Rules for Operation of the Electronic Shareholders' Forum

I. Introduction

Pursuant to the provisions of Section 539.2 of the Corporate Enterprises Law, AENA, S.M.E., S.A., (hereinafter "AENA", the "Company" or the "Administrator") approves these Rules for Operation (hereinafter the "Rules") of the Electronic Shareholders' Forum of AENA (hereinafter the "Forum") that will be made available on the Company's website (www.aena.es) from the call for and until the holding of each General Meeting of Shareholders.

II. Rules of the Forum

These Rules govern how AENA will enable and make the Forum available and the warranties and terms and conditions for access to and use of it by the shareholders of AENA and by any voluntary associations that may be established under current legislation.

With respect to the Forum these Rules supplement the terms and conditions for access and use contained in the Disclaimer on the website of AENA www.aena.es which shall be fully applicable to access to and use of the Forum in all matters not otherwise amended by or inconsistent with the provisions of these Rules.

AENA reserves the right to amend the design, settings, operation and contents of the Forum, the terms and conditions for accessing and using it and these Rules at any time and without prior notice, without prejudice to any other provision of law.

III. Acceptance of the Rules of the Forum

By registering as a user of the Forum ("Registered User") and accessing and/or using it the user fully and unreservedly accepts the terms and conditions set out in these Rules and the terms and conditions for access and use contained in the Disclaimer on the website of AENA www.aena.es.

AENA shall be the administrator of the Forum (hereinafter the "Administrator") under the conditions and with the powers provided for in these Rules and reserves the right to interpret the latter in case of any doubts or disputes in the use of the Forum.

IV. Objective and purpose of the Forum

The Forum is provided for the sole purpose of assisting with communication between validly registered shareholders and voluntary associations of AENA (individuals and legal entities and any voluntary associations that may be established) from the call for and until the holding of each General Meeting of Shareholders.

As a result Registered Users may send communications for posting in the Forum whose sole purpose is:

- Proposals it is wished to include as a supplement to the Agenda announced in the call.
- Requests to adhere to such proposals.
- Initiatives to reach a sufficient percentage to exercise a minority right under the Law.
- Voluntary proxy offers or requests.

However, the Forum is not a mechanism for online electronic conversation among the Company's shareholders and the voluntary associations that may be established or a virtual chat room. Equally the Forum is not a communication channel between the Company and its shareholders and any associations that may be established.

Under no circumstances may any communication sent to or posted in the Forum be construed as a notice to the Company for any purpose, and specifically for the purpose of exercising any rights that shareholders individually or collectively hold, and nor shall it replace compliance with the requirements established by the Law, the Company Bylaws, the internal regulations of the Company or any relationship there may be between the Company and such shareholders for exercising rights and powers or notification of any circumstances. Such rights, powers or notifications must be exercised or made through the channel established by law, contract or regulation and the Forum shall in no event constitute a valid channel for such purpose.

Thus in no case shall the posting of a supplementary proposal for the agenda on the Forum in and of itself entail acceptance thereof or as a consequence the amendment of the agenda announced in the notice of the General Meeting

Pursuant to Article 16 of the Company Bylaws and Section 519 of the Corporate Enterprises Law, shareholders who request the publication of a supplement to the notice of the Ordinary General Meeting including one or more items on the agenda must represent at least three percent of the share capital. These rights must be exercised within five days following the publication of the call by duly authenticated notice sent to the following address:

AENA, S.M.E., S.A.
Secretary's Office of the Board Of Directors
C/ Peonías nº 12
28042 Madrid

Likewise, shareholders representing the same percentage may within the time period and in the manner prescribed submit proposals based on resolutions regarding matters already included or to be included in the agenda.

V. Registered Users

Access to and use of the Forum is reserved exclusively to individual shareholders of AENA and to voluntary associations of shareholders of the Company validly established and registered in the special registry created for this purpose at the National Securities Market Commission (Comisión Nacional del Mercado de Valores) pursuant to Section 539.4 of the Capital Companies Act.

