AENA, S.M.E., S.A.
REGULATIONS OF THE SUSTAINABILITY AND CLIMATE ACTION COMMITTEE

Approved by the Board of Directors of Aena S.M.E., S.A. on 27 January 2026

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PREAMBLE

Article 1.- Nature and purpose

1. The Sustainability and Climate Action Committee of Aena is an internal body, of an informational and advisory nature, with powers to inform, advise and make proposals within in its scope of action in matters of sustainability and the Climate Action Plan. It shall be governed by the rules contained in the Company Bylaws, in the Regulations of the Board of Directors, and in these Regulations of the Sustainability and Climate Action Committee (hereinafter, the "**Regulations**").

2. The purpose of these Regulations is to determine the principles of action of the Sustainability and Climate Action Committee and to establish the basic rules of its organisation and operation, as well as the rules of conduct of its members.

Article 2.- Interpretation

3. These Regulations shall be interpreted pursuant to the applicable statutory and bylaw provisions, the Regulations of the Board of Directors, the principles and recommendations of the Good Governance Code for listed companies approved by the Board of the National Securities Market Commission (CNMV) on 26 June 2020 or the Code that replaces it and, in general, with the principles and recommendations of good corporate governance contained in the reports that are officially issued in Spain.

4. These Regulations implement and supplement the provisions of the Company Bylaws and the Regulations of the Board of Directors in all matters applicable to the Committee. The latter rules shall prevail over these Regulations in case of contradiction.

5. The Board of Directors has the power to resolve any doubts that may arise regarding the interpretation and application of these Regulations.

6. In the absence of a specific rule in these Regulations, the provisions of the Regulations of the Board of Directors on the functioning of the Committee shall be applicable, insofar as they are not incompatible with its nature, and especially regarding the form and time limit for convening meetings, delegation of representation to another Committee member, holding of uncalled meetings, voting in writing and without a meeting, and approval of the minutes of the meetings.

7. Capitalised terms used but not defined in these Regulations shall have the meaning given to them in the Company Bylaws and the Regulations of the Board of Directors.

Article 3.- Approval and amendment

1. These Regulations and any amendments thereto must be approved by the Board of Directors, by resolution adopted by an absolute majority of the Directors present or represented, at the initiative of its Chairman, the Chairman of the Committee, one third of the Directors or the Sustainability and Climate Action Committee itself. The amendment proposal must be accompanied by a report containing a supporting document explaining the grounds and the scope of the amendment sought. The report, together with the supporting document, shall be prepared by the Sustainability and Climate Action Committee, unless the proposed amendment has been submitted by at least one third of the Directors, in which case, those Directors must prepare the report and the supporting document, which shall be validated by the Sustainability and Climate Action Committee. The Sustainability and Climate Action Committee shall submit the report on the proposed amendment to the Board of Directors, unless the proposal is made at the initiative of the Board of Directors itself.

2. The call notice for the Board Meeting where the amendment proposal is to be submitted for approval shall be accompanied by the full text and all aspects proposed to be amended, the supporting document as well as the Sustainability and Climate Action Committee's report, where appropriate.

3. Any amendments to these Regulations shall also be subject to the dissemination rules set out in Article 4 below.

Article 4.- Dissemination

1. Committee members, as well as other Directors and senior management insofar as they are concerned, are required to know, comply with, and ensure compliance with these Regulations..

2. These Regulations shall be published on the Company website, so they may be consulted by shareholders, investors, regulators, and other stakeholders.

TITLE I

PRINCIPLES OF ACTION OF THE SUSTAINABILITY AND CLIMATE ACTION COMMITTEE

Article 5.- Principles of action

When performing its functions, the Committee shall take into account the following basic principles of action by its members:

(i) Independence in its functioning with regards to instructions and third-party relations that may compromise its performance, as well as freedom of judgement of its members;

(ii) An attitude of scepticism regarding the data and conclusions provided by the Company's executive directors and senior management, taking into account the arguments both for and against in an objective manner in order to adopt their own position, both collectively and individually for each member.

