Consolidated
Management Report

2022

Extract corresponding to the Sustainability Report

Consolidated Non-financial Information Statement (NFIS)



aena

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Introduction



Letter from the Chairman

(GRI 2-22)

Dear friends,

I am pleased to be reaching out to all of you to share the key aspects of our performance throughout 2022. We have undoubtedly left behind another very intense fiscal year, as a quick assessment of the year in question shows.

Fortunately, the year 2022 marks the end of the pandemic as we know it. Although aspects such as geopolitical, macroeconomic and sectoral instability have contributed to the persistence of a context of some uncertainty in the operations of our sector, we closed the year with a practically normalised situation in terms of connectivity and traffic volume.

243,7 million passengers have travelled through Aena's 46 airports and 2 heliports in Spain, representing 88,5% of 2019 traffic in the same period. For its part, traffic in our international subsidiaries has already exceeded 2019 figures. In this process of air traffic recovery, it should be noted that Spanish airports have been one of the few exceptions in the context of the serious operational problems that have occurred at major European airports, proof of the good work and solidity of Aena.

Commercial and real estate activity is also experiencing rapid and robust growth, both in our own businesses such as car parks and VIP lounges, which exceeded 2019 revenues, as well as in duty-free shops, food and beverage and car rental.

With regard to the international sphere, 2022 has seen another major milestone in Aena's internationalisation process. Specifically, in August, the Company was awarded the concession for the Block of Eleven Airports in Brazil, including Congonhas airport in Sao Paulo, making us the largest private operator in Brazil by number of airports (17) and the second largest by passenger volume.

With all of the above, our Company's economic and financial performance has shown a substantial improvement. 2022 leaves us with an EBITDA of €2,078,853 million and a net profit of €901,499 million, which will provide us with the necessary stability to establish future growth and the recovery of an attractive dividend for our shareholders.

And all of this alongside a growing recognition of our commitment to sustainability and ESG issues, by ESG analysts and benchmark indices. Thus, for example, for the first time in 2022 Aena has been included in S&P Global's prestigious Sustainability Yearbook 2021, and has once again achieved the highest rating awarded by the Carbon Disclosure Project (CDP) in terms of climate change.

In this unique and complex, yet encouraging, post-pandemic context, we have drawn up the value creation proposal contained in the Aena Strategic Plan 2022-2026, a stage in which we aspire to become "the safest, most efficient, sustainable and welcoming airports in the world, catalysts for the economy and tourism, and generators of value for our shareholders, our customers and society".

Our proposal is fundamentally based on the continuous development of our growth pillars: the development of aeronautical and commercial activity, the selective deepening of the internationalisation process, the continuation of the Airport Cities project and the seizing of opportunities for diversification, hand in hand with technology and digitisation.

In this amalgam, sustainability is enshrined as a transversal factor in all Aena's activity, embodied in our Climate Action Plan, on which we report annually at the General Shareholders' Meeting in a precise and transparent manner. This Plan, together with the 2021-2030 Sustainability Strategy, will involve an investment of over €550 million up to 2030, and will enable carbon neutrality to be achieved by 2026 and Net Zero by 2040.

Aena also renews its commitment to the Ten Principles of the UN Global Compact, which help to guide our actions in the areas of governance, human rights, labour standards, the environment and anti-corruption.

I would like to end by mentioning that our activity would not be possible without the effort and commitment of the more than 9,230 employees who make up the Company, as well as the trust placed in us by customers, tenants, airlines and shareholders, among others, who accompany us in our innovative commitment, participate in our achievements and support a model that serves as a benchmark in the sector.



Maurici Lucena Betriu - Chairman

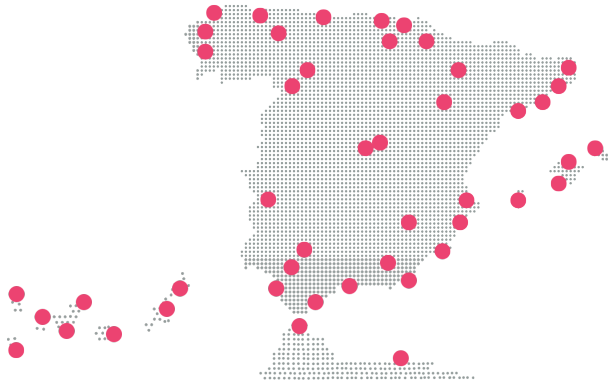
Aena in 2022

(GRI 2-1; 2-6)

The Aena Group consists of Aena S.M.E, S.A., Sociedad Concesionaria del Aeropuerto Internacional de la Región de Murcia ("SCAIRM"), Aena Internacional (ADI) in Spain, the companies of the London-Luton Airport Group in the United Kingdom, as well as Sociedad Concesionaria Aeroportos do Nordeste do Brasil, S.A. ("ANB") and the "Bloque de Once Aeropuertos de Brasil[1] (BOAB) in Brazil.

SPAIN

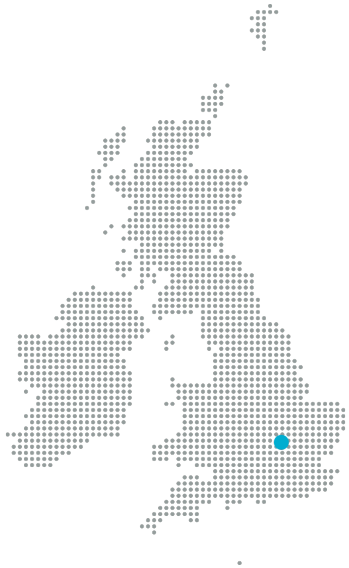
	2022	2021
No. of employees	8,196	7,892



	2022	2021
Passengers	243,681,775	119,952,578
Operations	2,216,327	1,518,847
Cargo (Tn)	1,000,356	998,700

UNITED KINGDOM

	2022	2021
No. of employees	685	628



	2022	2021
Passengers	13,136,865	4,585,985
Operations	118,064	61,560
Cargo (Tn)	32,001	26,430

BRAZIL

	2022	2021
No. of employees	349	291



	2022	2021
Passengers	13,862,694	11,799,368
Operations	135,074	122,398
Cargo (Tn)	71,140	68,286

[1] In August 2022, Aena, through its subsidiary Aena Desarrollo Internacional S.M.E., S.A., was awarded the concession for the operation and maintenance of 11 airports in Brazil (collectively known as the Eleven Airports Block of Brazil, or "BOAB"), including Congonhas-Sao Paulo. The signing of the contract is expected to take place in March 2023, and the concession contract is expected to enter into force ("Effective Date") in April 2023, so that operations at the airports will commence in the second half of 2023. Consequently, it is not taken into consideration in 2022 for non-financial reporting purposes.

Overview of the document

This Consolidated Management Report 2022 relating to the activity of the Aena Group (hereinafter "Aena" or "the Company") has been designed to inform Aena's stakeholders of its performance in economic, social and environmental matters throughout 2022, also complying with the reporting requirements of Act 11/2018, of 28 December, on Non-Financial Information and Diversity, with the preparation of the Non-Financial Information Statement.

2022 has been the year of the start of the recovery. In this sense, Aena expects to recover pre-pandemic traffic levels by 2024, earlier than initially planned, forecasting that the number of passengers on the network in Spain will be around 300 million by 2026.

This recovery is already underway and, in the case of the Aena network, is taking place without the operational problems that have been severely suffered by other European airports.

The Company has also been affected by other factors that have undoubtedly marked the course of the year. Among them, the evolution of macroeconomic conditions, the conflict in Ukraine and the rise in fuel prices are aspects that, although they have not had a significant impact on air traffic behaviour so far, have determined its evolution to some extent and may also have more significant consequences in the near future.

In order to respond to the current context and the main challenges that the Company will face in the coming years, at the end of 2022 Aena presented its new Strategic Plan 2022-2026, focused on consolidating the recovery that develops the value proposition, fundamentally through the development of the main aeronautical and commercial activities, the selective deepening of the internationalisation project, the continuation of the Airport Cities project and the seizing of diversification opportunities that arise through technology and digitisation. All of this combined with the Organisation's undeniable commitment to sustainability.

Through this document, Aena aims to show how the Company creates value in the short, medium and long-term. To present this information in a truthful, relevant and accurate manner, in accordance with most recognised reporting practices, the Company's economic and financial information is supplemented with a Non-Financial Information Statement, the Corporate Governance Report and the Annual Report on Remuneration for the fiscal year 2022.

The Company´s website[2] offers additional detailed information on different aspects, which are relevant to the different stakeholders.

The evolution of the Group's business is explained in Block A of this Consolidated Management Report, which provides a detailed analysis of the operational data of the aeronautical activity, as well as the results of the business areas developed by the Group.

With regard to the data of the aeronautical operations, Block A ("Activity Data" chapter, section 2.1) includes a comprehensive description of the evolution of traffic in the network's airports in Spain, and section 2.2 includes the evolution of operations corresponding to airports where the Group has an international presence. For their part, the financial results of the business areas are analysed by segment in Chapter 3 of the aforementioned Block A. For these analytical purposes and with the aim of offering a better understanding of the results of the Group's management of the airports that it operates in Spain, the traffic data, as well as the financial data of "Aena Sociedad Concesionaria del Aeropuerto Internacional de la Región de Murcia S.M.E., S.A." are integrated with the network's data when presenting the evolution of the aeronautical, commercial and real estate services activity in the Consolidated Management Report.

Structure of the Consolidated Management Report 2022

As has been the case in recent years, the structure of the Consolidated Management Report aims to provide financial and non-financial information in a single document: Consolidated Annual Accounts and Consolidated Management Report.

Other documents such as the Annual Corporate Governance Report and the Annual Report on Remuneration are also grouped together as sections of the Consolidated Management Report.

For its part, in order to avoid duplicate entries and to respond to some of the issues included within the scope of the Non-Financial Information Statement, the correlation table (see "Indexes section Act 11/2018"), includes a brief mention of such issues, as well as a reference to the chapter in which they are developed.

Appendices

- Consolidated Financial Statements.
- Summary of communications sent to the CNMV.

[2] See section "About this report – Links of interest".

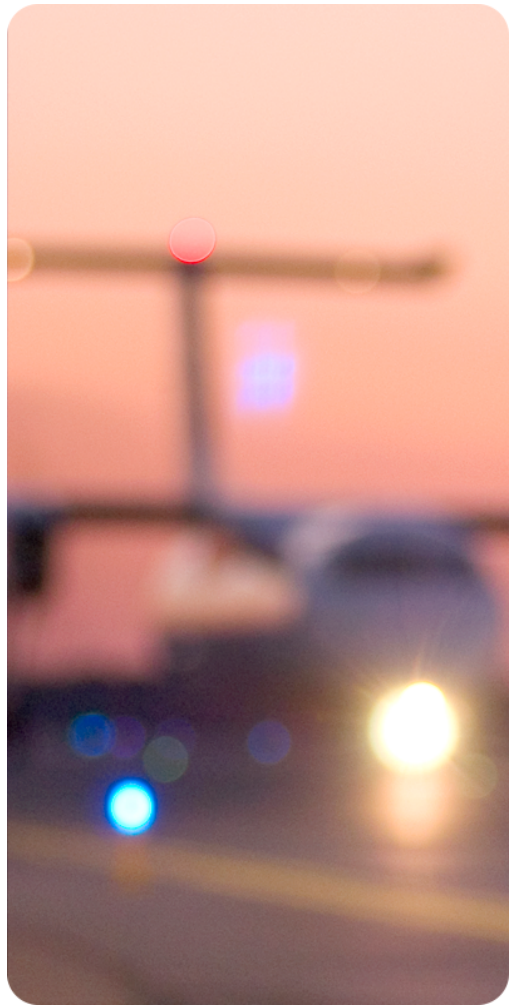
Level of review by external auditors

(GRI 2-5)

The content of the Consolidated Management Report 2022 has been submitted for different levels of review by external auditors and verifiers, with their corresponding degrees of assurance:

- KPMG, Auditores, S.L.[3] has verified that the Consolidated Non-Financial Information Statement and certain information included in the Annual Corporate Governance Report, referred to in the Auditing of Accounts Act, have been provided. It has also evaluated and informed about the consistency of the rest of the information included in the Consolidated Management Report with the Consolidated Annual Accounts, as well as whether the content and presentation of this part of the Consolidated Management Report are in accordance with the applicable regulations.
- KPMG Auditores, S.L. has issued an Independent Reasonable Assurance Report on the Internal Control System relating to the Financial Information of Aena S.M.E., S.A. and subsidiaries as of 31 December 2022.[4]
- Deloitte, S.L. has issued a verification report with a limited level of assurance of the contents in terms of non-financial information and diversity required by Act 11/2018 as well as the GRI contents, in its “in accordance” option, detailed in the sections "Act 11/2018 Content Index” and "GRI Content Index" of Block B of the consolidated management report.[5]

As a sample of Aena’s commitment to the regular rotation of external auditors, and in compliance with Article 52 of its Corporate Bylaws, the account auditors will be appointed by the General Shareholders’ Meeting before the end of the fiscal year to be audited, for a certain initial period of time, which may not be less than three (3) years or greater than nine (9), from the date on which the first fiscal year to be audited begins, being able to be re-elected by the General Shareholders’ Meeting under the terms provided by law once the initial period has ended. Additionally, for its contracting, Aena is subject to comply with Act 9/2017, of 8 November, on Public Sector Contracts, which transposes into the Spanish legal system the Directives of the European Parliament and of the Council 2014/23/EU and 2014/24/EU, of 26 February 2014.



[3] Other information: “Consolidated Management Report” in the “Audit Report”, under “Audit Report and Consolidated Annual Accounts”.
[4] See appendix of Section F of the Annual Corporate Governance Report of Aena S.M.E., S.A. of 31 December 2022.
[5] ‘Independent Verification Report’ in Section ‘B. Non-Financial Information Statement’.

2022: A year of hope



2022: A year of hope

EN

Approval of the **2nd Equality Plan.**

FEB

2021 economic results: **Aena records growth of 6.7% in its total revenue and reduces losses to €60 million** in 2021.

ACI recognises the efforts made by the **33 airports in the Aena network** that are part of the Airport Service Quality (ASQ) survey programme, with the "**The Voice of the Customer**" award.

Aena has signed up to the **Toulouse Declaration**, which reinforces the sector's commitment to achieving **zero carbon dioxide (CO2) emissions by 2050**.

Aena's inclusion in the **S&P Global Sustainability Year Book**.

Renovation of the **public website**.

MAR

The **2022 airport charges** are effective based on an Adjusted Maximum Annual Revenue (IMAAJ) of €9.95 per passenger, which represents a charge variation of -3.17% with respect to the 2021 IMAAJ.
+
ACI awards 7 airports: Barcelona-El Prat Josep Tarradellas Airport, Pamplona Airport, Reus Airport, Seve Ballesteros-Santander Airport, Region of Murcia International Airport and El Hierro Airport **win the award for "Best Hygiene Measures"**. Valladolid Airport, El Hierro Airport and Region of Murcia International Airport **win the "Best European Airport" award** in the category of less than two million passengers.

Two ANB airports **were awarded the 2022 Aviação Mais Brasil awards**, awarded by the Ministry of Infrastructure of Brazil: Recife Guararapes-Gilberto Freyre Airport wins the award for the **most timely airport in Brazil** (in the category of between 5 and 10 million passengers per year) and Campina Grande-Presidente João Suassuna Airport, the **best airport in the Northeast Region**.

Aena reports on the **Climate Action Plan** to its shareholders at the **General Shareholders' Meeting**.

ABR

Financial results for the first quarter of 2022: **Aena reduces losses down to €96.4 million** and increases its cash flow.

Aena activates the Charity Payroll to raise funds and support UNHCR in the **humanitarian crisis in Ukraine**. In total, the contributions amount to €42,810, from 912 donations, which are added to the €57,190 contributed by Aena to **bring the total amount to €100,000**.

Presentation of *TEAcompaño*. The Minister for Transport, Mobility and Urban Agenda, Raquel Sánchez, presented the new "*TEAcompaño*" application, developed by the public engineering company Ineco and implemented by Aena into its airport network.

MAY

Tenerife Sur Airport opens the **expansion of its terminal**.

30th anniversary of the Jerez Airport terminal.

Launch of SESAR JU, whose objective is to **accelerate, through research and innovation, the achievement of an inclusive, resilient and sustainable European Digital Sky**, of which Aena is a member

JUN

Aena's Airports enrolled in the **Airport Carbon Accreditation Programme** are advancing with their certification.

50th anniversary of the F.G.L. Granada-Jaén Airport.

ASPRID Project: Aena participates, along with 6 other organisations, in the European project ASPRID (**Airport System Protection from Intruding Drones**), which aims to study innovative ways of protecting airports from drone intrusions, within the **EU Horizon 2020 Programme**.

Aena signs a **new Memorandum of Understanding** for the **Airports for Innovation** network.

JUL

Financial results for the first half of 2022: **Aena returns to profit** after eight quarters in losses and **earns €163.8 million**.

Skytrax Awards: Aena, **World's Best Airport Group** for excellence in **managing the pandemic**.

ACI awards: La Palma Airport and Valencia Airport, the **best airports in Europe** in their category.

Aena remains among the first companies in the IBEX 35 with the **greatest impact on social networks**.

Aena launches a **new public tender** for ground handling services to third parties, in the ramp handling category. This is the **largest handling tender in the world**.

AGO

International expansion: Aena, through its subsidiary Aena Desarrollo Internacional S.M.E., S.A., has been awarded the **concession for the operation and maintenance of 11 airports in Brazil**, including Congonhas-Sao Paulo.

SEP

Sevilla Airport opens the **new No Schengen international departure area**.

Real estate development: Aena awards **P3 Group Sarl the first logistics development area of Adolfo Suárez Madrid-Barajas Airport City** (Area 1).

OCT

Financial results for the third quarter of 2022: **Aena's profit reached nearly €500 million and the company exceeded €1.558 billion in cash flow**.

Aena, ACI award for **best innovation in passenger-related processes**.

Aena brings together the world's leading international duty-free shop operators for the **world's largest duty-free tender**.

Awarding of the **first logistics area** at Adolfo Suárez Madrid-Barajas Airport City to **P3 Group Sarl**.

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NOV

Aena presents its **Strategic Plan for the years 2022-2026**: it forecasts that the number of passengers in Spain will be around 300 million in 2026 and expects to recover the consolidated EBITDA of 2019 between 2024 and 2025.

Aena has received the **"t for transparent" seal from the Haz Foundation**, which awards the first seal of transparency in **fiscal responsibility**.

London Luton Airport (**LLA**) in the United Kingdom has been recognised for its commitment to customer service in the **UK Customer Experience Awards 2022**.

On November 24th, the CNMC issued its supervisory resolution on airport charges for 2023, stating that the maximum revenue per adjusted passenger (IMAAJ) to be applied is EUR 9.95 per passenger, which represents a 0% fare variation compared to 2022 fares.

DIC

Aena has again achieved **the highest rating ("A") awarded by the Carbon Disclosure Project (CDP)** in climate change matters.

El Hierro Airport **celebrates its 50th anniversary**.

Aena launches the world's largest duty-free shop tender. The expected turnover is €18 billion and includes 86 duty-free points of sale, plus a large number of additional premises dedicated to other categories, which, among all of them, will occupy an area of 66,000 square metres. These objectives, aimed at maximising revenue, are anchored by Aena's fundamental pillars: sustainability, technology and customer experience.

1. The aviation sector as an economic and social driver

(GRI 3-3)

Air transport represents a strategic sectpr for global economic development, because of its key role in trade, tourism and investment. It is also a fundamental pillar for social and territorial development, boosting the progress and economic advancement of the regions and their connectivity.

This connectivity contributes to improving productivity and fostering innovation, improving operations and efficiency and increasing the attractiveness of business talent. It also facilitates and promotes world trade, increasing access to international markets and enabling the globalisation of production. In short, it connects people, companies, countries and cultures, promoting access to global markets.

Globally, around 60% of international tourists travel by air. In numerical terms, in 2019, airlines carried over 4.5 billion passengers, with revenue per passenger-kilometre (the distance travelled by all passengers) totalling almost 8.7 billion[6].

The global economic impact of aviation (direct, indirect, induced and tourism catalyst), in a pre-pandemic context, has been estimated at $3.5 billion, equivalent to 4.1% of gross domestic product (GDP) worldwide, directly generating 87.7 million jobs, either directly within the sector or through its supply chain.

In Spain, given its geographical position and its special configuration, encompassing peninsular and non-peninsular territories, the importance of air transportation is increasing, playing an essential role in connectivity, both nationally and internationally.

In economic terms, this sector is a basic pillar of the Spanish economy, contributing to the development of tourism, a sector which in 2019, prior to the health crisis, accounted for 12.4% of GDP and generated 2.72 million jobs.

Thus, despite the complex situation in which the economy, and the sector in particular, has found itself in recent years, the aviation sector is a key lever for continuing and driving the expected economic recovery.

In addition to the contribution to economic activity, both the sector in general and Aena in particular play an essential role in air connectivity. In this case, the Company, with Spain at the centre of world tourism and with an increasingly representative international presence, acts as a catalyst for the socio-economic development of the regions in which it operates, being a key player in tourism and transport.

An example of this essential function and commitment to connectivity is the awarding in 2022 of the concession for the management of 11 airports in Brazil, including Congonhas-São Paulo, the second busiest airport in the country. This is the largest international development operation in the history of Aena, which, through Northeast Brazil Airport Group, has already managed six other airports since 2020, making it the manager of 17 airports and almost 20% of Brazil's passenger traffic.

Aena thus highlighted the importance of the network model in which it has a great deal of experience, that is, managing many different types of airports, from international hubs to regional airports, and even island airports or airports for general aviation only.

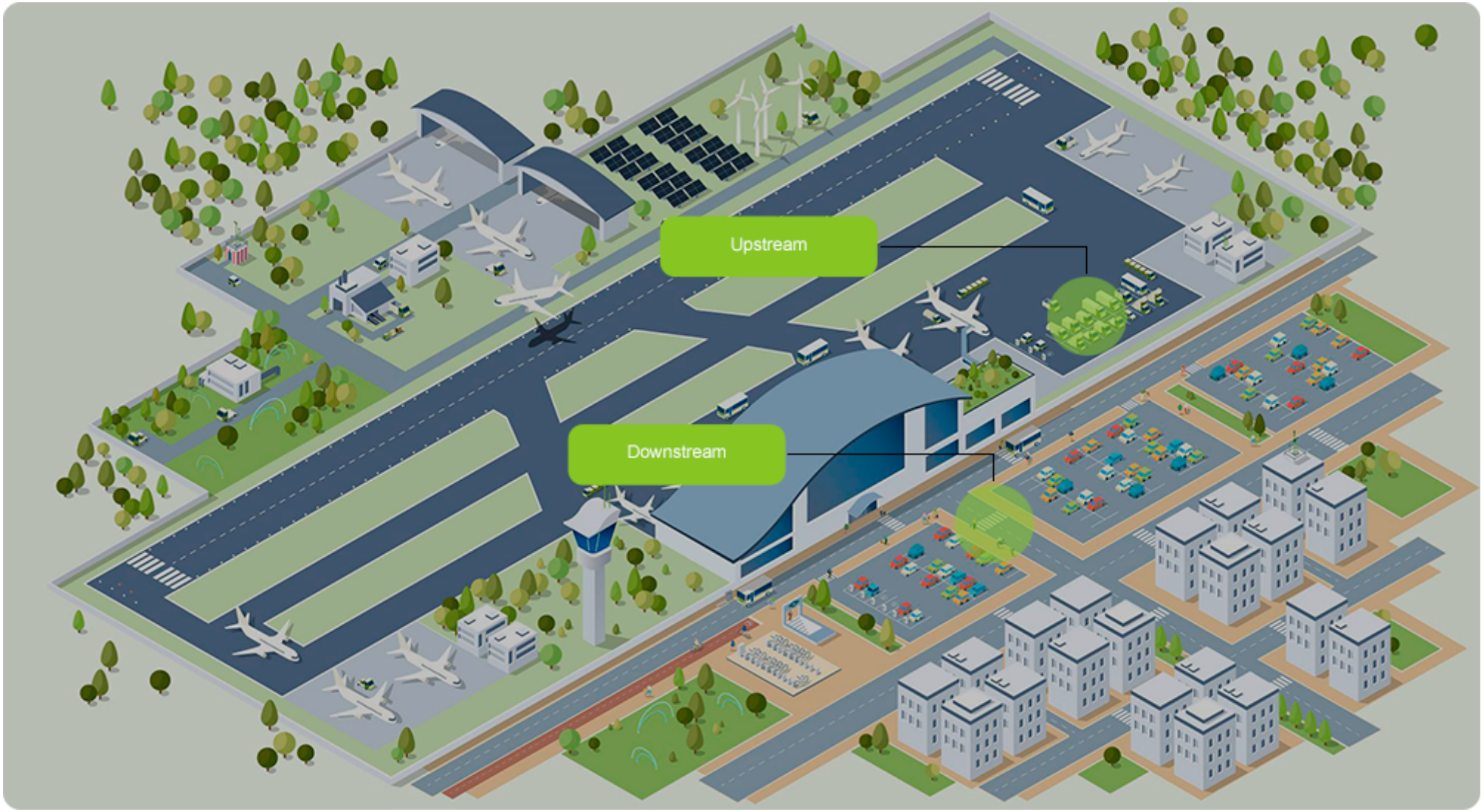
This successful management model attracts synergies in various areas and, therefore, generates efficiency.

