

CODE OF CONDUCT OF AENA, S.M.E., S.A.

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

CONTENTS

1. **PURPOSE.**
2. **SCOPE.**
3. **ETHICAL PRINCIPLES OF THE AENA GROUP.**
 - 3.1 Legality
 - 3.2 Integrity, honesty and trust
 - 3.3 Independence and transparency
 - 3.4 Excellency and quality in satisfying our stakeholders' expectations
 - 3.5 Respect for image and reputation
4. **GENERAL GUIDELINES OF CONDUCT**

People-related conduct

- 4.1 Compliance with human and collective rights
- 4.2 Respect for people
- 4.3 Non-discrimination and equal opportunity

Work-related conduct

- 4.4 Professionalism, responsibility and cooperation in the workplace
- 4.5 Work/life balance
- 4.6 Responsible use of resources
- 4.7 Healthy and safe workplace

Conduct related to the environment, stakeholders and image of the Aena Group

- 4.8 Environmental protection and promotion of sustainable development.
- 4.9 Relationship with clients, suppliers and partner companies
- 4.10 Relationship with investors and shareholders
- 4.11 Relationship with the public authorities
- 4.12 Corruption and bribery of members of public or private entities Gifts, commissions or credit facilities
- 4.13 Political or organisation membership activities
- 4.14 Corporate image and reputation
- 4.15 Conflicts of interest and incompatibilities
- 4.16 Projects of a social nature and sponsorships

Information-related conduct

- 4.17 Confidentiality and authenticity of information
- 4.18 Personal data protection
- 4.19 Financial information
- 4.20 Information and communication technology

Conduct related to legal obligations

4.21 Respect for legality and Aena's ethical principles

4.22 Tax obligations

4.23 Intellectual and industrial property rights

5. **KNOWLEDGE OF AND COMPLIANCE WITH THE CODE OF CONDUCT.**

6. **MONITORING AND CONTROL**

7. **BREACHES AND DUTY TO REPORT**

8. **PENALTIES FOR BREACHES**

9. **VALIDITY**

10. **REPEALING PROVISION**

1. PURPOSE

The purpose of this Aena Code of Conduct (hereinafter, “Code of Conduct” or “Code”) is to set out the principles and values of Aena S.M.E., S.A. (hereinafter, “Aena” or the “Company”) and the companies integrated into its group (hereinafter, the “Subsidiaries”) under the terms set out in Article 42 of the Code of Commerce (hereinafter, the “Aena Group”) with regard to ethics, integrity, legality and transparency that must guide the conduct of all individuals included within its scope of application, whether towards each other or in their relations with customers, shareholders, suppliers and, in general, all those persons and entities, both public and private, with which they deal in the pursuit of their professional activity, likewise fostering the effective compliance with the standards applicable to the entire set of activities under the principle of zero tolerance of any type of unlawful behaviour.

The Code of Conduct is therefore intended as a set of own rules which define the corporate culture, values and principles of the Aena Group, reinforcing standards of behaviour within the Company, the organisational structure of which—comprising multiple relations and hierarchical levels—makes it necessary for there to be a series of rules and principles to be observed by all personnel of the Aena Group in their professional conduct.

Although this Code does not seek to address all possible hypotheses or scenarios which can arise in our day-to-day business, it is intended to provide an accessible source of reference offering guidance and advice on how we should act in relation to matters of social importance, corporate responsibility issues, and, in general, questions of ethics, integrity and legality.

All those persons who provide their professional services within the Aena Group should therefore make themselves familiar with this Code and adhere to its terms, both literally and in spirit, since it forms the foundation of the good governance and corporate responsibility policies of the Aena Group, for which competence lies with the respective Boards of Directors and the Managing bodies of the companies of the Aena Group, through their respective Compliance Bodies.

2. SCOPE

This Code of Conduct is 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”). Notwithstanding the foregoing, Subsidiaries domiciled outside Spain may make the necessary adaptations to this Code in order to comply with the local law applicable to them.

However, when within the scope of local law applicable to Subsidiaries domiciled outside Spain there is a regulation in force, compliance with which requires the alteration or suppression of essential terms or principles of this Code, 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 and will be communicated to the Aena Management whose area of responsibility is related to this Code.

