

# 12.

## Methodology of this report

INITIAL INFORMATION AND  
TRACEABILITY

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SCOPE AND BOUNDARIES

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MATERIALITY AND PRINCIPLES  
OF THE ANALYSIS

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CONTENT REQUIRED BY LAW  
11/2018 ON NON-FINANCIAL  
INFORMATION AND DIVERSITY

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GRI CONTENT INDEX, GLOBAL  
COMPACT AND SDGS

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## INITIAL INFORMATION AND TRACEABILITY

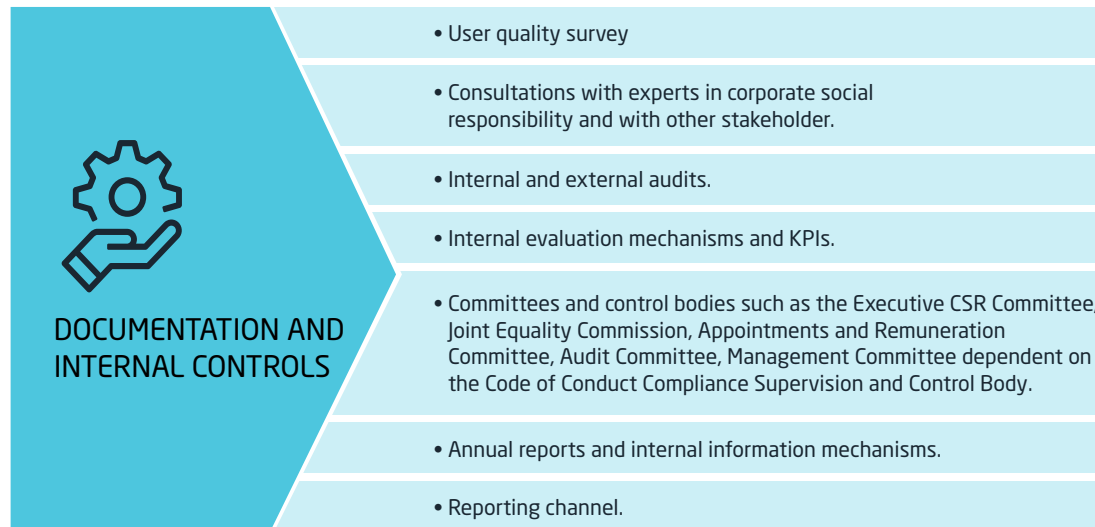
The Annual Corporate Responsibility Report is the result of the collaboration of all those responsible for the main areas of management of Aena. The work of coordination falls in the area of Corporate Responsibility.

This report has been developed in accordance with the GRI Standards: Exhaustive option. In addition, other information frameworks and guidelines have been taken as reference, such as the G4 supplement Airport Operators Sector Disclosures, also published by GRI, the United Nations Global Compact, Guiding Principles on Business and Human Rights of the United Nations, Sustainable Development Goals of the United Nations and Carbon Disclosure Project (CDP).

The content of the report describes the policies, results and risks as required by Law 11/2018, of 28 December, which modifies the Commercial Code, the revised text of the Capital Companies Law approved

by the Real Legislative Decree 1/2010, of 2 July, and Law 22/2015, of 20 July, on Audits of Accounts, regarding non-financial information and diversity. Aena, both for its status as a listed company and for the stipulations associated with its size, is obliged by this Law to disseminate certain contents whose location is listed in the table at the end of this chapter. The mandatory external verification report is published together with it.

All the content of this report is supported by documentation and internal controls, and covered by the policies and procedures incorporated into Aena's control systems that include:



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Abbreviations and acronyms

# Phases for the preparation of the report

1

Consultation of stakeholder groups and materiality analysis

- Internal agents
- External agents



2

Preparation of drafts

- All units



3

Review and consolidation

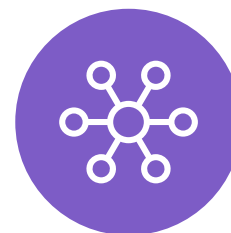
- All units



4

Final endorsement

- Board of Directors



5

Layout and dissemination

- External agents
- CR area



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## SCOPE AND BOUNDARIES

This report describes the results and progress of the company in economic, social and environmental matters, corresponding to the period between 1 January and 31 December 2018.

The significant impacts derived from the organisation's activities in the economic, environmental and social spheres, as well as those related to its services and commercial relations, have been classified into fifteen material issues, around which this report is developed. The results come from the materiality analysis carried out in 2017, for which different stakeholders participated through very diverse channels. In accordance with the international GRI standard, this report focuses on issues characterised as relevant, in order to favour conciseness, precision, comparability, etc.

In 2018, this analysis was updated with information from the usual tools that the company uses to communicate with its stakeholders. Likewise, the information on the economic situation was reviewed and information was incorporated on the matters included in Law 11/2018, which are summarised in a specific table of contents.

Given the nature and size of Aena's activities, all the relevant issues have an internal aspect, directly linked to the decisions of the organisation, and an external aspect, with impacts on the decisions of the stakeholders. The data provided on them come from Aena and public sources, since the company does not have access to data from other companies.

**In 2018, this analysis was updated with information from the usual tools that the company uses to communicate with its stakeholders.**



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Abbreviations  
and acronyms

# Aena materiality analysis

## MATERIALITY AND PRINCIPLES OF THE ANALYSIS

Aena's materiality analysis is the result of a process of reviewing and updating the analyses for 2016 and 2017, and adapting this to the sectorial context and the reality of the moment.

### REPORTING PRINCIPLES

#### Quality of the report

- Accuracy
- Balance
- Clarity
- Comparability
- Reliability
- Timeliness

#### Definition of contents

- Stakeholder inclusiveness
- Sustainability context
- Materiality
- Completeness

### STAKEHOLDERS

- CSR Experts
- Public administrations and regulatory bodies
- Shareholders, investors and analysts
- Service users (passengers, airlines, handling agents)
- Service providers and dealers
- Mass media
- Local community
- Society and NGOs
- Employees

### METHODOLOGY

1. Identifying trends and relevant issues for the sector and society as a whole taking into account its relationship with the company's strategic aims, the CSR strategy, risk analysis and the information demanded by the stakeholders.
2. Prioritising of the issues identified through the combination of an internal and external analysis of their relevance (please refer to materiality matrix).
3. Review and validation of material matters by the various management divisions of the company and approval by the Board of Directors.

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Relevant issues that make up the materiality matrix of the Aena Group

- CSR Strategy
- Profitability
- Open innovation culture
- Quality and service improvement
- Operational and airport security
- Control of suppliers
- Talent, working capacity and motivation
- Technological projects
- Human rights: commitment and due diligence
- Working conditions/Talent without labels
- Social contribution
- Ethics and transparency
- Mitigation of acoustic impact
- Energy and climate change

