

Dear Madam/Sir,

Leonardo is committed to carry out its activities in full respect of human rights, as stated in the Group's Code of Ethics and Charter of Values, based on the principles of the United Nations' Universal Declaration of Human Rights, the International Labour Organisation Conventions, the OECD guidelines, the Charter of Fundamental Rights of the European Union and additional relevant regulations.

In this view Leonardo has issued its Group Policy on Human Rights with the purpose 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 the company carries out operations. Through this Policy, Leonardo reaffirms its commitment to respect human rights and the above mentioned international standards and regulations.

As per the above, Leonardo can only carry out activities in the frame set up by the applicable laws and regulations, thus the Company has established an Internal Compliance Program (ICP) for the Group – [the Trade Compliance Program](#) – in order to ensure full compliance with the applicable Trade Compliance laws and regulation. Within this program, the Human Rights Impact Assessment (HRIA) is a core element, with the purpose of assessing potential impacts for the respect of human rights of the activities carried out by the Company. Leonardo's HRIA is carried out at both country level as well as at single transaction level covering the full range of activities in which Leonardo may be directly or indirectly involved.

From a general perspective, as provided by Leonardo Spa Trade Compliance Program, Yemen is included in the list of Sensitive Countries and for this reason every potential transaction is subject to monitoring to ensure these are carried out in the limits and to the extent of global export control and sanctions laws and regulations. In 2021, with the release of both the Leonardo Trade Compliance Guidelines and Directive, Kingdom of Saudi Arabia has been included the Sensitive Countries' list under provisions of the Leonardo Human Rights Impact Assessment, in order to be closely monitored as well. As a consequence for the conflict in Yemen and the related role of the Kingdom of Saudi Arabia, as you have mentioned in your inquiry, we can confirm that any activity carried out by Leonardo in either Yemen or Saudi is subject to an enhanced due diligence as part of the Monitoring of Politically Sensitive Transactions process to ensure the timely identification and fulfilment of the requirements prescribed by the applicable national, European Union and international legislation.

We would also mention that 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. As a further acknowledgment of its commitment, in 2021 Leonardo has been confirmed UN Global Compact LEAD, being part of a selected group of global companies recognised as having a leading role within the Global Compact Network.

Should you have further questions, please do not hesitate to contact us.