As a world leader in airport infrastructure management by passenger volume, Aena must ensure that infrastructures have sufficient capacity to accommodate future air demand, reinforcing its configuration as an essential element of development and mobility, while generating a positive social and environmental impact on the environment, throughout its entire value chain.

[6] Aviation: Benefits Beyond Borders. Air Transport Action Group (ATAG)

Aena and its value chain

(GRI 2-6)



Author: Isabel Moreno / El País

Activities performed by the Company

(GRI 2-6)

Aena and the Group's main business activity is airport management. The Company carries out its activities based on the following classification of segments: Airports, Real Estate Services, International and SCAIRM.

- The Airports segment substantially includes the Group's operations as an airport operator (identified in the aeronautical activity) as well as the management of commercial spaces in the airport terminals and the network of parking lots (identified in the commercial activity).
- The Real Estate Services segment essentially includes the Group's operation of the industrial and real estate assets that are not included in the airport terminals.
- The International segment consists of investment in other airport managers (mainly in the UK, Brazil, Mexico and Colombia).
- The SCAIRM segment corresponds to the activity of the company "Aena Sociedad Concesionaria del Aeropuerto Internacional de la Región de Murcia S.M.E., S.A.", which is also considered to be a single cash-generating unit in itself.

Given the different activities performed by the Aena Group (mainly in Spain, the UK*, Brazil*, as well as in Mexico**, Colombia** and Jamaica**), the total number of operations can be understood as the metrics of number of passengers embarked or disembarked from aircraft (270,681,334 at the end of 2022 and 131,756,532 at the end of 2021), total number of landings and take-offs made by aircraft (2,469,465 at the end of 2022 and 1,702,805 at the end of 2021), as well as weight expressed in tons of the total number of cargo transported (1,103,497 at the end of 2022 and 1,093,416 at the end of 2021).

Upstream

The types of suppliers comprising Aena's supply chain are mainly differentiated between those of works (construction, improvement, extension and maintenance of airport terminals, etc.), services (consultancy, maintenance, etc.) and supply and, on the other hand, commercial. Depending on the product or service provided, the nature of the relationships with suppliers may be short or long-term, and their geographical location varies according to the country in which the Aena Group companies operate. For more details and related indicators, see section "4.1.2. Description of the supply chain."

Downstream

With regard to the type of companies downstream of Aena, these include passengers, airlines and commercial partners, which use Aena's products and services for physical travel or to start up their own business. As in the case of business relationships with suppliers, the nature of these relationships with downstream companies can be short, medium or long-term. Finally, most downstream companies are located in the same jurisdictions in which Aena operates.

Aena's privileged position as a leader in its sector is based on the efficient and appropriate response to the expectations and needs of stakeholders throughout its value chain. In this way, relationships of trust are established that contribute to the creation of value.

*Through subsidiaries.
**Through associated companies.

1.1. 2022: Beyond recovery

(GRI 2-6)

In general terms, throughout 2022, Aena has seen how the effects of the pandemic caused by COVID-19 have progressively diminished, recovering a large part of its traffic levels compared to 2019.

In fact, the Company expects to recover pre-pandemic traffic levels (about 275 million passengers), earlier than initially planned, forecasting that the number of passengers on the network in Spain will be around 300 million by 2026.

This recovery is already underway and is taking place in the Aena network without major operational problems, as is happening at other European airports where recovery is occurring at a slower pace. In fact, particularly at Spanish airports, they have mainly derived from the echo of the dysfunctions experienced at airports in the rest of Europe. The labour and aviation transport legislation, together with the country's tourism potential and the coordination mechanisms generated, have been fundamental in facing up to and navigating the problems that have arisen over the last year, mainly due to geopolitical, macroeconomic and sectoral instability.

In any case, what is certain is that, during 2022, the Company has recovered more traffic than its peers, without suffering operational dysfunctions and maintaining the quality of service expected by customers. Thus, at the end of 2022, there was a recovery of 88,5% of the number of passengers in the airport network in Spain in 2019, 93.9% of the number of aircraft operations and 93.5% of the cargo volume.

Meanwhile, London-Luton Airport has recovered 73% of passengers in 2019, 83.5% of aircraft movements and 86.7% of cargo volume. Finally, in Brazil, Brazil's Northeast Airport Group recovered 100.1% of 2019 passengers, 99.0% of aircraft movements and 11.2% of cargo volume.

This has resulted in a very positive economic and financial performance. Consolidated revenue amounted to €4,237.5 million, representing a year-on-year increase of 69% compared to the restated consolidated revenues at 31 December 2021 (see note 2.1.1 Changes in accounting policies in the 2022 consolidated financial statements).

Operating expenses, reached €2,090.7 million, recording a year-on-year growth of 39.9%. With regard to the investment programme, the amount paid amounted to €728.1 million. Of this amount, €559.9 million corresponds to the Spanish airport network, €28 million to London-Luton Airport and €144.3 million to Northeast Brazil Airport Group[7].

It is also worth noting that in the area of international expansion, Aena, through its subsidiary Aena Desarrollo Internacional S.M.E., S.A., was awarded the concession for the operation and maintenance of 11 airports in Brazil at an auction held on 18 August. With this concession, Aena becomes the manager of a network of 17 airports in Brazil with a presence in nine states and over 40 million passengers.

In terms of Aena's financial position, there has been a significant reduction in the leverage ratio over the course of 2022. Moreover, available cash and credit facilities amount to a total of €3,779.3 million at 31 December 2022.

In light of this new, more encouraging scenario, Aena has been ready to define its new roadmap that will shape the coming years. A new Plan that follows a continuation of the previous one, paying special attention to sustainability as a transversal axis thereof, and other strategic enabling factors. These include innovation, social impact and people management.



[7] See sections 5 of Block A for more information.

1.2. The new Strategic Plan 2022-2026

(GRI 2-22)

In 2022, Aena has presented its new Strategic Plan 2022-2026 focused on consolidating recovery, enhancing innovation and being an international benchmark in sustainability.

With this new strategic framework, Aena intends to have the world's safest, most efficient, sustainable and welcoming airports, catalysts for economy and tourism, and value generators for our shareholders, our customers and society.

In this regard, together with the development of the core business, which involves maintaining the leadership position in safety and efficiency and the significant increase in commercial revenue, Aena is committed to growth through diversification, expanding international activity and tackling new businesses and opportunities such as Airport Cities and other adjacent businesses.

In its new Strategic Plan, Aena renews its commitment to shareholders and will propose, to the Shareholders' Meeting, a pay-out for the entire period of the Strategic Plan of 80% without applying the effects of DF7

All of this with sustainability as a transversal factor of our growth.

Aeronautical activity

With regard to the Company's aeronautical activity, the business strategy pursues three clear objectives:

- Contribute to increasing traffic volumes defined in the DORA II.
- Maintain the leadership position in operational efficiency, achieving the required levels of safety and quality.
- Ensure that infrastructures have the sufficient capacity to accommodate for the future air traffic demand



In order to meet these objectives, the Company expects a total investment in Spain of €2.25 billion in the period 2022-2026, with an average annual investment of €450 million.

Likewise, within the framework of the plan, the following aspects should be highlighted, among others:

- Disappearance in 2025 of the charge limits operating in 2022.
- Establishment of capacity growth bases that will be very relevant to DORA III and will expand the regulated asset base.
- Incorporation of structural changes to the cost base that will allow Aena to remain a leader in operational efficiency.
- Provision of alternative energy measures to ensure a cost reduction for this reason (Photovoltaic Plan).

Commercial activity

In the commercial sphere, Aena expects a significant increase in commercial revenue both per passenger (at least 12% by 2026 compared to 2019) and globally (more than 23%).

In the final months of 2022, aggregate sales of commercial lines already exceeded those of 2019 and, based on recent contracts awarded, the 2023 Minimum Annual Guaranteed rents (MAG) is 13% higher than those of 2019, while, by 2026, MAG rents are set to improve by up to 65%.

These figures will increase even further with the results of large tenders that will be put on the market during the period of the new Strategic Plan, such as that of the Duty-Free Shops, which is the largest in the world, and for which a strategy has been designed involving more commercial area, more competition and longer-term contracts.

This recovery of traffic and commercial business is set to occur despite a context of global and sectoral risks, among which include: first, geopolitical risks, such as the invasion of Ukraine, which impact the economy; second, purely macroeconomic risks, such as rising interest rates, general inflation and energy prices; and third, the sector-specific risks, such as structural changes to the cost base.

Aena has laid the foundations to continue to be the undisputed leader in safety and operational efficiency in the sector. Measures taken to control costs include the signing of contracts with third parties for the supply of services in the coming years (85% of these contracts have already been signed for 2023, 60% for 2024 and 55% for 2025).

In addition, a significant factor in this area will be the cost of energy, which will be contained in the medium-term with Aena's Photovoltaic Plan. This project, which involves an investment of €350 million for the construction of solar plants that self-supply airports, already has access and connection to the grid for 52% of its needs.

International activity: focused on Brazil and selective commitments

In this line, the Company's priority is to consolidate and maximise international assets, as well as to continue to focus selectively on attractive investments, with the utmost financial rigour.

In this regard, Brazil is set up as a strategic market in which 20% of the country's traffic will be managed from 2023. Aena will continue to implement the investments in the Northeast airports and will integrate the 11 airports awarded in August 2022 into the network.

In the largest airport in Brazil, Congonhas in Sao Paulo – the second airport with the highest passenger traffic in Brazil – Aena has designed an ambitious technical project that will meet the safety and quality requirements defined by the Brazilian government and increase the commercial offer.

Airport Cities and surrounding businesses

In 2022, Aena has launched the Airport Cities project through the Adolfo Suárez Madrid-Barajas Airport City project, of which the first 32 hectares have been awarded for logistical uses, with an additional 295 hectares to give it continuity.

This project is therefore already a reality that is expected to be transferred to other airports, such as Barcelona-El Prat Josep Tarradellas Airport, where the first launches are planned between 2024 and 2025; or Málaga-Costa del Sol Airport, Sevilla Airport and Valencia Airport, where the first tenders are planned between 2023 and 2024.

On the other hand, in the coming years, Aena will selectively exploit other opportunities adjacent to the core business, where it sees a competitive advantage, related to logistics, mobility and data-driven services.

Environmental sustainability, cross-divisional growth factor

Aena reformulates its commitment to environmental sustainability by maintaining ambitious decarbonisation targets, ahead of those of the sector: to be carbon neutral by 2026 and net zero by 2040. For this purpose, the Climate Action Plan (CAP) represents an investment of €550 million from 2021 to 2030.

VALUES AND PROPOSITION

1	Increasingly environmentally sustainable	2	Active listening and customer focus	3	Excellence in infrastructure and services
4	Talent and diversity	5	Innovation	6	Focus on results and tangible projects
7	Impactful leadership	8	Smooth and flexible communication	9	Dynamism: anticipating and adapting to change
10	Overview of all our activities	11	Growth and profitability	12	Integrity and commitment

1.3. Towards the recovery of air transportation

(GRI 3-3)

In order to recover air traffic, and place it at levels similar to those reached in 2019, and despite the fact that recovery depends to a large extent on exogenous factors, Aena will foster the growth of air traffic by acting through four levers:

- Regaining the passenger's confidence, offering maximum health safety at airports through the coordination of actions and protocols with relevant actors such as, among others, airlines, health authorities and other European airports. Likewise, in this five-year period, Aena must promote the deployment of technologies to minimise contact and streamline processes, thus reducing the risk of spreading COVID-19.
- Actively working with airlines to attract demand to the airport network.
- Enhancing the design and application of commercial incentives that drive the development of new routes and growth in the existing ones; and collaborating closely with local and regional authorities, economic and social agents, through Airport Coordination Committees, among others.
- Preparing the airport network to meet the long-term needs of air transportation, balancing these needs with those of the territories in which they provide services, through the necessary consensus.

Together with the measures planned to recover traffic, the DORA 2022–26 includes aspects focused on maintaining the rates with respect to 2021 levels during the next five years, among which the following stand out:

- The total recognised investment for the period of the DORA amounts to €2,250 million, with the average annual investment level during the period being €450 million. Aena considers that these investments will contribute to achieving the appropriate level of quality in the provision of airport services, especially in terms of sustainability and digitalisation.
- Sustainability is configured as a strategic aim of the company. In this regard, it sets the conditions for the sustainable development of the Aena airport network by establishing environmental standards that are articulated through 6 indicators referring to:



- absolute CO_2 emissions,
- energy efficiency,
- carbon neutrality,
- water consumption,
- noise levels,
- non-hazardous waste collected.

- Commercial incentives based on environmental criteria: As part of its sustainability strategy, Aena will be able to establish commercial incentives aimed at improving environmental sustainability at the network's airports.

The sector's biggest challenge for the next five-year period will be to recover air traffic levels prior to the pandemic and work together with airlines to achieve that common goal.

2. Context of the sector[8]

(GRI 3-3)

Aena is immersed in a process of constant development, which is essential to adapt to the demands of its environment and ensure the ongoing creation of value for all of its stakeholders.

This transformation process is in line with the main trends that reaffirm the Company's strategic vision: to continue to be the world's leading airport infrastructure operator, growing through diversification and placing sustainability as a transversal growth factor.

To do so, it is essential to respond to the new challenges associated with the sector that, once the pandemic is over, will mark the path to growth and that involve adapting to the current environment of geopolitical and economic uncertainty.

The Company's activity is subject to risks and uncertainties, many of which are difficult to foresee and beyond Aena's control. Macroeconomic factors (e.g., inflation), geopolitical factors (e.g., the evolution of the war in Ukraine), sectoral factors (e.g., staff shortages), the market situation, regulatory changes, movements in the domestic and international stock markets, and any other elements that could affect the evolution of the business, are variables about which there is uncertainty as to their evolution and/or potential impact.

In order to mitigate this level of uncertainty about the main challenges to which the Company is exposed, the identification, assessment and proper management of potential events and their impacts is essential to ensure the creation of value and the achievement of its objectives.

Risk management is a key pillar for the creation of value and the achievement of the Company's strategic objectives.

[8] This section is completed with the Financial Statements.

The main short, medium and long-term trends and risks that could result from the context in which Aena operates
(GRI 2-12; 3-1; 3-2)

TRENDS AND IMPACTS	SCENARIOS
MACROECONOMIC AND POLITICAL CONTEXT **CONCENTRATION AND COMPETITION**	See note 3.1.1. of the consolidated annual accounts for 2022. Geopolitical environment: Political instability (Russia-Ukraine conflict) Macroeconomic factors such as the market situation, economic uncertainty or movements in domestic and international stock markets, rising inflation and, in particular, energy prices. Risks associated with the emergence of new variants of the pandemic. Crisis in outbound markets and damage resulting from the financial situation of airlines, which could affect mainly the airline business and the concentration of airlines. Risk related to commercial and real estate business, affected by lower revenue derived from the seventh final provision of Act 13/2021 on Land Transport Management, changes in consumption trends, risk of non-payment and abandonment of premises, as well as greater concentration of customers. Related to the concentration of customers in activities, both aeronautical and commercial, and its revenue are especially dependent on its two main airports (Adolfo Suárez Madrid-Barajas Airport and Barcelona-El Prat Josep Tarradellas Airport). In addition, the Company faces the rise of other means of transport, such as high-speed trains (for example, AVE with high passenger volume hubs). All this may affect aeronautical and commercial revenue.
CYBERSECURITY	Exposure and increased threats and vulnerabilities in the face of cyberattacks. The pandemic has changed relationship patterns in communications and businesses, and has led to a rise in teleworking.
OPERATIONAL AND PHYSICAL SECURITY	The physical or operational security risks derived from terrorist attacks, wars or aviation accidents, the probability of which has not decreased and may evolve into new scenarios.
THIRD-PARTY DEPENDENCE	Failures in relevant operations carried out by third parties at the airport or under its coordination, and that may compromise the correct execution of services (controllers, handling companies, airlines, security, health controls, etc.), including labour disputes with critical service providers or air traffic management that negatively impact the capacity of infrastructure and that may be exacerbated in a scenario of widespread cost increases, especially for energy.

Sustainability is one of the greatest challenges for society today. There is a high level of consensus on the urgency of limiting the impact on the environment and the need to work collaboratively to compensate the impacts of recent years. A forceful and common response must be given, involving all the actors from public institutions, companies and citizens.

Potential restrictive consequences of the "imposition of sustainable aviation fuel (SAF)", in reference to one of the main regulatory changes that may affect Aena's activity.

The Group is exposed to the effects of climate change. This risk entails economic, operational and reputational impacts derived from the aspects indicated in note 3.4 of the consolidated Annual Accounts.

- Regulatory changes that may result in an increase in the price of carbon emissions, a reduction in demand or other aspects related to the use of sustainable aviation fuel (SAF).
- Level of implementation of the measures related to climate action and sustainability foreseen in the company's Climate Action Plan, aimed at establishing a decarbonised and sustainable economic model in the Network's airports, in a context of increasing pressure from investors and society as a whole.
- Resilience of airport infrastructure and operations in facing events associated with climate change, natural disasters and extreme weather conditions, and the need to undertake adaptation actions in airports in the medium to long term.
- Partial or total limitations to the operation, capacity and necessary development of airports resulting from environmental reasons or derived from compliance with existing or future environmental regulations.
- Destinations that are no longer attractive to visitors, due to changes in consumer preferences and behaviours, to the stigmatisation of the sector, to policies to discourage and restrict domestic flights on routes where there is an alternative high-speed train, to a possible imposition of a new eco-tax on the price of tickets, among others.
- A framework of uncoordinated national and regional climate policies and regulations.

SUSTAINABILITY AND CLIMATE CHANGE

When making traffic forecasts, and in addition to the foreseen macroeconomic environment, the Group has analysed the main risks, uncertainties and factors affecting air traffic, both globally, as well as those specific to the aviation sector, of these the possible impact of environmental measures is worth noting.

In the models proposed for developing air traffic projections, the impact of the following measures that are already being imposed in some European countries has been considered:

- Application of new taxes on plane tickets.
- Restriction of short-haul flights on routes served by the Spanish high-speed train (AVE): any restriction with a high proportion of connecting passengers would significantly limit medium- and long-haul connectivity and would limit the hub development of the main airports.

The impact that these measures could have on air traffic will depend on the conditions in which they are applied, although as of today there is still not enough detail on the scope and time frames for their implementation. For this reason, and to limit the uncertainty associated with the application of these measures, instead of the theoretical scenario that the econometric models would produce, the Base Scenario chosen is located in the medium-low range of these econometric models (Note 7.e of the Consolidated Annual Accounts).

Additionally, in recent years, various environmental initiatives that could have a major impact on the aviation sector, if they materialise, have emerged. Worth noting is the EU "Fit for 55", which includes, among others, the following legislative proposals:

- Review of the EU emission allowances trading scheme.
- Review of the Directive on energy taxation: elimination of air transport exemptions (kerosene taxes)
- ReFuelEU Aviation initiative for sustainable aviation fuels: Will force fuel suppliers and airlines to combine an increasingly higher level of sustainable fuels (SAF) into current fuels
- Regulation for the deployment of infrastructure for the supply of alternative fuels

In preparing the Group's Consolidated Financial Statements, management has taken into account the impact of climate change and assessing compliance with the objectives of the Climate Action Plan of Parent Company Aena S.M.E., S.A. These considerations have not had a significant impact on the judgements and estimates applied in preparing the financial information for the fiscal year.

See note 3.4 of the Consolidated Annual Accounts

ORGANISATION AND PUBLIC-PRIVATE REGULATION	Aena is a listed state-owned commercial company and, as such, its management capacity in certain areas is affected by the application of public and private law regulations.
INNOVATION AND DIGITAL TRANSFORMATION	Development of innovation and technological development policies that are appropriate to the needs of the business, and which are aimed at improving passenger experience, strengthening airport security and improving operational efficiency.
POLICY FRAMEWORK AND REGULATORY ISSUES	Changes in regulations and uncertainty regarding the interpretation of legislation arising in different areas, such as ESG, and the need to adapt to new and ongoing legal requirements, which may lead to an increase in litigation arising from conflicts with operators, suppliers and customers, as well as affect the company's management and reputation. Aena operates in a highly regulated sector, which guarantees that the airport network is managed in accordance with public service criteria, establishes a system of airport tariffs, and obliges it to ensure different airport security measures. On 3 October, Law 13/2021 came into force, which in its seventh final provision modifies the contracts for the lease or transfer of business premises for catering or retail activities that were in force on 14 March 2020 or were tendered prior to that date. Legal and regulatory. Related to uncertainty over the interpretation of legislation in the context of the current crisis and adaptation to new legal requirements that have led to an increase in litigation. See note 3.1.4) of the Consolidated Financial Statements. Impact on the valuation of the Group's assets. In compliance with accounting regulations, the Group carries out valuations of its assets to determine whether any impairment occurs as a result of the gradual recovery of air traffic, as well as the historical framework of uncertainty in which it operates, derived from geopolitical tensions and a complex macroeconomic environment. The resulting valuation adjustments are reflected in the income statement. Effects related to DORA II and the resolutions of the National Markets and Competition Commission (CNMC) on the supervision of airport tariffs and the granting of the economic rebalancing provided for in the regulation.
TAX COMPLIANCE AND TRANSPARENCY	A good governance model allows the generation of short, medium and long-term value for shareholders, customers, suppliers and other stakeholders, and strengthens the company’s control environment, reputation and credibility vis-à-vis third parties. Aena operates in a highly regulated sector, which guarantees that the management of the airport network is carried out with public service criteria. It also establishes a regime of airport charges and requires various airport security measures to be guaranteed. Together with these obligations, determined by its unique nature as a private company of public interest, the Company has its own Regulatory Compliance System, which includes procedures and policies to fight corruption and fraud, as well as different corporate policies that are periodically reviewed.

INVOLVEMENT OF STAKEHOLDERS	The way in which customers, suppliers, administrations, employees, shareholders, etc., are involved in the management of the companies has evolved towards a more digital profile, one that is more aware of environmental protection and health, more participatory and willing to be heard. The companies must provide, in a transparent manner, sufficient information about their sustainability policies, development, implementation and results. Need to supervise the process of preparing financial and non-financial information as well as its integrity.
PLANNING AND EXECUTION OF INVESTMENTS	Delays in the execution of committed investments resulting from third-party actions or other external effects (rising prices of building materials and energy, supply chain failures, new environmental regulations, enforcement of economic sustainability measures, etc.).
INTERNATIONALISATION	Aena's international activity is subject to risks associated with the materialisation of potential impacts that have not been contemplated in the planning of acquisitions, as well as those arising from the subsequent development of operations in third countries (through subsidiaries and investees) and the fact that profitability prospects may not be as expected due to the worsening of the economic situation, adverse legal and regulatory changes or other effects on concession contracts.
QUALITY OF SERVICE	Aspects that could have an impact on the quality of service perceived by passengers and in relation to other airports, such as adaptation to health requirements, which affect Aena's reputation or could lead to non-compliance.

3. Risks and their management

(GRI 3-3)

3.1. Structure, control and risk management[9]

(GRI 2-12; 2-24)

Aena has established a Risk Control and Management System (hereinafter, the Risk Management System or the System) whose purpose is to guarantee compliance with the Company's strategies and objectives, ensuring that the risks that could affect them are identified, analysed, assessed, managed and controlled systematically and with uniform criteria in a globalised competitive environment and a complex context.

This system allows Aena to adapt to the complexity of its business activity in a globalised competitive environment, in a complex economic context, where risks materialise more quickly.

The System develops the principles defined in the Risk Control and Management Policy approved by Aena's Board of Directors.

The purpose of the Risk Control and Management Policy is to ensure a suitable general framework for the control and management of threats and uncertainties of any nature that could affect Aena.



[9] Aena's Risk Management System, and the main risks faced by the Company in the short, medium and long-term; which are taken into account in the corporate risk map, are described in section E of the Annual Corporate Governance Report.