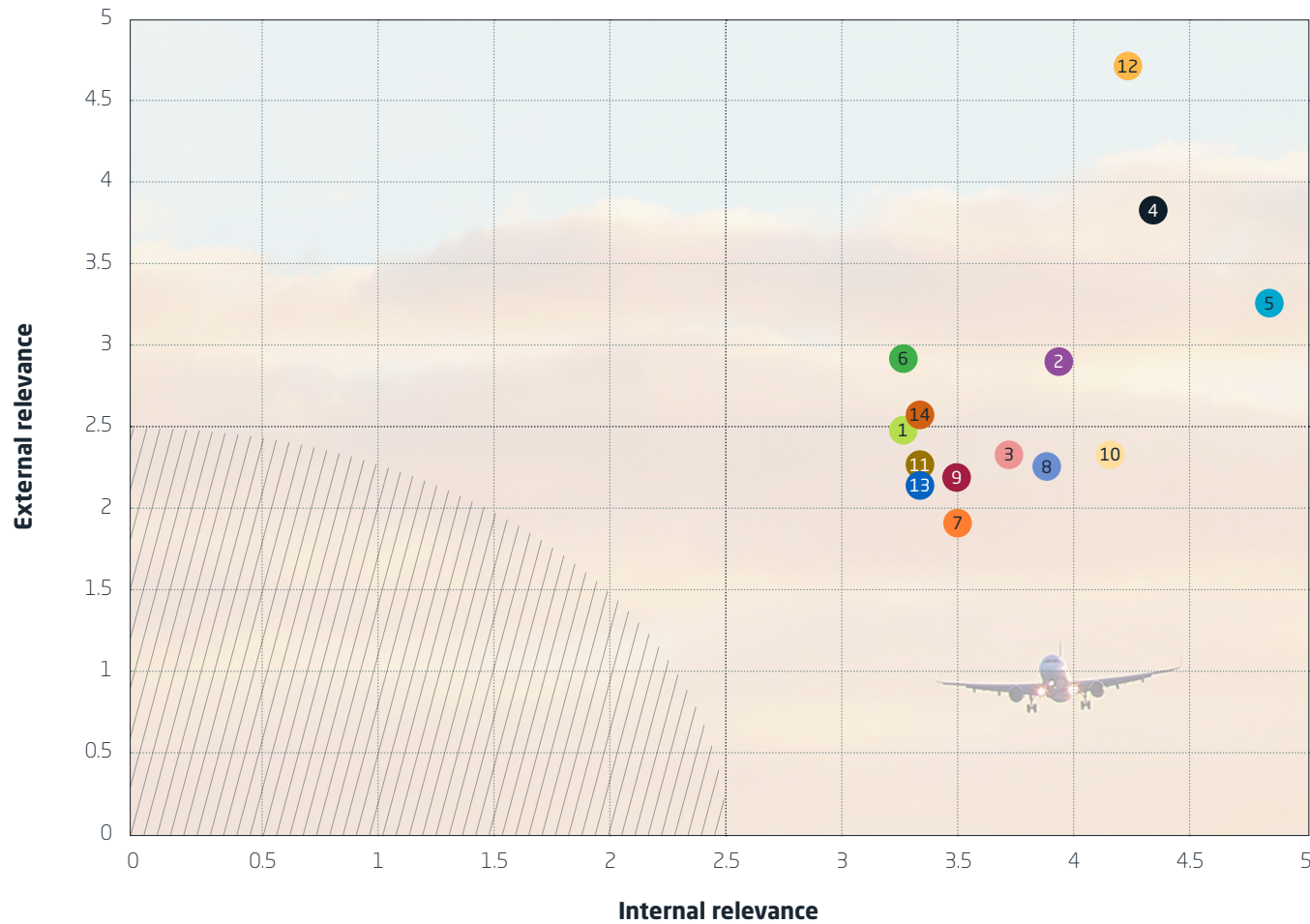


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## Materiality matrix



- 1 CSR Strategy
- 2 Profitability
- 3 Open innovation culture
- 4 Quality and service improvement
- 5 Operational and airport security
- 6 Control of suppliers
- 7 Talent, working capacity and motivation
- 8 Technological projects
- 9 Human rights: commitment and due diligence
- 10 Working conditions/Talent without labels
- 11 Social contribution
- 12 Ethics and transparency
- 13 Mitigation of acoustic impact
- 14 Energy and climate change



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Each of the issues identified has some degree of importance for decision-making in both Aena and its stakeholders:

AENA MATERIAL ASPECT	WHY IT IS MATERIAL?	GRI ASSOCIATED THEME
CSR Strategy	Aena wants to contribute to responsible tourism by making the services provide value to customers, shareholders and society in general. With this, it aims to ensure that it is perceived as a valuable company for its environment, that takes care of people and is transparent in its actions.	<ul style="list-style-type: none"> <li>• Indirect economic impacts</li> <li>• Local communities</li> <li>• Socioeconomic compliance</li> </ul>
Profitability	The DORA 2017-2021 regulates the maximum income per passenger, forcing the monitoring the costs in order to guarantee profitability. In addition, it imposes penalties in case of non-compliance with the deadlines for the completion of certain strategic investments.	<ul style="list-style-type: none"> <li>• Economic performance</li> <li>• Indirect Economic Impacts</li> </ul>
Open innovation culture	Creation of an innovative culture to be able to involve the rest of the company and add other partners that contribute to accelerate the innovation process of the companies.	<ul style="list-style-type: none"> <li>• Training and education</li> <li>• Local communities</li> </ul>
Quality and service improvement	The satisfaction and perception of the users determines the vast majority of opportunities for improvement and in the Spanish market may result in economic incentives/penalties as is duly stated in DORA 2017-2021.	<ul style="list-style-type: none"> <li>• Customer health and safety</li> </ul>
Operational and airport security	Airports are infrastructures sensitive to adverse weather conditions, which may be aggravated as a result of climate change, and to the risk of attacks, which may lead to a loss of operational capacity (delays, cancellations) and a high impact on efficiency and safety (accidents).	<ul style="list-style-type: none"> <li>• Customer health and safety</li> </ul>
Control of suppliers	The quality of service perceived by users depends to a large extent on the behaviour of the contractor companies. In addition, together with the human and labour rights of Aena, the ethical commitment is reinforced by extending these values to its supply chain.	<ul style="list-style-type: none"> <li>• Supplier environmental assessment</li> <li>• Freedom of association</li> <li>• Forced or compulsory labour</li> <li>• Supplier social assessment</li> </ul>
Talent, working capacity and motivation	It is essential to have a trained and committed staff to ensure the correct performance of the organisation against the new regulatory framework (DORA 2017-2021) in a growing environment of passenger volume and cost efficiency.	<ul style="list-style-type: none"> <li>• Training and education</li> </ul>
Technological projects	The integration between technology and business is a key factor for the competitiveness of the company.	<ul style="list-style-type: none"> <li>• Indirect economic impacts</li> </ul>

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Human rights: commitment and due diligence	The private sector is not an agent alien to social problems. Its activities have an impact on the well-being of the people who must be identified and controlled, as well as having mechanisms that allow an active contribution to make the fundamental human rights and labour rights promoted by the ILO a reality.	<ul style="list-style-type: none"> <li>• Security practices</li> <li>• Human rights assessment</li> <li>• Socioeconomic compliance</li> </ul>
Working conditions/Talent without labels <ul style="list-style-type: none"> <li>• Equality and diversity</li> <li>• Employee wellbeing</li> </ul>	<p>The diversity applied to talent in companies must not respond to quotas or prejudices, and instead to competencies, skills, experiences, knowledge, values and different attitudes contributed by people who complement each other to create a competitive team that responds to the needs of the market and society.</p> <p>Factors such as job stability, opportunities, communication, conciliation, recognition, convivial working environments, occupational health and safety or the connection with corporate values influence employees' performance rates.</p>	<ul style="list-style-type: none"> <li>• Employment</li> <li>• Occupational health and safety</li> <li>• Labor management relations</li> <li>• Diversity and equal opportunity</li> <li>• Non-discrimination</li> <li>• Socioeconomic compliance</li> </ul>
Social contribution	In addition to its impact on the economy and the creation of employment, air transport constitutes a strategic sector in terms of connectivity, accessibility, cohesion and territorial connection.	<ul style="list-style-type: none"> <li>• Indirect economic impacts</li> <li>• Acquisition practices</li> <li>• Local communities</li> </ul>
Ethics and transparency	Building a relationship of trust with stakeholders and demonstrating the company's responsibility is a fundamental pillar for competitiveness.	<ul style="list-style-type: none"> <li>• Anti-corruption</li> <li>• Anti competitive behavior</li> <li>• Public policy</li> <li>• Socioeconomic compliance</li> </ul>
Mitigation of acoustic impact	Acoustic impact is one of the most significant environmental effects of airport activity. The increase in air traffic and the growth of the population in the vicinity of airports contribute to increase the associated social problems.	<ul style="list-style-type: none"> <li>• Socioeconomic compliance</li> <li>• Exposure to noise</li> </ul>
Energy and climate change	The consequences of climate change affect the operational capacity and security of airports. If we add to this the scenario of the future Law of Climate Change and Energy Transition, advancements must be made in energy saving measures, implementation of renewables and the reduction of GHG emissions.	<ul style="list-style-type: none"> <li>• Energy</li> <li>• Emissions</li> <li>• Air quality</li> </ul>





## Other relevant issues

In reviewing its materiality analysis, Aena identified other issues that could be included in this report. However, since the relevance of all of them had not been evaluated, it was decided not to include them that year in the materiality matrix.

