

Sponsorships

Abstract on the process



1. FRAMEWORK AND SCOPE

The Company has defined specific rules aimed at regulating the process of managing sponsorships for entities, associations and foundations by Leonardo S.p.a. and has formalized specific internal regulations for the definition of roles, responsibilities, operating methods of the subjects involved, controls and due diligence activities related to the process.

2. GENERAL PRINCIPLES

The management of Sponsorship is compliant with the applicable national and international regulation and with the principles indicated in the Organizational, Management and Control Model pursuant to Legislative Decree no. 231/2001, in the Code of Ethics and in the Anti-Corruption Code of Leonardo Group.

The following general principles must be complied with:

- separation of responsibilities;
- signing power system;
- clarity and simplicity;
- impartiality and absence of conflicts of interest;
- traceability and filing.

3. GENERAL RULES OF CONDUCT

In line with company regulations for sponsorships it is necessary to:

- verify the feasibility of the initiative and its consistency with the company strategy and the relevant legislation;
- provide adequate documentation and motivations to support the sponsorship;
- indicate in a timely manner the expected beneficiary and all the assessments related to the reputational and honourableness requirements needed;
- respect the approval process;
- report the activities.

4. SUMMARY

The Company annually identifies sponsorship initiatives.

The planning and the related cost flows into the annual budget for approval by the Top Management.

The Company has defined certain controls to guarantee compliance with corporate principles and rules of conduct and has identified specific selection criteria for the initiatives.

With this in mind, it implemented a verification process on the recipients / beneficiaries of the identified initiative (due-diligence).

In particular, the counterparty's due diligence activities include, among others, the acquisition of all useful information of a corporate, financial and regulatory nature, with particular attention to honourability requirements.

Where necessary, the Company requests additional information from the other party, including the criminal certificate and / or pending or equivalent charges and / or the judicial register of the legal representative and top managers.

The results of the assessments identified provide for the allocation of a level of attention on the basis of which the Company decides whether or not to proceed with the initiative.



The assessments are carried out taking into account the potential risk factors and in line with the company strategy, the general principles contained in the Model 231/01, the Code of Ethics and the Group's Anti-Corruption Code.

Any violations of or derogations from the internal and external regulations must be promptly communicated to the Surveillance Body ex Legislative Decree No. 231/01.

Leonardo S.p.a. does not make charitable donations (excluding in kind donations coming from the programme Responsible Canteen).

5. ANNEXES

- Ann. - Reference Regulations;
- Ann. - Application form;
- Ann. - Supplier form;
- Ann. - Instructions for due diligence and risk factors;
- Ann. - Questionnaire;
- Ann. - Reputational report;
- Ann. - Activity report.