The Board of Directors of Aena has approved a procedure that regulates the steps to be followed in order to bring corporate policies in line with local laws applicable to subsidiaries based outside Spain, in the cases referred to in the previous paragraph.

In the remainder of the companies in which Aena has a direct or indirect stake without having effective control over them, Aena will promote, as far as possible, through its participation in their governing bodies, the adoption of codes of conduct.

3. ETHICAL PRINCIPLES OF THE AENA GROUP

The Aena Group undertakes to comply with and enforce the Ethical and Good Governance Principles set forth in this Code of Conduct, which shall at all times guide and govern the actions of all individuals to whom this Code applies, and which are the following:

3.1 Legality

Respect for the Law constitutes one of the fundamental principles of the Aena Group, and therefore all individuals to whom this Code applies have the priority and inexcusable duty to observe both the laws in force and the internal regulations appropriate to them in the exercise of their professional duties and responsibilities.

3.2 Integrity, honesty and trust

For the Aena Group, integrity—meaning honesty and professional conduct—is not an option but rather an unquestionable conviction.

Therefore, all individuals to whom this Code applies must be honest and trustworthy in all work-related actions and negotiations they perform, ensuring at all times that they are not influenced by personal or third-party-related motives, considerations or interests that could lead to a possible conflict of interest or illegal or inappropriate behaviour.

3.3 Independence and transparency

Independence and transparency are inalienable values for the Aena Group and, accordingly, all Individuals to whom this Code applies shall at all times act with impartiality, maintaining independent judgement that is free of any external pressure or personal interest.

The Aena Group does not interfere in political processes, nor does it make direct or indirect contributions to political parties, organisations and associations, to their representatives and candidates, or to professionals in the media.

3.4 Excellence and quality in satisfying our stakeholders' expectations

The Aena Group assumes, leads and drives dedication to public service through the management of the airports in its network, with the commitment to offer the highest levels of quality to its clients and users, and to contribute to the development of domestic and international air transportation, the mobility of citizens and economic, social and territorial cohesion, guaranteeing at all times air transport that is safe, sustainable and protective of the environment and in accordance with the principles of efficacy, economy and efficiency.

Accordingly, all individuals to whom this Code applies must exercise the proper diligence when performing their duties, offering a service that is safe and secure, of high quality and aimed at satisfying the expectations of our stakeholders, as the main way of achieving excellent returns in a manner that brings about sustainable growth for the companies of the Aena Group in the short, medium and long-term, with a commitment to investing the necessary time, efforts and resources for this purpose.

3.5 Respect for the image and reputation of the Aena Group

The Aena Group considers respect for its image and reputation as one of its most valuable assets which contributes to the perception of a company with integrity and respect for its stakeholders.

All individuals to whom this Code applies must exercise the utmost care and due diligence in preserving the image and reputation of the companies of the Aena Group in all their professional activities, including public interventions.

In performing their duties, all individuals to whom this Code applies shall act with loyalty, avoiding detraction or criticisms, or collaborating in actions or omissions that might directly or indirectly compromise the image of the Aena Group or harm the reputation of the organisation.

4. GENERAL GUIDELINES OF CONDUCT

In their relations with customers, partners, suppliers, airport users and, in general, with all those persons and entities, both public and private, with whom they have dealings in the course of their professional activities or due to their position within the Aena Group, all individuals to whom this Code applies must apply the values, standards and ethical principles contained in this document, and in particular the following guidelines for action:

PEOPLE-RELATED CONDUCT

4.1 Compliance with human and collective rights

The Aena Group is committed to the human rights and political freedoms recognised in the domestic and international legislation, and in particular to the principles set forth in the Universal Declaration of Human Rights, and therefore it possesses a Human Rights Policy.

Therefore, all individuals to whom this Code applies must respect, within the framework of their respective competences, the rights to freedom of association and collective bargaining, as well as the activities legally carried out by the organisations in representation of employees, in accordance with the duties and competencies legally attributed to them, with whom a relationship based on mutual respect shall be maintained in order to promote an open, transparent and constructive dialogue that will make it possible to consolidate the objectives of social and industrial stability.