Risk Management System

Develops the principles defined in the Risk Control and Management Policy
Based on the Integrated Corporate Risk Management Framework COSO II (Committee of Sponsoring Organizations of the Treadway Commission)

PHASES	RESPONSABILITIES			OBJECTIVES
IDENTIFICATION OF RISKS Strategic | Operational | Financial | Technology | Legal and Compliance Information | Social, Environmental and Good Governance	**Corporate and operational areas**	**Internal Audit Directorate**	**Board of Directors**	**Achievement of the Strategic Objectives**
EVALUATION Prioritisation in accordance with criticality based on impact and probability of occurrence				**Carrying out operations under the terms of safety and quality foreseen.**
MANAGEMENT Determination of mitigating activities and action plans that allow the accepted risk level to be reached				**Defending the rights of shareholders and any other significant stakeholders**
REPORTING AND MONITORING Each risk must have a follow-up system with controls and indicators.				
UPDATE Identified risks are reviewed and evaluated at least annually	**Management Committee**			**Safeguarding financial soundness and solvency**
SYSTEM SUPERVISION Assessment of the adequacy of the risks included in the risk management system and the functioning of the systems in place to control and manage them.	**Audit Committee**			**Safeguarding of reputation**

Aena's Risk Management and Control Policy

(GRI 2-24)

Aena's Risk Control and Management Policy, updated in December 2022, aims to establish an adequate general framework for the control and management of threats and uncertainties of any nature that could affect Aena, establishing the general guidelines of the Risk Management System.

The Risk Management System is constituted as a control and management model that operates comprehensively and continuously, centralising in the different corporate business and support areas. The methodological approach of the System is based on the COSO III[10] framework and comprises the following steps:

1. Identification of risks
2. Risk assessment
3. Risk control and management
4. Reporting and monitoring of risks
5. Updating of risks
6. Monitoring of the Risk Control and Management System

This System covers the different types of financial and non-financial risks faced by the Company including, to the extent they are significant, the main operational, technological, legal, social, environmental, political, reputational (including corruption-related), compliance and economic risks, considering those related to contingent liabilities and other off-balance sheet risks.

All identified risks are categorised and prioritised in the Corporate Risk Map. Each risk is managed by at least one Corporate Division, which is responsible for documenting its management in accordance with the parameters defined and approved in the Risk Control and Management Policy.

The Corporate Risk Map is updated by the Executive Management Committee on an annual basis, based on the information provided by the Corporate Divisions, and is supervised and evaluated by the Audit Committee. This map is ultimately approved by the Board of Directors on an annual basis.

The risks inherent to the international development of Aena are an integral part of its Risk Management System.

Moreover, the fundamental principles of risk management applicable to the subsidiaries in the United Kingdom (London-Luton Airport) and Brazil (ANB) are consistent with the contents of Aena's Risk Management and Control Policy, adapting business risk management to its dimensions and economic reality.

Responsibilities in the preparation and execution of the Risk Control and Management System.

The roles and responsibilities of the areas involved in risk control and management at the Company are established in the Risk Control and Management Policy, as described below:

- The Board of Directors defines, updates and approves Aena´s Risk Management and Control Policy, setting the acceptable risk level for each situation and being ultimately responsible for the existence and functioning of an adequate and effective Risk Management System[11].
- The Audit Committee monitors and evaluates the Risk Management System, ensuring that key financial and non-financial risks are identified, managed, communicated and maintained at planned levels. This monitoring covers the different types of risks faced by the Group and specifically includes the monitoring and evaluation of the following aspects:
  - The measures planned to mitigate the impact of identified risks and their effectiveness;
  - The information and internal control systems that are used to control and manage the above risks;
  - That the level of risk remains within the variables defined as acceptable.
- The Corporate Divisions identify and assess the risks under their area of responsibility, execute the mitigating activities associated with the risks, propose and report on the indicators for their proper monitoring and establish action plans to mitigate the risks, reporting on their effectiveness.
- The Internal Audit Division assists the Audit Committee in coordinating the activities defined in Aena's Risk Control and Management Policy, ensuring the proper functioning of the Risk Management System so that the main risks affecting Aena are properly identified, managed and quantified, and reporting to the Company's governing bodies. This division is structurally independent from the other areas and divisions.

Responding to major risks and new challenges

Aena's Risk Management System integrates the risk response plans, identifying the mitigating activities, action plans and contingency plans for the risks included in the corporate Risk Map, based on their assessment or level of criticality, to ensure risk management considering the established tolerance indicators and parameters.

With regard to the risks included in the corporate Risk Map, the mitigating activities and action and contingency plans vary according to each type of risk, and include, among others, the following:

- Operational Safety Management System.
- Internal Control over Financial Reporting System (ICFR) with certification ISAE 3000.

[10] COSO Enterprise Risk Management – Integrating with Strategy and Performance
[11] The number of Directors with risk audit training and experience can be found in Chapter 1, Sustainable Governance Model in Building Block B.

- Regulatory compliance system including policies and procedures to combat corruption and fraud, and the corporate governance policy.
- Cybersecurity Plan and Information Security Master Plan.
- Implementation of the ICT Security Office.
- ICT security reviews under ISO 27001.
- Climate Change Strategy (Climate Action Plan).
- Integrated Quality and Environment Management System.
- External and internal airport security audits.
- Corporate Tax policy.
- Occupational Risk Prevention Management System.

Promoting a risk management culture

Aena, in line with its commitment to the management and control of risks that may affect the fulfillment of its objectives, is developing various measures aimed at creating a risk culture throughout the organisation:

- Linking the Company's key challenges and risks to the establishment of strategic objectives linked to the performance of employees, especially those in positions of responsibility.
- Incorporation of criteria linked to performance in the area and achievement of variable remuneration (employee evaluation).
- Design and implementation of training and awareness-raising initiatives on risk control and management at all levels of the organisation. Specifically, monthly monitoring of risk indicators (KRIs) and quarterly monitoring of risk measures are carried out, coordinating the necessary actions with those responsible (reminders, refresher courses on the use of the reporting application (SAP-GRC), training for new additions to the system, etc.). Likewise, in 2022, 3 specific training actions were carried out (aimed at ANB staff), which were attended by 30 employees.
- Investment in technological platforms that facilitate and streamline the identification, management and monitoring of key risks (SAP GRC).



3.2. Risks in 2022[12]

(GRI 2-12; 3-1; 3-2; 3-3)

As previously indicated, the risk system includes the analysis and periodic monitoring of the risk map, ensuring adequate control and management of the identified risks.

In 2022, the Risk Map was updated[13]. For this review, both internal sources have been taken into account (e.g., Strategic Plan), as well as external sources (best practices of competitors). Thus, following the appropriate review, the map has gone from 16 risks to a total of 15[14], classified into: strategic, operational, financial, technological, legal and compliance, information and social, environmental and governance risks.

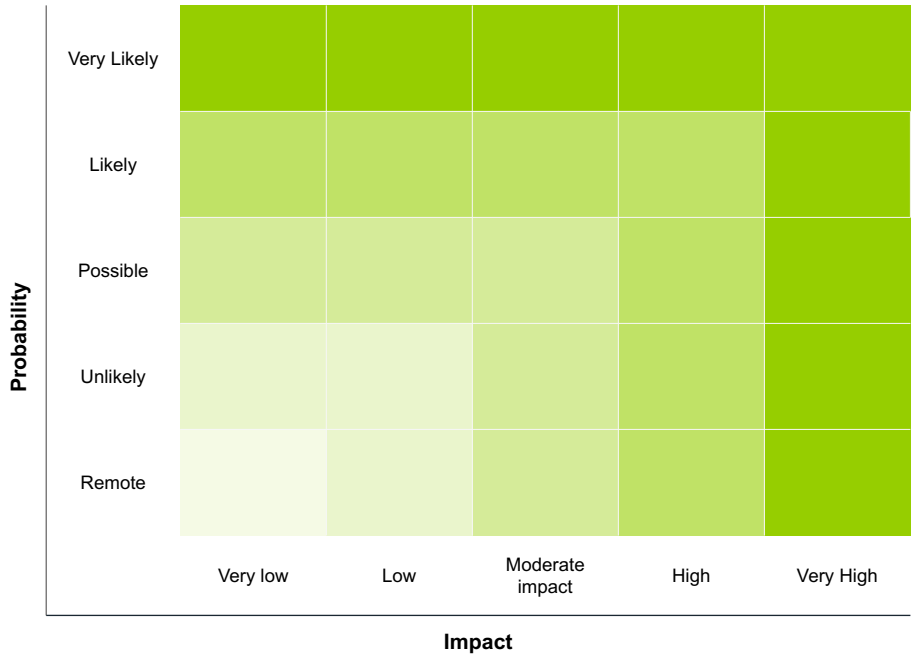
Within the Management Committee, various sessions/workshops have been developed with a focus on assessing the criticality of risks based on their impact (economic, operational and reputational) and the probability of its occurrence, reviewing the definition of risks and identifying possible emerging risks not detected in the previous phase.

Emerging challenges and risks

With regard to the procedures followed by the company to ensure that it responds to the new challenges that emerge (emerging risks), the Risk Control and Management Policy establishes that the Corporate Risk Map will be reviewed at least annually and assessments of the risks identified will be carried out, mainly through the information on the defined risks provided in the monitoring system that those responsible for them must report on the basis of the management carried out in the fiscal year.

In addition to these regular updates, both the Management Committee and the Board of Directors regularly analyse new risks faced by the company, requesting the necessary action plans, mitigating measures or contingency plans from the relevant management areas.

Specifically, at the beginning of 2022, a review of the Aena Risk Map was carried out to incorporate the impact of the emerging risks derived from the war in Ukraine and their impact on the macroeconomic environment (price increases, in particular energy prices, increased cyber-attacks, tighter financial conditions, etc.), assessing the incorporation of new associated mitigating measures.



[12] For more information, see Section E of the Annual Corporate Governance Report included as an Appendix of this Report
[13] In compliance with the provisions of the Policy, and in accordance with the provisions of the CNMV's Technical Guide 3/2017 on Audit Committees, the Company updates the risk map annually.
[14] See section E of the Annual Corporate Governance Report.

MAIN TYPES OF RISKS

In order to monitor each of the risks, the System currently includes the implementation and monitoring of action plans, mitigating activities, and indicators to control their development.

TYPE OF RISKS	CONTENT	CONTROL MECHANISMS AND MITIGATING ACTIVITIES
STRATEGIC	Risks that can arise from a chosen business strategy, and those from external and internal sources that could have a significant direct or indirect impact on the Group achieving its long-term vision and objectives. This category of risks includes those arising from changes in the environment in which the Group operates (political, economic and social), in the competitive environment (aeronautical and non-aeronautical market), changes affecting charges and operations, etc.	Master Plans. Monitoring of regulation on ownership and control (Brexit). Plan to attract air traffic and boost loyalty of airline companies. Strategic Plan for Commercial Development. Monitoring of measures and controls developed within the framework of COVID-19. Integrated Quality, Environmental and Energy Efficiency Management Policy Annual consultation process involving charges for the next fiscal year. Potential detection programmes in personnel and Employer Branding.
OPERATIONAL	These are the risks of suffering losses or lower activity due to weaknesses or failures in internal systems, controls or processes. Operational risks include those, among others, resulting from failures, investments, coordination of operations and air control; in addition to those related to employment and human resources.	Operational Safety Management System. Self-protection plans and contingency, preparation and response procedures to emergencies, winter contingencies, etc. External and internal airport security audits (safety and security). Network Management Centre and Airport Management Centres for communication, identification, follow-up and coordination of incidents. Corporate innovation strategy and collaboration with external companies in terms of innovation. Civil aviation liability policy for airport operator + war and terrorism civil liability. Policy for all risks, material damage, loss of profit and breakdown of machinery + excess coverage from the Insurance Compensation Consortium for catastrophic natural and terrorism-related risks. Meteorological services contract for air navigation at Aena airports. COVID-19 measures: communications, security and systems. Action plan for bomb warnings. Management of noise pollution and action procedures to ensure the correct management of plans and projects with an environmental impact. Investment planning, control and execution procedure. Employee protection policy (life, safety and health).

MAIN TYPES OF RISKS

In order to monitor each of the risks, the System currently includes the implementation and monitoring of action plans, mitigating activities, and indicators to control their development.

TYPE OF RISKS	CONTENT	CONTROL MECHANISMS AND MITIGATING ACTIVITIES
FINANCIAL	This category includes financing risks, variations in interest rates and exchange rates, liquidity risk and credit risk, as well as those related to contingent liabilities and other off-balance sheet risks.	Investment planning, control and execution procedures. Corporate tax policy. Interest rate hedging instruments, guarantees and bonds. Internal Control over Financial Reporting System (ICFR). Request to the External Auditor to review, on the basis of independent reasonable assurance, the Internal Control over Financial Reporting System (ICFR) of Aena S.M.E., S.A. (Parent Company) and subsidiaries (the consolidated Aena Group or the Group) at 31 December 2021, on the basis of the criteria established in COSO. Internal regulations and contracting control systems.
LEGAL AND COMPLIANCE	These are risks related to the mandatory nature of legal provisions established by national and international bodies and institutions in relation to compliance with general legislation (environmental, commercial, criminal, tax, labour, etc.), and sector and internal regulations, as well as risks that may affect the reputation of the Company and the Group, especially risks related to corruption.	Regulatory compliance system including policies and procedures to combat corruption and fraud, and the corporate governance policy. Monitoring of agreements and litigation with commercial operators. Management and monitoring of compliance risks through the SAP-RICUM application and complaints channel. Corporate Tax Policy. DORA II Code of Conduct.
INFORMATION	These are risks related to the reliability of the sourcing, obtainment and preparation of financial and non-financial information, both internal and external, that are significant for the Group.	Internal Control over Financial Reporting System (ICFR) with certification ISAE 3000. Oversight of financial and non-financial information by governing bodies. General Policy for the Communication of Financial, Non-financial and Corporate Information Policy of Communications and Contact with Shareholders.

MAIN TYPES OF RISKS

In order to monitor each of the risks, the System currently includes the implementation and monitoring of action plans, mitigating activities, and indicators to control their development.

TYPE OF RISKS	CONTENT	CONTROL MECHANISMS AND MITIGATING ACTIVITIES
TECHNOLOGICAL	These are risks related to the security of infrastructures and systems in the technological field	Cybersecurity Plan and Information Security Master Plan. Implementation of the ICT Security Office. Disaster Recovery Plans (DRPs). Information Security Policy and Management Procedures for incidents and security stopgaps. ICT security reviews under ISO 27001. Technology protection policy (loss or damage to computer systems and loss of stored data).
SOCIAL, ENVIRONMENTAL AND GOOD GOVERNANCE	These are risks related to the social rights of employees and other people related to the activity of the Company; those related to potential environmental impacts, including climate change and those related to the possibility of noncompliance with an adequate direction and management of Corporate Governance and transparency standards.	Climate change strategy (Climate Action Plan) and analysis of climate scenarios, and assessment of needs to adapt airports with monitoring of indicators. Integrated Quality and Environmental Management System, certified by an accredited external entity in accordance with the UNE-EN ISO 9001 and UNE EN-ISO 14001 standards. Occupational Risk Prevention Management System. HR processes and programmes (planning and organisation, training management, personnel recruitment and development). Action procedures to ensure the correct management of plans and projects with an environmental impact. Management of the acoustic impact on the surrounding populations: preparation of strategic noise maps, noise monitoring systems and flight paths, sound insulation plans. Employee protection policy (life, safety and health). Third Party Liability Policy for Managers and Directors. Sustainability Policy. Strategic Sustainability Plan. Presence in ESG indexes, such as FTSE4good, Vigeo Eiris, Sustainalytics Involvement in international initiatives (ACA Programme, Net Zero Carbon), reporting to the Carbon Disclosure Project (CDP). Collaboration with third parties.

BLOCK B

Sustainability Report
Consolidated Non-Financial Information Statement (NFIS)



1. Sustainable Governance Model (GRI 3-3)

Reference airport operator

51%
Owned by Enaire (majority shareholder)

Aena is part of Ibex 35

Aena is part of the IBEX Gender Equality Index to promote gender equality, launched by BME (Bolsas y Mercados Españoles)

Governing Bodies

General Shareholders´ meeting
Board of Directors
Audit Committee
Appointments, Remuneration and Corporate Governance Committee
Sustainability and Climate Action Committee
Executive Committee
Executive Management Committee

15 directors
(46.66% independent)

40% women
on the Board of Directors

In 2022, ESG issues have been present on the Board's agenda

Composition of the NFIS
Updated Climate Action Plan Report for 2021
Review of the Human Rights Policy and the Integrated Policy on quality control, the environment, energy efficiency, safety and health.
Approval of the 2022-2026 Strategic Plan, which establishes ESG goals, among others
Training on sustainability issues for Directors

The Board of Directors is responsible for ensuring the correct application and maintenance of the Aena Regulatory Compliance System

In the last 3 years, almost 100% of the workforce has participated in training activities related to the General Compliance System, Compliance Policy, Code of Conduct, Risk maps, etc.

Data protection

Compliance model
Mechanisms to inform data subjects of the privacy of their data
Measures to ensure compliance with regulations
Audits
Corporate culture in matters of personal data protection

In 2022, no personal data security breaches were detected and the exercises of rights received from the data subjects were addressed

Sustainable finance

EU sustainable finance taxonomy and disclosure on the degree of alignment of Aena's economic activities
Two sustainable syndicated lines of credit and two ESG-linked loan contracts

36.6% of revenue aligned according to the Taxonomy
28.8% of CapEx aligned according to the Taxonomy
33.4% of OpEx aligned according to the Taxonomy

Commitment to SDGs

8 DECENT WORK AND ECONOMIC GROWTH
9 INDUSTRY, INNOVATION AND INFRASTRUCTURE
10 REDUCED INEQUALITIES
11 SUSTAINABLE CITIES AND COMMUNITIES
16 PEACE, JUSTICE AND STRONG INSTITUTIONS

Aena carries out its activity supported by a robust governance model that, in turn, is supported by a set of internal policies, procedures and tools that reference best practices in corporate governance, complying with applicable regulations while ensuring the generation of value for stakeholders.

1.1. Capital and organisational structure

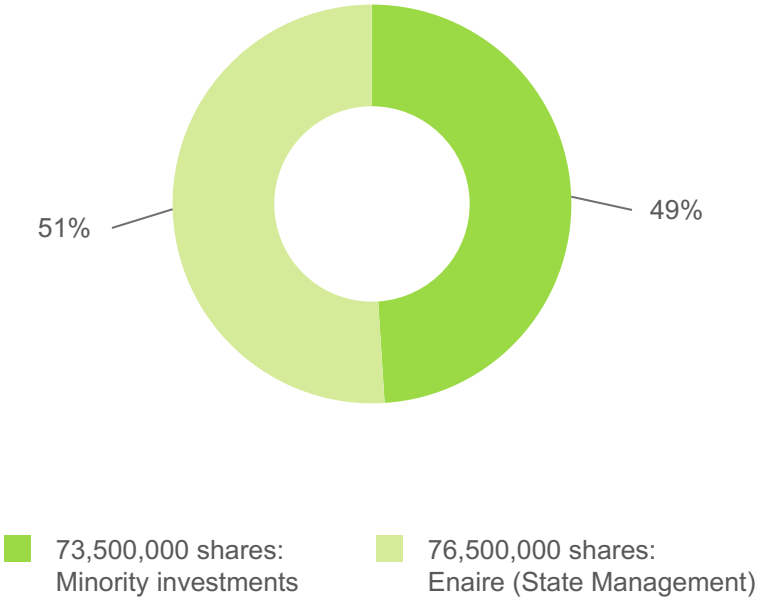
1.1.1. Structure of the property

(GRI 2-1; 201-4)

Aena is a state-owned commercial company established as a public limited company, which was positioned in 2019 as the world's largest operator by passenger volume. Its majority shareholder is ENAIRE (Public Corporate Entity under the Ministry of Transport, Mobility and Urban Agenda) owing 51% of the shareholding in the company, with the remaining 49% being free float. Since 11 February 2015, it has been listed on the Stock Exchanges of Madrid, Barcelona, Bilbao and Valencia, forming part of the IBEX 35 since June 2015.

The share capital of Aena amounts to €1,500,000,000, represented by 150,000,000 shares, each with a par value of €10, fully subscribed and paid. All the shares belong to a single class and series and confer the same rights and obligations on their holders. For more information about Aena's shareholders can be found in the section on Significant Holdings and Treasury Shares of the website of the National Securities Market Commission (CNMV[1]).

Aena is the parent company of a group composed of several subsidiaries and investee companies with a national and international presence.



150,000,000 shares with a par value of €10 each, fully subscribed and disbursed.

[1] See chapter 'Links of interest'.

Significant shareholders (as at 31 December 2022)

	% OF VOTING RIGHTS ATTRIBUTED TO THE SHARES			% OF VOTING RIGHTS THROUGH FINANCIAL INSTRUMENTS	% OF TOTAL VOTING RIGHTS
DENOMINATION	**% TOTAL (A)**	**% DIRECT**	**% INDIRECT**	**% (B)**	**% (A+B)**
BLACKROCK INC.	3.016	0.000	3.016	0.055	3.071
ENAIRE	51.000	51.000	0.000	0.000	51.000
HOHN, CHRISTOPHER ANTHONY	2.968	0.000	2.968	3.607	6.575
THE CHILDREN'S INVESTMENT MASTER FUND	0.000	0.000	0.000	3.607	3.607
VERITAS ASSET MANAGEMENT LLP	3.024	0.000	3.024	0.000	3.024

All the shares belong to a single class and series and confer the same rights and obligations on their holder.



1.1.2. Governing Bodies

(GRI 2-9; 3-3)

The highest governing bodies on which the Company's responsibility for management, supervision and control falls are the General Shareholders' Meeting and the Board of Directors, which in turn are supported by the Audit Committee, the Appointments, Remuneration and Corporate Governance Committee, the Sustainability and Climate Action Committee and the Executive Committee.

The good governance model allows the Company to generate short-, medium- and long-term value for all its stakeholders.
The management and control of Aena are distributed between the General Shareholders' Meeting, the Board of Directors and its committees.



The Corporate Governance tools comply with national and international best practices and recommendations, including those of the Code of Good Governance of the Spanish National Securities Market Commission (CNMV [Comisión Nacional del Mercado de Valores]).

- Corporate Bylaws.
- Regulations of the Board of Directors.
- Regulations of the General Shareholders´ Meeting.
- Internal Rules of Conduct in the Securities Market.
- Selection policy for Board Member candidates.
- Corporate governance policy.
- Code of Conduct.
- Regulatory compliance policy
- Anti-corruption and fraud policy.
- General policy for the communication of Aena´s economic-financial, non-financial and corporate information..
- Policy of communications and contacts with shareholders, institutional investors and voting advisors.
- Risk control and management policy.
- Corporate tax policy.
- Principles of the International Corporate Governance Network (ICGN).
- Corporate Governance Principles of the OECD.
- Code of Good Governance of the CNMV.
- Corporate Enterprises Act, Securities Market Act and other applicable Spanish legislation.
- Technical Guide 3/2017 on Audit Committees of entities of public interest of the National Securities Market Commission (CNMV)
- Technical Guide 1/2019 on Appointments and Remuneration Committees of entities of public interest of the CNMV.
- Sustainability policy
- Information security policy
- Policy of relations with stakeholders
- Human rights policy
- Data policy

General Shareholders' Meeting

(GRI 2-29)

The General Shareholders' Meeting is the sovereign corporate body of Aena in which all shareholders meet to deliberate and decide on matters that fall within their purview—in accordance with the majorities required in each case—or to be informed of any other matters that the Board of Directors deems necessary.

The organisation and operational rules are published in Aena's Corporate Bylaws (Articles 11 to 28, inclusive) and in the Regulations of the General Shareholders' Meeting. According to that stipulated in said documents, shareholders have, among other things, the right to supplement the agenda, to receive information prior to the holding of the General Shareholders' Meeting, the right to attendance and representation, delegation of representation in intermediary entities, remote voting, to be informed during the General Shareholders' Meeting or a separate vote on the matters of the day. In 2022, the Corporate Bylaws and the Regulations of the General Shareholders' Meeting were modified in order to incorporate the new Related Transactions regime introduced by Act 5/2021, and other financial standards regarding the promotion of the long-term involvement of shareholders in listed companies, with it also being necessary to adapt the content of the Regulations of the Board of Directors of Aena to the provisions of the aforementioned Act.

Aena incorporates various mechanisms in order to facilitate attendance, participation, communication and interrelationship with all shareholders and guarantee their rights, such as remote voting in advance, live broadcasting of the General Shareholders' Meeting through the corporate website, or the option to attend and hold meetings by video conference.

