

# **BUSINESS COURTESIES POLICY OF 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

This Business Courtesies Policy (hereinafter, “**Policy**”) of Aena S.M.E, S.A. (hereinafter, the “Company” or “Aena”) implements and supplements the ethical values of integrity and honesty of Aena and of the companies included in its Group (hereinafter, “**Subsidiaries**”) under the terms established in Article 42 of the Code of Commerce (the “**Aena Group**”) as enshrined in its Code of Conduct and the commitment to promote a preventive culture based on the principle of “zero tolerance” towards corruption in business, in all its forms, and towards any conduct that involves unlawful acts or a situation of fraud, as included in its Anti-Bribery Policy.

Business courtesies may be seen as a bribe even where this was not the intention of the giver and the recipient thereof.

In view of the above, and given that bribery is a corrupt practice which the Aena Group firmly rejects and condemns, the purpose of this Policy is to establish certain general and operating principles that foster ethical behaviour that inspires correct decision making with regard to the giving, promising or offering of business courtesies.

Lastly, this Policy includes a basic framework for compliance regarding bribery, in accordance with the provisions of international standards.

## II. SCOPE

This Policy applies to 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 S.M.E., S.A. 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 Divisions 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.

This Policy is also binding on and applicable to the members of the Company's Managing Bodies, its Senior Management team and, in general—without exception and irrespective of the office held, responsibility, occupation or geographical location—all employees of the Aena Group (**"Individuals to whom this Policy applies"**). In view of the foregoing, the Individuals to whom this Policy applies must observe and comply with the provisions of this Policy in all the activities they carry out in the exercise of their activity, regardless of whether they take place in Spain or abroad.

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 business courtesies policies.

### **III. GENERAL PRINCIPLES**

The general principles governing this Policy and that must guide the actions of the Individuals to whom this Policy applies are the ethical principles of the Aena Group, as set out in Section 3 of its Code of Conduct.

In view of the above, and as implementation thereof, the giving, promising or offering of business courtesies to any public authorities or employees or members of private enterprises, and the receipt thereof by the Individuals to whom this Policy applies, either directly or indirectly (through third parties) is forbidden, provided their frequency, characteristics or circumstances are not acceptable in accordance with the provisions of the following section.

### **IV. ACCEPTABLE BUSINESS COURTESIES**

Under no circumstances will courtesies be acceptable where they may be interpreted by an objective observer as being made in an attempt to affect the impartial criterion of the recipient.

#### **1. In all cases, the following will be considered acceptable for social uses and customs:**

1. Objects of little value used for advertising purposes (ballpoint pens, diaries, notebooks, other items of merchandising, etc).
2. Gifts and invitations of an institutional or formal nature made within the context of the courtesy that must prevail in this type of relationships, provided they are not excessive or extravagant in terms of local or sectoral standards.

3. The giving or receiving of restaurant gifts or invitations (meals) of a value equal to or over one hundred and twenty-five euros (€125) or its equivalent considering the local economic context of the subsidiaries not domiciled in Spain (either independently or jointly among several gifts/courtesies given or received within the term of one year by the same individual or enterprise), provided none of the following circumstances arises:

- They are offered, received or given outside traditional and/or socially accepted greetings.
- They are offered, received or given with the intention of influencing a third party or of seemingly incurring in an irregularity.
- They are offered, received or given at the private home of the recipient or of their close relatives.
- They may negatively affect the reputation of the Aena Group.
- They may lead to a potential or effective conflict of interest.
- They may lead to a sense of obligation for the counterparty.
- They consist of giving cash or monetary handouts through methods of payment similar to money or that allow for the transfer thereof, such as gift cards or discounts that are not available to all Aena employees, as a corporate benefit, or to the general public.
- They consist of loans or any type of credit facility, unless they are at arm's length and under market conditions.
- They have been requested or demanded directly or indirectly through close relatives or legal persons upon whom the requester has significant control or influence.
- They are not in accordance with local or international corruption laws or policies.

## **2. Other acceptable business courtesies:**

### **1. Professional events**

Invitations to attend external aeronautical, professional or academic-type events/forums require the authorisation of a direct superior, in accordance with the corresponding Procedure to attend external forums.

Participation in professional events for which the Aena Group professional receives a financial payment equal to or over five hundred euros (€500) or its equivalent in local currency, per participant and event, or for which business courtesies of an equivalent amount are received, must be communicated to the corresponding compliance body or unit.

## 2. Travel expenses associated with professional events

During the trips made by the Individuals to whom this Policy applies from the Aena Group, associated to invitations to take part in professional or external aeronautical, professional or academic-type forums, they will act in accordance with the applicable travel policies or procedures of the Aena Group.

Any travel and representation expenses that the Aena Group may incur for third parties must be duly authorised, consistent and reasonable, and may not under any circumstances be classified as excessive or extravagant. In these cases and to the extent possible, the aforementioned Travel Policy applicable to personnel of the Aena Group will apply. These expenses shall always be paid to the provider of the service and must in all cases be supported by the presentation of the relevant receipt.

Under no circumstances will the payment of travel expenses for close relatives be assumed or accepted.