In order to access and use the Forum, such shareholders and voluntary associations of shareholders must register as a "Registered User" by filling in the corresponding form to

register as a Registered User of the Forum, providing evidence of their status as a shareholder of AENA or of a voluntary association of shareholders duly established and registered with the National Securities Market Commission (Comisión Nacional del Mercado de Valores) in the manner set out in such form.

In the case of shareholders that are legal entities and from voluntary associations of shareholders, evidence of the proxy power of the person wishing to access the Forum shall be provided in the registration form in the manner set out therein.

Users may be required to fill in a special use form for subsequent access to and communications in the Forum.

Access to and use of the Forum by Registered Users is subject at all times to their continuing to be a shareholder of AENA pursuant to applicable regulations or as a voluntary association of shareholders that is duly established and registered.

If AENA as the Forum Administrator has reasonable doubts at any time regarding compliance with these conditions by any Registered User, it may request such user to provide evidence that such conditions are being met and it may ask for any information or documents it considers appropriate for verification of the circumstances set out herein.

The Administrator may ask for additional information from, suspend or remove Registered Users that fail to demonstrate compliance with such conditions to its satisfaction.

All communications sent by shareholders that cease to be shareholders prior to the holding of the corresponding General Meeting shall automatically be removed as shall all communications relating to or connected with them.

VI. Access to the Forum and publication of communications

1. Access to the Forum

All registered users may access the Forum and view the communications posted by other registered users.

The Forum only publishes the communications posted by Registered Users in connection with the issues set out in section IV of these Rules and does not constitute a means of electronic conversation among Registered Users or a virtual chat room. As a result the Administrator will only include in the Forum communications which are admissible under the law and pursuant to the corporate governance system of AENA and no other comments regarding such communications shall be posted in the Forum.

2. Posting communications in the Forum

All Registered Users may send communications regarding any of the issues set out in section IV above.

The communications shall be sent only in text format and once posted may be viewed by any other Registered User.

All communications are sent by Registered Users in their personal capacity and, except in the case of associations of shareholders duly authorised under the law and these Rules, no communications will be posted which are received from representatives of shareholders, shareholder pools and agreements, custodians, financial brokers or other persons acting on behalf of or in the interest of shareholders.

Requests to post communications must be made by filling in the forms available in the Forum for this purpose, which shall include:

- Identification of the Registered User sending the communication.
- Wording of the communication, precisely stating the content of the initiative.
- Brief description of the rationale for the communication.

All communications posted in the Forum shall include the identification details of the Registered User sending it: full name in the case of individuals; corporate name in the case of legal entities; and name and registration number in the registry maintained by the National Securities Market Commission (Comisión Nacional del Mercado de Valores) in the case of associations of shareholders, as well as in the latter two cases the identification details of their respective representatives. The date and time of posting shall also be stated.

By sending a communication the Registered User responsible for it represents and warrants that its content is lawful and complies with the provisions of the law and these Rules and the requirements of good faith, and that such Registered User has all the approvals and permissions required to send the communication concerned and that it does not infringe the rights of any third party.

The Administrator may check that any communications Registered Users wish to post comply with the law, these Rules and the requirements of good faith and may refuse to accept or may remove from the Forum any communication that it deems to be inconsistent therewith. It may also answer any communication sent by Registered Users by replying to the email address provided by the Registered User or by any other means of communication it deems appropriate.

3. Content of communications

Any use of the Forum by Registered Users shall fully comply with the law, these Rules and the requirements of good faith. As a result it is expressly forbidden to:

- Infringe the rights, property and lawful interests of AENA, other Registered Users and third parties, such as their intellectual and industrial property rights, freedom of religion, reputation, good name, privacy, the protection of personal data or any other property, rights or interests protected by law.
- Enter the personal information or details of third parties without the consentimiento expreso ~~informed consent~~ of the data subject or commit identity theft.
- Enter contents or expressions which are discriminatory, racist, sexist, violent, xenophobic or otherwise hurtful or offensive.
- Enter any kind of materials which are inappropriate or contrary to the requirements of good faith.
- Provide information of any kind intended to be used to commit criminal, civil or administrative offences.
- Carry out any kind of activities or provide information to third parties that make it possible to circumvent the technical restrictions that are built into the Forum's media and programs in order to prevent any unauthorised use.