Through its corporate governance system, Aena guarantees the generation of value, the efficient use of resources and transparency in its management and protects the interests of shareholders and of the company itself



2022 GENERAL SHAREHOLDERS' MEETING (2022 GSM)

Held on 31 March on first call (GRI 2-10; 2-14; 2-16; 2-20)[2]

Minimum number of shares to attend the Meeting: 1

Attendance and shareholding: 87.635% of the capital
(0,457% more than in 2021)

Average percentage of votes in favour of the approval of agreements: 97% (98,82% in 2021)

Main characteristics of the GSM 2022

The General Shareholders' Meeting was held in a mixed format, favouring both in-person and remote attendance, as provided for in Article 15.8 of the Corporate Bylaws and in Article 11.6 of the Regulations of the General Shareholders' Meeting of the Company.

The GSM was broadcast live on the Company's website, fostering open dialogue and intervention.

Summary of the agreements approved by the General Shareholders' Meeting 2022

Non-Financial Information Statement (NFIS) for the year ended 31 December 2021, an integral part of the consolidated Management Report, as formulated by the Board of Directors at its meeting held on 22 February 2022.

Designation of the external auditor of accounts for the 2023 fiscal year.

Ratification of the appointment of Mr Raúl Míguez Bailo and Mr Manuel Delacampagne Crespo as Nominee Directors, the re-election of Mr Maurici Lucena Betriu (Chairman and Chief Executive Officer) with the category of Executive Director and the appointment of Ms Eva Ballesté Morillas with the category of Nominee Director.

Modification of the Corporate Bylaws for the introduction of technical improvements and to incorporate other modifications introduced by Act 5/2021.

Voting, in a consultative manner, of the Annual Report on Remuneration of the Directors corresponding to the fiscal year 2021 (which obtained a percentage of votes in favour of 95.531%) and of the Updated Report of the Climate Action Plan (2021-2030).

The General Shareholders' Meeting is also the body responsible for the approval of Aena's non-financial information, such as the approval of the Non-Financial Information Statement corresponding to the 2021 fiscal year and the voting of the Updated Report of the Climate Action Plan and the Annual Report on Remuneration of the Directors.

RIGHTS OF SHAREHOLDERS

One share, one vote

Each share bears the right to one vote at the GSM, without prejudice to cases of suspension of voting rights provided for in the Corporate Bylaws, and legal restrictions.

All shareholders are treated equally.

Right to convene

Shareholders who own or represent at least three percent (3%) of the share capital have the right to request the Board of Directors to call the General Shareholders' Meeting, expressing in their request the matters that must be addressed. In this case, the Board of Directors shall convene the General Shareholders' Meeting to hold it within the legally provided term. The Board of Directors shall prepare the Agenda for the call, necessarily including the matters that would have been the subject of the request.

Right to intervene or request information

The shareholders may request in writing from the directors of Aena, up to the fifth day before the Shareholders' Meeting is scheduled to be held, convened in the first call and in the second call, any information or clarifications that they deem accurate about the matters included in the Agenda, or may ask in writing the questions that they deem pertinent. In addition, shareholders may request, under the aforementioned conditions, any clarifications they deem necessary regarding the information accessible to the public that the company had provided to the CNMV since the last General Meeting and in relation to the auditor's report.

Right to include one or more points on the agenda

Shareholders who possess or represent at least 3% of the share capital may request that one or more points be included on the GSM agenda and submit proposals for agreement, based on matters already included or that must be included in the agenda of the call, within five days of its publication.

Right of attendance

Attendance at the General Shareholders' Meeting may be conducted, either by going to the place where the meeting is to be held or, where appropriate, to other places that the Company has arranged, indicating this in the call and where they are connected to it by any valid systems, which allow for the recognition and identification of the attendees, the uninterrupted communication between the attendees, as well as the intervention and casting of votes, all in real time.

[2] The call for the General Shareholders' Meeting of Aena, held on 31 March, and the corresponding documentation, was made available to the different stakeholders more than one month in advance, including all relevant information (date, format, location, points of the agenda, supplementary documentation). In addition, this call included instructions to follow for allowing for remote attendance at the GSM and ensure the correct exercise of rights in real time, as well as accrediting of the identity of shareholders and representatives, establishing the necessary procedures to ensure safety and efficiency. It can be consulted on the Company's website, whose link is available in the chapter 'Links of interest' in this document.

Communication with shareholders
(GRI 2-29)

Through various forums or initiatives, Aena maintains an ongoing interrelationship with its shareholders. These initiatives include presentations of results, conferences and roadshows. The main relationship channels are via telephone or the investor relationship portal on the corporate website or the email address of the Shareholders and Investors Services Office (ir@aena).

These relationships are based on a series of principles and commitments that guide the company's actions, which are mainly set out in the following:

- The Policy of communication and contact with shareholders, institutional investors and voting directors of Aena, which empowers the Board of Directors to manage and control at the highest level the information provided to shareholders, institutional investors and the market as a whole, while safekeeping, protecting and facilitating the exercise of their rights and interests within the framework of the defence of corporate interests. It also defines the principles and standards of these conditions, such as ensuring transparency, authenticity, immediacy, equality, consistency, completeness and symmetry of the dissemination of information in the exercise and recognition of the rights of shareholders or the treatment of their legal rights and so forth.
- The general policy for the communication of Aena's economic-financial, non-financial and corporate information, with the aim of:
  - Creating principles and guidelines that embody the company's values and promote a system of stakeholder relations based on transparency, dialogue, building trust and creating shared value.
  - Ensuring that the quality of economic-financial, non-financial and corporate information provided to the market reflects all material aspects in a fair and balanced manner, complying with applicable legislation and good corporate governance practices.

During 2022, it is worth noting the 9 conferences and 8 roadshows that were held, along with the presentation in November of the 2022-2026 Strategic Plan (26 conferences and 16 roadshows by video conference in 2021). The main areas of interest have been the evolution of air traffic in the face of macroeconomic uncertainties, inflationary tensions and their impact on the cost base, the evolution of commercial revenues as well as ESG issues, which have become increasingly prominent.

The Board of Directors

The highest administrative and representing body of Aena is the Board of Directors, being empowered to carry out any act or legal business of administration and disposal, by any legal title, except those reserved by Law, the Corporate Bylaws or the Regulations of the General Shareholders' Meeting, to the exclusive competence of the General Shareholders' Meeting. In addition, it is set up as a body to supervise and control, performing its functions with unity of purpose and independence of management and providing the same treatment to all its shareholders.

Its maximum premise is the corporate interest of Aena, understood as the achievement of a profitable and sustainable business in the long term, which promotes its continuity and the maximisation of the economic value of the company, entrusting the ordinary management of the businesses.

As the supervision and control body of Aena's activity, it is competent to: set the management strategies and guidelines; implement and ensure the establishment of the appropriate procedures for reporting information to shareholders and markets in general; adopt the appropriate decisions on business and financial operations of special relevance; and oversee the determination of the tax strategy or the supervision of internal information reporting and control systems, among others[3]. It also has the non-delegable power to approve Aena's strategic plan or sustainability policies.

According to its Regulations, it entrusts the ordinary management of Aena's business to the management team and the corresponding executive bodies. Additionally, the Board of Directors has constituted the Executive Committee, the Appointments, Remuneration and Corporate Governance Committee, the Audit Committee and the Sustainability and Climate Action Committee.

As regards Aena's commitment to its shareholders, the Board of Directors carries out its activity in accordance with corporate governance rules mainly included in the Corporate Bylaws, in the Regulations of the General Shareholders' Meeting, in the Regulations of the Board of Directors and in the various Corporate Policies that respect the recommendations of the Code of Good Governance of the Public Companies of the CNMV.

At the close of 2022, Mr Maurici Lucena Betriu is the Chairman and Chief Executive Officer (Article 39.2 of the Bylaws and 15.2 of the Board Regulations) and, as such, executes the agreements of the Board of Directors itself, has delegated all the powers that are legally and statutorily delegated and guarantees the effective functioning of the Board of Directors (functions included in Article 15 of the Board Regulations).

On the other hand, the Board is also composed of Nominee Directors and Independent Directors who have been selected according to their honourability, suitability, solvency, competence, experience, qualifications, training, availability, dedication and commitment.

Especially with regard to the Independent Directors, they are elected as long as they can perform their functions

[3] The Board of Directors carries out its activity in accordance with certain corporate governance standards, mainly included in the Corporate Bylaws, in the Regulations of the General Shareholders' Meeting, in the Regulations of the Board of Directors and in the different Corporate Policies. Links to these rules are available in the chapter 'Links of Interest'. As established in its Regulations, the Directors are vested with the broadest powers to obtain information on any aspect of the Company. Specifically, External Directors may request for advisers and experts to be recruited by the Company in order to be assisted in the exercise of their duties.

without being conditioned by relationships with Aena or its Group, its significant shareholders or its directors.

In total, the Board of Directors of Aena is composed of 15 members, whose profiles provide diversity of knowledge, abilities, ages, backgrounds, experiences and gender to bring real value to Aena from integrity and transparency.

In 2022, Aena has strengthened the Board of Directors with the addition of new profiles with experience in ESG matters.

Leadership and independence
(GRI 2-11)

At Aena, the Chairman and CEO, Maurici Lucena, is responsible for the effective functioning of the Board of Directors. His functions are included in Article 15 of the Board Regulations.

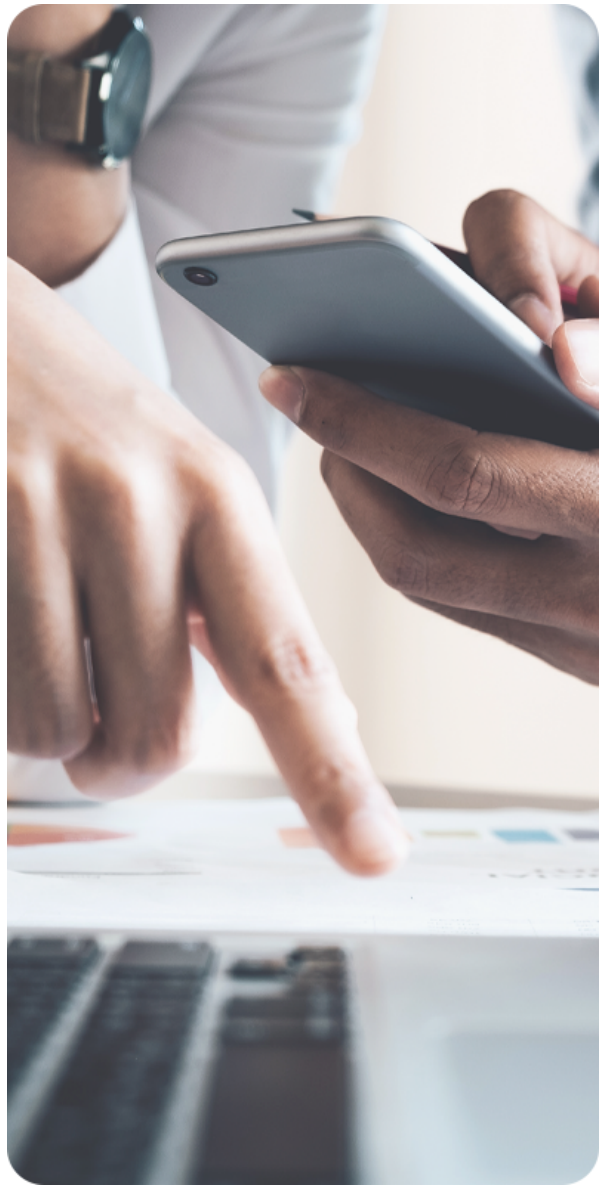
For his part, the Lead Independent Director, Jaime Terceiro, elected among the Independent Directors, is entrusted with the functions of coordinating and meeting the non-executive Directors and maintaining contact with investors and shareholders.

The latter is also specially empowered to request the summons of the Board of Directors or the inclusion of new points on the Agenda of an already convened Meeting, as well as to preside over the Board of Directors in the absence of the Chairman and to coordinate his succession plan.

As for the committees of the Board of Directors, with the exception of the Executive Committee, all of them are made up of non-Executive Directors, with the majority being independent directors. In this regard, the Regulations of the Board of Directors establish the requirements for a Director to hold the category of an Independent Director.

Among these, it is established the following who may not qualify to be an Independent Director[4]:

- Those who have been employees or Executive Directors of companies of the Aena Group, unless 3 or 5 years has elapsed, respectively, since the termination of that relationship.
- Those who receive from Aena or the Aena Group any amount of remuneration or benefit for a concept other than the remuneration of the Director.
- Those who are or have been during the last 3 years partners of the external auditor or the person responsible for the audit report, whether it is the audit of the Company or any other company of its group during said period.
- Those who maintain, or have maintained in the last year, a business relationship with the Company or any company of its group, either on their own behalf or as a supplier of goods or services, or that of an advisor or consultant.
- Those who have been Directors for a continuous period of more than 12 years.



[4] Art. 8.5 of the Regulations of the Board of Directors.

A Board of Directors that is diverse and balanced in skills, origins, experiences, age and gender (as of 31 December 2022) (GRI 2-9; 405-1)[5]

Promotes the constructive participation of shareholders, always guaranteeing equal treatment, as well as of the different stakeholders, in terms of sustainability and governance; integrates sustainability, in its social, environmental and corporate governance aspects, as the basis of Aena's actions; supervises the evaluation and management of risks and the integrity of reporting systems, to ensure the creation of sustainable value, among others.

40% Women (6 out of 15 members)	3.47 years average term of mandate	53.93 years: average age of the Board (20% aged between 25 and 45 years, 80% over 45 years)	1 Lead Independent DIrector-	9 Directors with experience in the sector, 13 with financial experience
No. of Board meetings: 15 98.22% attendance 2 meetings of the Lead Independent Director with the Independent Directors	6 Directors are members of Boards of Directors in other entities[6]	Annual self-assessment of the performance of the Board of Directors Every three years, external evaluation	Individual election of Board members[7]	Length of tenure in the position: 4 years[8]

	Chairman and CEO	Director Executive	7 Independent Directors 46.67% Independent Directors							6 Nominee Directors 40% Nominee Directors					
	Maurici Lucena	**Javier Marín**	**Irene Cano**	**Leticia Iglesias**	**Tomás Varela**	**Amancio López**	**Jaime Terceiro** Lead Independent	**Juan Río**	**María del Coriseo González-Izquierdo**	**Angélica Martínez**	**Pilar Arranz**	**Manuel Delacampagne**	**Juan Ignacio Díaz**	**Raúl Míguez**	**Eva Ballesté**
Gender	Man	Man	Woman	Woman	Man	Man	Man	Man	Woman	Woman	Woman	Man	Man	Man	Woman
Year of appointment	2018	2020	2020	2019	2022	2015	2015	2020	2022	2018	2012	2021	2018	2021	2022
Member of other expert committees	EC (C)		ARC (M) SC (P)	AC (C) SC (M)	AC (M) ARC (M)	ARC (C)	AC (M) EC (M)	SC (M)	SC (M) ARC (M)	EC (M)	SC (M) EC (M)	AC (M)		EC (M) AC (M)	ARC (M)
Training	E/F	AE, E/F	E/F	E/F, AUD	E/F	E/F	AE, E/F	E/F, SC/ENG	E/F, OT	E/F, OT	OT	E/F, OT	E/F	SC/ENG	E/F
Experience	FS, SM, IT, AER, UN	IT, SF, AUD, AER, INFRA, AD, UN, T, ESG	FS, AUD, IT, ESG, SM	FS, AUD, IT, ESG, SM	FS, AUD, ESG, AD, OT	FS, T, A,. ESG, OT	FS, AUD, UN, AER, SM	IT, AUD, SF, INFR, SM, ESG	IT, FS, ESG, OT	FS, AUD, INFR, SM	AUD, CO, AER, SM, INFR, OT	IT, AUD, FS, SM, OT	FS, AUD, T, OT, UN, SM	AUD, FS, INFR, UN, SM	IT, FS, ESG, OT
Directors in other listed entities (number)	—	—	—	2[9]	1[10]	—	—	—	—	—	—	—	—	—	—
% Attendance at Board meetings	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	73%	100%	100%
% Attendance at Committee meetings[11]	EC: 100%	—	ARCGC: 88.8% SC: 100%	AC: 100% SC: 100%	SC: 100%	—	AC: 90% EC: 100%	SC: 100%	ARCGC: 100% SC:100%	EC: 100%	—	AC: 100%	—	EC: 100% AC: 100%	ARCGC: 100%
Shares (no.) or (%)	—	340 shares	—	—	—	—	—	—	—	—	—	—	—	—	—

Member of Committees: EC: Executive Committee; AC: Audit Committee; ARC: Appointments, Remuneration and Corporate Governance Committee; SC: Sustainability and Climate Action Committee; (M): Member; (C): Chairman
Training: Economic/Financial: E/F; Auditing and risk management: A/R; Environmental, Social and Governance matters: ESG; Non-financial risks: NFR; Aeronautical: AE; Other Science and Engineering: SC/ENG; Other: OT
Professional Experience: Innovation/New technologies/Digital transformation: IT; Data protection: DP; Auditing/Risk Management: AUD; Compliance: CO; Academic/University/Research sector: UN; Financial Sector: FS; Aeronautical: AER; Infrastructure and transport: INFR; Senior Management (other sectors): SM; Sustainability/Corporate Responsibility: ESG; Tourism: T; Other: OT.

[5] See details of the composition of the Board of Directors in 2021 in the 2021 Aena Non-Financial Information Statement (Link available in the section 'Links of Interest').
[6] In accordance with the provisions of the Regulations of the Board, Board Members may not be part of more than five (5) Boards (Art. 29 (xi)) or more than three (3) Boards of Directors of other companies whose shares are traded on any domestic or foreign stock exchange.
[7] All directors were elected by the GSM with the exception of Mr Raúl Míguez Bailo and Mr Manuel Delacampagne Crespo, elected by the Board of Directors for the co-opting procedure, although their appointments were ratified at the GSM of 2022, and with the exception of the appointments of Ms María del Coriseo González-Izquierdo and Mr Tomás Varela Muiña, who, with several vacancies having arisen within the Board by the resignation of 2 Directors, were also elected through the co-opting procedure, and will be proposed for ratification at the next GSM of 2023.
[8] After the first 4 years, Directors may be re-elected following the indicated procedure, for equal periods, as long as the GSM does not decide to remove them or they resign from their position. In the case of Independent Directors, their position as members of the Board of Directors of the Company may not exceed twelve years (Art. 11 Regulations of the Board). Lastly, Mr Maurici Lucena was re-elected as Chairman and Chief Executive Officer at the 2022 GSM.
[9] Independent Director of ACERINOX, S.A. and LAR ESPAÑA REAL ESTATE SOCIMI, S.A. .
[10] Independent Director of Finalbion S.L.U. and Juluis Baer Gruppe AG
[11] Two meetings of the Executive Committee were held in 2022.

Selection, appointment, re-election and succession plan of Aena
(GRI 2-10)

The Policy for Selecting Directors ensures that the proposals for the appointment of Aena Directors are supported by a prior analysis of the needs of the Board of Directors, with the premise of guaranteeing the balance, diversity and wealth in the composition and decision-making.

- In relation to the selection of candidates, the Board of Directors carries out an analysis of the needs in this regard, supported with advice and a report from the Appointments, Remuneration and Corporate Governance Committee (hereinafter, ARCGC), which itself relies on external advice for the selection of Independent Directors.
- As regards the re-election of Directors, the ARCGC prepares the proposals for appointment in the case of Independent Directors and prepares a report prior to the proposal of the Board of Directors in the case of Nominee Directors and Executive Directors. ARCGC's proposals and reports evaluate the honourability, suitability, solvency, competence, experience, qualifications, training, availability and commitment of candidates. In the event that the Board of Directors does not take into account the ARCGC's proposals and reports, the reasons that motivate it are justified in the minutes.
- Proposals for the appointment and re-election of Directors are submitted for the consideration of the General Shareholders' meeting[12] or, in the event of co-opting, of the Board of Directors, in accordance with the provisions contained in the Law and in the Corporate Bylaws. The Directors are elected individually when there is a vacancy on the Board of Directors, either due to the resignation of any of its members or due to the end of their mandate. If the vacancy occurs once the GSM has been convened and before it takes place, the Board of Directors may appoint a Director until the next GSM is held.
- The Directors may be eligible for re-election after the expiration of their term (4 years), as established in the Corporate Bylaws and in the Regulations of the Board of Directors.

The Chairman, the Vice Presidents (if applicable), the specially authorised Independent Directors and, in the event that they are Directors, the Secretary and the Deputy Secretaries (if applicable) of the Board of Directors who are re-elected as members of the Board of Directors by the General Shareholders' Meeting continue to hold the positions they previously held, without the need for a new appointment.

In 2022, the appointments of the directors Raúl Míguez Bailo and Manuel Delacampagne Crespo were ratified by the GSM, who, following the aforementioned procedure, were elected through co-option by the Board. Likewise, the GSM ratified the appointment of Eva Ballesté Morillas as a Nominee Director, after the term for which another Director was appointed had expired.

Similarly, the Board of Directors appointed in March Ms Maria del Coriseo González-Izquierdo Revilla as Independent Director, through the co-opting procedure, after the resignation of a Director on 23 February 2022 and, in the month of November, appointed Mr Tomás Varela Muiña as Independent Director through the co-opting procedure, also after the resignation of another Director.

Both appointments will be proposed for ratification by the General Shareholders' Meeting to be held in 2023.

For its part, the Corporate Governance Policy includes, among its principles, that of ensuring the orderly and efficient succession of the Company's Chief Executive, so that it does not influence the regular development of its activities. The ARCGC is the committee responsible for examining and organising the succession of the Chairman of the Board of Directors and the company's Chief Executive Officer. It is also responsible, if applicable, for drawing up any proposals to the Board of Directors so that such succession occurs in an orderly and planned manner[13].

The coordination of the Chairman's[14] succession plan is the responsibility of the Lead Independent Director.

Aena's corporate governance system ensures the diversity and balance of the Board of Directors, ensuring the orderly and efficient succession of the Company's Chief Executive so that it does not affect the normal development of the activities

Diversity on the Board of Directors

Diversity on the Board of Directors is a key aspect of its proper functioning. Therefore, the selection of candidates for Directors is based on a prior analysis of the needs of the Board of Directors, and the assessment thereof will be carried out according to the diversity of knowledge, capabilities, experiences, age and gender of members on the Board of Directors.

The Policy for Selecting Candidates for the Board of Directors of Aena provides the relevant framework for:

- Having an adequate balance in the composition of the Board that optimises decision-making and contributes diverse views to the discussion of the issues of their ability, considering as important factors in obtaining different visions to achieve diversity in gender and age;

[12] In the event that the vacancy occurs after the GSM, the appointment is made by the Board by the co-opting procedure which, in any case, will be ratified by the GSM.
[13] Art. 24 Regulations of the Board of Directors.
[14] Art. 15 Regulations of the Board of Directors.

- Promoting diversity of gender, age and origin, training, knowledge and professional experience;

- Rejecting any type of discrimination based on a person's race, nationality, social origin, gender, marital status, sexual orientation, religion, political ideology, disability or any other personal, physical or social condition.

The Board of Directors is the body responsible for approving this policy and ensuring, among other things, that it is concrete and verifiable; ensuring that the proposals for appointment or re-election are based on a prior analysis of the needs of the Board of Directors, thus promoting the diversity of knowledge, experiences and gender on the Board of Directors[15].

With regard to gender diversity, the Appointments, Remuneration and Corporate Governance Committee (ARCGC) has the been assigned the task of establishing a target representation ratio for the least represented gender on the Board of Directors, preparing guidelines on how to achieve that target and informing the Board on gender diversity issues.

The Board of Directors annually evaluates diversity in its composition and powers.

In 2022, 40% of Board members are women (26.67% in 2021). Aena aims to ensure that at least this percentage is maintained in successive years.

Training
(GRI 2-17)

In accordance with good governance best practices, in December 2021 the Appointments, Remuneration and Corporate Governance Committee (ARCGC) approved the Directors' Training Plan for the year 2022, in which ESG aspects have become a major focus.

In this regard, the schedule of training sessions given by experts on the EU taxonomy of sustainable finances and on matters of sustainability on the Boards of Directors, can be reported. In addition, 6 training sessions were given in 2022 on various current subjects, such as cybersecurity and megatrends of the digital traveller.

These training activities are held periodically, and are scheduled according to the availability and needs of the Directors. In this way, Aena promotes the knowledge of aspects related to sustainability and new trends by the governing bodies.

Evaluation of the Board
(GRI 2-18)

The Board of Directors annually evaluates its own functioning and the quality and efficiency of its work, the operation and composition of its Committee, the diversity in the composition and competencies of the Board of Directors, as well as the performance and contribution of the Chairman of the Board, paying special attention to the chairs of the Committees, the Lead Independent Director and the work of the Secretary of the Board. From the results obtained from this evaluation, the action plan for the next fiscal year is established to correct any deficiencies identified.