Of these issues, the following should be highlighted:

Other environmental issues	The environmental complaints received imply indications of risks that the organisation has to consider in its management. On the other hand, Law 11/2018 requires all companies subject to its requirements to report on their performance in certain environmental matters. The category 'Other environmental issues' includes those that are not materials for Aena, but on which the company must offer information in accordance with Law 11/2018, such as Water, Biodiversity, Effluents and waste.
Normative framework in labour matters	<p>The legal status of Aena as a state mercantile society generates limitations in the hiring of personnel, in the organisational development and in the compensation and alignment of interests.</p> <p>The risks arising from the current legal framework pose a competitive disadvantage compared to other private listed companies and also mean that they cannot cope with the new requirements arising from increased activity, functions, new roles and greater workload and responsibility, in an increasingly competitive and demanding environment.</p> <p>Aena wants to request a specific legal framework for listed commercial companies that have a majority participation of Public Administrations, which will not be subject to the application of the general rules that regulate the hiring, personal, budgetary, economic-financial, accounting and control of state mercantile companies of the institutional public sector, except for the external control of the Court of Accounts and the financial control of the General Intervention of the State Administration.</p>
Other issues	Special legal framework adapted to the uniqueness of Aena.
Shareholder remuneration	Aena's commitment to its shareholders is reflected in the company's remuneration to this stakeholders regarding dividends. In 2018, the Company distributed 80% charged to the profit/(loss) of Aena SME, S.A. of 2017, and within the framework of the Strategic Plan 2018-2021, it was approved to distribute 80% over the net profit for 2018, 2019 and 2019.
Allocation of capital	Aena has the capacity and resources to continue creating value for its shareholders, directly with the attractive dividend policy, as well as increasing the value of the Company through the development of the property business and international expansion, growth pillars included in the scope of the Strategic Plan 2018-2021.



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CONTENT INDEX  
REQUIRED BY LAW  
11/2018, OF 28  
DECEMBER, WHICH  
MODIFIES THE  
COMMERCIAL CODE,  
THE REVISED TEXT  
OF THE CAPITAL  
COMPANIES LAW  
APPROVED BY THE  
ROYAL LEGISLATIVE  
DECREE 1/2010,  
OF 2 JULY, AND LAW  
22/2015, OF 20  
JULY, ON AUDITS  
OF ACCOUNTS,  
REGARDING  
NON-FINANCIAL  
INFORMATION AND  
DIVERSITY.

## Business model description

SUBJECTS	PAGE/EXPLANATION	FRAMEWORK USED
Business environment.	3, 4, 7, 11, 167	GRI 102-2
Organisation and structure.	9, 10, 28, 48	GRI 102-18
Markets in which it operates.	8, 11	GRI 102-6
Objectives and strategies.	3, 4, 35, 36	GRI 102-14
Factors and trends that may affect your future evolution.	40, 41, 43, 44	GRI 102-15

## Description of the policies that the group applies with respect to these issues

SUBJECTS	PAGE/EXPLANATION	FRAMEWORK USED
Due diligence procedures applied to the identification, evaluation, prevention and mitigation of risks.	40, 41, 43, 44	GRI 103-2
Significant impacts and verification and control. Measures taken.	40, 41, 43, 44, 170, 171	GRI 103-1

## Results of the policies

SUBJECTS	PAGE/EXPLANATION	FRAMEWORK USED
Key indicators of relevant non-financial results that allow monitoring and evaluation of progress and favour comparability between companies and sectors.	GRI Index	GRI 102-54



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## Main related risks linked to the activities of the group

SUBJECTS	PAGE/EXPLANATION	FRAMEWORK USED
Commercial relationships, products or services that may have negative effects.	11, 40, 41, 43, 44	GRI 102-2
How the group manages these risks.	38-44	GRI 103-2
Procedures used to detect and evaluate them.	38, 39	GRI 103-3
Information on the impacts that have been detected and their breakdown, in particular on the main risks in the short, medium and long term.	38-44	GRI 102-46, GRI 102-47

## Information on environmental issues

SUBJECTS	PAGE/EXPLANATION	FRAMEWORK USED
Current and foreseeable effects of the company's activities on the environment.	112, 113	GRI 103-2
Current and foreseeable effects of the company's activities on health and safety.	73, 74 and 75	GRI 103-2
Environmental evaluation or certification procedures.	114, 115	GRI 103-3
Resources dedicated to the prevention of environmental risks.	117 Environmental report 2017	GRI 103-3
Principle of precaution.	38-44, 114, 115	GRI 102-11
Quantity of provisions and guarantees for environmental risks.	Consolidated accounts and management report 2018	GRI 103-3
Pollution.	Measures to prevent, reduce or repair carbon emissions that seriously affect the environment.	120-126
	Any form of air pollution specific to an activity, including noise and light pollution.	116-119, 127 GRI Index

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SUBJECTS		PAGE/EXPLANATION	FRAMEWORK USED
Circular economy and prevention and waste management.	Prevention, recycling, reuse, recovery and elimination of waste.	128	GRI 419-Aena 1
	Actions to combat food waste.	It is not significant.	Not applicable
Sustainable use of resources.	Water consumption and water supply according to local limitations.	127	GRI 419-Aena 1
	Consumption of raw materials and measures adopted to improve the efficiency of their use.	It is not significant.	Not applicable
	Consumption, direct and indirect, of energy.	120 GRI Table	GRI 302-1, GRI 302-2
	Measures taken to improve energy efficiency.	120 GRI Table	GRI 302-3, GRI 302-4
	Use of renewable energies.	121-123 GRI Table	GRI 302-1
Climate change.	Important elements of greenhouse gas emissions generated as a result of the activities of the company and the use of the goods and services it produces.	121-123 GRI Table	GRI 305-1, GRI 305-2, GRI 305-3, GRI 302-5
	Measures taken to adapt to the consequences of climate change.	40, 41, 121-126	GRI 201-2
	Reduction goals established voluntarily in the medium and long term to reduce greenhouse gas emissions and the means implemented for that purpose.	113, 126	GRI 305-5
Protection of biodiversity.	Measures to preserve or restore biodiversity.	128	GRI 419-Aena 1
	Impacts caused by activities or operations in protected areas.	128	GRI 419-Aena 1, GRI-A09



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## Information on social and staff issues

SUBJECTS		PAGE/EXPLANATION	FRAMEWORK USED
Employment	Total number and distribution of employees by sex, age, country and professional category.	89, 90, 100	GRI 102-8
	Total number and distribution of work contract modalities.	100	GRI 102-8
	Annual average of permanent contracts, temporary contracts and part-time contracts by sex, age and professional category.	100	GRI 102-8
	Number of dismissals by sex, age and professional category.	191	GRI 401-1
	The average remunerations and their evolution disaggregated by sex, age and professional categories or equal value.	98	GRI 405-2
	Wage gap.	98	GRI 405-2
	The remuneration of equal or average jobs in the company.	98	GRI 405-2
	The average remuneration of directors and executives, including variable remuneration, allowances, compensation, payment to long-term savings systems and any other perception disaggregated by sex.	29	GRI 102-38
	Implementation of 'right to disconnect' policies for employees.	102, 103	GRI 401-2, GRI 401-3
	Employees with disabilities.	101	GRI 405-1
Work organisation	Working time organisation.	The Working Day and the work regime is included in Chapter 10 of the 1st Collective Agreement of the Aena Group.	GRI 401-2, GRI 401-3
	Number of hours of absenteeism;	GRI table	GRI 403-2
	Measures designed to facilitate the enjoyment of work/life balance and encourage joint responsibility of these by both parents.	102, 103	GRI 401-2, GRI 401-3
Health and safety	Health and safety conditions in the workplace	104, 105	GRI 403-2, GRI 403-3, GRI 403-4
	Work accidents, in particular their frequency and severity, as well as occupational diseases; disaggregated by sex.	105, GRI table	GRI 403-2, GRI 403-3
Social relationships	Organisation of social dialogue, including procedures for informing and consulting staff and negotiating with them.	106	GRI 402-1, GRI 403-1, GRI 403-4
	Percentage of employees covered by collective agreement by country.	106	GRI 102-41
	The balance of collective agreements, particularly in the field of health and safety at work.	106	GRI 403-4

