

# **SUSTAINABILITY 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

For Aena S.M.E., S.A. (hereinafter, “**Aena**” or the “**Company**”), sustainability is understood as a commitment to social progress, environmental balance and economic growth, which must permeate the business model itself, the corporate strategy and guide the Company’s actions.

Therefore, through this Sustainability Policy (hereinafter, “**Policy**”), Aena endorses its commitment to sustainability, and reaffirms its focus on the creation of long-term value for all its stakeholders, ensuring that its activity is carried out pursuant to a set of values, principles, criteria and attitudes that promote sustainable social and environmental development, and fostering the implementation and development of its ethical principles based on integrity and transparency.

By virtue of the cross-cutting nature of sustainability, this Policy is configured as the reference framework on which the principles that guide the Company’s actions are established, especially in environmental and social matters, and is therefore developed and complemented by the rest of the Company’s policies that address specific issues related to respect for human rights, diversity, fiscal responsibility, prevention of corruption and other illegal conduct, and stakeholder management, inter alia.

The Policy aims to define and establish the principles, commitments, objectives and strategy that the Company will adhere to when carrying out its business, optimising its contribution to sustainable development and meeting present needs without compromising those of future generations, creating long-term value, maximising positive impacts and minimising negative impacts on society and the environment throughout the entire value chain, through ethical and transparent behaviour.

Furthermore, this Policy also has the following objectives:

- To establish the Company’s operating principles with regard to environmental and social issues, related to diversity, fiscal responsibility, health and safety, respect for human rights and the prevention of corruption and other illegal conduct.
- To promote the integration of sustainability requirements at all organisational levels, ensuring the availability of the necessary resources.
- To provide in a transparent manner sufficient information on the development, implementation and results of sustainability policies.
- To have the necessary methods or systems in place to manage sustainability risks and opportunities.

## 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 sustainability policies.

## III. PRINCIPLES

This Policy establishes the following general principles of action in the area of sustainability, based primarily on the principles set out in the United Nations Global Compact, the United Nations Sustainable Development Goals (SDGs), the regulations applicable to the Aena Group’s area of activity, and the expectations of stakeholders:

- To integrate sustainability in all the business areas and organisational levels of the companies of the Aena Group, transferring this culture to employees, customers, suppliers, value chain, partners and other stakeholders and, specifically, to ensure sustainable management and alignment with social and environmental sustainability objectives by supplier and contractor companies, within the scope of the work carried out for the Aena Group.
- To integrate the sustainability due diligence process in all of the Company’s processes, as a basis for the assessment of the main impacts, risks and opportunities related to the Company’s own operations and the upstream and downstream phases of the activity chain of the Aena Group.

- To maintain a firm commitment to quality and environmental management, in accordance with the provisions of the Company's integrated management policy on quality, environment, energy efficiency and occupational health and safety.
- To embrace the fight against climate change as a strategic priority, to reduce greenhouse gas emissions, to contribute to mitigate its effects in order to achieve carbon neutrality in all airports, acting as a third party tractor in the assumption of these commitments.
- To integrate the climate change factor in the internal decision-making processes, as well as in the analysis and management of the related risks and opportunities in the short, medium and long term, incorporating appropriate adaptation mechanisms.
- To minimise the environmental impacts of the Aena Group's activity, under a preventive approach (especially with regard to climate change, air quality<sup>1</sup>, noise management, water management and discharges, impact on biodiversity and ecosystems and management of hazardous and non-hazardous waste), ensuring that processes comply with the highest quality standards and promoting the transition to a circular economy that includes all processes.
- To ensure the correct implementation of the Aena Group's social policies, which address certain stakeholder needs and expectations and cover related aspects, such as human rights, diversity, equal opportunities and work-life balance, fair pay, health and safety, quality, and promotion and development, paying special attention to the difficulties faced by people with special needs.
- To respect and protect internationally recognised fundamental human rights (freedom of association, right of association and collective bargaining, absence of child labour, elimination of forced or compulsory labour, etc.), declaring the Aena Group's absolute opposition to modern slavery and human trafficking, and any other practice that may involve a violation of individual or collective dignity.
- To provide a safe and healthy working environment, characterised by equal opportunities and non-discrimination (in particular for reasons of race, nationality, social origin, gender, marital status, sexual orientation, age, religion, political ideology, disability or any other personal, physical or social condition of individuals), the promotion of diversity, the management, attraction and retention of talent, development and work-life balance, through the implementation of appropriate tools.
- To add value in the geographical areas in which the Aena Group operates, through promoting the local business fabric and job creation, as well as the deployment of social actions aligned with the business model and local needs, focused on fostering participation in the communities, favouring integration in the territory, contributing to social well-being and improving people's quality of life, as well as promoting, among others, education, employment, cultural wealth and heritage, health, science and research, and the inclusion of the most disadvantaged groups.
- To collaborate with organisations, non-governmental and non-profit entities, as well as with international bodies that pursue a social purpose for the effective development

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<sup>1</sup> These include nitrogen oxides (NOx), sulphur oxides (SOx), carbon monoxide (CO), volatile organic compounds (NMVOC) and particulate matter (PM 10 and PM2.5).

of sustainability actions, both in their environmental and social aspects, to pool efforts in the community.