4.2 Respect for people

The Aena Group rejects any form of workplace, sexual or gender-based harassment, due to one's sexual orientation, and sexual identity or gender expression, as well as any form of physical, psychological, or emotional abuse or abuse of authority, as well as any other conduct that may violate a person's individual rights. In this respect, intimidation, lack of respect and consideration or any type of physical or verbal aggression are unacceptable and shall not be permitted or tolerated in the workplace.

All individuals to whom this Code applies, and those in management roles or who have personnel under their charge in particular, must ensure that the previously described situations do not occur and must at all times foster relations based on respect, equity and reciprocal collaboration in order to create a respectful and positive work environment for the personal and professional development of all employees.

4.3 Non-discrimination and equal opportunity

The Aena Group undertakes to provide the same opportunities of access to work and professional promotions, rejecting any type of discrimination by reason of race, nationality, social origin, gender, marital status, sexual orientation, religion, political ideology, disability or any other personal, physical or social condition.

In this respect, all individuals to whom this Code applies who take part in any way in recruitment, selection and/or professional promotion processes shall make decisions based on the principles of objectivity, responsibility and transparency, without allowing themselves to be influenced by factors that may alter the objectivity of their judgement, in order to identify the people who best fit the profile, qualifications and needs of the position to be filled.

In addition, the Aena Group shall make any adaptations to job positions or the work environment that are objectively necessary to ensure that disabled workers can progress professionally on a level playing field with the rest of the employees.

WORK-RELATED CONDUCT

4.4 Professionalism, responsibility and cooperation in the workplace

All Individuals to whom this Code of Conduct applies must at all times maintain behave with integrity, professionalism and responsibility in their decisions and actions, in addition to carrying out their work using both their technical skills and the appropriate prudence and care, to achieve the best performance of the duties assigned to them in accordance with the highest levels of quality, the law and the regulations and procedures established internally by the Aena Group.

Likewise, all Individuals to whom this Code applies must promote a working environment of cooperation and teamwork, and must at all times act in a spirit of collaboration and make available to the organisation the knowledge or resources that may facilitate the achievement of the objectives and interests of the Aena Group.

The Aena Group also considers that integrity and responsible conduct in the workplace is incompatible with the use of illegal drugs or the abuse of alcohol and, therefore, the performance of work under the effect of these substances shall be penalised in accordance with the provisions of section 8 of this Code.

4.5 Work/life balance

All individuals to whom this Code applies must promote a working environment and climate compatible with the personal and family life of the workers, collaborating with the people in their teams to achieve the best possible work-life balance.

4.6 Responsible use of resources

The Aena Group considers it essential that its resources be used with due care and rigour by all individuals to whom this Code applies and, therefore, it provides them with the suitable resources and means they need to pursue their professional activities.

Consequently, all individuals to whom this Code applies shall undertake:

- a. To be respectful and careful in the use of the installations, IT equipment, furniture, work tools and other items made available by the Aena Group, which must only be used for professional purposes and never for personal benefit.
- b. To use the resources and means made available to them responsibly, in a manner that does not infringe the rights and interests of the Aena Group and respects at all times the policies established by the Aena Group to regulate their use.
- c. To avoid any practice that impairs the value of the Aena Group, in particular superfluous activities and expenses.

4.7 Healthy and safe workplace

Guaranteeing a safe and risk-free working environment in all its facilities is a priority for the Aena Group. It is the goal of the Aena Group to bring about constant improvement of working conditions and safety in all its facilities.

Therefore, all individuals to whom this Code applies must strictly comply with the legal provisions on operational safety applicable in each case, as well as with the internal rules and instructions that complement them and any others that, at a local level, may be established by the airport management or by the competent body where they carry out their activity, in order to ensure the protection of civil aviation against any act of unlawful interference.

Furthermore, all Individuals to whom this Code applies must at all times observe the preventive measures applicable to health and safety in the workplace, using the resources established by the Aena Group and in strict compliance with the rules regarding occupational risk prevention.

CONDUCT RELATED TO THE ENVIRONMENT, STAKEHOLDERS AND IMAGE OF THE AENA GROUP

4.8 Environmental protection and sustainable development

As a leader in the provision of airport services under a framework of safety, quality and efficiency, the Aena Group pursues its activity with an active and responsible commitment to preserving the environment. Accordingly, it respects the requirements laid down in the applicable legislation on pollution prevention and environmental protection, while advocating for the sustainable development of air transport.

