

HUMAN RIGHTS POLICY AT AENA S.M.E., S.A.

Approved by the Board of Directors of Aena
S.M.E., S.A. on 26 May 2026

I. PURPOSE

Aena S.M.E., S.A. (hereinafter, “**Aena**” or the “**Company**”) deems the protection of Human Rights to be an essential part of its values and the minimum framework for action to ensure the legitimate development of its business activity.

With this Human Rights Policy (hereinafter, the “**Policy**”), the Company formalises its commitment and responsibility to respect and protect Human Rights and, to avoid causing or actively contributing to any form of adverse impact on the Human Rights of employees, as well as upstream and downstream in its value chain, through its services and business relationships, with the aim of not being complicit in any form of abuse or violation. Furthermore, it establishes the general principles necessary to ensure such commitment and responsibility.

This commitment thus transcends the people who form part of Aena and includes those who collaborate along the value chain, as well as all the communities that live in the environment in which its operations are carried out, including indigenous peoples and other groups in vulnerable situations.

Furthermore, in all its relations with suppliers and business partners, Aena promotes respect for the same principles, paying particular attention to situations of conflict and high risk of violation.

II. SCOPE

This Policy is applicable to Aena (parent company) and to any of the companies integrated in its group (hereinafter, “**Subsidiaries**”), under the terms established in article 42 of the Code of Commerce (the “**Aena Group**”).

Notwithstanding the foregoing, Subsidiaries registered outside of Spain may make the necessary adaptations to this Policy in order to comply with the local law applicable to them.

However, when within the scope of local law applicable to Subsidiaries registered outside of Spain there is a regulation in force, compliance with which requires the alteration or suppression of essential terms or principles of this policy, its adaptation shall require that, once it is approved in the form of an addendum by the Board of Directors of the corresponding subsidiary, it be submitted, together with a legal report justifying the mandatory nature of the local regulation, to the Board of Directors of Aena for its final approval. Once the addendum has been definitively approved, it will be published on the website, along with the rest of the policies, and will be communicated to the Aena Management whose area of responsibility is related to this Policy.

The Board of Directors of Aena has approved a procedure regulating the steps to be followed to adapt corporate policies to the local law applicable to subsidiaries domiciled outside Spain in the cases referred to in the preceding paragraph.

In the remainder of the companies in which Aena has a direct or indirect stake without having effective control over them, Aena shall promote, as far as possible, through its participation in

their governing bodies, the adoption of human rights policies.

III. PRINCIPLES

This Policy draws on, inter alia, the principles set out in:

(a) United Nations (UN):

- The International Bill of Human Rights made up of: the Universal Declaration of Human Rights (UN, 1948), the International Covenant on Economic, Social and Cultural Rights (UN, 1966), and the International Covenant on Civil and Political Rights (UN, 1966) and the two protocols that develop it.
- The UN Global Compact.
- Guiding Principles on Business and Human Rights.
- Sustainable Development Goals.
- Convention on the Rights of the Child.
- Convention on the Rights of Persons with Disabilities.
- Declaration on the Rights of Indigenous Peoples.
- UN Human Rights Council Resolution 48/13 on the human right to a clean, healthy and sustainable environment.

(b) International Labour Organisation (ILO):

- The International Labour Organisation's Declaration on Fundamental Principles and Rights at Work (ILO, 1998), and the eight fundamental conventions that complement it.
- Tripartite Declaration of Principles concerning Multinational Enterprises.
- ILO Social Policy.

(c) Organisation for Economic Co-operation and Development (OECD):

- *Guidelines for Multinational Enterprises.*

(d) National constitutions and laws that recognise or apply human rights.

Based on these principles, the Aena Group assumes the following **commitments**:

(i) Commitments regarding Labour Practices¹

- Employment and promotion of a respectful and dignified work environment:

The Aena Group acknowledges the right to dignified, stable and quality work, to free choice and freedom of movement, and rejects any act that violates the worker's right to privacy or dignity.

Similarly, Aena and its Subsidiaries promote compliance with local laws and respect for the culture, customs and values of the people in the communities in which the Company's activities are carried out.

- Promoting equal opportunities, diversity and non-discrimination:

The Aena Group rejects all forms of discrimination on grounds of age, nationality, race, sex, sexual orientation, gender identity, religion, marital status, disability, political ideology, origin or social status, or any other personal, physical or social condition of people, guaranteeing equal opportunities, respect and the promotion of diversity among its staff, at any stage in the development of their employment relationship. The selection and promotion of workers is based on the principles of equality, merit and ability.