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SUBJECTS		PAGE/EXPLANATION	FRAMEWORK USED
Training	The policies implemented in the field of training.	87, 91-93	GRI 404-2
	The total amount of training hours by professional categories.	92	GRI 404-1
Universal accessibility for people with disabilities.		80, 109-110	GRI 405-1
Equality	Measures taken to promote equal treatment and opportunities between women and men.	102, 103, 109-110	GRI 405-1, GRI 405-2
	Equality plans (Chapter 3 of Organic Law 3/2007, of 22 March, for the effective equality of women and men).	99, 108	GRI 405-1, GRI 405-2
	Measures taken to promote employment.	108, 110	GRI 405-1, GRI 405-2, GRI 413-1
	Protocols against sexual and gender-based harassment, integration and universal accessibility for people with disabilities.	24, 25, 26, 99, 108	GRI 405-1, GRI 405-2
	The policy against all types of discrimination and, where appropriate, management of diversity.	24, 25, 26, 99, 108	GRI 405-1, GRI 405-2, GRI 406-1

## Information on respect for human rights

SUBJECTS		PAGE/EXPLANATION	FRAMEWORK USED
Application of due diligence procedures in the field of human rights.		56-57	GRI 102-16, GRI 102-17, GRI 412-2
Prevention of the risks of violation of human rights and, where appropriate, measures to mitigate, manage and repair possible abuses.		56-57	GRI 102-16, GRI 102-17, GRI 412-2
Complaints about cases of violation of human rights.		57 There were none in 2018.	GRI 102-17
Promotion and compliance with the provisions of the fundamental conventions of the International Labour Organization related to respect for freedom of association and the right to collective bargaining.		55, 106	GRI 102-16, GRI 407-1, GRI 408-1, GRI 409-1
The elimination of discrimination in employment and occupation.		24, 25, 26, 54	GRI 406-1, GRI 102-12
The elimination of forced or compulsory labour.		54	GRI 102-12, GRI 102-16, GRI 102-17
The effective abolition of child labour.		54	GRI 102-12, GRI 102-16, GRI 102-17



## Information related to combating corruption and bribery

SUBJECTS	PAGE/EXPLANATION	FRAMEWORK USED
Measures taken to prevent corruption and bribery.	24, 25, 26	GRI 205-1, GRI 205-2, GRI 205-3
Measures to combat money laundering.	24, 25, 26	GRI 205-1, GRI 205-2, GRI 205-3
Contributions to foundations and non-profit entities.	130	GRI 201-1 GRI 413-1

## Information about the company

SUBJECTS	PAGE/EXPLANATION	FRAMEWORK USED	
Commitments of the company with sustainable development.	The impact of society's activity on employment and local development.	142-154	GRI 413-1, GRI 413-2
	The impact of society's activity on local populations and in the territory.	142-154	GRI 413-1, GRI 413-2
	The relationships maintained with the actors of the local communities and the modalities of dialogue with them.	48, 50, 51, 116-119, 139-142	GRI 102-43, GRI 413-1, GRI 413-2
	The association or sponsorship actions.	139-142	GRI 102-13, GRI 413-1, GRI 413-2
Subcontracting and suppliers.	The inclusion in the purchasing policy of social issues, gender equality and environmental issues.	27, 148	GRI 308-1, GRI 414-1
	Consideration in the relations with suppliers and subcontractors of their social and environmental responsibility.	148	GRI 308-1, GRI 414-1
	Supervision systems and audits and their results.	57, 149	GRI 308-1, GRI 414-1
Consumers.	Measures for the health and safety of consumers.	73, 74, 75	GRI 416-1, GRI 416-2
	Claims systems, complaints received and resolution of them.	76, 114	GRI 103-3
Tax information.	The benefits obtained country by country.	12	GRI 201-1, GRI 201-4
	Taxes on benefits paid.	147	GRI 201-1, GRI 201-4
	The public subsidies received.	GRI table	GRI 201-1, GRI 201-4



## GRI CONTENT INDEX, GLOBAL COMPACT AND SDGS

GRI STANDARD	DESCRIPTION	GLOBAL COMPACT	SDG	LOCATION/CONTENT	OMISSIONS/NOTES
<b>GRI 101: Foundations 2016</b>					
<b>GRI 102 General Disclosures 2016</b>					
<b>ORGANIZATIONAL PROFILE</b>					
102-1	Name of the organization			p. 7	
102-2	Activities, brands, products and services			p. 11	
102-3	Location of headquarters			C/ Arturo Soria 109. 28043 Madrid	
102-4	Location of operations			p. 8	
102-5	Ownership and legal form			p. 7	
102-6	Markets served			p. 11	
102-7	Scale of the organisation			p. 12, 13, 14, 65	
102-8	Information on employees and other workers		8, 10	p. 89, 90 , 100, 101 Sources of data: SAP HR, internal sources, London-Luton Airport. On the other hand, in Aena, SME, S.A., there are no workers from temporary employment agencies.	
102-9	Supply chain		8	p. 148-152	The type of suppliers can be consulted in the internal standard for general contracts. In the Aena Suppliers Portal, you can consult the bids and contracts. Commercial services are also contracted as described in Aena's commercial contracting standard. The bids and contracts can be consulted at the Aena Company Portal.
102-10	Significant changes to the organisation and its supply chain			p. 148-152 In 2018, a new Chairman of the Board of Directors was appointed.	
102-11	Precautionary principle or approach	7		p. 38-44, 114, 115	
102-12	External incentives			p. 139, 140	
102-13	Membership of associations			p. 141, 142	



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GRI STANDARD	DESCRIPTION	GLOBAL COMPACT	SDG	LOCATION/CONTENT	OMISSIONS/NOTES
<b>STRATEGY</b>					
102-14	Statement from senior decision-maker			p. 3	
102-15	Key impacts, risks and opportunities	6, 7, 10		p. 21, 40, 41	
<b>ETHICS AND INTEGRITY</b>					
102-16	Values, principles, standards, and norms of behaviour	1 to 10	16	p. 23-25	
102-17	Mechanisms of advice and concerns about ethics	1, 2, 10	16	p. 23, 26	
<b>GOVERNANCE</b>					
102-18	Governance Structure			p. 9, 10, 28	
102-19	Delegating authority			p. 10	
102-20	Executive-level positions with responsibility for economic, social and environmental topics			p. 10	
102-21	Consulting stakeholders on economic, environmental and social issues		16	p. 50	
102-22	Composition of the highest governance body and its committees		5.16	p. 28	
102-23	Chair of the highest governing body		16	p. 10	
102-24	Nominating and selecting of the highest governance body		5, 16	p. 29	
102-25	Conflicts of interest		16	p. 28	Aspect regulated in the Regulations of the Board of Directors.
102-26	Role of highest governance body in setting, values and strategy			p. 9	

102-27	Collective knowledge of highest governance body			<p>The existing training plans include:</p> <ul style="list-style-type: none"> <li>Block 1: Compliance/regulation: sessions on a new regulation for public procurement are proposed; EU Regulation on the Protection of Personal Data.</li> <li>Block 2: Business: sessions on digital transformation and new business models are proposed; cybersecurity; acoustic impact of airport infrastructure - comparative legislation; strategic plans.</li> </ul> <p>Informative sessions on 'Acoustic Impact of Airport Infrastructures' and on 'Airport Tariffs' were held.</p> <p>In addition, given that in 2018 there were several changes in the composition of the Board of Directors, the following information sessions were held for the new directors: Corporate governance; main trends in the airport sector.</p>	
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GRI STANDARD	DESCRIPTION	GLOBAL COMPACT	SDG	LOCATION/CONTENT	OMISSIONS/NOTES
<b>GOVERNANCE</b>					
102-28	Evaluating the highest governance body's performance			p. 29	
102-29	Identifying and managing of economic, environmental and social impacts	1, 7, 10	16	p. 40, 41, 43, 44, 170, 171	
102-30	Effectiveness of risk management processes	1, 2, 7, 10	16	p. 39	
102-31	Review of economic, environmental and social topics	1, 2, 7, 10		p. 38	
102-32	Highest governance body's role in sustainability reporting			p. 166	
102-33	Communicating critical concerns			p.23, 26, 27	
102-34	Nature and total number of critical concerns			p. 170, 171	
102-35	Remuneration policies			p. 29 Report on corporate governance of Aena.	
102-36	Process for determining remuneration			p. 29	
102-37	Stakeholders' involvement in remuneration			Not applicable	The status of a state company means that the remuneration of the CEO and senior executives of Aena SME, S.A. is regulated by the General Budgets of the State.
102-38	Annual total compensation ratio			Not available	This information will be included in future reports.
102-39	Percentage increase in annual total compensation ratio			Not available	This information will be included in future reports.
<b>STAKEHOLDER ENGAGEMENT</b>					
102-40	List of stakeholders groups			p. 50	
102-41	Collective bargaining agreements	3,4,6	8	p. 106	
102-42	Identifying and selecting stakeholders			p. 48	
102-43	Approach to stakeholder engagement			p. 48-50	
102-44	Key issues and concerns raised			p. 170, 171, 172	
<b>REPORTING PRACTICE</b>					
102-45	Entities included in the consolidated financial statements			p. 7 Annual accounts and Management Report 2018.	
102-46	Defining report content and topic boundaries			p. 167	
102-47	List of material topics			p. 170, 171	