In this sense, since care for the environment is a basic principle for the Aena Group, it shall endeavour to disseminate its environmental policies and promote among its employees, contractors, suppliers and collaborating companies respect for the environment and the adoption of good environmental practices. Aena has implemented a Sustainability Policy and a Management Policy which covers quality, the environment, energy efficiency and health and safety in the workplace.

Moreover, all Individuals to whom this Code of Conduct applies must at all times act within the scope of their remit, with full compliance with both environmental legislation and internal policies or regulations on environmental matters, in order to reduce as much as possible the environmental impact of our activity at all the airports within the network of the Aena Group, and contribute to the sustainable development of the companies of the Aena Group.

4.9 Relationship with clients, suppliers and partner companies

The Aena group regards its clients, suppliers and partner companies as indispensable to achieve its objectives of growth and improvement in the quality of its services and, therefore, considers it a priority to establish with all of them relationships based on respect, transparency and trust in order to obtain mutual benefits for all, refraining from any action that could be contrary to free competition. In this regard, the Aena Group has an Antitrust Policy that implements Aena's commitment to free competition and good market practices, and establishes the basic principles of regulatory compliance in this area.

All Individuals to whom this Code applies, in particular those who intervene directly or indirectly in the selection or contracting of clients, suppliers and collaborating companies, must avoid any kind of interference that could affect their impartiality or objectivity, promoting competition and equal treatment, and must act in such a way in these contracting processes as to avoid any conflict between their personal interests and those of the Aena Group.

In particular, all individuals to whom this Code applies must ensure the proper functioning and continuous improvement of the customer service systems, seeking the creation of a collaborative framework that allows their needs to be anticipated and facilitates the meeting of mutual objectives, avoiding any discriminatory treatment towards customers.

4.10 Relationship with investors and shareholders

The relationships of the Aena Group with its investors and shareholders must be based on transparency, trust and sustainable reciprocal benefits. In this respect, the stated intention of the Aena Group is to create value for its investors and shareholders on a continuous and sustainable basis, while providing them with channels of communication and consultation that allow them to obtain suitable, accurate, useful and complete information on the Aena Group. To this end, Aena has a Communication and Contact Policy for shareholders, institutional investors and proxy advisors.

4.11 Relationship with the public authorities

The relationships of the Aena Group with the public authorities shall be guided by institutional respect, transparency and compliance with any decisions issued by them.

In addition, all individuals to whom this Code applies must at all times maintain an attitude of cooperation and transparency with any public authorities or supervisory body in the event of any request, inspection or monitoring they may carry out at our organisation. In this respect, any judicial or administrative communications from any public authorities must be forwarded to and managed by the person with responsibility for the matter in question, who shall reply to them within the mandatory time limit.

All information submitted to the courts or administrative authorities at their request must be truthful, appropriate, useful and consistent.

4.12 Corruption and bribery. Gifts, commissions or credit facilities.

The Aena Group firmly and rigorously rejects any form of corruption, bribery or extortion, and is opposed to the influencing of people outside the Aena Group or to be influenced in order to obtain or to generate for others any kind of benefit or advantage through practices that infringe the law applicable in each case, or the principles and rules of conduct contained in this Code.

In this sense, the Aena Group has an Anti-bribery policy as a commitment to permanently monitor and sanction fraudulent acts and conducts, and a Business Courtesies Policy that sets out the general and operating principles regarding the giving, promising or offering of business courtesies.

4.13 Political or organisation membership activities

The making of donations or contributions to a political party, federation, coalition or electoral group is expressly forbidden when charged using resources of each of the companies of the Aena Group.

Relationships with, membership of or cooperation with political parties or with other types of entities, institutions or associations with public purposes that go beyond those of the Aena Group, as well as any contributions or services to them, must be pursued in a manner that clearly shows their personal nature and avoids any involvement on the part of Aena Group, during free time and without using any of the resources of the Aena Group (including computers, e-mail and telephones of the Aena Group).