(iii) Encourage, through the Chairman of the Committee, a constructive dialogue that promotes the free expression of its members and favours diversity of views.

(iv) Continuous two-way dialogue with its usual liaisons, mainly: the Sustainability Assurance provider, the Innovation, Sustainability and Customer Experience Division and the senior management. This is without prejudice to any coordination that may have to be established with other Board Committees insofar as they have different powers on the same matter.

(v) Sufficient analytical capacity, with the possibility of relying on the expert advice of a third party when deemed necessary for the proper performance of their duties, considering the complexity of the matter in question.

(vi) Sufficient dedication by the Committee members, prior to holding meetings, and to the analysis and evaluation of the information received.

(vii) Maximum diligence and professional competence of the Committee members in executing their tasks.

TITLE II

RESPONSIBILITIES OF THE SUSTAINABILITY AND CLIMATE ACTION COMMITTEE

Article 6.- Responsibilities in the area of environmental and social sustainability

Notwithstanding any other duty that may be entrusted by the Board of Directors, the Sustainability and Climate Action Committee shall have the responsibilities in matters related to environmental and social sustainability:

1. To be aware of, to promote, guide and supervise the Company's objectives, action plans, practices and policies with regard to environmental and social matters, submitting all proposals it deems appropriate to the Board of Directors, and in any event, to submit sustainability policies for approval, ensuring that said policies identify and include, at least:

   (i) The principles, commitments, objectives and strategy with regard to shareholders, employees, customers, suppliers, corporate affairs, the environment, diversity, fiscal responsibility, respect for human rights and the prevention of corruption and other unlawful conduct.

   (ii) The methods or systems for monitoring compliance with the policies, associated risks and their management.

   (iii) The mechanisms for supervising sustainability risk, including risks related to ethical aspects and business conduct.

   (iv) The channels of communication, participation and dialogue with stakeholders.

   (v) Responsible communications practices that avoid the manipulation of information and safeguard integrity and honour.

2. To assess and verify performance and compliance with the plans, objectives and sustainability strategy and practices in environmental and corporate matters, ensuring that they are focused on achieving greater sustainability, promote the corporate interest and creation of long-term value, and take into account the legitimate interests of other stakeholders, and to report to the Board of Directors on these topics and, where appropriate, to propose recommendations to improve the positioning of the Company and the Aena Group (understood in the terms established in Article 42 of the Commercial Code) (hereinafter, "Aena Group") in this area.

3. To ensure that the practices of the Company in environmental and social matters are in line with the established strategy and policies.

4. To support and oversee Aena's contribution to the achievement of the United Nations-approved Sustainable Development Goals (SDGs).

5. To review, prior to its approval by the Board of Directors, and subsequently oversee compliance with the Company's Climate Action Plan, which includes actions to mitigate the effects of climate change, as well as the monitoring of the indicators established for compliance with the decarbonisation objectives in line with:

   (i) Aena's "Sustainability Objectives on Climate Change", which must be suitably updated taking into account Spanish and European regulatory requirements and meet or exceed the objectives of:

      a. Articles 2.1 (a) and 4.1. of the Paris Agreement;

      b. the Declaration of the Government of Spain in the face of the Climate and Environmental Emergency of 21 January 2020; and

      c. the National Integrated Energy and Climate Plan 2021-2030, or such other plan as may be in force at any given time;

   (ii) the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD), in order to establish the Risks, Opportunities and Financial Impact arising from Climate Change; and

   (iii) Act 11/2018 on non-financial reporting and diversity, as well as the guidelines derived from the European Commission's supplement on climate-related reporting to Directive 2014/95/EU of the European Parliament and of the Council, which sets out a description of performance and risk policies linked to environmental issues.