To conduct the evaluation, at least every three years, the Board of Directors is assisted by an external consultant, whose independence is verified by the Appointments, Remuneration and Corporate Governance Committee (ARCGC).

In 2022, an evaluation of the Board has been made with internal resources, not counting, unlike in the previous year, with the support of the aforementioned external consultant. The summary of the main conclusions of this evaluation can be consulted in the Annual Corporate Governance Report, highlighting the following:

- 94% of the Directors' appraisals of the issues raised have been 'excellent' or 'adequate' with respect to the functioning of the Board of Directors.
- 100% of the Directors' appraisals of the issues raised about the functioning and composition of the Board of Directors' Committees have been 'excellent' or 'adequate'.

As a result of this evaluation, the members of the Board of Directors have positively assessed the improvement proposals provided for in the 2022 Action Plan, considering that various actions have been carried out for its fulfilment. In particular, the deadlines for sending the documentation of the meetings have been improved, the operation of the *Dilitrust* technological tool has been improved, a new executive summary model has been designed, the number of sessions related to the Company's strategy has been increased, the goal of gender diversity has been met and communications to the Director regarding voting delegations have been improved.

In addition, an Action Plan for fiscal year 2023 has been prepared to reinforce the areas of improvement detected in the evaluation.

[15] See Art. 9 of the Regulations of the Board of Directors.

ESG issues appearing on the Board's agenda during 2022
(GRI 2-12)

Business Ethics

Review of the Human Rights Policy and the Integrated Policy on quality control, the environment, energy efficiency and occupational health and safety in December 2022

Setting ESG objectives in the 2022-2026 Strategic Plan

Non-financial information

Reporting of Non-Financial Information

Climate change

Approval of updated 2022 Climate Action Plan report

Board Meetings

During the fiscal year 2022, 15 meetings of the Board of Directors were held (2 more than in 2021), with a percentage of attendance of 98.22% (0.3% more than in 2021).

Among the matters discussed, ESG issues were evaluated quarterly, among other things:

- Report of non-financial information through the formulation of the 2021 NFIS.
- Updated Climate Action Plan Report for 2021.
- Review of the Aena Group Corporate Policies, such as the Human Rights Policy and the Integrated Policy on quality control, the environment, energy efficiency, safety and health.
- Approval of the 2022-2026 Strategic Plan, which establishes ESG goals, among others.

All matters submitted for approval by the Board of Directors were unanimously approved by those present, except those points in which certain Directors abstained in order to avoid incurring a possible conflict of interest..

Committees supporting the Board

(GRI 2-9; 2-12; 2-14)

The Board of Directors has four committees: the Executive Committee, the Audit Committee, the Appointments, Remuneration and Corporate Governance Committee and the Sustainability and Climate Action Committee[16]. The latter was created by reinforcing Aena's leadership in achieving more sustainable air transport, and has the responsibility of knowing, driving, guiding and supervising the Company's ESG objectives, action plans, practices and policies.



[16] Detailed information on the functioning of these bodies can be found on the corporate website. The Regulations of the Board of Directors detail their specific powers, composition, the performance assessment process of their members, as well as their rights and duties. Links to such committees are available in the chapter 'Links of Interest'.

	Audit Committee	Appointments, Remuneration and Corporate Governance Committee	Sustainability and Climate Action Committee	Executive Committee
Examples of powers	Supervision and control of the reporting system of financial and non-financial information, as well as risk assessment, including those of an operational, technological, legal, social, environmental, political and reputational nature. Establish and supervise a mechanism that allows employees to confidentially report any irregularities of potential significance that may be detected within the company; to coordinate the bodies responsible for compliance; review the regulatory compliance policy, and any other policies and procedures aimed at preventing inappropriate conduct; and supervise the management of the Complaints Channel.	Establish objectives in the area of gender diversity Supervise compliance with corporate governance standards and internal codes of conduct of the company, as well as periodically evaluate and review the corporate governance system. Supervise communication policies. Supervise and evaluate the processes of relationship with the different stakeholders. Coordinate the process of reporting non-financial and diversity information. Be informed of, promote and supervise the Company's innovation strategies and practices	Be informed of and drive, steer and monitor the objectives, action plans, practices and policies of the Company in environmental and social matters. Evaluate and verify the performance and compliance with the environmental and social strategy and practices. Ensure that the practices of the company in environmental and social matters are in line with the established strategy and policies. Support and supervise Aena's contribution to the achievement of the SDGs. Promote a coordinated strategy for social action and sponsorship. Review and supervise compliance with the Climate Action Plan, as well as the corresponding annual follow-up report.	Decision-making capacity of a general scope and, consequently, with express delegation of all the powers that correspond to the Board of Directors, except those that are considered non-delegable by virtue of the law, the applicable regulations on corporate governance, the Corporate Bylaws or the Regulations of the Board of Directors.
Chair	**Independent director**	**Independent director**	**Independent director**	**Chairman and CEO**
Composition **I: Independent; N: Nominee; E: executive**	I I I N N	I I I I N	I I I I N	N N N I E
Independent directors (%)	60%	80%	80%	20%
Presence of women	20%	60%	80%	40%
Meetings[17]	10	9	4	2
% Attendance	98%	97.77%	100%	100%
Other relevant information	All members have experience in the financial and/or audit and risk sectors. Two members with experience in the aeronautical sector/infrastructure and transport. Two members with experience in ESG.	Three members with senior management experience. Three members with experience in ESG. Three members with expertise in innovation, new technologies/digital transformation.	Four members with experience in ESG. One member with experience in Regulatory Compliance.	Five members with experience in the aeronautical sector/infrastructure and transport. 4 members with experience in Auditing and Risks. One member with expertise in innovation, new technologies/digital transformation.

[17] For detailed information on the matters covered by the different Committees during the 2022 fiscal year, the Annual Reports of the relevant activities can be consulted, the link of which is available in the chapter 'Links of interest'.
The details of the Board's 2021 committees can be found in the 2021 NFIS, with the link available in the chapter 'Links of interest'.

Executive Management Committee

(GRI 2-9; 2-11; 2-12; 2-13)

Aena's organisational structure has been configured to ensure compliance with regulatory market commitments, the drive for new value-generating lines of business, or expansion on an international scale, providing sustainability and innovation as cross-divisional axes.

In accordance with the Regulations of the Board of Directors, the ordinary management of Aena's businesses is entrusted to the management team and the corresponding executive bodies.

The Chief Executive Officer and the Management Committee are responsible for the day-to-day management, implementation and development of the decisions taken by the Governing Bodies. Together with the Chief Executive Officer, the Management Committee is composed of 8 directors (60% women, 40% men), each of whom has a long and proven experience in the aviation, financial, transportation or commercial and real estate sector. Specifically, the Directorate of Innovation, Sustainability and Customer Experience is working to deploy sustainable culture in the Company and strengthen the environmental sustainability of airport activity.

The main mission of the Management Committee is to ensure the implementation and achievement of the strategic objectives established by the Board of Directors, maximizing the value of the Company for its shareholders and ensuring its long-term viability. For this purpose, the Committee meets once a week.

As part of its mandate, the Executive Management Committee approves Aena's operational and management standards and internal procedures that affect multiple Management areas and it reviews the Corporate Policies, which are referred to the corresponding Committees for, where appropriate, their subsequent approval by the Board of Directors.

To ensure proper management, Senior Management reports on these aspects, among many others, to the highest governing bodies on a certain frequency (not established, but as the need arises). In this regard, all members of the Executive Management Committee have at some time attended the Board of Directors to report on matters within their area of competence, many of them attending on a recurring basis. The Executive Management Committee is also familiar with all related transactions carried out by the Aena Group.

The Executive Management Committee's functions include the alignment of the strategy approved by the Board of Directors with the different business lines.

Composition of the Management Committee at 31/12/2022[18]



Maurici Lucena Betriu
Chairman and CEO



Javier Marín San Andrés
Executive Director and Managing Director of Airports



María José Cuenda Chamorro
Chief Commercial Officer Commercial and Real Estate



Ángel Luis Sanz Sanz
Director of the Chairman & CEO Office, Regulation and Public Policies



Elena Roldán Centeno
General Secretary and Secretary of the Board of Administration



José Leo Vizcaíno
Economic-Financial Director



Begoña Gosálvez Mayordomo
Organisation and Human Resources Director.



Amparo Brea Álvarez
Director of Innovation, Sustainability and Client Experience



María Gómez Rodríguez
Director of Communications

[18]Detailed information on the functioning of this body can be found in the various internal documents and regulations, the links to which are available under. 'Links of interest'

Remuneration of the Board and Senior Management

(GRI 2-19; 2-20)

Aena is subject to the regulatory frameworks and remuneration models applicable to capital companies, as well as the regulations applicable to senior managers in the public sector.

The application of public regulations on remuneration implies that:

- The contracts of the executives who are part of the Executive Management Committee of Aena, as well as those of the Internal Audit Manager and the Head of Aena International, are subject to Royal Decree 451/2012, of 5 March, which regulates the remuneration regime of senior managers and directors in the corporate public sector, and other entities.
- The remuneration of the Directors is regulated by the following: Royal Decree 462/2002, of 24 May, on the compensation for services provided; the aforementioned Royal Decree 451/2012; the Order issued by the Ministry of Finance, of 30 March 2012, which approves the classification of state-owned commercial companies in accordance with Royal Decree 451/2012, of 5 March; and the Order issued by the Ministry of Finance, of 8 January 2013, which approves the maximum amounts of compensation for the attendance to board of director meetings of state-owned commercial companies.

Since the Directors can only receive a maximum remuneration for their participation in the meetings of the Board, Aena does not have discretion to determine the remuneration in accordance with the provisions in the article 217 of Royal Legislative Decree 1/2010, which approves the consolidated text of the Corporate Enterprises Act. For more information, see the Annual Report on the Remuneration of Directors.

In 2022, the consultative vote of the Annual Report on Remuneration of Directors corresponding to the 2021 fiscal year was supported by practically the entire GSM, with a percentage of vote in favour of 95.53%[19].



[19] In 2021, the Annual Report on the Remuneration of Directors corresponding to the 2020 fiscal year was supported by practically the entire GSM, with a percentage vote in favour of 95.75%.

Remuneration received by Directors and Senior Management (GRI 405-2)[20]				
	2021		2022	
Fees of the Executive Directors (Chairman-CEO and Managing Director of Airports) The remuneration is classified as basic and supplementary (it may not exceed twice the basic remuneration):	**Chairman and CEO**	**Managing Director of Airports**	**Chairman and CEO**	**Managing Director of Airports**
The basic (fixed) remuneration	€117,203.40	€94,753.08	€118,993.20	€96.199,92
The supplementary remuneration that includes:				
Job allowance	€46,881.36	€22,508.52	€47,597.28	€22,852.07
Variable supplement (maximum 60% of the basic remuneration): depends on the fulfilment of the company objectives, among which are objectives in terms of sustainability (preparation and proposal of the Climate Action Plan), which are weighted for the Chairman-Chief Executive Officer in 25% of 100% of the company objectives (20% of 100% in 2021), and for the Airport Managing Director in 25% of 50% of the company objectives (10% of 100% in 2021).	€13,047.38	€27,213.38	€13,230.62	€27,595.57
Other items	€1,333.10	€4,982.39	€1,344.53	€5,071.78
Total	**€178,465.24**	**€149,457.37**	**€181,165.63**	**€151,719.34**

Remuneration of Directors[21]				
	2021		2022	
	Men	**Women**	**Men**	**Women**
They receive a maximum annual amount of €11,994 as compensation for attending Board meetings, and this limit cannot be exceeded. The remuneration for attendance corresponding to Board Members with the status of High Ranking Government Officials is deposited into the Public Treasury.[22]	**€11,994**	**€11,994**	**€11,994**	**€11,994**

Remuneration of Senior Management				
	2021		2022	
	Men	**Women**	**Men**	**Women**
To calculate the equated average remuneration, the basic salary, variable remuneration, allowances, compensation, long-term forecast systems and other annual items have been taken into account. In addition, the corresponding salary review has been applied (0.9% in fiscal year 2021, and 3,5% in fiscal year 2022). The variable bonus depends on the achievement of company objectives, including a sustainability objective, which are weighted at 25%, out of the 50% to 40% weighted company objectives for Senior Management.	**133,127**	**127,472**	**137,487**	**136,365**
Wage gap:	**4.2%**		**0.8%**	

[20] Information on the remuneration of the Board of Directors is detailed in the Annual Report on the Remuneration of Directors. See section 'Links of interest'.
[21] For the calculation of the average remuneration, only those remunerations received by the Directors who have held their position during the entire current fiscal year have been taken into account, excluding those whose remuneration must be paid into the Public Treasury due to their status as a High Ranking Government Official, as indicated.
[22] During fiscal year 2022, remunerations corresponding to attendance by High Ranking Officials—Maurici Lucena Betriu, Angélica Martínez, Juan Ignacio Díaz Bidart, Angel Luís Arias Serrano—were deposited into the Public Treasury.
In the case of Ángel Luis Arias Serrano, the allowances were paid into the Public Treasury until 31 March 2022, when he ceased to be a Director of Aena.

1.2. Culture and corporate ethics

(GRI 2-1; 3-3)

Aena, by its legal nature, is subject to a regulatory regime that covers public and private regulation.

As a state-owned commercial company and, therefore, part of the State Public Sector, it is subject to the provisions of the following articles: 166.1.c) of Act 33/2003 on public administration assets, section 2.2.c) of Act 47/2003 on the national budget and Act 40/2015 of 1 October on the legal regime of the public sector. As a publicly listed company, Aena is also subject to Legislative Royal Decree 1/2010, through which the consolidated text of the Corporate Enterprises Act was approved, as well as to Legislative Royal Decree 4/2015, of 23 October, via which the consolidated text of the Securities Market Act was approved.

As a result of the foregoing, it is subject to particularities related, for example, with the remuneration of Directors or their liability regime, the acquisition of majority shares in other companies, the hiring of personnel, the contracting of suppliers through public tenders, the access to public information or the submission to transparency regulations.

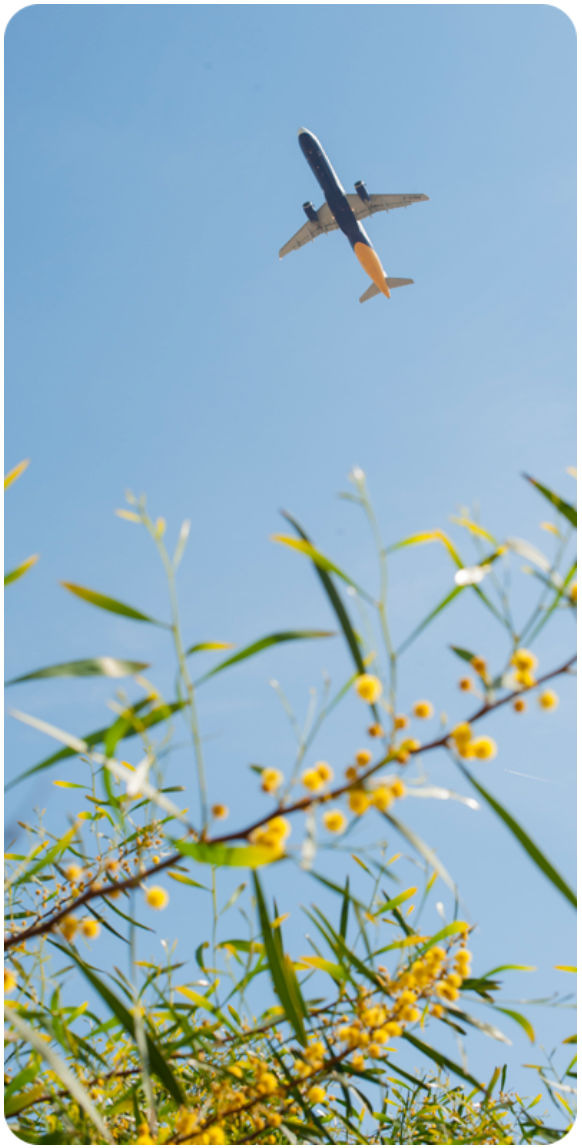
Additionally, in Spain[23], Aena is subject to other regulations, such as:

- The Airport Regulation Document (DORA)—instrument that establishes the minimum necessary conditions in airport management—and to the requirements established in European regulations in relation to airport and operational security.
- The provisions from the State and European Aviation Security Agencies (AESA and EASA respectively), the General Directorate of Civil Aviation (DGAC) and the International Civil Aviation Organisation (ICAO).
- The requirements related to quality control and the environment stemming from the application of ISO 20906, ISO 9001:2015, ISO 14001:2015, ISO 27002:2013 and ISO 19600 standards; EU Regulation 139/2014 or Airport Carbon Accreditation, to which it has voluntarily subscribed.

Based on the guidelines of the regulatory framework, Aena has developed a series of basic (high-level) internal standards that form the Company's compliance model and which contribute to effectively and efficiently articulating the company's management with its strategic objectives. This internal regulatory framework consists of a set of policies that reinforce Aena's commitment to good corporate governance in accordance with the values and principles of the Company, and to diligently exercise the due control across the organisation that is enforceable over the management bodies, directors and employees, in order to minimize as much as possible the risk of malpractices or regulatory breaches in the conduct of its activity[24]. All of them bind and apply to Aena and the companies included in its group (under the terms established in Article 42 of the Commercial Code).

They are periodically reviewed in order to align with the strategic objectives of the company, as well as to integrate good practices.

The Code of Conduct, Compliance Policy, Anti-Corruption and Anti-Fraud Policy, among others, have been reviewed this year.



[23] Through its subsidiary Aena Desarrollo Internacional (ADI), Aena is present in Brazil through the company Aeroportos do Nordeste do Brasil (ANB) and, in the United Kingdom through the indirect shareholding in the management of the London-Luton Airport, with the regulations of each country being applicable.
[24] In the UK, there are a set of policies covering compliance aspects – primarily the Business Ethics Policy, the Tax Evasion Facilitation Prevention Policy and the above-mentioned Code of Conduct. In addition, an Anti-Bribery Policy has been drawn up and approved in the fiscal year 2022.

All persons who make up the Company assume the principles established in the standards and frameworks of action in the performance of their professional activities

(GRI 2-23; 2-24)

Internal documents that make up the Aena Action Framework

Document	Date Last Updated
Integrated Quality, Environmental, Energy Efficiency and Occupational Health and Safety Management Policy	20/12/2022
Code of Conduct	
Regulatory Compliance Policy	
Regulatory Compliance System Manual	
Selection policy for Board Member candidate	
Policy of communications and contacts with shareholders, institutional investors and voting advisors	
Risk control and management policy	
Corporate tax policy	
Corporate Governance Policy	
Anti-corruption and fraud policy	
Information security policy	
Human rights policy	
Data Policy	21/12/2021
Sustainability policy	28/9/2021
Policy of relations with stakeholders	
General policy for the communication of economic-financial, non-financial and corporate information	29/6/2021

The highest body responsible for all Policies is the Board of Directors. Likewise, all of them bind and apply to Aena and the companies included in its group (under the terms established in Article 42 of the Commercial Code).

All internal rules are posted on the Company's website. They are also available to employees on the corporate intranet.

1.2.1. Regulatory Compliance System

(GRI 2-23; 3-3)

Aena has a Regulatory Compliance System (hereinafter also referred to as SCNG [*Sistema de Cumplimiento Normativo General*]) that allows the detection and management of the risk of non-compliance with applicable regulations and it guarantees the respect of the obligations and commitments assumed through internal policies or procedures, in each country in which it operates.

In this regard, the Regulatory Compliance System is cross-sectional in nature and is, aligned with market best practices, aimed at preventing or mitigating not only criminal risks but also those arising from actions contrary to internal or external applicable regulations, while focused on ensuring the legality of actions conducted by employees, directors and managers in the course of their professional activities[25], in order to exercise due preventative control that is legally enforceable against third parties.

Within the framework of the System, the Company has a series of elements for the proper implementation and monitoring of the 'culture of compliance'.

- Regulatory Compliance Policy
- Code of Conduct.
- Anti-Corruption and Fraud Policy.
- Compliance System Manual.
- Complaints Channel.

All of them bind and apply to all members of the administrative body, Senior Management and all employees in the organisation.

In Spain, the Board of Directors has appointed a collegiate internal body, the Compliance Supervision and Control Body (hereinafter also referred to as OSCC [*Órgano de Supervisión y Control de Cumplimiento*]), whose powers include the implementation, development, application and supervision of the SCNG, and ensures the suitability of the SCNG to the needs and circumstances of the Company at all times.

The OSCC is responsible for also carrying out the correct implementation and deployment of the culture of compliance in subsidiary companies, as well as promoting and furthering best practices in investee companies[26].

In addition, the OSCC has a risk map and compliance controls that are reviewed and updated annually to incorporate, where appropriate, new risks based on the Company's activities or for their adaptation to the applicable regulations. This management is carried out through a computer application that allows the OSCC to carry out its monitoring and supervision of risks and its controls for continuous improvement and the strengthening of the System based on the experience acquired.

For the development of a culture of compliance, there is a fundamental axis in the form of training and awareness conducted across the organisation, which is carried out periodically and is extended out to all managers, directors and employees. It also comprises participation in compliance forums, in order to integrate the best practices of the sector.

Compliance Action Plan in 2022

In Spain, in 2022, the following actions were carried out in relation to the compliance activity:

- Risk analysis and compliance controls for the continuous improvement of the System.
- Adaptation of current management tools to the requirements of the regulations (Directive 2019/1937).
- Communication, awareness and training through publications in the magazine aena 360º of revealing articles on corruption, the system of risks, competition, the complaints channel, with training given to new employees on compliance in general and in particular to members of the OSCC and other groups about the risk management system.
- Review and analysis of the elements that make up the System, taking into consideration certifiable standards.

For its part, in the United Kingdom, in the London-Luton Airport during 2022, the local Compliance Policy (approved in July 2022) and the Code of Conduct, as was the Fraud and Corruption Prevention Policy, including the regulation of aspects related to the prevention of conflicts of interest. In addition, the development of a risk map and compliance controls continues, which is reviewed and reported annually to the Audit and Risk Committee, as well as to the corresponding local administrative bodies.

Finally, in Aena´s Airports in Brazil, during 2022, policies, standards and procedures have been updated, which make up the Internal Standards Manual. In addition, in order to train the organisation on matters of compliance, training courses have been given on the subjects about the responsibilities and main policies, an ethical culture, conflicts of interest and anti-corruption (see more details below).

[25] In Spain, the Compliance System is not linked to employee compensation or the Performance Management System (PMS) of the workforce in general, although it is linked to employees who perform functions in Compliance.
[26] The UK LLA Group, which manages the London-Luton Airport, has its own Compliance Committee to set the framework for compliance activities and monitor their development. The committee meets quarterly, and its activities are reported to the OSCC of Aena as well as to the Audit and Risk Committee of the Airport itself. The Group has adequate policies and procedures of its own, reviewed regularly and in line with those established for the parent company.
In Brazil, they also have a Compliance Committee of their own reporting to the Audit Committee. ANB has its own policies and procedures that are adequate and reviewed on a regular basis and in line with those established in the parent company in Spain. To ensure awareness of the main policies, an Internal Standards Manual has been drawn up and disseminated to employees.

The Board of Directors adheres to the highest levels of ethics and business integrity in the exercise of its functions, forming a core framework for guiding its actions and thus enabling it to achieve the purposes and values of the Organisation, while also ensuring compliance with ethical standards on behalf of the Company's directors in the exercise of their duties



'Zero tolerance' of corruption in business, in all its forms.

Policies and procedures, based on a preventive culture to mitigate the risk of corruption and bribery.



Formal commitment to human rights and absolute rejection of modern slavery.

Implementation of the corresponding mechanisms to ensure compliance.



Ensure everyone's safety as a priority.

Understood in the broadest sense (health and security, physical, operational, cybersecurity, sanitary).



Encourage ethical behaviour and conduct.

Act with integrity and promote an ethical culture through standards and training, due diligence and monitoring procedures.



Tax policy.

Ensure compliance with applicable regulations and manage tax matters in a transparent, proactive and responsible manner.



Management, control and transparent communication of information.

Through the communication policies approved by the Company, that of the relationship with stakeholders, and the Internal Rules of Conduct.



Anti-lobbying practices.

Express prohibition in the Code of Conduct to make donations or contributions to a political party, federation, coalition or constituency.



Complaints Channel.

Confidential and independent, available to all stakeholders.



Risk management system, including ESG risks.

The Board of Directors: ultimately responsible for the existence and operation of an adequate and effective system.