- Include contents or materials without the approval of the holders of the intellectual and industrial property rights to such contents or materials.

- Damage, disable, overload or impair the operation of the Forum or the computer equipment of AENA, other Registered Users or third parties, as well as the documents, files and contents of any kind stored on such computer equipment (hacking), or prevent the normal use and enjoyment of the Forum by other Registered Users.

Placing any kind of publicity or advertisement by Registered Users is absolutely forbidden.

Any Registered User that becomes aware of any contents included in or provided through the Forum which are contrary to the law, the provisions of these Rules or the requirements of good faith may report such contents to the Administrator via the contact mailbox referred to in the contact mailbox section, although such reporting shall not entail any liability for AENA even when it does not take any action with respect to such contents.

Registered Users agree to use the Forum diligently, properly and in compliance with applicable law, these Rules and the requirements of good faith consistent with the purpose of the Forum as set out in section IV above.

4. Removal of communications after the General Meeting

Once a General Meeting of Shareholders has ended, the Administrator reserves the right to remove and delete all communications relating to it.

VII. Scope of the Forum

The Forum is not a channel for communication between AENA and Registered Users.

Consequently no communication sent to or posted on the Forum may in any way be construed as a notice to AENA for any purpose, and specifically for the purpose of exercising any rights that Registered Users individually or collectively hold, and nor shall it replace compliance with the requirements established by law and the corporate governance regulations of AENA for the exercise of any such rights or for the conduct of the initiatives and activities of shareholders.

Shareholders shall exercise all their rights and powers through the legally established instruments and pursuant to the provisions of the law and the corporate governance regulations of AENA and the Forum shall in no event constitute a valid instrument for this purpose.

VIII. Administrator's liability

1. Extent of the liability of AENA

AENA accepts no liability for the accuracy, truthfulness, validity, lawfulness or relevance of the communications sent by Registered Users or for the opinions expressed by them.

AENA shall only be liable for its own services and the contents directly produced by it and identified with its copyright notice as a trademark or as intellectual or industrial property of AENA.

By accessing and/or using the Forum, all Registered Users represent that they acknowledge and agree that they shall be solely and exclusively liable for their use of the Forum.

2. Contents

Any Registered User may send communications about any of the issues set out in section IV above.

The Administrator expressly reserves the right to deny access to and/or use of the Forum and not publish or remove communications sent by Registered Users that are in breach of legal provisions, these Rules or the requirements of good faith.

The Administrator has the power but not the duty to monitor the use of the Forum and its contents, which are the sole responsibility of the Registered Users sending them. In all circumstances the Administrator may put in place tools to filter and moderate the contents of the communications and also remove contents when it believes they may be unlawful or contrary to the provisions of these Rules or the requirements of good faith.

Registered Users shall be liable for any damages that AENA, any other Registered User or any third party may suffer as a consequence of access to and/or use of the Forum (specifically including the sending of communications) which is in breach of any of the provisions of applicable law, these Rules or the requirements of good faith.

IX. No licence

AENA authorises Registered Users to use the intellectual and industrial property rights associated with the software application installed on the server of AENA or a third party that runs the features making up the Forum solely for the purposes established in section IV above and pursuant to the terms and conditions set out in these Rules. Registered Users shall refrain from obtaining or attempting to obtain access to or use of the Forum and its contents by means or procedures other than those made available to them or indicated for such purpose in each case.

AENA does not grant any kind of licence or permission to use its intellectual or industrial property rights or to any other property or right related to the Forum other than as specified in the preceding paragraph.

X. Cost of use

Access to and use of the Forum by Registered Users is free, although the Registered User's telecom service provider's rates may apply.

