DATA POLICY OF AENA S.M.E., S.A.

Approved by the Board of Directors of Aena S.M.E., S.A. on 19 December 2023.

I. PURPOSE

The Board of Directors of Aena, S.M.E., S.A. (the "**Company**" or "**Aena**") has the power to design, evaluate, and review, on an ongoing basis, the Corporate Governance System and, specifically, to approve the Corporate Policies.

The purpose of this Aena Data Policy (the "**Policy**") is to set forth the principles and aspects governing the actions of the Company to promote the value of the data and facilitate decision-making based on the information provided by the data, as well as to establish the criteria relating to the quality, traceability, interoperability, security, uniqueness, and ethics thereof.

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 SME SA 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 Directors whose area of responsibility is related to this policy.

The Board of Directors of Aena shall approve 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.

III. PRINCIPLES

Aena's data are critical assets that must be governed and protected to ensure the Company's operation. To this end, Aena must act according to the following principles:

a) Adopting the necessary measures to ensure ease of access to data, its ethical use, confidentiality, integrity and protection.

b) Defining and implementing the Data Governance function in order to establish responsibilities and carry out control over the management of data as company assets and coordinate the people, processes and technologies oriented to this end.

c) Establishing the rules that ensure the proper use, quality, homogeneity and cohesion of the data to facilitate decision-making in its management.

IV. ACTION POINTS

This Policy is based on the following main action points:

1. To establish a homogeneous transversal approach to data management, based on policies that improve the decision-making process in Aena.
2. To identify the data and domains in force in the environments of the business units.
3. To define the roles and responsibilities in the area of Data Governance.
4. To define the necessary means and procedures that regulate and guarantee the adequate implementation of the Data Policy.
5. To align the objectives, resources, methodologies and key principles of Data Governance with the strategy and business objectives.
6. To align the strategic objectives of Data Governance with the established legal and contractual requirements.
7. To establish the regulatory compliance mechanisms that guarantee the security, and confidentiality where applicable, of data management.
8. To promote the Data Management culture among all company personnel.
9. To facilitate data accessibility throughout the organisation in a homogeneous manner, according to the needs of each unit.
10. To establish a methodology based on continuous improvement, through a process of revision and updating of the data management model, in order to adapt it at all times to the context of the organisation, as well as to existing recommendations and best practices.
11. To ensure the ethical use of the data managed by Aena.
12. To ensure coordination in the acquisition of data from third parties (either through their purchase or through a collaboration agreement), so that there are no duplications, as well as control of the Aena data that is transferred to third parties. To establish the appropriate control mechanisms through the Data Governance Office.

V. DATA GOVERNANCE STRUCTURE

This Policy will be developed by internal rules to be drawn up by the Data Governance Committee and approved by the Executive Management Committee of the Company, defining, inter alia, the following aspects:

- Roles, responsibilities and ethics.
- Data quality.
- Data source management.
- Data traceability.
- Data control, storage and security.

VI. MONITORING AND CONTROL

Compliance with this Policy shall be monitored by the Nomination, Remuneration and Corporate Governance Committee, which shall ensure that it is correctly applied and complied with.

VII. VALIDITY

The Data Policy was approved by the Board of Directors of Aena at its meeting of 21 December 2021. It was last updated at its meeting of 19 December 2023. It will remain in force as long as no amendments are made to it.