CULTURE BASED ON ETHICS AND INTEGRITY

ETHICAL PRINCIPLES AND GOOD GOVERNANCE

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

REGULATORY COMPLIANCE SYSTEM

Zero tolerance for any conduct that involves an unlawful act or contravenes the policies, values and principles of the Company[27]

Prevent or mitigate the risks of noncompliance or bad practices, through the appropriate principles, mechanisms and procedures	Ensure respect for the established obligations, the commitments assumed, and the legality of the acts

GOVERNANCE, ORGANISATION AND SUPERVISION: COMMITMENT AT ALL LEVELS OF THE ORGANISATION

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

DUE DILIGENCE AND DEVELOPING A CULTURE OF GOOD ETHICS AND COMPLIANCE

Regulatory framework and public commitment	Risk diagnosis and default impacts of non-compliance	Implementation of risk control, prevention and mitigation measures[28]	Training, communication and awareness	Monitoring and reporting	Investigation of incidents, repairs and corrective proposals
Regulatory compliance policy	Identify, analyse and systematically evaluate potential risks, adopting a proactive and preventive culture.	Prevention control: ensure compliance with internal regulations, policies and standards.	Training and awareness actions to promote a corporate culture based on ethics and compliance. In 2022, the training and awareness activities included in the Communications and Awareness Plan designed by the OSCC have been continued.	Complaints channel, email, communication through the hierarchical superior.	Failure to comply with the provisions of the Policy may result in the application of the appropriate disciplinary measures, in accordance with the provisions of the Aena disciplinary regime and corporate regulations, where applicable.

[27] The elements that make it up (policies, Code of Conduct, complaints channel) are binding on and applicable to the Board of Directors, directors and all employees, including those of the subsidiaries, insofar as applicable according to their regulations and except as established by their own policies, without exception, whatever their position, responsibility or geographic location. In all other companies in which Aena participates directly or indirectly without control, Aena promotes, through its participation in their governing bodies, the adoption of these policies and the establishment of compliance supervision and control systems, in case they have not yet adhered to them.
[28] See also information contained in the image 'Prevention of Corruption Measures'.

DUE DILIGENCE AND DEVELOPING A CULTURE OF GOOD ETHICS AND COMPLIANCE					
Regulatory framework and public commitment	**Risk diagnosis and default impacts of non-compliance**	**Implementation of risk control, prevention and mitigation measures**	**Training, communication and awareness**	**Monitoring and reporting**	**Investigation of incidents, repairs and corrective proposals**
Code of Conduct	All Subject Persons, as well as professionals who join or become part of Aena, are expressly affected by the full content of the Code and, in particular, the ethical principles and rules of conduct established therein.	Action control: obligation to report any possible illicit act or breach through the Complaints Channel.	Implementation of online training courses on the importance of Compliance, as well as modules on the awareness of a culture of compliance, to reinforce knowledge about the Regulatory Compliance System and the Code of Conduct and to contribute to preventing or mitigating the risk of committing criminal actions.	Internal and external audits[29]	It will be considered a breach of labour law that may be sanctioned, following the procedure set out in the Aena Collective Agreement and other applicable regulations. The penalties corresponding to disciplinary offences will be classified by Aena as minor, serious or very serious, depending on the specific circumstances of the case, and in accordance with the provisions of the disciplinary regime provided for in the Collective Agreement of Aena, and, where appropriate, the other applicable regulations. For breaches attributable to: (i) the members of the Board of Directors, the provisions of the Regulations of the Board of Directors and the applicable regulations will apply to these effects; and (ii) employees who are linked to Aena by means of a senior management contract, the provisions of the contracts that regulate their relationship with Aena will apply to these effects, as well as in the applicable regulations.
Anti-corruption and fraud policy	Complements and develops the provisions of the Code of Conduct and the Regulatory Compliance Policy. This implies its firm rejection and zero tolerance for any conduct that is illegal or that violates Aena's policies, standards, values and action principles.	Reviewing controls, through the OSCC, by conducting an ongoing assessment of risk maps, compliance policies and regulatory adaptations to the SCNG in all processes.	Active participation in different specialised business forums.	Internal and external information and reporting.	Aena prohibits entering into any financial transaction, contract, convention or agreement whenever there are sufficient reasons to believe that there could be some link to improper or corrupt activities.

[29] In 2022, the implementation of the Action Plan proposed by the Internal Audit Division was completed after the internal review of the system and the compliance function. This plan has been aimed at the remediation of detected incidents.

1.2.2. Code of conduct

(GRI 2-26)

The Code of Conduct is regarded as the main instrument of the Company used for dealing with behaviours that may breach regulations or be unethical, formalising Aena's commitment and respect for the best values and Ethical and Good Governance Principles. This document reflects the principles and values of ethics, integrity, legality and transparency that guide the conduct of all Aena employees with each other and in their relationships with customers, partners, suppliers and in general, with all those persons and entities – public and private – with which they relate in the course of their professional activity.

The Code binds and applies to the members of the Administrative Bodies, of the Senior Management and in general to all employees of Aena or any other company wholly owned by Aena and domiciled in Spain

In subsidiary companies that are not domiciled in Spain, the Code of Conduct approved by their own Administrative Bodies applies to them, in accordance with the principles set out in the Aena Code of Conduct[30].

- In Spain, the principles and guidelines of conduct are structured into five large blocks: people; work; environment, stakeholders and image; information; legal obligations.

  The Code of Conduct expressly reflects everyone's duty to inform, report and collaborate in the investigation of the possible risks or breaches thereof, of any other internal regulations or protocol of action implemented. It also establishes penalties for non-compliance, classified according to the established disciplinary regime.

  The Code of Conduct is reviewed annually, primarily within the framework of the process of monitoring, controlling and evaluating the operation of the General Compliance System.

- In the UK, at the London-Luton Airport, they have their own Code of Conduct, which has been revised during the fiscal year 2022 to align with the latest adaptations approved in the Code of Conduct of Aena in Spain. The document covers various aspects, such as employment relationships, regulating business practices, reporting and complying with legal requirements and establishing disciplinary actions in the event of non-compliance, with the supervision and follow-up of which resting with the local Compliance Committee.

- In Brazil, at Aena´s Airports they have a Code of Conduct that contains obligations and scenarios that cover all hierarchical levels, and includes disciplinary measures in the event of non-compliance. It is disseminated on the internal website of the ethics channel. It has also been incorporated into the Manual or white paper of policies approved this year in the organisation, and disseminated within it. The body responsible for the supervision and control of compliance is the local Compliance Committee, which is supported in the exercise of its functions by the Legal Advisory Department and a local Compliance Manager assigned to this Department.

To ensure compliance with the Code of Conduct, measures of disciplinary action are included in the event of non-compliance

Training and awareness activities have been developed throughout 2022. In Spain, these include the following:

- For employees: publications in the corporate newsletter – which can be accessed through the intranet–, messages for raising awareness on the notice boards in the workplace, training sessions on the Aena General Compliance System aimed at different groups, as well as specific training for OSCC members and staff related to risk management.

- For third parties: dissemination of the Policies on the corporate website, including the Code of Conduct, as well as messages related to ethics and integrity in the company in the contracting specifications.

In this regard, it should be noted that, in the UK, at London-Luton Airport, the Code of Conduct is disseminated to all employees of the London-Luton Airport, who receive a printed copy.

In the last 3 years, almost 100% of the workforce has participated in related training activities.

For its part, training has been provided in Brazil and 100% of all active workers at Aena's airports have acknowledged in writing that they have received a printed copy and have read the Code of Conduct.

The principles of the Code of Conduct are a cornerstone in the management of the entire organisation.

[30] The same Code of Conduct shall apply to persons representing companies not domiciled in Spain, provided it is compatible with the local regulations that apply to them.

1.2.3. Regulatory Compliance Policy

(GRI 2-26)

The Compliance Policy falls within the scope of Aena's good corporate governance policies, and finds its basis in the Company's commitment to the values and principles set out in the Code of Conduct.

The Compliance Policy adopts the following objectives and functions:

- Identify the principles of action associated with the main areas of compliance that affect Aena
- Demonstrate a commitment to embed a culture of regulatory compliance in the organisation and convey a strong message of rejection and zero tolerance for any conduct that contravenes the policies, values and principles of the company.
- Establish the principles, mechanisms and procedures to prevent, identify and resolve situations in which unethical, illegal or regulatory non-compliant practices occur in the conduct of its activity.

In this way, Aena's Regulatory Compliance Policy contributes to reinforcing Aena's commitment to good corporate governance, in accordance with the values and principles contained in the Code of Conduct, and to diligently exercise proper control to minimise as much as possible the risk of bad practices or regulatory breaches.

All members of the Board of Directors, managers and employees of the Aena Group, and to whom the Policy applies, are obliged to report any incident that constitutes a possible criminal offense, legal breach or irregularity of which they have evidence through the Complaints Channel, or any other tools made available (see section 'Complaints Channel').

With regard to international subsidiaries, the aforementioned Compliance Policy applies to them in accordance with their regulations. In this line, Aena airports in Brazil and the United Kingdom have their own compliance policies, having reviewed and approved modifications in 2022.

The basic Principles that inspire Aena's actions in matters of regulatory compliance, which all people in the organisation must respect, ensuring their compliance, are as follows:

Legislation Safeguarding and compliance with current legislation and with internal regulations.	**Disclosure** Promoting knowledge of and respect for legal obligations, the Code of Conduct, and internal rules and procedures.	**Responsibility** Applying, in a fair and proportional manner, sanctions to penalise breaches, in accordance with the provisions of the applicable Collective Agreements, Regulations and Contracts.
Zero tolerance 'Zero tolerance' towards the committing of unlawful or criminal acts, encouraging a preventive culture	**Reporting and communicating** On any incident constituting a possible criminal offense or breach of which is recorded, through the channels that Aena has established	**Transparency and trustworthiness** Applying principles of transparency, mutual trust, good faith and loyalty in relations with Public Administrations, and companies or bodies governed by public law.
Self-monitoring Prompting of self-control processes in taking decisions and actions by managers and employees.	**Investigation** Investigating any complaint of allegedly criminal acts or those involving a breach, guaranteeing the confidentiality of the complainant and the right to counsel of the person under investigation.	**Cooperation** Providing any assistance and cooperation that may be required by judicial, administrative or any national or international supervisory bodies.
Dissemination Disseminate the General Regulatory Compliance System among all Relevant Persons and make the principles and standards it contains available to them.	**Resources** Provide the General Regulatory Compliance System with sufficient financial, material and human resources for its development, within an appropriate framework for the definition, supervision, monitoring and achievement of objectives.	**Better and proper functioning** Carry out the periodic reviews and continuous improvement of the General Compliance System and facilitate the exercise of the functions of the OSCC to ensure its proper functioning.

1.2.4. Prevention of fraud, corruption and bribery

(GRI 2-26; 3-3; 205-1; 205-2)

The Company's commitment to combating all forms of corruption and bribery is outlined in Aena's Anti-Corruption and Fraud Policy, which supplements and develops the Code of Conduct and the Compliance Policy. This document reflects the clear rejection and zero tolerance for any conduct that involves illegal behaviour or violates the Company's policies, standards, values or principles of conduct. It also illustrates the commitment and principles of action related to the monitoring and disciplining of fraudulent acts and conduct or those which instigate corruption in any of its manifestations, promoting the implementation of effective communication and awareness-raising mechanisms aimed at all employees, directors and governing bodies, as well as the development of a corporate culture of ethics and honesty.

This Policy applies to all members of the Board of Directors, managers and all employees, regardless of their place of residence or place of work, as well as to Aena consultants, partners and third-party representatives[31].

All members of Aena's Board of Directors are aware of anti-corruption policies, which are reviewed and updated annually.

In relation to due diligence processes, and in addition to the general provisions of the Code of Conduct[32], Aena has adopted a series of measures specifically aimed at preventing corruption, which are subject to periodic review in order to evaluate and increase their effectiveness, including the following:

- Control measures in the contracting of suppliers, commercial customers, and representatives and commercial agents. It stipulates that all contracts or agreements to be signed will include an anti-corruption clause, unless, due to the nature of the relationship or other circumstances in question, it is justified in the file that it is not considered necessary. As such, the template of the clause to be included is attached in an annex to the contract or agreement.
- Control measures in relations with partners, in order to determine the identity of the counterparty and its administrators, de facto or de jure, and the identity of the real holder. In this regard, Aena's partners must have anti-corruption protocols and controls, and risks are evaluated through the appropriate procedure in order to ensure that the third party is trustworthy and, consequently, that it does not carry out activities that may involve risks, economic harm or compromise Aena's reputation and good image.
- Control measures in corporate operations.

The type of conduct prohibited in the Policy includes the following:

- Making facilitation payments, which are understood as small payments made to public officials with the aim of speeding up the performance of their duties, such as access to public services, obtaining ordinary licences or permits, administrative procedures, etc. Therefore, any activity that could result in a facilitation payment being made or accepted by or on behalf of Aena or that could suggest that such payment may be made or accepted must be avoided.
- Contributions to political parties.

In Spain, as well as the United Kingdom and Brazil, there is a complaints channel through which any potential irregularities detected in this matter can be reported.

At the close of the year, there were no cases reported of any contracts having been terminated for this reason – not in Spain, in the United Kingdom or in Brazil – nor were there convictions from any judicial proceedings related to corruption.

[31] According to that established in the Policy with regard to corruption and fraud, this is applicable to the subsidiaries controlled directly or indirectly by Aena, adapting, where appropriate, those procedural or other matters that are strictly essential to make them compatible and comply with the regulatory requirements applicable in each case, while adapting and/or developing the principles contained in the aforementioned Policy to the particularities of their own nature and jurisdiction. In this regard:
- In the United Kingdom, there are also different policies, aligned with that of Spain (such as the local Code of Conduct, the Anti-Bribery, Corruption and Conflict of Interests Policy and the Prevention of Facilitation and Tax Evasion Policy) that reflect zero tolerance for fraud, corruption and bribery. These policies, approved at the highest level of local management, are available on the LLA Hub.
- For its part, in Brazil there is an Anti-Corruption and Anti-Fraud Policy, aligned with that of Aena in Spain, which is published on its website as well as on the internal Sharepoint. This policy binds all employees, members of the Management Board and the Board of Directors. Brazil's Anti-Corruption and Anti-Fraud Policy also rejects corruption in any form, prohibiting certain conduct and establishing due diligence measures necessary to prevent its materialisation in relations with business partners, corporate operations, suppliers and commercial customers. It also defines the role of the local Compliance Committee in monitoring and inspecting potential irregularities. As specific measures to fight fraud, corruption and bribery, the following are available:
  - Due diligence procedures performed by the Contracting department and supported by an external company.
  - Procedure for identifying any third parties that may engage in corrupt practices, by consulting records of companies with poor reputation from the federal government and investigating the third party (www.portaltransparencia.gov.br/sancoes/ceis?ordenarPor=nome&direcao=asc).
  - System for reporting cases of corruption in the Company, which are cause for justified termination of the employee, and communicating the violation to the relevant public authorities. In the event of a case of corruption in relations with third parties, the termination of the contract is expected to involve the payment of a fine and compensation for damages.

[32] In particular, in its sections: 4.12 (Corruption and bribery of members of public or private entities. Gifts, commissions or credit facilities), 4.13 (Political or associative activities), and 4.16 (Projects with social content and sponsorships).

It is also worth mentioning that in Spain, the United Kingdom and Brazil, specific awareness-raising actions have been carried out on corruption, fraud and good practices, reaching 100% of employees in both Spain and Brazil. This has been complemented with specific training[33],[34] for:

- In Spain, workers who have joined in 2022, having participated in courses 240 employees.
- Along the same lines, at the London-Luton Airport in the United Kingdom, when starting their activity, workers have received specific training in different areas, including anti-corruption and bribery. As a result, 274 employees have completed the training in 2022.
- In Brazil, 436 workers have received training on anti-corruption and related topics (LGDP, Compliance, Conflict of Interest, etc.).

In addition, during the month of December, communication actions have also been carried out in Spain and Brazil in commemoration of the international day of the United Nations fight against corruption, with the aim of raising awareness among organisations about this social problem.

Nature of the confirmed corruption cases (GRI 205-3)	2021				2022			
	Spain	United Kingdom	Brazil	Consolidated Total	Spain	United Kingdom	Brazil	Consolidated Total
In which an employee has been terminated for corruption or disciplinary action has been taken (number)	0	0	0	0	0	0	0	0
In which contracts with business partners have been terminated or not renewed due to corruption-related violations (number)	0	0	0	0	0	0	0	0
Public legal cases related to corruption filed against the organisation or its employees during the period covered by the report, and the results of those cases (number)	0	0	0	0	0	0	0	0
Fines or penalties for cases of corruption or bribery (number)	0	0	0	0	0	0	0	0
Contributions to political parties and/or representatives (€)	0	0	0	0	0	0	0	0
Monetary losses as a result of legal processes associated with professional integrity (€)	0	0	0	0	0	0	0	0

[33] In the UK, workers receive specific training in different areas when starting their activity (including anti-corruption and bribery). In Brazil, as previously indicated, 436 workers have received training on the Compliance System, the Code of Conduct, anti-corruption and fraud, etc.
[34] In 2021, more than 779 workers participated in Spain in the training course on Aena's General Compliance System, which includes its Compliance Policies, Code of Conduct, etc. In the United Kingdom, 100% of the workforce has been trained in this matter during 2020 and 2021. Finally, in Brazil, 297 workers participated in related training actions.

MEASURES FOR PREVENTING CORRUPTION

Aena's objective is to ensure that there is no case of fraud, corruption or bribery in any of its forms

<table>
<tr><td rowspan="3">Depending on the type of transaction and/or stakeholder (*)

(*) The Management Committee of Aena will be able to develop internal criteria to determine certain operations such as those of high risk. For an operation to be considered as high risk, this circumstance will be expressly set out in the reports of the transaction proposal to the company's decision-making bodies, so that they can take such circumstance into consideration when authorising the transaction.

If the transaction is authorised, it will expressly be recorded and the mitigating measures adopted, if any, will be reported.</td><td>Gifts, commissions, invitations, credit facilities or any type of bribe (members of public/private entities)</td><td>Political or associative activities</td><td>Social content, patronage and sponsorship activities</td><td>Books and accounting records</td><td>Corporate operations</td></tr>
<tr><td>Express prohibition on the delivery, promise or offer of any kind of payment, commission or gift to any authorities or public officials or members of private entities, provided that due to their frequency, characteristics or circumstances they could be interpreted by an objective observer as made with the intent to affect the impartial judgement of the receiver or to influence the performance of their responsibilities.

Duly authorised, consistent and reasonable travel and representation expenses.

Obligation to reject and inform the Compliance Supervision and Control Body of any illicit situation.

Prohibition of receiving from customers, suppliers, intermediaries or counterparties, loans or any type of credit facility.

Express prohibition on political contributions.</td><td>Express prohibition on making donations or contributions to a political party, federation, coalition or grouping of electors from Company resources.

When applicable, prior to the acceptance of any public office, the Persons Subject to the Code must inform the Organisation and Human Resources Management, in order to determine the existence of incompatibilities or restrictions on their exercise</td><td>They must be duly approved and authorised in accordance with applicable regulations, and in no case may they be used as subterfuge to carry out covert payments contrary to the Code of Conduct.</td><td>Proper recording in the Aena accounting books.

Accounting standards and principles with accuracy and completeness and have adequate internal processes and controls to ensure that accounting and financial reporting are complete, reliable and comply with all applicable legal requirements.

Maintain accurate, appropriate and reasonably detailed documentation to cover all transactions made.

Strictly prohibiting the deliberate misstatement, omission or secret usage in the recording of Aena accounts, funds or assets</td><td>Analysis of the legal framework of the sector and country in which the entity operates.
.
Anti-corruption analysis of shareholders and the entity.

Verification of the proper constitution and functioning of the entity.

Verification of the correct keeping of the accounting and financial records.

Verification of the correct keeping of corporate books.

Regulatory compliance analysis.
Inclusion of anti-corruption clause.</td></tr>
<tr><td colspan="3">Suppliers, business customers, representatives and business agents—business transactions</td><td>Partners</td></tr>
<tr><td colspan="3">Measures to verify the qualifications and integrity of every supplier and customer before initiating binding commercial relations, whenever it may be deemed appropriate by the Unit proposing the commercial relationship, thereby always considering the contracting regulations that may be applicable in each case.

Inclusion of the anti-corruption clause in all contracts and specifications signed with third parties.

Due diligence process for commercial agents and legal representatives.

Ban on offering or granting, to public officials, third parties or any employee of Aena; gifts, presents or other unauthorised advantages in order to obtain favourable treatment in the granting, or conservation, of contracts or benefits of a personal nature or for the supplier company.

In any relationship with third parties, in a potential situation of conflict of interest, the Code of Conduct establishes the duty of information and authorisation by the Body before making a decision or carrying out the corresponding operation.</td><td>Prove a renowned performance in the sector and a recognised ethical behaviour trajectory.

Evaluation by Aena through the appropriate procedure, taking into account issues such as the type of transaction to be carried out, the type of agreement or contract to be signed, the identity of the third party or its shareholders, the jurisdiction, etc. in order to ensure that the third party is trustworthy and, consequently, does not carry out activities that may involve risks, economic damage or compromise the reputation and good image of Aena.

Have anti-corruption protocols and controls, and inclusion of anti-corruption clauses.

Enhanced due diligence process with the purpose of carrying out investigations of greater depth and scope and additional measures will be established, in the event that additional risks are observed,</td></tr>
<tr><td>Other measures to make it effective</td><td colspan="4">Adequately take into account the risks associated with fraud, corruption and bribery, in particular all those related to relations with third parties, in Aena's internal procedures and in the Risk Management Systems.

Knowledge of and respect for these procedures are promoted through adequate dissemination and specific training programmes.

Receipt of employee inquiries. Management of queries and direct report to Compliance Supervision and Control Body.

Submission of the corresponding complaint in the Complaints Channel.

Internal (compliance supervision and control body) and external analysis (external company, when deemed appropriate by the compliance supervision and control body) of the complaints received.

Internal and external dissemination of the Policy; control measures in contracting with suppliers, commercial customers and representatives, as well as in corporate operations.

Internal and external audits.</td></tr>
</table>



1.2.5. Procedure for Related Transactions

(GRI 2-15)

The Regulations of the Board of Directors reserves the mandate for the Board of Directors to approve – following the review of a report from the Audit Committee – the transactions carried out by Aena in Spain or its subsidiaries with Directors, with shareholders holding 10% or more of the voting rights or represented on the Board of Directors or with any other persons that should be considered related in accordance with the law

In addition to the provisions of the Board of Directors Regulations, and in compliance with the provisions of Royal Legislative Decree 1/2010, of 2 July, which approves the consolidated text of the Corporate Enterprises Act, Aena has a Procedure on related transactions that details the rules to follow for the approval and publication of said transactions.

This Procedure establishes and regulates, among others, the following aspects:

- What is understood as a related party and a related transaction;
- The procedure to be followed for approval, distinguishing in the case of those transactions that are the competence of the General Shareholders' Meeting, the Board of Directors or the Management Committee, as a delegated body.
- The procedure for recording transactions and their control, both semi-annually and on the occasion of the Annual Accounts; general rules of procedure and calculation and those applicable to the reporting and publication of transactions[35].

Likewise, and in order to ensure its effective and appropriate application, the Procedure includes the commitment to organise training sessions on the applicable regulations about related transactions. .

With this Procedure, it guarantees that, in the adoption of its relevant decisions, the sole purpose is to defend the best interests of the Aena Group and its shareholders, avoiding the influence of the motivations or aims of the persons involved.

The Related Transactions Procedure is applicable to all companies of the Aena Group.

1.2.6. Conflicts of interest

(GRI 2-11; 2-15)

Under the principle of zero tolerance for any type of unlawful behaviour, the Company regulates the conflicts of interest of its different groups (directors, management bodies, workers, third parties, etc.) through various internal rules and procedures in the matter[36]. In this regard:

- Article 26 of the Regulations of the Board of Directors includes the duty of diligence, according to which Directors are obliged to express their opposition to any proposed decision submitted to the Board of Directors that may be contrary to the law, the Corporate Bylaws, the Regulations or the corporate interest, and request that this opposition be recorded in the minutes. For their part, Independent Directors and other Directors who do not affect the potential conflict of interest must express their disagreement in the case of decisions that may harm shareholders who are not represented on the Board of Directors.
- The Conflicts of Interest Procedure includes the mechanisms of action, in terms of the prevention of conflicts of interest in which the directors and shareholders of the Company and its Group, as well as related persons, may be found, in accordance with the provisions of the current corporate regulations and regulatory standards and in the Aena Corporate Governance System.