In addition, before accepting any public office, all individuals to whom this Code applies must inform the People and Organisation Department of Aena, or in the case of Subsidiaries, the equivalent body, of such circumstance so that it may determine the existence of any incompatibilities with or restrictions on the office in question. Moreover, all individuals to whom this Code applies must also comply with whatever is established for the purpose in the legislation on incompatibilities.

4.14 Corporate image and reputation

The Aena Group considers its corporate image and reputation as one of its most valuable assets to preserve the trust of its shareholders, clients, employees, suppliers, authorities and society at large. Therefore, all Individuals to whom this Code applies must use the corporate image and reputation of the Aena Group correctly and properly.

In this sense, all Individuals to whom this Code applies must exercise particular caution in any public intervention, when intervening before the media, participating in professional conferences or seminars, or in any other act that may be publicly disseminated, provided that they appear as personnel of the Aena Group.

Likewise, all Individuals to whom this Code applies shall pay due attention to the use made of the name of the Aena Group by clients, suppliers and external partners, ensuring that such use is correct and suited to the corporate image and identity.

4.15 Conflicts of interest and incompatibilities

Despite the impossibility of identifying and responding to each of the personal conflicts of interest that may arise in practice within our organisation, a conflict of interest will be generally considered to exist in those situations in which the personal interest of any individuals to whom this Code applies or a natural or legal person associated with them, whether directly or indirectly, differs from the interest of the Aena Group.

Faced with a potential situation of conflict of interest, all individuals to whom this Code applies must always act, in the fulfilment of their responsibilities, with loyalty, honesty and in defence of the interests of the Aena Group. They must abstain from giving priority to their personal interests at the expense of those of the Aena Group and from intervening or influencing the taking of decisions affected by such conflicts of interest, in accordance with the provisions of the Conflict of Interest Compliance Policy and the General Procedure on Conflicts of Interest approved in this regard.

Persons Subject to this Code may not participate in public auctions for the sale of movable or immovable property organised by any of the companies belonging to the Aena Group, with a view to avoiding situations of conflict of interest.

Similarly, Persons Subject to this Code who, by virtue of their duties within the Aena Group, have access to non-public information regarding the auctioning of movable and immovable property owned by any Company of the Aena Group, shall not disclose or share such information with other persons, especially in relation to persons who are considered close relatives in accordance with the Anti-Bribery Policy.

In turn, persons who, in the performance of their duties, are assigned any responsibility for the auctioning of movable or immovable property owned by the Aena Group must notify the Aena Compliance Department, or the equivalent body of its Subsidiaries, as soon as they become aware of this, both of access to non-public information and of the participation of their close relatives in the auctioning processes for which they are responsible.

All individuals to whom this Code applies who wish to engage in a second activity, whether public or private, must comply with the provisions of the regulations on incompatibilities.

4.16 Projects of a social nature and sponsorships

In order to comply with the commitment to transparency of the Aena Group, any collaboration, sponsorship, donation or patronage arrangement pursued by Aena, in addition to being properly recorded in the books of account of the respective companies of the Aena Group, and to having secured any express internal and external authorisations that may be required, may only be pursued with organisations or institutions that are not linked to any political party and whose purpose is not political and that have the appropriate organisational structure to guarantee the proper administration of the resources contributed by Aena.

Such collaborations, sponsorships, donations or patronage must always be aimed at strengthening the good reputation and image of our brand and our commitment to

society, and under no circumstances may they be used as a subterfuge to conduct practices or make covert payments contrary to this Code of Conduct.

Moreover, the Aena Group must, as far as possible, effectively monitor any collaboration or sponsorship entered into in order to know the correct use of the resources of Aena.

INFORMATION-RELATED CONDUCT

4.17 Confidentiality and authenticity of information

The Aena Group considers that it is essential to respect the confidentiality of any information that is the property of the respective companies of the Aena Group and considered reserved and confidential, to which any individuals to whom this Code applies may have access by reason of their office.

In this respect, all individuals to whom this Code applies must observe the duty of professional secrecy with respect to any non-public information of which they become aware as a result of their professional activity, whether it originates with or refers to Aena, its employees or any other third party. In particular, all individuals to whom this Code applies undertake:

- a. To use the information or data exclusively for the purpose of carrying out their professional activity in the Aena Group, and to disclose it only to those other professionals who need to know it for the same purpose.
- b. To strictly observe the duty of permanent confidentiality of any information learned in the course of their work in the Aena Group, even after their professional relationship with the Aena Group has ended.
- c. Not to use the confidential or reserved information of the Aena Group for their own benefit or that of a third party.