- No admission of forced labour, illegal trafficking, human trafficking or modern slavery in any of its forms:

The Aena Group rejects the use of forced labour in all its forms; coercive treatment and any manifestation of harassment, including physical, psychological, sexual or abuse of authority, or any other conduct that intimidates or offends people's rights, including those derived from illegal trafficking, human trafficking or any form of modern slavery.

- Facilitating freedom of association and collective bargaining:

The Aena Group acknowledges the right of employees, without interference, to form or participate in organisations for the defence and promotion of their interests, through the right of association and trade union representation, or in the forms of representation chosen in accordance with the legislation and practices in force in the different countries where the employment relationship takes place.

The Aena Group also recognises the value of collective bargaining as the preferred instrument for determining the contractual conditions of its employees, as well as for regulating relations between management and trade unions.

¹ Including migrant workers.

- Favouring the personal development of employees:

The Aena Group recognises the importance of professional training and guidance for the development of people and their skills, encouraging the participation of employees and their representatives in them.

- Fair and equal pay:

The Aena Group recognises the right to decent remuneration, adjusted to the training, experience, responsibilities and functions of male and female employees, in accordance with the applicable laws and regulations.

The Aena Group is committed to ensuring the effective application of the principle of equal pay for work of equal value and, in particular, the non-existence of gender-based pay differentials.

- Right to time off and the right to family and personal life:

The Aena Group undertakes to respect the weekly working hours and rest time of employees, in accordance with the provisions of current labour legislation, as well as to promote the reconciliation of work and family life of its employees.

- Protecting the health and safety of people, the right to life and liberty:

The Aena Group is committed to ensuring physical and psychological health and safety conditions in the workplace. To this end, it promotes the dissemination and reinforcement of a safety culture, developing risk awareness and encouraging responsible behaviour on the part of workers, mainly through information, training and the implementation of preventive measures.

- Regarding the rights of minors and rejection of the use of child labour:

The Aena Group respects the rights of children and rejects the use of child labour, according to the definition of this concept contained in the legislation in force in the country in which it operates.

- The right to freedom of opinion, information and expression, as well as data privacy and intimacy:

To this end, the Aena Group provides its professionals with communication channels that guarantee freedom of opinion and expression, and ensures the right of its professionals to the protection of their personal data and privacy. All of this, however, bearing in mind the provisions of the Aena Code of Conduct, with regard to obligations relating to confidentiality and truthfulness of information.

(ii) Commitments regarding services

- Safe, excellent, quality service:

The Aena Group is committed to providing a safe, accessible, innovative

and quality service for all, to protect the different groups in the use of the services offered, including people with functional diversity, and to avoid any discriminatory treatment.

It also guarantees user safety, ensuring that the services provided are in accordance with the standards agreed or legally required in terms of consumer health and safety. In addition, the company opposes any form of human trafficking and cooperates with the various stakeholders in this regard.

- Relations with customers based on the principles of transparency, privacy, confidentiality, freedom of expression and non-discrimination:

The Aena Group establishes a relationship based on respect and the principles of transparency and trust, freedom of expression, confidentiality and non-discrimination with its customers, respecting the diversity of opinions. It also works continuously to ensure compliance with these principles, providing consumers with access to complaint mechanisms, and takes reasonable measures to ensure the security of personal data.

(iii) Commitments regarding the environment and the community

- Maintaining safety and rights in the communities:

The Aena Group ensures that the rights of the local communities in which it operates are respected, and that the negative impact of its activities on the environment is minimised, favouring open and constructive dialogue based on the principles of transparency, confidentiality and non-discrimination.

The Aena Group pays special attention to the most vulnerable communities, people with functional diversity, indigenous populations, ethnic, religious and linguistic minorities, and migrants, promoting corporate values.

- Contributing to the protection of the environment and reducing the environmental footprint:

To manage natural capital, prevent environmental and noise pollution, and control and minimise the environmental and acoustic impact of the Aena Group's operations and activities.

- To contribute to maintaining honesty and integrity, ethical relations and good tax practices, and to reject corruption and anti-competitive practices:

The Aena Group is committed to fighting corruption in its different forms, through the existence of different elements such as internal regulations and policies. It rejects any form of corruption, bribery or extortion and declares that it is against influencing the will of people to obtain a benefit or advantage of any kind through the use of practices that contravene the law.