  Likewise, actions carried out in the area of preventing conflicts of interest that may arise with either members of the Aena management team or directors who are considered to be High Ranking Government

[35] The details of Aena's Related Transactions can be found both in Aena's Consolidated Financial Statements and in the Annual Corporate Governance Report, as well as in the Related Transactions section available on Aena's corporate website and on the CNMV website.
[36] The conflict of interest is regulated in the Corporate Enterprises Act, which establishes the possible situations in which it is considered that there may be a conflict of interest. This situation is also provided for in the Aena Code of Conduct

Officials, subject to Act 3/2015 of 30 March, in regulation of the exercise of High Ranking Government Officials of the State, as well as their respective related persons, are also the subject of said procedure[37].

- The OSCC has approved General Instructions on Conflict of Interest for members of Aena's senior management, which aims to develop the provisions of the Code of Conduct in relation to 'conflicts of interest', assess the existence of such conflicts and determine Aena's policy in managing these situations, with respect to those transactions in which the particular interest of the person carrying them out enters or could enter into a conflict, directly or indirectly, with the interest of the Company.
- The Regulations on Duties of the General Regulatory Compliance System of Aena and the Procedure for Managing the Complaints Channel regulate the potential for conflicts of interest for the Compliance Supervision and Control Body and members of the Compliance Division.
- A specific section is dedicated to the Code of Conduct, in such a way that, in the event of a situation of potential conflict of interest, the Persons Subject to the Code must always act, in the fulfilment of their responsibilities, with loyalty, honesty and in defence of the interests of Aena, refraining from prioritising their personal interests at the expense of those of Aena and intervening or influencing the decision-making affected by the conflict of interest.

In this regard, in the United Kingdom, at the London-Luton Airport, during 2022, within the framework of the review of the policies, the regulation of the conflict of interest has been included as a specific part of the policy on the prevention of fraud, corruption and conflicts of interest.

For its part, at Aena´s Airports in Brazil, a Due Diligence of Suppliers is carried out through a General Information Form (FIG, Formulario de Información General]) to collect information on politically exposed persons and potential conflicts of interest. This form is submitted by the contracting department in internal processes. During 2022 and within the dissemination and awareness activities carried out, specific training has been given in the area of conflict of interest.

1.2.7. Specific measures to combat money laundering

(GRI 2-23; 2-26; 3-3)

In both Spain and Brazil, the Anti-Corruption and Fraud Policy defines Aena's commitment to maintaining reliable and complete business relationships with third parties. It stipulates that through the due diligence process in the Company's relationships with partners, business agents and representatives, the following should be determined:

- The identity of the counterparty and their actual or legal administrator.
- The identity of the beneficial owner, as established in the provisions set forth in Article 4.2 of Act 10/2010, of 28 April, on the prevention of money laundering and the financing of terrorism; and the identity of the financial activity within which the corresponding business relationship is established.

Aena prohibits any financial transaction, contract, arrangement or agreement where there are reasonable grounds to believe it may involve improper or corrupt practices. Partner transactions will only be completed if they are recognised for good industry performance and proven ethical behaviour. Third parties (partners, sales agents and representatives) can easily be evaluated through a due diligence process that analyses, among other things, the type of transaction to be carried out.

Likewise, to help combat money laundering, both in Spain and Brazil, an Internal Control Over Financial Reporting System (ICFR) has been established, which is audited. In Brazil, additionally, training activities are carried out in this regard.

In addition to the above, in the United Kingdom, at the London-Luton Airport, they have their Fraud, Corruption and Conflicts of Interest Prevention Policy, aligned with that of the parent company, as well as the Tax Evasion Prevention Policy, through which specific anti-money laundering measures are regulated. To reinforce compliance, specific online training actions are planned for all employees.

Aena is committed to strictly adhere to the laws and regulations against money laundering and the financing of terrorism.

1.2.8. European Transparency Registry and Lobbying

(GRI 415-1)

Aena has been registered since 2016 in the European Transparency Registry, to which it periodically reports information – the last occasion being in June 2022 – on the activities and resources that it allocates to perfect and advance the legislative and regulatory framework of the European Union. Specifically, information is reported regarding the policy on air transport, the environment, security and safety, passenger rights, external relations, competition, ground handling, time slots, single European Sky, trade, aid, etc. Within this framework, Aena is aligned with the Code of Conduct of said register.

At the European level, Aena contributes through the *Airports Council International Europe* (ACI Europe), whose Chairman is Javier Marín, Managing Director of Airports and Executive Director of the Company. ACI

[37] In accordance with the provisions of current corporate and regulatory regulations and the Aena Corporate Governance system

Europe is made up of airport managers, working to ensure effective communication and defence of their legislative, technical, environmental, passenger and commercial interests, among others. Specifically, the following types of issues are addressed: airport capacity and time slots, improved connectivity, the liberalisation of aviation and foreign relations, airport leadership and change management, airport traffic, airport security and protection, customer service, EU funding, air traffic management, regional airports and the European Single Sky and SESAR joint undertakings. In addition, climate action stands as a matter of great importance within this organisation.

Regarding the contributions to representatives and political parties, these are expressly prohibited in the Aena Code of Conduct, as well as in the Policy against corruption and fraud, and therefore none have been made during the 2022 fiscal year. Likewise, it is strictly prohibited to receive or give, to promise or offer any kind of payment, commission or gift to any authorities or public officials or members of private entities, provided that due to their frequency, characteristics or circumstances they could be interpreted by an objective observer as made with the intent to affect the impartial judgement of the receiver. Furthermore, it prohibits accepting or giving any gifts or gestures of hospitality for an individual amount greater than one hundred euros, for the same reason.

In relation to travel and representation expenses for third parties that Aena may incur, in Spain they must be duly authorised, consistent and reasonable, without in any case being classified as excessive or extravagant, and in these cases and to the extent possible, the Travel Policy Applicable to Aena personnel must govern. The expenses must always be paid to the service provider and must have the corresponding proof of payment. Likewise, any offer by any third party in the public or private sector of payments, commissions, remuneration or gifts of any kind must be rejected by the Persons Subject to the Code and brought to the attention of the Compliance Supervision and Control Body. Any doubt that Persons Subject to the Code may have on how to act in a given situation must be referred to the Compliance Supervision and Control Body. In addition, the receipt of loans or any type of credit (unless they are available to any third party under similar conditions, and the conditions being applicable across the market) from customers, suppliers, intermediaries or counterparties is strictly prohibited for any Person Subject to the Code. The above restrictions also apply to close relatives and legal entities over whom those affected by the restrictions or their close relatives exercise control or significant influence – both from the point of view of Persons Subject to the Code (i.e., the prohibition on accepting gifts extends to the next of kin of a Director) and from that of third parties (i.e., the prohibition on giving gifts to a public official also extends to the next of kin of the latter).

Finally, no contributions can be made for lobbying purposes in either the United Kingdom or Brazil, and therefore no lobbying policies are available.

1.2.9. Unfair Competition[38]

(GRI 206-1)

In Spain, aspects related to the protection of competition are included in the framework of the Regulatory Compliance System given the Company's objective to promote respect for the regulations of the protection of the competition. In this regard, after identifying the competition risks and including them in the matrix of risks and controls, the guarantor management carries out a relevant control exercise that, in turn, is subject to supervision by the compliance division.

Aena's Human Rights Policy sets out the organisation's formal commitment to avoid any conduct related to unfair competition.

In addition, the Competition Compliance Policy has been approved in 2022 in the UK.

In Spain, the conditions established in the DORA allow Aena to exercise control in order to avoid any type of practice related to unfair competition, in this case as a guarantor for the Company's pricing practices.

This document establishes the criteria for the annual setting of airport charges in the period 2022-2026, and serves as a guarantee to avoid entering into anti-competitive agreements, and in particular agreement where prices are established.

On the other hand, the Act 9/2017, of 8 November 8, on Public Sector Contracts is applicable in the contracting of suppliers to Aena. This regulation establishes a series of measures to be used in the event that there are substantiated indications of collusive conduct in the contracting procedure, as defined in Article 1 of Act 15/2007, of 3 July, on the Protection of Competition, whereby they will be transferred prior to the awarding of the contract to the National Markets and Competition Commission, or, if applicable, to the relevant independent competition authority.

In 2022, training has been given to Senior Management in matters of competition.

[38] On 20 February 2020, the Commercial Court summoned Aena to answer the lawsuit filed by Ryanair DAC in which it seeks the declaration of nullity of a penalty imposed by Aena on Ryanair, amounting to €9,000, an immaterial amount for the Organisation, the declaration of nullity of the contractual clause establishing the penalty and the refund of the amount imposed. The declaration of nullity of the clause in question is based on the fact that it had been imposed through abuse of a dominant position. The trial will be held on 1 March 2023. Aena has consistently argued that the basis of the Claimant's claim is not a question of abuse of a dominant position, but rather opposition to the imposition of the corresponding penalty and, therefore, a contractual issue. Aena considers that the civil courts should have jurisdiction to hear this matter and will make this clear at the appropriate procedural moment.

In the United Kingdom, during fiscal year 2022, a policy of their own (LLA Competition Compliance Policy) has been approved and related training has been provided.

During the 2022 fiscal year, no proceedings have been opened or concluded against Aena in Spain, the United Kingdom or Brazil for anti-competitive practices[39] (including monopolistic practices and threats to free competition)

1.2.10. Complaints Channel[40]

(GRI 2-16; 2-26; 406-1)

Aena has specific channels – in Spain, in the United Kingdom and in Brazil – through which reports can be processed regarding any irregular or illegal conduct and which could violate the Company's policies, procedures and standards of action, as well as other confidential communications.

In particular, in Spain[41]:

- Internal complaints channel: available to internal stakeholders[42], and accessible via the intranet or using the complaints channel mailbox. To make the report, they must identify themselves, thus guaranteeing at all times the right to confidentiality of the identity of the complainants, to the defence and presumption of innocence of the affected persons[43].
- External complaints channel: this can be accessed through Aena's corporate website and by mail addressed to Aena's Compliance Division so that any person, including employees, who can make their report, thus enabling them to remain anonymous, if the complainant so wishes.
- Likewise, the possibility of filing the complaint in person is an option, in which case the reported incident will be recorded and the informant will be informed about the processing of their data, in accordance with the provisions of Regulation (EU) 2016/679 and Organic Law 3/2018 of 5 December on the Protection of Personal Data and guarantee of digital rights.
- Finally, in accordance with the new regulations on the protection of persons reporting on regulatory and anti-corruption violations transposed by Directive (EU) 2019/1937 of the European Parliament and of the Council, of 23 October 2019, regarding the protection of persons reporting violations of European Union law, there is a Complaints channel for the independent whistleblower protection authority for those complaints regarding the commission of any actions or omissions that constitute a violation of European Union law.

The aforementioned Complaints Channel is managed and supervised by the OSCC through the Compliance Division, offering the following guarantees:

- Functional independence of the informant: all reports received are reviewed by the OSCC.
- Confidentiality of the identity of the person making it, as well as the informant and affected person in terms of the new regulations, in the event that the report is not made anonymously.
- Informing the people who are strictly involved in the process, and following up on and finalising the complaints made..
- No retaliation by the informant.

In the event of a violation, the expected disciplinary measures would apply:

- For employees, in the Collective Bargaining Agreement.
- For Senior Management, disciplinary measures are provided for in the contracts that regulate their relationship with Aena.
- The members of the Board of Directors shall be subject to the provisions of the Regulations of the Board of Directors.

This way of proceeding for the management of complaints is reflected in the "Complaint Channel Management Procedure", as well as in the Procedure for the processing and instruction of complaints that is being modified in order to adapt it to the new regulations on the protection of persons reporting on regulatory and anti-corruption violations by which Directive (EU) 2019/1937 of the European Parliament and of the Council is transposed, of 23 October 2019, regarding the protection of persons reporting violations of European Union law.

To raise awareness of the Employee Complaints Channel, several informational modules were published in 2022 through the internal newsletter.

In the UK, a new complaints management procedure (Whistleblowing Policy), available on the intranet for all employees, has been approved during 2022, which includes the steps to follow in the event of making a complaint. Reports can be filed through:

- Direct communication with the manager;
- The Whistleblowing Officer;
- The airport operations service, whose supplier has changed in 2022;

[39] Data first reported in this NFIS 2022 of the Aena Group.
[40] Links to the websites cited in this section of the document can be found in the chapter 'Links of Interest' of this document.
[41] In Spain, available for the receipt of complaints from Aena S.M.E., S.A., SCAIRM and ADI. In addition to these channels, complaints can be made by post at the registered office, informing the immediate manager.l.
[42] Members of the Management Bodies, directors and employees of Aena.
[43] If the employee wishes to remain anonymous, he or she may file a complaint through the External Complaints Channel, available on the Organisation's website.

- A confidential external telephone service managed by an external company; legal counsel;
- The CEO.

To ensure knowledge of the organisation, messages are distributed periodically.

For its part, at Aena airports in Brazil, a Procedure for the Management of the Ethics Channel is available for the processing of complaints, as well as a corresponding tool (Ethics Channel). This platform is managed internally and has the ability to process reports anonymously[44] Reports received are addressed to compliance@aenabrasil.com.br and they are only received by members of the CCAB (ANB Compliance Committee) and the Compliance Manager. All reports are treated confidentially.

In 2022[45] Aena received 60 reports (24 in Spain, one in the United Kingdom and 35 in Brazil) through the corresponding channels (14 less than in 2021, when 33 were received in Spain, 3 in the United Kingdom and 38 in Brazil).



Reports are received by the Compliance Division through official channels (internal and/or external):
- Intranet (form),
- website (telematic portal), postal mail and others.

Once the report has been received, it is classified by the Compliance Division as a complaint or claim based on the criteria established in the Procedure for the management of the complaint channel approved by the Compliance Supervision and Control Body (OSCC).
If it is classified as a complaint, it is assigned a correlative registration number.

After the preliminary evaluations, their admission or inadmissibility is agreed within 5 business days.
Additional information may be collected prior to admission. The decision adopted on its admission or inadmissibility shall be communicated to the submitter within seven days.
Any person who is the subject of the complaint shall also be informed of the facts of which he or she is accused, unless this would jeopardise the effectiveness of subsequent legal action or if the matter is of a non-critical employment nature in which notifying the accused could have negative consequences, which shall be suitably assessed by the OSCC, and always in compliance with the regulations on the protection of personal data.

Following the submission of the OSCC, an investigation procedure is initiated, which will conclude with the report of conclusion and termination of the procedure.
For all this, reference is made to the provisions of the Manual for the treatment and investigation of facts communicated through the Complaints Channel.

report of the conclusions of the instructor by the Compliance Division has been received, it will be submitted to the OSCC, which will conclude on:
- Whether there has been any non-compliance. If no breach is recorded, the complaint will be filed.
- The measures to be taken in view of the facts reported.

Compliance Division will notify the submitter of the end of the investigation that is the subject of this procedure and the result in a succinct manner. The accused will also be notified, if it has not already been done and will be informed of the consequences and conclusions of the investigation.

[44] Available in Portuguese.
[45] With regard to the complaints received in Spain in 2021, 7 complaints from the year 2021 (which were pending resolution) and 17 from the fiscal year 2022 have been closed by the OSCC. As of the date of this report, 4 reports remain open, under investigation by designated instructors.

		2021			2022		
Type of Complaint[46]	**Status**	**Spain**	**United Kingdom**	**Brazil**	**Spain**	**United Kingdom**	**Brazil**
Workplace Harassment[47]	Dismissed	5	1	-	3	-	3
	Accepted	-	2	-	-	-	-
	Measures Taken	-	Promotion of training. Employee withdrawal from process.	-	Redirected to the Workplace Harassment procedure	-	-
Discrimination Based on Gender	Dismissed	-	-	-	-	-	-
	Accepted	-	-	-	-	-	-
	Measures Taken	-	-	-	-	-	-
Violation of Employment Rights	Dismissed	4	-	-	15	-	-
	Accepted	-	-	-	-	-	-
	Measures Taken	-	-	-	Reinforcement measures.	-	-
Corrupction and Fraud	Dismissed	2	-	1	1	-	-
	Accepted	1	-	-	1	-	-
	Measures Taken	Financial	-	Improvement of controls	Corrective measures and reinforcement of controls.	-	-
COVID-19/Healthcare	Dismissed	4	-	-	-	-	1
	Accepted	-	-	1	-	-	-
	Measures Taken	-	-	Healthcare protocol compliance conference	-	-	-
Breach of Code of Conduct or Other Regulations	Dismissed	3	-	-	1	-	6
	Accepted	-	-	-	1	-	2
	Measures Taken	-	-	-	Reinforcing and other corrective measures.	-	Guidance and corrections for the supplier. Reinforcement of maintenance of facilities. Moving personnel to another unit. Reinforcement in employee orientation.
Irregularities in Contracting	Dismissed	3	-	-	-	-	2
	Accepted	-	-	-	-	-	-
	Measures Taken	-	-	-	-	-	-
Others	Dismissed	11	-	26	2	1	21 (1 under evaluation)
	Accepted	-	-	10	-	-	-
	Measures Taken	-	-	Verbal and written warnings. Conducting climate research. Feedback.	Reinforcement measures	Internal investigations and audits by the Airport	-

[46] In both 2021 and 2022, there were no complaints of the following types received in any of the jurisdictions in which Aena operates: Money Laundering, Unfair Competition and Monopolistic Practices, and Data Protection.
[47] Complaints of harassment may be received through the Complaints Channel or the programme provided in the protocol for addressing the prevention of sexual harassment, and includes a specific protocol.

1.2.11. Data Protection

(GRI 3-3)

Aena has a data protection and privacy compliance model that is based on respect to the fundamental right to data protection and privacy included in the Code of Conduct, as well as in a set of documents in which said commitment is formally reflected.

Aena formalises its commitment to this respect based on data protection and privacy in the Code of Conduct, the Information Security Policy, the Human Rights Policy and other documents.

This model is based on an Information Security Policy, which also includes the importance of ensuring information privacy, and a set of rules, procedures and instructions to ensure compliance with this regulation.

In Spain, Aena has a Privacy Policy for customers and users of the website and of airports, as well as a Privacy Policy for Shareholders and Investors, both published on the website. Likewise, there are Privacy Policies for employees. These policies detail the processing of personal data and the information required by the General Data Protection Regulation (GDPR) and by the Data Protection Act 2018.

The model is managed by the Central Data Protection Office (OCPD) and the Data Protection Officer.[48] Likewise, there is a Data Protection Committee, which comprises members from Aena´s Corporate Management divisions, with implications on the subject, performing support and advisory functions.

In the UK, a Privacy Policy is available for customers and some airport operators, accessible through their website. This document explains how personal data is used for a variety of purposes and details the information required by the Data Protection Act 2018. Likewise, contracts with suppliers and operators cover Data Protection through the preparation of specialised contracts or through the Airport's Charges and Conditions of Use. A Data Protection Policy is also available and can be viewed by employees on the LLA Hub.

Such policies are integrated into the compliance system, and include disciplinary action to be taken in the event of non-compliance. In addition, the local Data Protection Officer engages internal audit within the data protection framework and where appropriate external audit.

The responsibility for managing any data protection issues ultimately rests with the Legal Counsel.

In Brazil, there is a Governance Programme for the protection of personal data, focused on ensuring compliance with the applicable General Data Protection Act (Act 13.709/2018). Among the guidelines it contemplates are the following:

- The management of third parties, to ensure the correct use of personal data.
- Activities with personal data, in order to keep the activity history up to date, the responsible compliance officer must be informed of any changes that may be related to the subject
- Members of the Data Protection Committee, responsible for participating in the development of the project and disseminating the related information.

All of this is carried out under the internal regulations that are applicable, including the Privacy Policy for airport users and the Privacy Policy for third-party workers, among others.



[48] Its main function is to ensure compliance with current legislation on data protection, maintaining and updating the Record of Processing Activities, implementing security measures, coordinating internal and external audits on the subject, advising the rest of the corporation, responding to the requirements of the Spanish Data Protection Agency (AEPD [Agencia Española de Protección de Datos]) or dealing with exercise of rights requests that any citizen may ask of Aena. The point of contact with the Central Data Protection Unit is via email at ocpd@aena.es, and with the Data Protection Officer, who has the highest responsibility in ensuring effective compliance with the regulations in question, at the following address: dpd@aena.es
In the United Kingdom, a Data Protection Officer of their own is available, who was replaced in mid-2022.

DATA PROTECTION AND PRIVACY COMPLIANCE MODEL
Code of Conduct: collects respect for the fundamental right to data protection and privacy

Formal commitment to the highest level	
Information Security Policy	
Approved by	Board of Directors
Available on	Corporate Intranet in Spain, UK, and Brazil (Sharepoint) and Corporate Website (all users) [49]
Scope	It includes directors, managers and, in general, all employees of the Aena Group without exception and regardless of their position, responsibility, occupation or geographic location, as well as contracted companies, collaborating companies and customers and, more generally, any person who has access to the information and/or systems of the organisation as well as to all physical infrastructures (buildings, airports, etc.). In turn, it is applicable to all of Aena's information systems, regardless of the supporting technology and all types of information created or used to support Aena's business, regardless of its format or storage medium.
Main Features	It defines the mode of access, use, custody and safeguarding of computer assets, always guaranteeing the integrity, confidentiality, availability, authenticity and specific traceability of Aena's critical information systems, respecting the current legal framework, and faithfully complying with the guidelines, procedures and access regulations that are established. It includes the main guidelines regarding the processing of information and, consequently, prohibits the disclosure, duplication, modification, destruction, misuse, theft and unauthorised access to information owned by Aena or by other companies and persons entrusted to it, and must access only that information necessary for the performance of their functions.
Set of procedures, guides and measures	
Applicable to directors, managers and employees, as well as all persons and companies related to the Company, in order to ensure that all information assets are adequately protected, limiting their use to the purpose of the processes for which they are intended and ensuring that access to them is controlled. [50]	

Mechanisms to inform data subjects of the privacy of their data [51]

	Employee Data Privacy Policy[52]	**Privacy Policy for users of the facilities, websites and App**	**Privacy Policy for personnel collaborating companies**	**Privacy Policy for Shareholders and Investors**
Available on	Corporate website and intranet	Corporate websites for all users, suppliers and customers	Corporate website, for all employees of collaborating companies	Corporate website
Countries	Spain and UK	Spain, UK and Brazil	Spain and Brazil	Spain
Main features	They include information about: • Who is responsible for the processing of personal data • Nature of the data processed • Purposes for which the personal data will be used • How to exercise the rights of access, rectification, deletion, opposition, limitation of processing, portability, exclusion and if not subject to automated individual decisions • Retention period of the data • Who the data is communicated to (disclosure to third parties) • Data security measures • Mechanisms established so that the user can escalate issues related to data privacy, such as how to contact the Data Protection Officer			

[49] See chapter 'Links of interest'.
[50] Such documentation is prepared by the Central Data Protection Office and approved by the Data Protection Officer. The approval procedure is pending to include the agreement of the Data Protection Committee. This documentation is available to all personnel of the group companies on the personal data protection portal posted on the intranet.
[51] In Brazil, both privacy policies have been approved by local corporate management, and apply equally to customers, users, passengers and third-party personnel, respectively. Its objective is to inform about the personal data collected and the processing carried out on them, as well as to provide contact information (privacidade@aenabrasil.com.br) in order to exercise the rights established by Brazilian Act No. 13.709/2012. The policies are posted on the ANB's website.
[52] In Spain, the United Kingdom and Brazil, clauses are also introduced in the employment contract of employees that aim to inform about the personal data collected and the processing carried out on them, as well as to provide contact information in order to exercise the rights established by the applicable local regulations. The clause is signed by employees, who keep a copy.

Measures to guarantee privacy. Risks[53]

At the time of collection of personal data from the different data subjects, they are informed of the processing of their personal data through the corresponding information clauses and/or privacy information policies, and it is guaranteed that such data will only be used for the reported purposes and during the defined storage periods.

To ensure adequate risk management in the area of data protection, informational privacy policies are available, aimed at each of the groups, through which they are informed about the processing of their personal data, in accordance with the provisions of the data protection regulations (see infographic above). Such policies inform about the group company or companies acting as data controller, the types of data processed, purposes of processing, legal bases for such processing, retention and suppression times, data transfers or communications of transfer to third parties and, where appropriate, international transfers of data and the necessary guarantees for their execution, as well as how to exercise your recognised rights with the data controller, and how to contact the Data Protection Officer and the Supervisory Authority. In cases where automated decisions exist, they are reported along with their characteristics, in accordance with regulations. The Policies available in Spain are as follows[54]:

- Data privacy information policy for users of the facilities, customers, suppliers and the Aena website.
- Privacy Information Policy regarding the App.
- Privacy Information Policy for shareholders and investors.
- Privacy Information Policy for employees.
- Privacy Information Policy for employees of collaborating companies.[55]

Likewise, the model to be followed in this regard – 'privacy by design' – puts the protection of personal data at the centre of the preparation of any product or service from the initial stages. These take into account a number of safety measures based on the corresponding risk. These measures are based on a risk analysis methodology (relating to personal data privacy), and data protection impact assessments. So, in the event of the creation of new products or services that involve the processing of personal data or significant changes in an existing data processing, the Central Data Protection Office, together with the Data Protection Officer, perform the corresponding processing analysis, taking into account the privacy risks and, based on what is required by regulations, the corresponding Privacy Impact Assessment. These are reviewed periodically to pursue continuous improvement. This model applies to all personal data-processing transactions carried out by the companies of the group of the different groups of interested parties: employees, shareholders and investors, customers and suppliers.