All Individuals to whom this Code applies shall uphold the truthfulness of the information as a basic principle in all their actions. Therefore, they must truthfully convey all the information they have to disclose, both internally and externally, and in no case must they knowingly provide incorrect or inaccurate information that could mislead the recipient and negatively impact the image or reputation of the Aena Group.

4.18 Personal data protection

All Individuals to whom this Code applies are bound to respect the privacy of all persons, employees, customers, and any other persons, with regard to personal or family life,

whose data they have access to due to the activity of the Aena Group, and must safeguard any personal data that is stored and exchanged during their professional activity in the Aena Group.

4.19 Economic, financial, non-financial and corporate information

All economic and financial, as well as non-financial and corporate information of the Aena Group shall be prepared with reliability and accuracy, ensuring at all times that any economic information presented by the Aena Group to its shareholders and investors, the securities markets or any public authorities or public or private supervisory body, is true and complete, pursuant to the General Communications Policy for economic, financial, non-financial and corporate information of Aena.

In this regard, all individuals to whom this Code applies responsible for preparing the economic and financial information of Aena must ensure that all the information reflects all of the transactions, events, rights and obligations affecting Aena, and that these have been recorded, classified and valued at the right time and in accordance with the applicable legislation, thus making sure that this information offers a true image of the equity, the financial situation, the profit and loss and cash flows of Aena.

Likewise, persons responsible for preparing the economic, financial, non-financial and corporate information must comply with all of the internal and external control procedures established by Aena in order to guarantee that all transactions receive the correct accounting treatment and are properly reflected in the information published by Aena, as well as meeting all regulatory requirements.

The Audit Committee shall supervise the financial, non-financial and corporate reporting process and the effectiveness of any internal controls, internal and external audits, and risk management systems.

4.20 Information and Communication Technology

When using the computer and IT systems of the Aena Group, the Individuals to whom this Code applies must take security extra measures and strictly comply with the rules for their use and the policies established for that purpose. In this regard, the Aena Group has an Information Security Policy and a Data Policy.

The Individuals to whom this Code applies shall undertake to use Artificial Intelligence responsibly, in compliance with the relevant policies and procedures approved by Aena and the companies of the Aena Group in this regard.

The corporate Policies and rules of use regarding these matters are available on the corporate intranets of the Aena Group to all Individuals to whom this Code applies.

CONDUCT RELATED TO LEGAL OBLIGATIONS

4.21 Respect for legality and for ethical principles of the Aena Group

All Individuals to whom this Code applies must comply with the general provisions that apply to them in the course of discharging their professional duties and responsibilities (laws, regulations, circulars from regulatory and supervisory bodies), as well as with any internal regulations that apply to the activity conducted by each individual person. To this end, any doubts as to the regulations that apply or to the legality of a given action should be submitted to the legal department or to the human resource/people department in the case of a labour-related doubt.

In addition, all Individuals to whom this Code applies must engage in professional conduct that is upright, impartial, honest and in accordance with the ethical principles of the Aena Group, and must refrain from engaging in situations, activities or interests that are illegal or immoral and/or in any way incompatible with the duties entrusted to them in our organisation.

All Individuals to whom this Code applies who become involved, whether as alleged liable parties, witnesses or in another capacity, in a process involving a criminal or civil court, employment tribunal or judicial review, which is directly or indirectly related to their professional activities at the Aena Group, must inform the respective legal departments as soon as possible, which will inform the corresponding Compliance managers.

4.22 Tax and social security liabilities

The Aena Group expressly prohibits any practices that involve avoiding paying tax or social security contributions and, in general, any payment that must be made to the Public Authorities in compliance with the liabilities set out by law. The Individuals to whom this Code applies must avoid said practice at all times.

4.23 Intellectual and industrial property rights

All Individuals to whom this Code applies must respect the intellectual property rights of the Aena Group and right of use with regard to any courses, projects, software and IT systems, equipment, manuals, know-how, processes and, in general, any project or work developed or created by any company in the Group, whether as a result of its professional activity or that of a third party.