GRI STANDARD	DESCRIPTION	GLOBAL COMPACT	SDG	LOCATION/CONTENT	OMISSIONS/NOTES
<b>REPORTING PRACTICE</b>					
102-48	Restatements of information			Any restatement of information collected in previous reports is explained in each case. Information from reports prior to 2017 was limited to the parent company, and since 2017 it is included insofar as is possible with Luton.	
102-49	Changes in reporting			p. 167 No changes were made that affect the comparability with previous reports.	
102-50	Reporting period			2018	
102-51	Date of most recent report			2017	
102-52	Report cycle			Annual	
102-53	Contact point for questions regarding the report			rc@aena.es	
102-54	Claims of reporting in accordance with GRI Standards			p. 167	
102-55	GRI Index			p. 179	
102-56	External assurance			The external assurance of the CSR 2018 Report exclusively covers the obligations derived from Law 11/2018. The internal control and verification systems of the organisation guarantee the veracity of the information.	
<b>103 - MANAGEMENT APPROACH 2016</b>					
103-1	Explanation of the material topic and its boundary			p. 170, 171	
103-2	The management approach and its components	1 to 10		p. 10, 26, 54, 59, 62, 72, 73, 74, 87, 88, 108, 112, 113, 129, 148, 156, 157	
103-3	Evaluation of the management approach	1 to 10		p. 10, 26, 54, 59, 62, 72, 73, 74, 76, 87, 88, 108, 112, 113, 129, 148, 156, 157, Table GRI-8	
<b>200 - ECONOMIC IMPACTS</b>					
<b>201 - ECONOMIC PERFORMANCE 2016</b>					
201-1	Direct economic value generated and distributed		5,8,9	p. 144	
201-2	Financial implications and other risks and opportunities due to climate change		13	40, 41	This information will be expanded on in future reports.
201-3	Defined benefit plan obligations and other retirement plans			Not available	This information will be included in future reports.
201-4	Financial assistance received from the Government			Aena did not receive subsidies, tax credits or credits or financial incentives from the government in 2018.	



GRI STANDARD	DESCRIPTION	GLOBAL COMPACT	SDG	LOCATION/CONTENT	OMISSIONS/NOTES
<b>203 - INDIRECT ECONOMIC IMPACTS 2016</b>					
203-1	Infrastructure investments and services supported		5, 9,11	p. 69, 153, 154	
203-2	Significant indirect economic impacts		1,3,8	p. 143-154	
<b>204 - PROCUREMENT PRACTICES 2016</b>					
204-1	Proportion of spending on local suppliers		8	p. 148	
<b>205 - ANTI-CORRUPTION 2016</b>					
205-1	Operations assessed for risks related to corruption	10	16	p. 43, 44	
205-2	Communication and training about anti-corruption policies and procedures	10	16	Through the Aena intranet, an online course may be accessed on the organisation's code of conduct.	
205-3	Confirmed incidents of corruption and measures taken	10	16	None	
<b>206 - ANTI-COMPETITIVE BEHAVIOR 2016</b>					
206-1	Legal actions for anti-competitive behavior, anti-trust and monopoly practices		16	None	
<b>300 - ENVIRONMENTAL IMPACTS</b>					
<b>302-ENERGÍA 2016</b>					
302-1	Energy consumption within the organisation	7, 8, 9	7, 8, 12, 13	p. 120 Internal energy consumption (Gj) and Total itemised consumption in TABLE GRI-1	
302-2	Energy consumption outside the organisation			Not available	The necessary information cannot be obtained as it is beyond the scope of the organisation.
302-3	Energy intensity	7, 8, 9	7, 8, 12, 13	p. 120	The full year traffic data for London-Luton Airport were not available at the closing time of this report.
302-4	Reduction of energy consumption	7, 8, 9	7, 8, 13	Table GRI-2	
302-5	Reduction in energy requirements of products and services			Not applicable	The services offered by Aena do not entail energy consumption by the end user.



GRI STANDARD	DESCRIPTION	GLOBAL COMPACT	SDG	LOCATION/CONTENT	OMISSIONS/NOTES
<b>305-EMISIONES 2016</b>					
305-1	Direct GHG emissions (scope 1)	7, 8, 9	3, 12, 13, 14, 15	p. 121, Table GRI-4	
305-2	Energy indirect GHG emissions (scope 2)	7, 8, 9	3, 12, 13, 14, 15	p. 121, Table GRI-5	
305-3	Other indirect GHG emissions (scope 3)	7, 8, 9	3, 12, 13, 14, 15	p. 122	
305-4	GHG Emissions intensity	7, 8, 9	13, 14, 15	p. 121	
305-5	Reduction of GHG emissions	7, 8, 9	13, 14, 15	p. 121, Table GRI-6	
305-6	Emissions of ozone-depleting substances			Not applicable	The direct emissions of ozone-depleting substances are not significant, and neither are those of nitrogen oxides (NOx) nor sulphur oxides (SOx). Air quality is controlled by immission measurements and it is not possible to distinguish the amount of pollutants from Aena's activities. No legislation applies to the direct emissions into the atmosphere from Aena's activity.
305-7	Nitrogen oxides (NOx), sulphur oxides (SOx) and other significant air emissions			Table GRI-7	
<b>307 - ENVIRONMENTAL COMPLIANCE 2016</b>					
307-1	Non-compliance with environmental laws and regulations.	7	16	In relation to the contentious-administrative appeal against Aena, ENAIRE and the Ministry of Public Works filed by some residents of the town of Ciudad Santo Domingo (Algete, Madrid), the Ninth Section of the Contentious-Administrative Chamber of the Superior Court of Justice of Madrid, in the court order of 30 July 2018, the sentence issued in 2008 was considered to be executed regarding the noise caused by the flights of the Adolfo Suárez Madrid-Barajas airport as there was an evident reduction of noise pollution.	
<b>OTHER ENVIRONMENTAL ISSUES LINKED TO AIRPORT MANAGEMENT</b>					
A09	Number of impacts with wild animals per 10,000 movements	7	15	Table GRI-3	
A07	Exposure to noise			p. 116-119	


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GRI STANDARD	DESCRIPTION	GLOBAL COMPACT	SDG	LOCATION/CONTENT	OMISSIONS/NOTES
<b>400 - SOCIAL IMPACTS</b>					
<b>401-EMPLOYMENT 2016</b>					
401-1	New employee hires and employee turnover	6	5, 8, 10	p. 95, 96. TABLE GRI-9	
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	6	3, 5, 8	p. 102-104	
401-3	Parental leave	6	5, 8	p. 101	
<b>402- LABOR-MANAGEMENT RELATIONS 2016</b>					
402-1	Minimum notice periods regarding operational changes		8	Not available	This information will be included in future reports
<b>403-OCCUPATIONAL HEALTH &amp; SAFETY 2016</b>					
403-1	Workers representation in formal joint management-worker health and safety committees	3	8	p. 104	
403-2	Types of injury and rates of injury, occupational diseases, lost days and absenteeism, and number of work-related fatalities		3, 8	p. 105 The number of total absenteeism hours in 2018 was 675,918.33.	
403-3	Workers with high incidence or high risk of diseases related to their occupation		3, 8	No occupational diseases were detected	
403-4	Health and safety topics covered in formal agreements with trade unions		3, 8	p. 94, 106	
<b>404-TRAINING AND EDUCATION 2016</b>					
404-1	Average hours of training per year per employee		4, 5, 8, 10	p. 92	
404-2	Programs for upgrading employee skills and transition assistance programs		8	p. 91, 92	
404-3	Percentage of employees receiving regular performance and career development reviews		5, 8, 10	p. 98	