## V. UNACCEPTABLE BUSINESS COURTESIES

In addition to the courtesies that do not comply with the provisions of the above section, invitations to leisure events (sports, musical and, in general, any type of recreational event) except those of an institutional or formal nature made within the context of the courtesy that must prevail in this type of relationships, are not acceptable, provided they are not excessive or extravagant in terms of local or sectoral standards.

Invitations to leisure trips will not be acceptable under any circumstances.

Furthermore, business courtesies made at strategically important times will not be acceptable. More specifically, Individuals to whom this Policy applies and who are involved in hiring or negotiating processes (personnel from the hiring units and from business or corporate units) during the course thereof may not accept business courtesies offered by individuals or companies involved in said processes, except where they involve invitations to take part in training days duly authorised by their direct superior, which they attend under equal conditions to the other participants.

## VI. EXCLUSIONS

The provisions of this Policy do not apply to sponsorship, donation or patronage contracts, which will be processed in accordance with their own internal procedures.

## **VII. OPERATING PRINCIPLES**

The Individuals to whom this Policy applies must reject or, where appropriate, return and inform the compliance body or unit of the corresponding Aena Group company of any offering of unacceptable business courtesies made by a third party from the public or private sector.

In the case of unacceptable business courtesies, their recipient will be responsible for their return. However, in the case of unacceptable gifts or courtesies for which, due to the situation, the context or the culture of whoever offers them, their rejection may be uncomfortable, disrespectful or offensive, the recipient will accept them and will inform their direct superior of such, sending the item in question to the compliance body or unit for its return. Where, due to the same reasons or circumstances, its return is not appropriate, it will be sent to the corresponding sustainability unit so that it may be used for purposes of social interest.

Where the Individuals to whom the Code applies have any doubts as to the provisions of the Business Courtesies Policy, they must consult the compliance body or unit of the corresponding Group company.

## **VIII. REPORTING IRREGULARITIES**

All employees of the Aena Group must, in good faith, communicate and report any irregular conduct or violation of which they become aware within the scope of action of the Aena Group. This communication must be made via the channels established by the Internal Information Systems of the Aena Group.

Likewise, customers, suppliers, contractors, and persons or companies outside the Aena Group may report any irregularity or violation of which they are aware within the scope of action of the Aena Group.

## **IX. MONITORING AND CONTROL**

The Board of Directors of Aena, as the highest governing body of Aena, will supervise the correct application of the Policy through its Audit Committee.

## **X. KNOWLEDGE OF AND COMPLIANCE WITH THE BUSINESS COURTESIES POLICY**

This Policy will be published on the Aena website and on the other corporate websites, and its compliance is obligatory for all Individuals to whom it applies.

Failure to comply with the provisions of this Policy may lead to the application of the appropriate disciplinary measures, in accordance with the applicable provisions of the disciplinary regime of the Aena Group and other corporate regulations, where applicable.

## **XI. VALIDITY**

The Business Courtesies Policy was approved by the Board of Directors of Aena, at its meeting of 25 June 2024, and last updated at its meeting on 26 May 2026. It will remain in full force as long as no amendments are made to it.

The amendments made to the Business Courtesies Policy will be approved by the Board of Directors of Aena, following a favourable report from its Audit Committee on the recommendation of Aena's Compliance Monitoring and Control Body.

## SCHEDULE 1. GLOSSARY

- **Conflict of interest:** a conflict of interest is understood to be any situation in which the interest of Aena or any of the companies of its Group directly or indirectly collide with the particular interest of a specific member or of a person related to him/her.

Furthermore, a conflict of interest is also deemed to exist when the personal interest of a specific member of Aena or of any company of its Group, or of a person related to him/her, unduly influences, or may unduly influence, the adoption or execution of decisions during the exercise of a commercial or transactional relationship.

- **Corruption or acts of corruption:** will mean the act of offering, promising, giving or accepting an undue advantage to/by a public official/employee or an employee/representative of a company, directly or indirectly, with the aim of obtaining an illegal advantage (e.g. from a contract, licence, favourable outcome of an inspection, court proceedings, etc.). Bribery is therefore a mechanism or form of corruption.
- **Public official/employee and/or public authority:** whether national or international, this term will apply to: (i) any person holding a legislative, executive, administrative or judicial office, whether appointed or elected, permanent or temporary, paid or honorary, regardless of that person's seniority in office; (ii) any other person performing a public function, including for a public agency or public enterprise, or providing a public service; (iii) any person connected with a public office in any public international body; and (vi) any other person defined as a public official/employee in the domestic law of each jurisdiction.
- **Business courtesies:** will mean the gifts or courtesies, invitations and travel expenses associated to invitations, in the broadest sense, which are given to, or received from a third party personally and without any consideration in return, by an employee, manager or director of the Aena Group, or of their closest relatives.
- **Gifts:** include material goods (food, jewellery, watches, works of art, electronic equipment, etc.) and services (trips, accommodation, use of facilities, etc.).
- **Invitations:** this category includes invitations to restaurants (meals), invitations or tickets or professional events, or leisure invitations (recreational, cultural, sport, etc.).