Accordingly, the receipt and delivery, promise and offer of any kind of payment, commission or gift to any authorities or public officials or members

of private entities is prohibited, provided that this may be interpreted by an objective observer as having been made with the intention of affecting an impartial criterion as set out in the Aena Code of Conduct and in the Aena Business Courtesies Policy.

Furthermore, the Aena Group avoids any type of conduct and procedure against unfair competition, guarantees compliance with current tax regulations and promotes good tax practices and ethical and transparent relations with regulatory bodies and public administrations.

- It dissociates its activities from any relationship with the use of weapons that generate controversy, such as anti-personnel mines, cluster munitions, chemical and biological weapons.

In line with its scope of activity, Aena and its Subsidiaries exclude any exposure and relationship with these types of weapons in all its operations.

Aena and its Subsidiaries will disseminate its commitment to Human Rights throughout its value chain, encouraging its suppliers, contractors, business partners and other collaborating companies to formalise their commitment to Human Rights and, if they do not have their own policy, to subscribe to that of Aena. All of this must take place within a framework of relationships based on trust and mutual benefit.

In particular, Aena and its Subsidiaries will encourage impartiality and objectivity, as well as the application of fair criteria, to be applied in the selection processes of contractors, suppliers and external collaborators.

IV. POLICY DEVELOPMENT

For the effective development of this Policy and the principles it takes as a reference, Aena and its Subsidiaries are committed to collaborating with non-governmental organisations and other institutions of a social nature, as well as contributing to the development of social and environmental projects.

In addition, Aena and its Subsidiaries will promote a culture of respect for Human Rights, raising the awareness of its professionals and the rest of its partners in this matter, in all the areas in which it operates.

V. WHISTLEBLOWERS' CHANNEL AND COMPLAINTS

Aena and its Subsidiaries are committed to establishing effective complaint mechanisms in its operations from the start of economic activity, so that individuals who may potentially see their Human Rights violated have the ability to bring such a situation to the attention of the company.

Furthermore, employees of Aena and its Subsidiaries are obliged to inform the Company of any possible breach of the commitments set out in this Policy, as well as in the other guidelines and standards of conduct established by the same.

To this end, through the whistleblowing channels set up for this purpose, any third party may express their concerns or address, report, denounce, and communicate conduct or facts relating to non-compliance with the Human Rights principles contained in this Policy, as well as the other regulations in force, in any company of the Aena Group and/or its value chain. These communications will be managed by the competent bodies, in accordance with the procedure established for this purpose.

Aena and its Subsidiaries guarantee the management of all communications received under the principles of legality and ethics, independence and impartiality, transparency and accessibility, traceability and security, confidentiality and anonymity, secrecy, diligence and speed, good faith, respect and protection of the communicating party and fundamental rights.

VI. MONITORING AND CONTROL

Pursuant to the provisions of the Regulations of Aena's Sustainability and Climate Action Committee, said Committee's competencies include knowing, promoting, guiding and supervising the objectives, action plans, practices and policies of the Company in environmental and social matters, ensuring that such policies identify and include, among others, the principles, commitments, objectives and strategy regarding respect for Human Rights.

In addition, Aena's Nomination, Remuneration and Corporate Governance Committee is responsible for coordinating the process of reporting non-financial and diversity information, including the disclosure of information on Human Rights.

The control and monitoring mechanisms provided by Aena for compliance with its commitments in Human Rights allow for an uninterrupted assessment of the level of risk, as well as the identification of real and potential impacts, both positive and negative, or social concerns.

Aena therefore works on the development of a continuous due diligence process in its own activities and others related to third parties, based on criteria of proportionality and probability, focused on identifying, preventing, mitigating and responding to potential negative consequences on Human Rights, and where necessary, providing appropriate and effective redress.

To ensure compliance with these commitments among its suppliers, Aena includes in its contractual clauses, the assumption by bidders -and the subsequent awardee of the contracts- of the duty to comply with the highest national and international standards in terms of Human Rights and ethics. As well as compliance with the highest standards in this area, adhering to the principles and values of action defined respectively in the Aena Code of Conduct and the Human Rights Policy.

This Policy is publicly communicated and disseminated to all its stakeholders through the Aena corporate website.

VII. VALIDITY

This Policy was approved by the Board of Directors at its meeting of 28 January 2020 and last updated at its meeting of 26 May 2026. It will remain in force as long as no amendments are made to it.