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GRI STANDARD	DESCRIPTION	GLOBAL COMPACT	SDG	LOCATION/CONTENT	OMISSIONS/NOTES
<b>405-DIVERSITY AND EQUAL OPPORTUNITY 2016</b>					
405-1	Diversity of governance bodies and employees.	6	5, 8	p. 100, 101, 110	
405-2	Ratio of basic salary and remuneration of women to men	6	5, 8, 10	There are no salary differences due to gender	
<b>406-NON-DISCRIMINATION 2016</b>					
406-1	Incidents of discrimination and corrective actions taken	6	5, 8	p. 99	
<b>407-FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING 2016</b>					
407-1	Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	3	8	Not applicable	For the sector (public) and legal framework of the geographical areas where it operates (Europe), they have not been identified as significant risks associated with the violation of the rights of freedom of association and collective bargaining. Due to the eminently local nature of the supply chain, the same risks are assumed for suppliers.
<b>409-FORCED OR COMPULSORY LABOR 2016</b>					
409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labor	4	8	p.43	
<b>410-SECURITY PRACTICES 2016</b>					
410-1	Security personnel trained in human rights policies or procedures	1, 2	16	Not available	Security is a concession and it is outside the scope of the organisation to control the human rights training of the employees of the concessionaire company.
<b>412-HUMAN RIGHTS ASSESSMENT 2016</b>					
412-1	Operations that have been subject to human right reviews or impact assessments	1, 2		p. 43-44	
412-2	Employee training on human rights policies or procedures	1, 2		p. 57	There is a course accessible from the intranet in relation to the code of conduct in place at Aena SME, S.A.
412-3	Significant investment agreements and contracts that include human right clauses or that underwent human rights screening	1, 2		p. 57	



GRI STANDARD	DESCRIPTION	GLOBAL COMPACT	SDG	LOCATION/CONTENT	OMISSIONS/NOTES
<b>413-LOCAL COMMUNITIES 2016</b>					
413-1	Operations with local community engagement, impact assessment and development programmes		8, 17	p. 133-154	
413-2	Operations with significant actual and potential negative impacts, on local communities	1, 2		p. 116-119	
<b>414-SUPPLIER SOCIAL ASSESSMENT 2016</b>					
414-1	New suppliers were screened using social criteria		5, 8, 16	p. 149	
414-2	Negative social impact in the supply chain and actions taken		5, 8, 16	p. 40, 41, 43, 44, 149	
<b>415-PUBLIC POLICY 2016</b>					
415-1	Political contribution		16	The Aena Code of Conduct prohibits the financing of parties and/or political representatives.	
<b>416-CUSTOMER HEALTH AND SAFETY 2016</b>					
416-1	Assessment of the health and safety impacts of product and service categories			p. 40, 41, 43, 44, 78	
416-2	Incidents of non-compliance concerning the health and safety impacts of products and services		16	p. 76, 114	
<b>418-CUSTOMER PRIVACY 2016</b>					
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data		16	p. 76, 163	
<b>419-SOCIOECONOMIC COMPLIANCE</b>					
419-1	Non-compliance with laws and regulations in the social and economic area		16	At the date of preparation of this Report, Aena SME, S.A. has not committed any breach of laws and/or regulations in the social and economic fields.	The sanctioning procedures in social matters, initiated in 2018, of an amount equal to or greater than €5,000 have not become final in administrative proceedings in the period covered by the report.
419- Aena 1	Information required by Law 11/2018, regarding non-material topics for Aena included in the GRI Guide		16	p. 127, 128, p. 173	Aena's indicator related to compliance with the legal obligations of non-financial information.





## Table GRI-1

### GRI 302: Energy 2016

#### CONTENT 302-1: ENERGY CONSUMPTION WITHIN THE ORGANISATION

302-1.A. SPANISH NETWORK		2016	2017	2018
Fuel Consumption (Gj)	Diesel	149,845	154,070	192,710
	Petrol	1,604	1,995	2,241
	Natural Gas	140,264	152,552	163,915
	Propane	1,201	1,153	1,036
	Kerosene	1,399	1,992	2,178
	<b>Subtotal</b>	<b>294,313</b>	<b>311,762</b>	<b>362,081</b>
Energy consumption (Gj)	Electricity	3,333,244	3,395,244	3,385,854
	Heating	231,134	210,011	213,872
	Cooling	383,585	425,017	402,666
	<b>Subtotal</b>	<b>3,947,963</b>	<b>4,030,273</b>	<b>4,002,392</b>
<b>TOTAL ENERGY CONSUMPTION (GJ)</b>		<b>4,242,276</b>	<b>4,342,035</b>	<b>4,364,472</b>
Energy generated from renewable sources (Gj)	Wind power	9,579	8,071	9,278
	Solar power/ photovoltaics	1,379	1,600	1,509
	Solar thermal energy	286	424	29
	Geothermal	95	140	156
	<b>Subtotal</b>	<b>11,340</b>	<b>10,235</b>	<b>10,972</b>
Energy consumed from renewable sources (Gj)	Wind power	8,319	7,497	8,324
	Solar power/ photovoltaics	1,277	1,479	1,416
	Solar thermal energy	286	424	29
	Geothermal	95	140	156
	<b>Subtotal</b>	<b>9,978</b>	<b>9,540</b>	<b>9,925</b>
Energy sold from renewable sources (Gj)	Wind power	1,261	574	954
	Solar power/ photovoltaics	102	121	93
	Solar thermal energy	0	0	0
	Geothermal	0	0	0
	<b>Subtotal</b>	<b>1,362</b>	<b>695</b>	<b>1,047</b>

302-1.B. LONDON-LUTON AIRPORT			
Fuel consumption	2016	2017	2018
Gas oil (litres) (1)	418,854	478,343	495,233
Petrol (litres) (2)	0	0	
Gas (kWh)	9,794,458	8,747,622	9,365,134
Propane (litres)	3,912	5,559	3,755
Butane (m <sup>3</sup> )	0	0	0
Aviation kerosene (litres) (3)	0	0	0
Other non-renewable resources	0	0	0

(1) Vehicles, heating and electricity

(2) Petrol vehicles, if applicable.

(3) Fire drills, if applicable.

Energy consumption (kWh)	2016	2017	2018
Electricity	36,185,751	36,726,846	35,975,300
Heating	9,794,458	8,747,622	9,365,134
Cooling	0	0	0
Steam	0	0	0

Notes: Densities, LCVs and provisional 2018 emission factors. Source of combustible densities: Royal Decree 61/2006, of 31 January, which determines the specifications of petrol, gas oils, fuel oils and liquefied petroleum gases and regulates the use of certain biofuels. Royal Decree 1088/2010, of 3 September, which modifies Royal Decree 61/2006, of 31 January, regarding the technical specifications of petrol, gas oils, use of biofuels and sulphur content of fuels for maritime use. Iberian association of natural gas for mobility. GHG Protocol. Source of lower calorific values (LCV). MITECO, 'Emission factors: Carbon footprint record, compensation and carbon dioxide absorption projects', April 2018 (Version 10), data for the corresponding year. IDAE table of calorific values of the main energy sources, [http://www.idae.es/uploads/documentos/documentos\\_PCL\\_Combustibles\\_Carburantes\\_final\\_valores\\_Update\\_2014\\_0830376a.xlsx](http://www.idae.es/uploads/documentos/documentos_PCL_Combustibles_Carburantes_final_valores_Update_2014_0830376a.xlsx) Conversion GJ: 1 kWh = 0.0036 GJ

Heating and cooling energy consumption correspond to the energy consumption for air conditioning in T4/T4S of the Adolfo Suárez Madrid-Barajas Airport from the energy surplus generated by the SAMPOL cogeneration plant (currently under concession).