   (iv) Directive (EU) 2022/2464 of the European Parliament and of the Council (hereinafter, "CSRD" -Corporate Sustainability Reporting Directive-), which reforms and extends the framework applicable to sustainability reporting by large companies and certain groups, as well as the regulations transposing it into Spanish law.

   (v) Regulation (EU) 2020/852 of the European Parliament and of the Council on the establishment of a framework to facilitate sustainable investment.

Article 7.- Responsibilities related to sustainability reporting

1. Notwithstanding any other duty that may be entrusted by the Board of Directors, the Sustainability and Climate Action Committee shall have the following powers regarding sustainability reporting:
   (i) Verify that the contents of the sustainability reporting is in line with the Company's sustainability strategy; and to monitor its implementation on an ongoing basis.

   (ii) Continuously supervise the process of preparation and submission of the Sustainability Report, without prejudice to the powers of the Audit Committee to supervise, prior to the preparation of the Annual Accounts, the process of preparation and presentation, as part of the management report, of the sustainability reporting.

   (iii) Report, prior to their submission to the Board of Directors, on the contents of the reports made public by the Company in matters of sustainability and, in any case, the contents of the Sustainability Report, ensuring the quality, clarity, coherence and integrity of the text and compliance with applicable regulations and international benchmarks.

   (iv) Oversee the preparation and publication of the specific and detailed annual report on the progress made by the Company in relation to the objectives set out in the Climate Action Plan, to be prepared in accordance with the recommendations of the Task Force on Climate-Related Financial Disclosures.

   (v) Supervise that the information published by the Company on its website on regarding matters within the jurisdiction of the Committee is sufficient and appropriate, taking into account the good governance recommendations assumed by the Company, in coordination with the Audit Committee and the Appointments, Remuneration and Corporate Governance Committee within the framework of their respective competences.

2. The Sustainability and Climate Action Committee shall fulfil the responsibilities provided for in this article in coordination, when necessary, with the Audit Committee.

Article 8.- Other responsibilities entrusted to the Sustainability and Climate Action Committee

The Sustainability and Climate Action Committee shall also have the following responsibilities:

1. Issue all corresponding reports and execute all actions within its jurisdiction, or at the request of the Board of Directors or its Chairman.

2. Participate in the selection process of the Sustainability Assurance provider which is the responsibility of the Audit Committee.

3. Promote a coordinated strategy for social action, sponsorship and patronage consistent with the Company's policies.

4. Follow up on the Company's presence in the most widely recognised sustainability indices and ratings.

The Sustainability and Climate Action Committee shall fulfil the responsibilities provided for in this article in coordination, when necessary, with the Audit Committee.

TITLE III

COMPOSITION OF THE SUSTAINABILITY AND CLIMATE ACTION COMMITTEE

Article 9.- Composition

1. The Sustainability and Climate Action Committee shall consist of five (5) members, who shall be appointed by the Board of Directors, subject to the law and the requirements set forth in the Company Bylaws, the Regulations of the Board of Directors and these Regulations, from among the non-executive Directors, the majority of whom shall be independent.

2. The Board of Directors and the Appointments, Remuneration and Corporate Governance Committee shall encourage diversity in the composition of the Committee as a whole, especially with regard to a balanced presence of men and women, their professional experience, their sectoral skills and knowledge, and their international experience and responsibilities, taking into account the constraints arising from the smaller size of the Committee compared to the Board.

Article 10.- Appointment of members and positions of the Committee

1. The members of the Sustainability and Climate Action Committee shall be appointed ensuring that they have the knowledge, skills and experience required for the functions that they may be called upon to undertake, specifically, in sustainability, environmental and social matters.

2. The Chairman of the Sustainability and Climate Action Committee shall be appointed from among the Independent Directors on the committee.

3. The Board of Directors shall appoint the members of the Sustainability and Climate Action Committee and its Chairman and Secretary by an absolute majority.