~~XI. Security and data protection~~

~~The security and data protection provisions of the terms and conditions for access and use of AENA's website (www.aena.es) shall apply to the Forum. In particular, all personal information provided by Registered Users or generated as a consequence of the use of~~

~~the Forum will be processed by the Company in order to establish, manage and supervise the operation of the Forum pursuant to the provisions of these Rules and applicable law.~~

~~Registered Users expressly acknowledge and accept that their personal information may be published in the Forum.~~

~~Registered Users may exercise their rights to view, change, delete and object to the use of their personal information and to withdraw their consent to the release of their personal information to companies in the Aena Group by contacting the Central Data Protection Office (OCPD – Oficina Central de Protección de Datos), C/ Peonías nº 12, 28042 Madrid or by emailing **ocpd@aena.es**, stating the right they wish to exercise and enclosing or attaching as applicable a photocopy or scanned copy of their identity card, passport or other document identifying them.~~

XI. Política de privacidad

Se le informa que, Aena S.M.E S.A., como responsable del tratamiento, inscrito en el Registro Mercantil de Madrid, Tomo 28806, Folio 211, Sección 8 , Hoja M-518648 con CIF A86212420 y sito en la Calle Peonías 12, 28042, Madrid, tratará los datos personales facilitados por los Usuarios Registrados (accionistas individuales de AENA y asociaciones voluntarias de accionistas) en el momento del registro y durante su participación en el Foro Electrónico de Accionistas o que sean facilitados, tanto por las entidades de crédito y empesas de servicios de inversión en la que dichos accionsitas tengan depositadas o custodiadas sus acciones como por enteidades que, de acuerdo con la normativa reguladora de del mercado de valores, hayan de llevar los registros de los valores representados por medio de anotaciones en cuenta, con las siguientes finalidades:

- Con la finalidad de gestionar el desarrollo, cumplimiento y control de la relación accionarial existente en lo relativo a la Convocatoria y celebración de la Junta General de Accionistas, el deber de información a los accionistas por parte de la sociedad, comunicación con los accionistas, gestión de votaciones, gestión de relaciones institucionales y para el correcto funcionamiento y gestión del Foro Electrónico de Accionistas, conforme a lo establecido en estas Normas y su normativa aplicable, incluyendo, sin carácter limitativo, la publicación o difusión de sus datos personales en el Foro. El tratamiento se basa en el consentimiento del Usuario Registrado al darse de alta en el servicio, en virtud de lo establecido en la Ley de Sociedades de Capital donde se establece la posibilidad de realizar las comunicaciones entre la sociedad y los socios, incluyendo la posible remisión de documentos, solicitudes y demás información, a través de medios electrónicos, siempre que dichas comunicaciones se acepten por el socio

- Con la finalidad de control interno y gestión del cumplimiento de obligaciones derivadas de la normativa aplicable en materia de sociedades de capital, Mercado de Valores, Transparencia y Acceso a la Información pública y Buen Gobierno, y Código Unificado de Buen Gobierno para las sociedades cotizadas, con base en el interés público.

Los datos serán conservados mientras usted sea Usuario Registrado, así como durante el plazo en que pueda surgir una reclamación. No se prevén cesiones ni transferencias internacionales, salvo obligación legal.

Los Usuarios Registrados podrán ejercitar sus derechos de acceso, rectificación, supresión, oposición, limitación del tratamiento y portabilidad, cuando procedan, así como retirar su consentimiento (en el supuesto de que el tratamiento se base en su consentimiento), a través de la siguiente dirección de correo electrónico: ocpd@aena.es o dirigiendo un escrito a Calle Peonías 12, 28042, Madrid, así como a través del Portal de Servicios Telemáticos (https://serviciostelematicos.aena.es). Para cualquier duda relacionada con protección de datos, puede contactar con nuestro Delegado de Protección de Datos mediante el siguiente correo electrónico: dpd@aena.es También puede, en cualquier momento, presentar una reclamación ante la Agencia Española de Protección de Datos.

XII. Contact mailbox

Registered Users who have suggestions or proposals to improve the Forum, need technical support, wish to report contents that are in breach of these Rules or would like to exercise their rights under data protection regulations may write to the Company's email address that will be included in the Forum to that end. The purpose of this mailbox is to assist Registered Users and enhance the quality of the Forum and does not entail any kind of control by or liability for the Administrator.