and prepares the Action Plan, requesting potential changes

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9a. The Audit Report is submitted to:
- Chairman of the Board of Directors; CEO;
- Chairman of the Control and Risk Committee;
- Chairman of the Board of Statutory Auditors;
- Chairman of Leonardo’s Surveillance Body and Competent Division Managing Director. If requested, to the Leonardo’s Anti-corruption O.U.

9b. In case of Reports concerning one or more Group Companies, the Audit Report is submitted to:
- Company Chairman, CEO or equivalent, Chairman of the Board of Statutory Auditors, Chairman of the Company’s Surveillance Body or equivalent body, and for information purposes to: Leonardo’s Administration and Control Bodies. If requested to the Leonardo’s Anti-corruption O.U.

If needed, propose an Action Plan to be submitted to Leonardo CEO or other competent Group Company CEO.

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Legend:
- O.U. involved
- Performed Activities
- Question Mark
- End of process
- Alternative flow