4. The Secretary of the Sustainability and Climate Action Committee may be one of its members or the Secretary or Deputy Secretary of the Board of Directors. In the latter case, the Secretary is not required to be a member of the Sustainability and Climate Action Committee.

Article 11.- Term of office

1. The members of the Committee shall hold office for as long as their appointment as Directors of the Company remains in force, unless the Board of Directors resolves otherwise.

2. Members of the Committee who are re-elected directors of the Company by resolution of the General Shareholders’ Meeting shall continue to hold office on the Committee without the need for a new election, without prejudice to the power of revocation vested in the Board of Directors.

Article 12.- Dismissal of the members of the Sustainability and Climate Action Committee

The members of the Committee shall cease to hold office:

(i) When they cease to be Directors of the Company.

(ii) When they cease to be non-executive directors, although maintaining their status as directors of the Company.

(iii) By resolution of the Board of Directors.

TITLE IV

FUNCTIONING OF THE SUSTAINABILITY AND CLIMATE ACTION COMMITTEE

Article 13.- Meetings of the Sustainability and Climate Action Committee

1. The Sustainability and Climate Action Committee shall meet as many times as necessary, in the opinion of its Chairman, for the exercising of its powers and at least four (4) times a year. It shall also meet at the request of at least two (2) of its members. The Chairman of the Board of Directors and Chief Executive Officer may request briefing sessions of the Sustainability and Climate Action Committee on an exceptional basis.

2. Notwithstanding the above, the Sustainability and Climate Action Committee shall meet whenever the Board of Directors asks for the issue of a report or approval of proposals within its remit and whenever, in the judgement of the Chairman of this Committee, it is appropriate for the good development of its purposes.

3. The meetings shall be scheduled by the Chairman of the Committee. To this end, an annual schedule shall be drawn up setting out the meetings planned for the year, as well as the most relevant matters to be dealt with. This shall constitute the annual work schedule of the Committee.

Article 14.- Holding of Meetings of the Sustainability and Climate Action Committee

1. The Sustainability and Climate Action Committee shall be validly constituted when the majority of its members are present at the meeting, in person or by proxy.

2. Resolutions shall be adopted by an absolute majority of the Directors attending the meeting (present or represented), with the Chairman casting the deciding vote in the event of a tie.

3. Without prejudice to the powers attributed to the Audit Committee, the Sustainability and Climate Action Committee, through its Chairman, may request the attendance of the Sustainability Assurance provider and of the Innovation, Sustainability and Climate Action Division at its meetings whenever it deems it appropriate, and at least on the occasion of the Sustainability Assurance process, whether annual or interim, in accordance with the provisions of section 1 of Article 7 above.

4. Through its Chairman, the Sustainability and Climate Action Committee may also summon any employee (including the senior management) of the Company and even arrange for any employee to appear without the presence of any manager. Employees shall be required to appear before it, attend its meetings and to provide it with their collaboration and access to all information required to fulfil its duties that may be available to them, when so requested by the Committee.

   The presence of senior management, employees or other executive or non-executive Directors, as well as third parties at Committee meetings shall require a prior invitation from the Chairman.

   Those invited to Committee meetings, and especially the Sustainability Assurance providers, shall not participate in the deliberation and voting phases, except in specific cases, which shall be recorded in the minutes, indicating their justification.

5. The Sustainability and Climate Action Committee shall draw up an annual report containing the activities performed by it, enabling the shareholders and other interested parties to understand the activities carried out by the Committee in the previous fiscal year. This annual report shall be published on the occasion of the convening of the General Shareholders' Meeting and shall be made available to shareholders and investors.

Article 15.- Resources

1. The Company shall provide the Sustainability and Climate Action Committee with sufficient resources to enable it to perform its duties and shall assist the

Sustainability and Climate Action Committee, among other duties, in scheduling meetings and agendas, drafting of documents and minutes of meetings, and the collection and distribution of information. Resource requirements shall be channelled through the Secretary of the Board of Directors.