All Individuals to whom this Code applies must also respect the intellectual and industrial property rights held by third parties unrelated to the Aena Group and, in particular, any

type of information or physical or electronic documentation belonging to a third party that has been obtained (e.g. through the holding of a previous post) may be incorporated, utilised or employed without the due consent of its owner.

Furthermore, all individuals to whom this Code applies shall refrain from using the image, name or trademarks of Aena for personal reasons or purposes unrelated to the companies of the Aena Group. They may only be used for the proper pursuit of their professional activity in the Aena Group.

5. KNOWLEDGE OF AND COMPLIANCE WITH THE CODE OF CONDUCT

All Individuals to whom this Code applies, as well as any individuals who join or become part of the Aena Group in any form, are expressly affected by the entire contents of this Code and, in particular, by the ethical principles and rules of conduct set out in its provisions.

6. MONITORING AND CONTROL

The Compliance Bodies of the companies of the Aena Group are in charge of overseeing, controlling and evaluating the correct operation of the Regulatory Compliance Systems of the Aena Group, and have, among others, the obligation to promote knowledge of and compliance with the Code of Conduct, interpret it and provide guidance in decision-making in case of doubt, as well as to make proposals for its improvement whenever deemed appropriate.

7. BREACHES AND DUTY TO REPORT

In accordance with the provisions of this Code, respect for the law constitutes one of the fundamental principles of the Aena Group and, accordingly, we endeavour to attain the highest levels of compliance and integrity in pursuing our activity, assuming as a management objective the achievement of a high degree of awareness on the part of employees of the importance of acting at all times with the utmost respect for the law and minimising as far as possible the risk of unethical practices or regulatory breaches occurring in our organisation.

In this respect, all individuals to whom this Code applies must perform their professional duties according to and with respect for the internal policies and regulations established to prevent any unlawful and/or criminal conduct in our organisation, and in accordance with the provisions of the Criminal Code, which must be read, understood and always borne in mind in the discharge of the duties assigned to each individual.

In this respect, in order to prevent or, where applicable, detect any irregular conduct that may occur at any of the hierarchical levels of the Aena Group, all individuals to whom this Code applies must inform on, report and collaborate in the investigation of possible risks to or breaches of the Code of Conduct or any other internal regulation or protocol of action established in the Aena Group, and/or of any action that may be considered unlawful or criminal of which they have knowledge or suspicion, through the communication channels of the Internal Reporting System.

Aena guarantees absolute confidentiality and anonymity in the processing of reports and expressly and rigorously prohibits the adoption of any kind of retaliation or negative consequence for an employee as a result of having made a report in good faith.

The respective Whistleblowers' Channel of the Aena Group can be accessed from the respective corporate websites and intranet.

8. PENALTIES FOR BREACHES

Any breach of the Code of Conduct, any other internal regulations or policy and/or legal or contractual provision in the discharge of the professional duties assigned to each person shall be deemed to be a labour breach subject to penalties, in which case the procedure provided for in the respective Collective Bargaining Agreements and/or other applicable regulations in the companies of the Aena Group.

The penalties applicable to the disciplinary misconduct referred to above shall be classified by each Company of the Aena Group as minor, serious or very serious, depending on the specific circumstances of the case and in accordance with the disciplinary rules established in the Collective Bargaining Agreements and/or other applicable regulations in the companies of the Aena Group.

Furthermore, in the case of breaches attributable (i) to the members of the Boards of Directors, the provisions of the Regulations of the Board of Directors and the applicable legislation shall apply for these purposes, (ii) to employees who work for the Aena Group under a senior management contract, the provisions of the contracts regulating their relationship with the Aena Group, as well as of any legislation applicable to them, shall apply for these purposes.

9. VALIDITY

This Code of Conduct was approved by the Board of Directors of Aena at its meeting of 30 June 2015 and was last updated at its meeting of 26 May 2026. It will remain fully in force as long as no amendments are made to it.

The amendments made to the Code of Conduct will be approved by the Board of Directors of Aena, following a favourable report from its Audit Committee on the recommendation of the Compliance Monitoring and Control.