- To ensure the application of responsible tax principles and practices in accordance with the Corporate Tax Policy and the Company's Code of Conduct.
- To support the adherence of the companies of the Aena Group to projects or initiatives of proven reputation and credibility that, both nationally and internationally, aim to promote responsible practices in business organisations and sustainable development, as well as to adopt and disseminate the principles that emanate from these initiatives.
- To foster innovation and ongoing improvement, using the Company's strategy as a development driver.
- To promote the principles of transparency, integrity and business ethics, operating according to the provisions of the Code of Conduct and the Regulatory Compliance Policy or the Company's Anti-Bribery Policy.
- To establish channels of communication, participation and dialogue with stakeholders and responsible communication practices that avoid manipulation of information and protect integrity and honour, in accordance with the provisions of the Company's policies on the communication of financial, non-financial and corporate information, privacy or security of information, as well as those related to stakeholders.
- To ensure accountability regarding compliance with the commitments acquired by Aena in the area of sustainability by issuing reliable, rigorous, truthful and relevant information in a transparent manner to shareholders, investors and other stakeholders.
- To consider stakeholder interests and opinions when performing and updating the dual materiality analysis process, with a view to identifying, assessing, prioritising and determining the significance of potential and actual positive and negative impacts, as well as risks and opportunities that may have a financial impact on the Aena Group, in the short, medium and long term, related to people and the environment.

#### **IV. MONITORING AND CONTROL**

Pursuant to the provisions of the Regulations of the Board of Directors of Aena, its Board of Directors is responsible for the promotion and deployment of the Sustainability Policy.

As issues relating to social, environmental and corporate governance aspects are important, specific functions are attributed to specialised committees. The Sustainability and Climate Action Committee of Aena, in particular, is constituted as the internal body empowered to assess and control sustainability and the Climate Action Plan, responsible for knowing, promoting, guiding and supervising the objectives, action plans, practices and policies of the Company in environmental and social matters. Aena's Audit Committee's responsibilities include identifying the different types of risks, as well as supervising and assessing the risk control and management systems, including non-

financial risks (social y environmental, etc.). Aena's Audit Committee should, in particular, review the clarity and integrity of all financial and related non-financial information made public by the company, such as financial statements, management reports, risk management and control reports, corporate governance reports, etc. Aena's Audit Committee should assess in which cases it makes sense and may involve the statutory auditors in the review of any of the reports in addition to the financial statements.

The Company adopts the following mechanisms to control and monitor the Sustainability Policy, as well as the impacts, risks and opportunities in this area and its management:

- To promote a commitment to develop a sustainable business management model focused on the creation of value through the Sustainability Strategy, the Climate Action Plan and those support instruments and specific actions which, aligned with the Company's Strategic Plan, set out the medium- to long-term framework for action in this area and enable compliance with the principles, commitments and objectives established in environmental and social matters by this Policy.
- To promote the performance and monitoring of due diligence in sustainability matters, in accordance with the process described in the international instruments of the United Nations Guiding Principles on Business and Human Rights and the guidelines of the Organisation for Economic Co-operation and Development (OECD) for Multinational Enterprises.
- To carry out a continuous assessment of the degree of progress of the commitments acquired and the projects established in the area of sustainability, establishing measurable and assessable objectives. To this end, Aena's competent Committees will meet periodically to discuss these matters.
- To disseminate the commitments acquired by the Company in sustainability matters, their monitoring and evaluation through appropriate communication and reporting mechanisms.
- To ensure that the Board of Directors of Aena, through its Sustainability and Climate Action Committee and other specific Committees depending on the matter, carries out the approval, monitoring and supervision of the principles and guidelines set out in this Policy.

The aforementioned supervision and control mechanisms are complemented with those established in the Risk Control and Management Policy and other policies of the Company.

## **V. VALIDITY**

This Policy was approved by the Board of Directors of Aena at its meeting of 28 September 2021 and last updated at its meeting of 26 May 2026. It will remain in force as long as no amendments are made to it.

This Policy replaced and superseded the Corporate Responsibility Policy approved by the Board of Directors of Aena at its meeting of 23 February 2016.