2. For certain more complex matters, the Committee may, with the support of the Secretary of the Board of Directors, seek the advice, opinions or reports of experts in legal or sustainability matters or in any other field that it considers appropriate for the best performance of its duties.

3. The Board of Directors and the senior management shall ensure that the Committee has access to the Company's own information in an appropriate, timely and sufficient manner.

Article 16.- Assessment

1. As part of the Board's annual assessment, the Committee shall assess its performance autonomously, in order to strengthen its functioning and improve planning for the following year.

2. In the interests of transparency, the extent to which the assessment has led to significant changes in the organisation and internal procedures of the Sustainability and Climate Action Committee shall be publicly disclosed, and included in the Sustainability and Climate Action Committee's annual activity report.

TITLE V

RELATIONS OF THE COMMITTEE WITH OTHER CORPORATE BODIES AND WITH THE SUSTAINABILITY ASSURANCE PROVIDER

Article 17.- Relations with the Board of Directors and the General Shareholders' Meeting

1. Through its Chairman, the Committee shall report to the Board of Directors on the matters discussed and decisions taken at its meetings at the first subsequent meeting of the Board of Directors. All members of the Board of Directors shall have access to the minutes of the Committee's meetings.

2. After the close of each fiscal year, the Committee shall submit to the Board of Directors the annual report on its activities during the previous fiscal year provided for in section 5 of Article 14 of this Regulation.

3. At the General Shareholders' Meeting, the Committee shall report on the activities carried out during the year via the report referred to in section 5 of Article 14 of these Regulations and where appropriate, shall respond, through its Chairman, to the questions raised therein by shareholders on matters within its competence.

4. The annual report on the Committee's activities shall be published on the Company's website as provided for in Article 15.5 of these Regulations when the General Shareholders' Meeting is convened.

Article 18.- Relations with the Sustainability Assurance provider

1. Without prejudice to the powers of the Audit Committee regarding the assurance process of the mandatory sustainability reporting, the Committee's relations with the Sustainability Assurance provider shall be fluid, continuous and respectful of their independence, in accordance with the provisions of these Regulations and the regulations governing this activity.

2. In this regard, the Committee shall set, in an annual schedule of meetings, those in which the Sustainability Assurance provider shall participate, and in order to preserve their independence, the Sustainability Assurance provider shall not be invited to participate in the decision-making phase of the Committee's meetings.

Article 19.- Relations with the Audit Committee and other Committees

1. The Audit Committee and the Sustainability and Climate Action Committee shall meet jointly at least once a year, and whenever deemed appropriate, in order to

ensure coordination between the two Committees and the effectiveness of the Company's sustainability risk management and control systems.

2. The Chairmen of the Audit Committee and the Sustainability and Climate Action Committee, with the support of the Secretary of the Board of Directors, shall ensure smooth communication between the two Committees.

3. The Committee shall collaborate and liaise, as necessary, with other Committees of the Board.

TITLE VI

TRAINING

Article 20.- Welcome programme

1. The Committee shall ensure that the protocol for joining the Board of Directors includes the necessary information so that Board members who are also joining the Sustainability and Climate Action Committee have a minimum homogeneous knowledge of the Company and their active participation is facilitated from the outset.

2. This information shall include at least the following points:

   (i) Role of the Committee, its responsibilities and objectives.

   (ii) Functioning of the other committees of the Company.

   (iii) Expected time commitment for each member.

   (iv) Overview of the Company's business and organisational models and strategy: main business activities and segments; and most important policies of the Company in the area of sustainability.

   (v) Sustainability reporting obligations of the Company.

Article 21.- Training programme

The Committee shall have an annual training plan that ensures the updating of knowledge regarding the sphere of its responsibilities and especially regarding new developments in environmental and sustainability legislation;

TITLE VII

VALIDITY

Article 22.- Validity

These Regulations were approved by the Board of Directors at its meeting of 27 January 2026 and shall remain in full force and effect until amended.