

CULTURE BASED ON ETHICS AND INTEGRITY

ETHICAL PRINCIPLES AND GOOD GOVERNANCE

Legality	Integrity, honesty and trustworthiness	Independence and transparency	Excellence and quality in meeting our stakeholders' expectations	Respect for the image and reputation of Aena
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REGULATORY COMPLIANCE SYSTEM

Zero tolerance for any conduct that involves an unlawful act or contravenes the policies, values and principles of the Company

Prevent or mitigate the risks of noncompliance or bad practices, through the appropriate principles, mechanisms and procedures	Ensure respect for the established obligations, the commitments assumed, and the legality of the acts
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GOVERNANCE, ORGANISATION AND SUPERVISION: COMMITMENT AT ALL LEVELS OF THE COMPANY

Board of Directors Supervises, through the Audit Committee, the operation of the Compliance Supervision and Control Body. Approve the regulatory framework	Audit Committee Oversees operations and enforcement of the compliance model	Compliance Division Annual review of policies and update of compliance risk map, training and communication plan, management of the complaints channel and measures, etc	Supervision and Control Body Implementation, development and compliance with the Aena General Regulatory Compliance System	The Regulations of the Regulatory Compliance System define the responsibilities at the different hierarchical levels
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DUE DILIGENCE AND DEVELOPING A CULTURE OF GOOD ETHICS AND COMPLIANCE

Regulatory framework and public commitment	Risk diagnosis and default impacts	Implementation of risk control, prevention and mitigation measures	Training, communication and awareness	Monitoring and reporting	Investigation of incidents, repairs and corrective proposals
Regulatory compliance policy	Determine, analyse and assess possible risks in the most methodical way, adopting a preventive and proactive culture.	Prevention control: ensure compliance with internal regulations, policies and standards.	Training and awareness actions to promote a corporate culture based on compliance and ethics. The actions in 2023 have consisted of continuing the Communication and Awareness Plan created by the CSCB.	Complaints Channel.	Failure to comply with the provisions of the Policy may result in the application of the appropriate disciplinary measures, in accordance with the provisions of the Aena disciplinary regime and corporate regulations, where applicable.



Due diligence and developing a culture of ethics and compliance

Regulatory framework and public commitment	Risk diagnosis and default impacts	Implementation of risk control, prevention and mitigation measures	Training, communication and awareness	Monitoring and reporting	Investigation of incidents, repairs and corrective proposals
Code of Conduct	All Subject Persons, as well as professionals who join or become part of Aena, are expressly affected by the full content of the Code and, in particular, the ethical principles and rules of conduct established therein.	Action control: obligation to report any possible illicit act or breach through the Whistleblowing Channel.	Implementation of online training courses on the importance of Compliance, as well as modules on the awareness of a culture of compliance, to reinforce knowledge about the Regulatory Compliance System and the Code of Conduct and to contribute to preventing or mitigating the risk of committing criminal actions.	Internal and external audits ^(A)	It will be considered a breach of labour law that may be sanctioned, following the procedure set out in the Aena Collective Agreement and other applicable regulations. The penalties corresponding to disciplinary offences will be classified by Aena as minor, serious or very serious, depending on the specific circumstances of the case, and in accordance with the provisions of the disciplinary regime provided for in the Collective Agreement of Aena, and, where appropriate, the other applicable regulations. For breaches attributable to: (i) the members of the Board of Directors, the provisions of the Regulations of the Board of Directors and the applicable regulations will apply to these effects; and (ii) employees who are linked to Aena by means of a senior management contract, the provisions of the contracts that regulate their relationship with Aena will apply to these effects, as well as in the applicable regulations.
Anti-corruption and fraud policy	Complements and develops the provisions of the Code of Conduct and the Regulatory Compliance Policy. This implies its firm rejection and zero tolerance for any conduct that is illegal or that violates Aena's policies, standards, values and action principles.	Reviewing controls, through the CSCB, by conducting an ongoing assessment of risk maps, compliance policies and regulatory adaptations to the GRCS in all processes.	Actively participating in different specialised business forums.	Internal and external information and reporting.	Aena prohibits entering into any financial transaction, contract, convention or agreement whenever there are sufficient reasons to believe that there could be some link to improper or corrupt activities.
Policy of the Internal Information System and Whistleblower Protection	Its purpose is to ensure the protection of whistleblowers against possible reprisals and to outline the general principles of the Internal Information System and Whistleblower Protection in which the Whistleblower Channel is integrated as a formal mechanism for communication, consultation, or reporting of irregularities.	Forecasts necessary for the Internal Information System and existing internal information channels to comply with the requirements established in current legislation.	Deployment of the Training, Communication, and Awareness Plan, and review and update of policies.	Appointment of the Internal Information System Manager and promotion of information exchange among the different System Managers within the Group.	In Aena, there is a Procedure for managing the Internal Information System and Whistleblower Protection, as well as a Protocol for Prohibition of Retaliation. Additionally, there are procedures for dealing with Workplace Harassment and Protocols for addressing Sexual Harassment and Gender-based Harassment. In Brazil and the United Kingdom, the companies within the Group establish their respective internal information procedures with the necessary adaptations to comply with the applicable regulations in each case.

Also, refer to the information contained in the image "Measures for the Prevention of Corruption."

(A) In 2023, the implementation of the action plan proposed by the Internal Audit Department following the internal review of the compliance system and function has been completed. This plan was aimed at addressing the detected incidents.