



September 2021

# **SUSTAINABILITY POLICY OF AENA, S.M.E., S.A.**



## **1. INTRODUCTION**

For Aena S.M.E., S.A. (hereinafter, "**Aena**" or the "**Company**"), sustainability is understood as the commitment to social progress, environmental balance and economic growth, which must permeate the business model itself and guide the Company's actions.

Accordingly, through this Sustainability Policy (hereinafter, the "**Policy**"), Aena endorses its commitment to corporate responsibility and sustainability, and reaffirms the focus of its activity on the creation of long-term value for all its stakeholders, ensuring that its activity is carried out in accordance with a set of values, principles, criteria and attitudes that foster sustainable social and environmental development, and encouraging the implementation and development of its ethical principles based on integrity and transparency.

## **2. SCOPE AND APPLICATION**

This Policy is applicable to Aena and to any of the companies integrated in its group (under the terms established in article 42 of the Commercial Code) (the "**Aena Group**").

Due to the cross-cutting nature of sustainability, this Policy is shaped as the framework of reference setting out the principles that guide the Company's actions, especially in environmental and social matters, for which reason it is developed and complemented by the other Corporate Policies that address specific issues relating to respect for human rights, diversity, fiscal responsibility, stakeholder management, prevention of corruption and other illegal conduct, and stakeholder management, among others.

## **3. PURPOSE**

The Policy aims to define and establish the principles, commitments, objectives and strategy to be followed by the Company to carry out its activity, optimising the contribution to sustainable development and covering current needs without compromising those of future generations, creating long-term value, maximising positive impacts and minimising negative impacts on society and the environment throughout the entire value chain, through ethical and transparent conduct.

The following are also objectives of this Policy:

- Establish the Company's operating principles with regard to environmental and social issues, related to diversity, fiscal responsibility, health and safety, respect for human rights and the prevention of corruption and other illegal conduct.



- Encourage the integration of sustainability requirements at all organisational levels, ensuring the availability of the necessary resources.
- Provide sufficient information on the development, application and results of sustainability policies and do so transparently.
- Have the necessary methods or systems in place to manage sustainability risks and opportunities.

#### **4. OPERATING PRINCIPLES**

Based mainly on the principles laid down in the United Nations Global Compact, the United Nations Sustainable Development Goals (SDGs), the regulations applicable to the Company's operational sphere, and the expectations of stakeholders, this Policy establishes the following general operating principles sustainability matters:

- Integrate sustainability in all the Company's business areas and organisational levels, passing on this culture to employees, customers, suppliers, value chain, partners and other stakeholders and, specifically, ensure sustainable management and alignment with social and environmental sustainability objectives by suppliers and contractors, in the scope of the work carried out for Aena.
- Maintain a firm commitment to quality and environmental management, in accordance with the Company's integrated quality, environmental and energy efficiency management policy.
- Assume the fight against climate change as a strategic priority, to reduce greenhouse gas emissions, contribute to mitigate their effects in order to achieve carbon neutrality and global zero emissions at all airports.
- Integrate the climate change variable in internal decision-making processes, as well as in the analysis and management of the Company's risks and opportunities in the short, medium and long term.
- Minimise the environmental impacts of the Company's activity (especially in relation to climate change, air quality, noise management, water management, impact on biodiversity and waste management), ensuring that processes comply with the highest quality standards and promoting the transition to a circular economy that includes all processes.
- Ensure the development of the Company's social policies, which meet certain needs and expectations of stakeholders and cover related aspects, such as human rights, diversity, equal opportunities and work-life balance, health and safety or quality, paying special attention to the difficulties of people with special needs.
- Respect and promote internationally recognised fundamental human rights (freedom of association, the right of association and collective bargaining, non-existence of child labour, elimination of forced or compulsory labour, etc.), declaring the Company's absolute opposition to modern slavery and human trafficking, and any other practice that may involve a violation of individual or collective dignity.



- Provide a safe and healthy working environment, characterised by equal opportunities and non-discrimination (in particular on grounds of race, nationality, social background, gender, marital status, sexual orientation, age, religion, political ideology, disability or any other personal, physical or social condition of individuals), the promotion of diversity, the management, attraction and retention of talent, the development and reconciliation of professional and personal life, through the implementation of appropriate tools.
- Add value in the geographical areas where the Company operates, strengthening participation in the communities, favouring integration in the territory and contributing to social well-being and the improvement of people's quality of life, to promote, inter alia, education, employment, cultural wealth, health, research and the inclusion of the most disadvantaged groups.
- Ensure the application of responsible taxation principles and practices in accordance with the Company's tax policy and Code of Conduct.
- Support the accession of the organisation to projects or initiatives of proven repute and credibility which, at both domestic and international level, have as their purpose promoting responsible practices in business organisations and sustainable development, and adopting and disseminating the principles that stem from these initiatives.
- Promote innovation and continuous improvement, taking the Company's strategy as a lever for development.
- Promote the principles of transparency, integrity and business ethics, acting in accordance with the provisions of the Code of Conduct and the Regulatory Compliance Policy or the Anti-Corruption and Anti-Fraud Policy.
- Establish channels of communication, participation and dialogue with stakeholders and responsible communication practices that avoid manipulation of information and protect integrity and honour, in accordance with the provisions of the Company's policies on the disclosure of financial, non-financial and corporate information, privacy or security of information, as well as those related to stakeholders.
- Guarantee accountability in relation to compliance with the commitments acquired by Aena in sustainability matters by issuing reliable, rigorous, truthful and relevant information in a transparent manner to shareholders, investors and other stakeholders.

## **5. MONITORING AND CONTROL MECHANISMS**

Pursuant to the provisions of the Regulations of the Board of Directors of Aena, the Board of Directors is responsible for the promotion and deployment of the Sustainability Policy.

Given the relevance of issues relating to social, environmental or corporate governance aspects, specific functions are attributed to specialised Committees. In particular, the Sustainability and Climate Action Committee is set up as the internal body with powers of evaluation and control in matters of sustainability and the Climate Action Plan,



responsible for knowing, promoting, guiding and supervising the objectives, action plans, practices and policies of the Company in environmental and social matters.

Sustainability skills and knowledge will be considered a factor in the composition of governance bodies, as appropriate.

To control and monitor the Sustainability Policy, as well as the associated risks and the management of these, the Company adopts the following mechanisms:

- Promote the commitment to the development of a sustainable business management model focused on the creation of value through the Strategic Sustainability Plan and those support instruments which, in line with the Company's Strategic Plan, set out the medium- to long-term framework for action in this area and enable compliance with the principles, commitments and objectives established in environmental and social matters through this Policy.
- Carry out an ongoing assessment of the degree of progress of the commitments acquired and the projects established in the area of sustainability, establishing measurable and assessable objectives. To this end, the different Committees will meet periodically to deal with these matters.
- Disseminate the corporate responsibility commitments acquired by the Company, their monitoring and assessment through appropriate communication and reporting mechanisms.
- Guarantee that the Board of Directors, through the Sustainability Committee and other specific Committees assigned to the task, approves, monitors and oversees the principles and guidelines contained in this Policy.

The aforementioned supervision and control mechanisms are supplemented by those established in the Risk Control and Management Policy and other Company policies.

## **6. VALIDITY**

This Policy was approved by the Board of Directors of Aena at its meeting on 28 September 2021 and came into force on that date. It shall remain in full force until any modification is made.

Said Policy replaces the Corporate Responsibility Policy approved by the Board of Directors of AENA at its meeting on 23 February 2016, and updated at its meeting on 28 January 2020.