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Table GRI-2

302-4: REDUCTION OF ENERGY CONSUMPTION			
Spanish Network	2017	2018	Variation (%)
Consumption (GJ)	4,342,035	4,364,072	0.5%
Reduction of consumption (kWh/ATU)	2.53	2.41	-5.0%
London-Luton Airport	2017	2018	
Reduction of electricity consumption (kWh)	268,147	751,546	

Table GRI-3

TOTAL ANNUAL NUMBER OF WILDLIFE IMPACT EVENTS PER 10,000 AIRCRAFT MOVEMENTS		
	2017	2018
Network of Spanish airports	4.46	4

Table GRI-4

 CONTENT 305-1:  
DIRECT GHG EMISSIONS  
(SCOPE 1)

	2016				2017				2018			
	CO <sub>2</sub> (t)	CH <sub>4</sub> (t)	N <sub>2</sub> O(t)	CO <sub>2</sub> e(t)	CO <sub>2</sub> (t)	CH <sub>4</sub> (t)	N <sub>2</sub> O(t)	CO <sub>2</sub> e(t)	CO <sub>2</sub> (t)	CH <sub>4</sub> (t)	N <sub>2</sub> O(t)	CO <sub>2</sub> e(t)
Diesel	11,103.480	0.2699	0.2704	11,190.8206	11,416.5580	0.2705	0.2850	11,508.2428	14,279.8392	0.3195	0.3591	14,394.8314
Petrol	111.1671	0.0321	0.0074	114.1705	138.2380	0.0397	0.0091	141.9285	155.2923	0.0447	0.0102	159.4574
Natural Gas	7,868.8089	0.1450	0.1387	7,913.7605	8,603.9354	0.1577	0.1508	8,652.8252	9,244.8047	0.1694	0.1621	9,297.3360
Propane	76.3836	0.0010	0.0046	77.7911	73.3309	0.0010	0.0047	74.7458	65.9137	0.0009	0.0039	67.0856
Electricity	102.1576	0.0029	0.0033	103.2152	145.4480	0.0041	0.0047	146.9537	158.9996	0.0045	0.0051	160.6456
<b>TOTAL</b>	<b>19,261.9972</b>	<b>0.4509</b>	<b>0.4245</b>	<b>19,399.7578</b>	<b>20,377.5102</b>	<b>0.4731</b>	<b>0.4542</b>	<b>20,524.6960</b>	<b>23,904.8494</b>	<b>0.5390</b>	<b>0.5404</b>	<b>24,079.3560</b>

Notes: Provisional emission factors 2018.  
 Source of emission factors: MITECO, EMEP/EEA (Corinair), US EPA, US FAA.  
 Global Warming Potential Source (GWP): IPCC AR4 (2007).  
 Global Warming Potential Source (GWP): IPCC AR4 (2007).  
 Consolidation approach for emissions: Operational control.


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Table GRI-5

**CONTENT 305-2  
INDIRECT GHG EMISSIONS  
WHEN GENERATING  
ENERGY (SCOPE 2)**

	DIRECT GHG EMISSIONS (SCOPE 2)											
	2016				2017				2018			
	CO <sub>2</sub> (t)	CH <sub>4</sub> (t)	N <sub>2</sub> O(t)	CO <sub>2</sub> e(t)	CO <sub>2</sub> (t)	CH <sub>4</sub> (t)	N <sub>2</sub> O(t)	CO <sub>2</sub> e(t)	CO <sub>2</sub> (t)	CH <sub>4</sub> (t)	N <sub>2</sub> O(t)	CO <sub>2</sub> e(t)
Electric power	299,662.9288	0.0000	0.0000	299,662.9288	207,199.2417	0.0000	0.0000	207,199.2417	212,699.40	0.00	0.00	212,699.40
Heating and cooling energy	31,821.8822	0.0000	0.0000	31,821.8822	31,411.9905	0.0000	0.0000	31,411.9905	31,411.99	0.00	0.00	31,411.99
<b>TOTAL</b>	<b>331,484.8110</b>	<b>0.0000</b>	<b>0.0000</b>	<b>331,484.8110</b>	<b>238,611.2322</b>	<b>0.0000</b>	<b>0.0000</b>	<b>238,611.2322</b>	<b>244,111.39</b>	<b>0.00</b>	<b>0.00</b>	<b>244,111.39</b>

Notes: Provisional emission factors 2018.  
 Provisional heating and cooling emissions 2018.  
 Source of emission factors: REE, MITECO.  
 Global Warming Potential Source (GWP): IPCC AR4 (2007).  
 Consolidation approach for emissions: Operational control.

Table GRI-6

	GHG EMISSIONS AVOIDED IN THE SPANISH NETWORK (EQUIVALENT CO <sub>2</sub> TONNES)		
	2016	2017	2018
Emissions avoided (Scope 1)*	127	249	289
Emissions avoided (Scope 2)*	651	693	773
<b>TOTAL</b>	<b>331,484.8110</b>	<b>0.0000</b>	<b>0.0000</b>

\* Emissions avoided thanks to the implementation of renewable energy facilities.


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## Table GRI-7

### CONTENT 305-7: NITROGEN OXIDES (NOX), SULPHUR OXIDES (SOX) AND OTHER SIGNIFICANT AIR EMISSIONS

NITROGEN OXIDES (NOX), SULPHUR OXIDES (SOX) AND OTHER SIGNIFICANT AIR EMISSIONS																		
	2016						2017						2018					
	NOx(t)	SOx(t)	CO(t)	NMVOC(t)	PM10(t)	PM2.5(t)	NOx(t)	SOx(t)	CO(t)	NMVOC(t)	PM10(t)	PM2.5(t)	NOx(t)	SOx(t)	CO(t)	NMVOC(t)	PM10(t)	PM2.5(t)
Diesel	58.8995	5.2577	18.6324	4.3300	3.7675	3.4911	63.0204	5.3548	19.9423	4.7504	4.0223	3.7533	78.2753	7.0907	24.7358	5.9542	5.0388	4.6797
Petrol	0.5384	0.0004	3.5703	0.4630	0.0012	0.0012	0.6625	0.0005	5.0497	0.5813	0.0015	0.0015	0.7473	0.0005	5.4063	0.6506	0.0017	0.0017
Natural Gas	10.3795	0.0940	4.0677	3.2261	0.1094	0.1094	11.2889	0.1022	4.4240	3.5087	0.1190	0.1190	12.1297	0.1098	4.7535	3.7700	0.1279	0.1279
Propane	0.0817	0.0007	0.0597	0.0509	0.1010	0.1010	0.0804	0.0007	0.0505	0.0425	0.0697	0.0697	0.0692	0.0006	0.0560	0.0482	0.1054	0.1054
Kerosene	0.1627	0.0329	21.7263	0.6537	4.9098	4.9098	0.2316	0.0469	30.9330	0.9307	6.9904	6.9904	0.2532	0.0512	33.8151	1.0174	7.6417	7.6417
<b>TOTAL</b>	<b>70.0619</b>	<b>5.3857</b>	<b>48.0563</b>	<b>8.7237</b>	<b>8.8889</b>	<b>8.6124</b>	<b>75.2838</b>	<b>5.5051</b>	<b>60.3995</b>	<b>9.8137</b>	<b>11.2029</b>	<b>10.9339</b>	<b>91.4747</b>	<b>7.2529</b>	<b>68.7667</b>	<b>11.4404</b>	<b>12.9154</b>	<b>12.5563</b>

Notes: Source of emission factors: EMEP/EEA (Corinair).

## Table GRI-8

### 103-3: EVALUATION OF THE MANAGEMENT APPROACH

COMPLAINTS MECHANISMS AT LONDON-LUTON AIRPORT	
	2018
Complaints received in 2018	8,247

## Table GRI-9

NUMBER OF DISMISSALS BY SEX AND AGE IN 2018				NUMBER OF DISMISSALS BY CATEGORY IN 2018	
	% over 45 years	% between	Total		
Men	2	0	2	Coordinators	1
Women	1	1	2	Technicians	2
<b>TOTAL</b>	<b>3</b>	<b>1</b>	<b>4</b>	Support Staff	1
				<b>TOTAL</b>	<b>4</b>



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# APPEN- DICES

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# External verification report



## INDEPENDENT ASSURANCE REPORT ON THE NON-FINANCIAL INFORMATION STATEMENT

(Free translation from the original in Spanish.  
In case of discrepancy, the Spanish language version prevails.)

To the shareholders of AENA S.M.E., S.A.:

According to article 49 of the Commercial Code, modified by Law 11/2018, of December 28, we have carried out an order for a verification, with a limited assurance scope, of the State of Consolidated Non-Financial Information (hereinafter NFIS) for the year ended December 31, 2018, of AENA S.M.E., S.A. and subsidiaries (hereinafter, the Group).

The NFIS is included in the *Non-Financial Information Statement: Corporate Responsibility Report 2018*, which is part of the Management Report and is presented separately, including information additional to that required by article 49 of the current Commercial Code. This additional information has not been subject of assurance. The information that constitutes the NFIS of the Group and that has been the subject of our assurance work is referenced to its position in *Non-financial Information Statement: Corporate Responsibility Report 2018*, in Chapter 12 of that document.

### Responsibility of the Board of Directors and Management

The AENA's Board of Directors is responsible for the approval and content of the NFIS included in the *Non-financial Information Statement: Corporate Responsibility Report 2018*. The NFIS has been prepared in accordance with the prevailing mercantile regulations and the criteria of the Global Reporting Initiative (GRI) standards. For the contents in which GRI has not been referenced, the criteria taken into account are specified.

The Board of Directors are also responsible of the mechanisms and processes for obtaining information and preparing the NFIS, and includes the design, implementation and maintenance of such internal control as they determine is necessary to enable the preparation of a NFIS that is free from material misstatement, whether due to fraud or error.

### Our responsibility

Our responsibility is to express our conclusions in an independent limited assurance report based on the work performed, on the information collected exclusively in the

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Abbreviations and acronyms



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NFIS and corresponding to the financial year 2018. The data for previous years were not subject to the verification required by prevailing mercantile regulations.

We conducted our review engagement in accordance with International Standard on Assurance Engagements, "Assurance Engagements other than Audits or Reviews of Historical Financial Information" (ISAE 3000), issued by the International Auditing and Assurance Standard Board (IAASB) of the International Federation of Accountants (IFAC)

As established by the aforementioned standards, the procedures performed in a limited assurance engagement are smaller in scope and extent and, therefore, the safety provided is also lower than that provided by a reasonable assurance work and the present assurance report can only be understood in these terms.

The procedures we perform in the assurance work, are based on our professional judgement, and included making inquiries of management, the review of the processes for compiling and validating the information, the application of analytical procedures and sample review testing of the information included in the NFIS, as is described below.

- Meetings with Group personnel to know the business model, policies and management approaches applied, the main risks related to these issues and obtain the necessary information for the external review
- Analysis of the scope, relevance and integrity of the content included in the NFIS according to their importance, as expressed in prevailing mercantile regulations. The Group has established the importance of the aspects to be reported in the NFIS, based on the materiality analysis described in Chapter 12 of the *Non-financial Information Statement: Corporate Responsibility Report 2018*.
- Analysis of the processes for compiling and validating the data presented in the 2018 Non-Financial Information Statement.
- Review of information regarding the risks, policies and management approaches applied in relation to the material aspects presented in the NFIS.
- Checking, through tests, based on a selection of a sample, of the information related to the content of the 2018 NFIS and its correct compilation from the data provided.

**Our independence and quality control**

We have complied with the independence and other ethical requirements of our Code of Ethics for Professional Services for the Assurance of Non-financial Information which

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is based on the fundamental principles of integrity, objectivity, professional competence, diligence, confidentiality and professionalism.

Our firm applies International Standard on Quality Control 1 (ISQC 1) and thus maintains a global quality control system that includes documented policies and procedures related to compliance with ethical requirements, professional standards and applicable legal and regulatory requirements. Our firm applies international standard ISO 14001 to minimise the environmental impact of our services.

The engagement team was comprised of professional specialised in reviews of non-financial information and, specifically, in information on environmental, social and human resources issues, human rights, anti-corruption and bribery measures and the relationship between companies and society.

**Conclusion**

Based on the assurance procedures performed and the evidences obtained, nothing has come to our attention that cause us to believe that the NFIS of the Group for the year ended 31 December 2018 has not been prepared, in all material respects, in accordance with prevailing mercantile regulations regarding non-financial information and the criteria of the selected GRI standards, as well as other criteria described in the NFIS.

**Use and Distribution**

This report has been prepared in response to the requirement established in the prevailing mercantile regulations in Spain at the date of its issuance, and may not be suitable for other purposes and jurisdictions.

On 26 February 2019

VALORA CONSULTORES DE GESTIÓN, S.L.



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Abbreviations  
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# Abbreviations and acronyms

## ABC

Automated Border Control

## A-CDM

Airport Collaborative Decision Making.

## ACI

Airports Council International.

## AdP

Aéroports de Paris.

## AECID

Spanish Agency of International Cooperation for Development.

## AERCE

Spanish Association of Procurement, Contracting and Procurement Professionals.

## AESA

State Air Safety Agency.

## PPP

National Infrastructures Agency.

## API

Public-Private Partnership

## APU

Auxiliary Power Unit.

## A-SMGCS

Advanced-Surface Movement Guidance and Control Systems.

## ASQ

Airport Service Quality.

## ATM

European air traffic management system.

## ATU

Parameter that reflects the activity of an airport, taking into account its aircraft, passengers and the annual cargo volume.  $ATU = \text{Passengers} + (100 * \text{Aircraft}) + (10 * \text{Tonnes of cargo})$

## BIM

Building Information Modelling.

## CAA

Civil Aviation Authority.

## CAE

Coordination of business activities.

## Chap.

Chapter.

## CDM

Collaborative Decision Making.

## CDP

Carbon Disclosure Project.

## CEDDET

Centre for Distance Learning for Economic and Technological Development.

## CERMI

Spanish Committee of Representatives of People with Disabilities.

## CNMV

National Securities Market Commission.

## DART

Direct Air to Rail Transport.

## DART

Direct Air to Rail Transfer.

## dB

Decibels.

## Human Rights

Human rights.

## EIS

Environmental Impact Statement.

## Head of

Director

## DORA

Airport Regulation Document.

## EDS

Explosive detection system.

## EMMA

Mobility surveys in air mode.

## PPE

Personal Protection Equipment.

## GAP

Grupo Aeroportuario del Pacífico.



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Abbreviations and acronyms



**GBP**

Pound sterling.

**GHG**

Greenhouse gases.

**IG**

Interest group.

**GRI**

Global Reporting Initiative.

**GSE**

Ground service vehicles.

**HAH**

Heathrow Airport Holdings Ltd.

**IIRC**

International Integrated Reporting Council.

**Inc.**

Increase.

**KPIs**

Key Performance Indicators.

**LLAOL**

London Luton Airport Operations Ltd.

**LTO**

Landing and Take-Off.

**M**

Million.

**SNM**

Strategic Noise Maps.

**Maintenance**

Maintenance.

**N/A**

Not applicable.

**NSP**

Network Service Provider.

**ICAO**

International Civil Aviation Organization.

**OCSO**

Operational Safety Central Office.

**SDG**

Sustainable Development Goals.

**ILO**

International Labour Organisation.

**NGO**

Non-Governmental Organisation.

**PSO**

Public Service Obligations.

**PAE**

Employee Service Programme.

**Pax**

Passengers.

**PRM**

Passengers with reduced mobility.

**ORP**

Occupational Risk Prevention

**CR**

Corporate Responsibility

**RD**

Royal Decree.

**RE**

Regulation

**REE**

Red Eléctrica de España.

**RESA**

Runway End Safety Area.

**REVLA**

Aena Bidders Voluntary Register.

**MGR**

Minimum guaranteed rents.

**RPAS**

Remotely Piloted Aircrafts.

**HR**

Human Resources.

**SM**

Social media.

**RFFS**

Rescue and Fire Fighting Services.

**ICT**

Information and Communication Technology.

**TRLCSP**

Consolidated text of the Law on Contracts of the Public Sector.

**FVU**

Flight Verification Unit.



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Abbreviations and acronyms



**Your opinion matters**

Send your suggestions and queries to:

[rc@aena.es](mailto:rc@aena.es)

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