Measures to ensure compliance with regulations. Audits

Among the measures to check the degree of adequacy to data protection regulations is a programme of internal audits and 'on-site' reviews that detect and remedy any deficiencies detected.

In 2022, a total of 47 'on-site' editions[56] (4 in 2021) distributed between Spain (3) and the United Kingdom (44), having detected 57 deficiencies (32 in 2021) distributed between Spain (34) and the United Kingdom (23).

Corporate culture in matters of personal data protection

During 2022, and with the aim of promoting a culture of personal data protection, a series of training and awareness-raising actions have been carried out in the field that have contributed to the training of 988 employees in Spain (4,253 employees in 2021) and 304 employees in the United Kingdom[57].

[53] Risks relating to data protection and cybersecurity are included among the so-called 'legal and compliance risks', as set out in the Company's Risk Management and Control Policy. As for their governance, supervision and review model, as it is incorporated in the Company's Risk Map, it is subject to the same governance model as the rest. The Board of Directors defines, updates and approves the Risk Control and Management Policy implemented in Aena and establishes the acceptable risk level. Subsequently, and supervised by the Audit Committee, the Aena Management Committee updates the risk map annually based on the monthly information provided by the different corporate management departments. In the event of a violation, in Spain, the Aena Code of Conduct establishes that breaches of data protection may lead to the application of disciplinary sanctions in accordance with labour legislation.

[54] In the UK and Brazil they have their corresponding policies and standards adapted. For example, in Brazil the Privacy Policy for airport users, the Privacy Policy for third party workers, or employment contracts of employees; while in the UK they have the Privacy Notice for employees and contractors.
In addition, in Brazil, all activities involving the processing of personal data are properly recorded and reviewed annually.

[55] In Brazil, they have the Information Security Policies, Information Privacy Policy for facility users, customers, suppliers and of the Aena website and the Information Privacy Policy for employees of collaborating companies, aligned with those of Aena. Links to policies that are publicly available can be found in the 'Links of Interest' chapter of this document.
For its part, in the United Kingdom they have an IT Security Policy, a Data Protection Policy, the Privacy Policy for Customers available at Privacy Notice – London Luton Airport (london-luton.co.uk), Policy of disclosure to third parties, and privacy policy of the website. Links to policies that are publicly available can be found in the 'Links of Interest' chapter of this document.

[56] None have been conducted in Brazil.

[57] Data from 2021 not available for UK

It should also be noted that in Brazil, training is provided to the entire workforce in order to disseminate and publicise the Data Protection Governance Programme and, since 2019, 358 employees (108 in 2022[58]) have received training on the Brazilian General Data Protection Law (LGPD) and other related topics. In addition, the local ICT area conducts specific training on access controls and security enhancements[59].

Likewise, in Spain, employees are equipped with a series of materials and general information about this (disclosure plans, procedures, guides, etc.) through the data protection portal published on the intranet. In Brazil, this work is carried out by sending internal communications in this regard.

Also, in Spain, periodic videoconferences are held with the Coordinators of Data Protection Airport Groups, in which the Data Protection Officer addresses the most relevant issues that have arisen during the period, and answers any questions or queries that the Coordinators may have. In 2022, a total of 16 took place (12 in 2021). Finally, it is worth noting the periodic distribution of informational modules in matters of data protection, having reached 18 in 2022 (11 in 2021).

In 2022, as in 2021, no personal data security breaches were detected and the exercises of rights received from the data subjects were addressed.

Data Protection Indicators (GRI 418-1)

	2021				2022			
	Spain	United Kingdom	Brazil	Consolidated Total	Spain	United Kingdom	Brazil	Consolidated Total
Total identified cases of customer data leaks, thefts or losses (number)	0	1 (less)	0	1 (less	0	0	0	0
Violations of the data protection regulations and notified to the user	0	0	0	0	0	0	0	0
Breaches of personal data	0	0	0	0	0	0	0	0
Affected customers (number)	0	0	0	0	0	0	0	0
Claims received by third parties and corroborated by the organisation in data protection material (number)	0	0	0	0	0	0	0	0
Claims from regulatory authorities on data protection material (number)	3	0[60]	0	3	1	0	0	1

[58] Data from 2021 not available for Brazil.
[59] Data from 2021 not available for UK and Brazil.
[60] A total of 3/4 complaints were received regarding subject access requests and a complaint from the Information Commissioner Officer (ICO), for the direct management of the same from the Airport itself with the complainants involved. No other measure was taken.

1.3. Fiscal transparency

Fiscal approach

(GRI 207-1)

The Board of Directors positions itself as solely responsible for determining the Tax Strategy[61], which integrates the values of transparency, integrity and prudence, and defines the approach taken in relation to tax matters in a manner consistent and aligned with the Group's strategy[62].

Tax governance

(GRI 207-2)

Following the recommendations of the codes of good tax practice (such as the OECD Principles of Corporate Governance) in the countries in which the activity of Aena or the Group companies it controls is carried out, is one of the main commitments adopted and reflected in the Corporate Tax Policy, with it being applicable to Aena in Spain, and to the companies controlled by Aena in the UK and in Brazil (under the terms established in Article 42 of the Commercial Code).

The Board of the London-Luton Airport has approved the Tax Evasion Prevention Policy in July 2022, aligned with that of Aena in Spain.

In this regard, the Audit Committee stands as the body responsible for reviewing and supervising the corporate policies, among which is the one mentioned in matters of tax practice. Likewise, it is under its responsibility to review the procedures aimed at preventing irregular conduct, such as those related to tax issues[63].

Each half-year, the head of the Economic-Financial Management division transfers transactions with related parties of the Company to the Board of Directors; and at least twice a year, on the date of drawing up the Annual Accounts, and on the date of submitting the Corporate Tax information, it reports on the adoption of tax policies as well as those transactions that have a significant tax impact.

The Sustainability and Climate Action Committee is also involved in this matter, through its work of understanding, promoting, guiding and monitoring the objectives, action plans, practices and policies of the company in environmental and social matters, ensuring that they have adequately identified and included responsible tax principles, responsibilities, objectives and strategies, etc..

Respect for and proper compliance with established obligations and tax commitments is critical to achieving the SDGs.

The principles of action of the Sustainability Policy, which take as reference the principles set forth in the United Nations Global Compact and the Sustainable Development Goals, include ensuring the application of the responsible tax principles and practices defined in the fiscal policy and the Code of Conduct of the Company.

Risk management and control

(GRI 2-26; 207-2)

Tax risks are included in the Company's risk map under the category of 'legal and compliance' risks, so the same management, monitoring and review model applies to them as to the rest of the risks. Therefore, the Board works on the definition, updating and approval of risk control and management policies, as well as on the establishment of acceptable levels thereof and, based on the information received monthly from the different corporate departments, an annual update of the risk map is carried out under the supervision of the Audit Committee.

Any type of complaint that shows irregular conduct that may imply the performance of an act contrary to the law, the Company's policies and procedures or the rules contained in the Code of Conduct (including those related to tax obligations), can and should be processed through the Complaints Channel, which constitutes a mechanism for reporting concerns in various matters.

Participation of stakeholders and management of tax concerns

(GRI 207-3)

The processing by Aena of tax matters is carried out in a framework of transparency, proactivity and responsibility with its stakeholders[64] in order to respect the tax laws of each jurisdiction in which it operates, minimising reputational risk, and making its activity compatible with the creation of value for the shareholder and the rest of the stakeholders.

Specifically, topics such as responsible tax management and exchanging best practices are addressed by actively engaging companies in clusters and working groups in matters of good governance. Likewise, Aena engages in various forums with the Tax Administration Service and

[61] The Tax Strategy can be found in the chapter 'Links of Interest'.
A specific frequency/period for the review of that Strategy has not been defined at this time.
[62] Said Strategy is subject to annual review. However, since its approval, only small wording adaptations have occurred.
[63] The Chairman of the Audit Committee informs the Board of the aspects addressed at the different Committee meetings, including, if applicable, the aspects related to the Company's tax contribution.
[64] Through the communication and dialogue mechanisms described in the 'Relationships with Stakeholders' section contained in the 'Document approach', Aena actively communicates with all of its stakeholders to deal with all matters that it considers relevant, including, where appropriate, those related to the Company's tax and fiscal practices."

other third parties to strengthen its fiscal transparency in accordance with the Code of Good Governance, having been one of the eleven IBEX companies awarded with the transparent 't' stamp in the fiscal year 2022, which is awarded by Fundación Haz.

With regard to cooperation with tax authorities, within the framework of the Company's tax policy, the Group integrates the principles of transparency, mutual trust and honesty in its relations with tax authorities, providing the tax information and documents requested in the shortest time possible and with the most adequate coverage

Finally, the policy reflects Aena´s commitment to collaborate with the Tax Administration on possible inspection procedures to reach agreements and compliance with them, to the extent possible and without prejudice to good business management and the legitimate right to disagree in the event of a dispute.

1.3.1. Tax contributions[65]

(GRI 207-4)

Aena is aligned with its commitments in terms of sustainable development and contribution to the progress of the communities in which it operates by satisfying its tax obligations, which constitutes its main contribution to the sustainment of public charges and is carried out under the premises of responsible taxation and transparency.

The Aena Group tax contributions[66] for the fiscal year 2022 amounted to €526.5 million (€285 million in 2021). Taxes borne amounted to €455.7 million (€267.3 million), with the largest one being the profit tax, which totalled €176.2 million. The tax contribution in the fiscal year 2022 is distributed between €32.5 million of taxes paid in the United Kingdom (6.2% of the total) -€16.1 million in 2021-, €469 million in Spain (89.1% of the total) -€258 million in 2021-, and €24.9 million in Brazil (4.7% of the total) -€10.8 million in 2021-.

Tax indicators (GRI 207-4)

Tax jurisdictions where Aena has shares	Revenue from intra-group transactions with other tax jurisdictions	Pre-tax profit	Taxes withheld and paid on behalf of employees	Taxes collected from customers on behalf of a tax authority	Significant uncertain tax positions	Intra-company debt	Corporate tax paid (cash received basis)	Tax on profits/losses for companies (exclude deferred tax on profits and provisions for uncertain tax positions)¡	Other taxes or payments to governments
2022									
SPAIN	11.7	1,110.9	193.03	-42.2	-	30	165.1	236.8	145.1
UNITED KINGDOM	-	16.2	3.9	13.7	-	-	8.9	6.3	6
BRAZIL	-	59.2	8.1	14.6	-	-	2.2	20.2	-
2021									
SPAIN	8.6	-566	164	-56.7	-	16	-	-182.4	150.7
UNITED KINGDOM	-	-63.7	2.9	6.5	-	-	0.3	-3.4	6.4
BRAZIL	-	-92.7	4	6.2	-	-	0.6	-31.5	-

[65] In accordance with Note 32 of the Consolidated Annual Accounts, the main permanent differences that are adjusted in the calculation of the income tax expense correspond to non-deductible expenses. The main temporary differences in 2022 relate mainly to the impairment charge for fixed assets (details of which are provided in Note 8), the difference between tax and accounting depreciation, and the provision for bad debts and provisions for contingencies and personnel expenses. The main difference between the estimated amount payable and the amount actually paid was due to the various uncertainties affecting the macroeconomic scenarios of the world economy at the beginning of the year, which made it difficult to foresee the performance of the business.

[66] All data relating to Aena's tax contribution have been included in the Annual Accounts, and are therefore verified by an external auditor. Similarly, with respect to public grants received by Aena, the detail can be consulted in the Annual Accounts. The data relating to "Pre-tax profit" and "Tax on profits/losses for companies" for 2021 has been restated in accordance with note 2.1.1. Changes in accounting policies of the Financial Statements.

1.4. Sustainability: Aena's management pillar

(GRI 2-22)

Aena's role in economic and social matters and the impact it exerts on the environment in which it operates, highlight the importance of sustainability in its management, as a cross-divisional aspect thereof.

In this line, during 2022 Aena has taken another step in its commitment to sustainability, including it as a primary aspect in the Company's 2022-2026 Strategic Plan and reaffirming its commitments acquired in the 2021-2030 Sustainability Strategy.[67]

The Company adapts its lines of action to the main regions in which it operates, sharing common objectives in some cases. Thus, in Spain, the Sustainability Strategy 2021-2030 was approved in 2021, aligned with the Sustainable Development Goals (SDGs) of the United Nations Agenda 2030, while its equivalent in the United Kingdom – the Responsible Business Strategy 2020-2025 – was approved at the London-Luton Airport.

With the aim of achieving this roadmap, the Company configures its governance model to ensure its effectiveness and correct development, in order to deal with the main ESG stakes and challenges.[68]

New challenges – such as energy, with a strong impact on prices, or new environmental and social demands that will entail an increase in costs – in no case constitute a brake on Aena's commitment to sustainability. Rather, they stand as an opportunity to reinforce their roadmap in a new context in which to prioritise environmental and social challenges, identify associated growth opportunities and further strengthen sustainability in the company's strategy.

SUSTAINABILITY STRATEGY 2021-2030 AND AENA STRATEGIC PLAN 2022-2026

- Decarbonisation and reduction of pollution
- Responsible management of resources (water, energy, promotion of a circular economy, etc.)
- Impact on the natural environment (biodiversity, noise)
- Commitment to the local community (noise, human rights protection, most vulnerable groups)
- Protecting, caring for and managing internal talent

Responsible Business Strategy 2020–2025 (RBS), United Kingdom (London-Luton Airport)

Environmental responsibility and efficiency → **Community engagement** → **Security and protection** → **Growing together with our employees** → **Deliver great customer experience** → **Sustainable supply chain**

[67] The Aena Climate Action Plan is part of the Strategy
[68] Although Aena's airports in Brazil do not yet have their own Sustainability Strategy, they do carry out ESG activities.

1.4.1. Sustainability Policy

The Sustainability Policy, approved in 2021, defines and establishes the principles, commitments, objectives and strategy to be followed by Aena to carry out its activity, optimising the contribution to sustainable development, creating long-term value throughout its value chain, through ethical and transparent behaviour. Monitoring and control mechanisms are also defined and established in order to ensure that they are achieved.

In this sense, the Policy that is applicable to Aena in Spain and to any of the companies integrated in its group constitutes the internal framework of reference with which the Company reaffirms its commitment to 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 promote sustainable social and environmental development.

Its principles of action include integrating sustainability in all organisational areas and levels, transferring this culture to all stakeholders, ensuring sustainable management and alignment with social and environmental sustainability objectives throughout the value chain.

EXPLICIT COMMITMENT TO SUSTAINABILITY

Sustainability Policy, applicable to Aena in Spain and to any of the companies included in its group (under the terms established in Article 42 of the Commercial Code)	**Sustainability Strategy: 5 Strategic Programmes**
• Integrate sustainability across all business areas and organisational levels of the Company • Maintain a firm commitment to quality and environmental management • Assume the fight against climate change as a strategic priority • Analysis and management of climate change risks and opportunities • Minimise environmental impacts (climate change, air quality, noise management, water management, biodiversity condition and waste management) • Ensure the development of social policies (human rights, diversity, equal opportunities, safety and health or quality). • Respect and promote internationally recognised fundamental human rights and absolute opposition to modern slavery. • Provide a safe and healthy work environment characterised by equal opportunity and non-discrimination, the promotion of diversity, the management, attraction and retention of talent, the development and balance of professional and personal life • Contribute value in the geographic areas in which it operates. • Contribute to social well-being and the improvement of quality of life. • Ensure the application of responsible tax principles and practices.. • Encourage innovation and continuous improvement. • Support the Company's adherence to projects or initiatives of proven reputation and credibility. • Uphold principles of transparency, integrity and business ethics. • Establish channels of communication, participation and dialogue with stakeholders. • Ensure accountability.	**Carbon neutrality.** **Sustainable aviation.** **Responsible use of resources.** **Community and sustainable value chain.** **Social commitment.**

Specific objectives → **Specific actions** → **Associated budget** → **Monitoring** → **Communication and reporting**



1.4.2. Sustainability Governance

(GRI 2-9; 2-12; 2-13; 2-22; 3-3)

The commitment of the Board of Directors with sustainability has been formalised through the cited Sustainability Policy. Based on this, the duties of the Board of Directors include the promotion and deployment of said internal regulatory framework.

To ensure the correct materialisation and implementation of the Sustainability Strategy, the Sustainability and Climate Action Committee includes, among its functions, knowing, promoting, guiding and supervising the objectives, action plans, practices and policies of the Company in environmental and social matters[69].

Likewise, in terms of accountability, each Committee has powers attributed to it, including the reporting of sustainability information. Specifically, the Board of Directors must prepare and publish the Climate Action Plan and keep it updated, as well as the corresponding annual Updated Reports. These reports include the progress made by the Company in relation to the objectives established in the current Climate Action Plan, which must be prepared in accordance with the recommendations of the Working Group on the Disclosure of Financial Information related to Climate (see section '2.2.1. Climate Action Plan') and then submitted to a consultative vote by the GSM.

As a result of the Sustainability Strategy, Aena has created the position of Chief Green Officer, in order to make sustainability a fundamental element in the Company's decision-making and strengthen the commitment in this area with all stakeholders.

Additionally, the coordination of the different cross-divisional areas in the implementation of the Sustainability Strategy and the support in its implementation is carried out by an internal work group, which requires the active and direct involvement of all areas and employees.

Aena adopts the main international reference frameworks promoted by the United Nations for sustainable management. Thus, it commits to the Ten Principles of the Global Compact, the Guiding Principles on Business and Human Rights and the Seventeen Sustainable Development Goals.

[69] Article 24 bis of the Regulations of the Board of Directors regulates the functions of the Sustainability and Climate Action Committee.

SUSTAINABLE GOVERNANCE		
 Approval	**Board of Directors** • Approval of the Climate Action Plan. • Guidance and control of the strategy, objectives, risks and results in matters related to sustainability. • Providing support to the Audit Committee in the process of supervising the risk management system, ensuring the identification, management and communication of the main risks within the planned levels. • Monitoring the progress made with the Sustainability Strategy/Climate Action Plan (including actions and associated risks).	
 Monitoring and evaluation	**Sustainability and Climate Action Committee** • Drive, guide and monitor environmental and social policies. • Monitoring of the main sustainability strategic lines and collaboration with the Audit Committee in the supervision of the associated risks. • To evaluate and verify performance and compliance with environmental and social strategy and practices, ensuring that they are focused on achieving greater sustainability, promote social interest and long-term value creation and take into account the legitimate interests of other stakeholders, and to report on them to the Board of Directors. • Validation of future sustainability strategy evolution.	Quarterly meeting to ensure periodic follow-up.
	Chief Green Officer Make Sustainability a fundamental element in decision-making. Enhance commitment in this area with all stakeholders.	
 Coordination and support	**Internal workgroup** Coordination of business areas for the deployment of the strategy. Support for the Sustainability and Climate Action Committee.	Periodic review of actions
 Implementation	Innovation, Sustainability and Customer Experience Management. Organisation and Human Resources Management.	Commissioning and development
	All organisational areas and employees with direct and active involvement in the actions.	

1.4.3. Features of the Sustainability Strategy

(GRI 2-19; 3-3)

The 2021-2030 Sustainability Strategy in Spain is made up of 5 strategic programmes that address some of the main ESG challenges identified. These programmes are developed in 16 lines of action, aligned with the SDGs, which in turn are deployed in projects and actions, and are specified in a series of goals.

The evolution of the Sustainability Strategy is carried out based on quantitative objectives and specific KPIs that are reported periodically.

The Sustainability Strategy promotes collaboration with third parties through working groups and joint projects with the aim of minimising their impact on the environment.

This new roadmap, whose associated investment is around €750 million[70], enables the sustainable performance of the Company and third parties, which positions Aena as an industry driver in sustainability.

Likewise, the degree of progress towards the objectives set is reviewed annually in order to promote and further the achievement of all the established goals, which is linked to the remuneration of the workforce as an incentive. [71]

The Company links the approval at the General Shareholders' Meeting of the Updated Climate Action Report and the fulfilment of strategic objectives of the Climate Action Plan to the variable remuneration of employees

STRATEGIC PROGRAMMES

	Carbon neutrality	Sustainable aviation	Responsible use of resources	Community and sustainable value chain	Social commitment	Communication and transparency
Action lines	Renewable energies Energy efficiency Sustainable own fleet Offsetting of emissions	Clean aircraft propulsion Efficiency in aeronautical operations Sustainable ground handling fleet	Efficient water footprint Circular economy	Sustainable mobility Cooperation and awareness Air quality Noise management Preservation of biodiversity	Relationship with the community Human resources management	Ensure transparency of the results obtained from the plan Communication with ESG rating agencies and shareholders
Some strategic objectives	> Carbon-neutral airports by 2026 > Reduction in water consumption per passenger > Reduction of atmospheric contaminants (NOx, SOx, PM) > Zero Waste 2040 > Protect and promote local and global biodiversity			> Limit the impact of noise on local communications > In 2026, we will triple the amount destined for social action initiatives relative to 2019. And by 2030, it will account for 1% of net profit. > Development of a human rights due diligence procedure > Increase the number of women in management positions		
Some achievements completed	**100% of electricity consumption from renewable sources on the Spanish grid and at Luton airport** **67% of own CO2e emission reductions in the Spanish network (base year 2019)** Development of a human rights due diligence process					

Associated investment, close to €750 M

Note: The details of the Sustainability Strategy 2021-2030 can be consulted on the Aena website. Likewise, the NFIS details and describes the different lines of action and the corresponding objectives (see Chapters 2, 3 and 5).

[70] Total economic budget of the Strategy for the period 2021–2030.
[71] In the United Kingdom, as previously indicated, there is a Responsible Business Strategy, which also contains 6 main lines of action, aligned with the Sustainability Strategy in Spain. Detailed information on their degree of achievement and progress can be consulted annually in the Sustainability Report published by the airport itself (for more information, see the "Links of interest" section). Likewise, throughout this document, the degree of performance of the Airport in the different ESG matters is reported.
Aena's airports in Brazil, as previously indicated, although they do not yet have their own Sustainability Strategy, they do carry out ESG activities.

1.4.4. Contribution to the Sustainable Development Goals (SDGs)

Since its approval in 2015, the SDGs have been key inputs for the identification of mega trends and ESG challenges for Aena. These objectives have strengthened their prominence in the Organisation with the approval of the Sustainability Policy and the formulation of the new Strategy in 2021, as well as the approval of the Strategic Plan.

In this regard, the SDGs are set up as a key element of Aena's business management, with their corresponding follow-up measures that ensure that policies cover the three dimensions of sustainable development – social, environmental and economic – and provide evidence for an effective assessment of progress in the contributions.

Aena formulates and aligns its framework of action taking the SDGs as a reference, while being aware of the importance that companies have in achieving these objectives.

The Aena Board of Directors assumes the commitment of the Organisation to the SDGs



Objectives and strategic benefits	SDGs	Outstanding actions and achievements	Report section
Decarbonisation and the fight against climate change Evolve towards a more sustainable model by implementing specific actions such as the use of low-emission energy sources, the evolution towards clean means of displacement, the use of sustainable aviation fuels, among others, working collaboratively with stakeholders. Reduce the Organisation's carbon footprint by contributing to the mitigation and adaptation to climate change. Following the TCFD guidelines, carry out the analysis of risks and opportunities for climate change and know the impact of climate change on the Organisation. Comply with decarbonisation commitments and act as a tractor of other agents in the aviation sector to accelerate the fight against climate change.		Consultative vote of the Updated Climate Action Plan Report at the General Shareholders' Meeting. Purchase of 100% of renewable energy in 2020, 2021 and 2022. in Spain and the United Kingdom. Level 3 of the Airport Carbon Accreditation (ACA) programme at the Adolfo Suárez Madrid-Barajas Airport, Barcelona-El Prat Josep Tarradellas Airport, Palma de Mallorca Airport and London-Luton Airport. Obtention of Level A in the questionnaire of climate change of CDP. Inclusion of environmental criteria in the contracting specifications and mandatory clauses. 67% reduction in own CO2e emissions in the Spanish network (base year 2019) 145,932 t of CO2e emissions avoided due to the Company's own renewable energy facilities and energy efficiency, as well as to the purchase of electrical energy from a renewable source Allocation of new photovoltaic plants at Adolfo Suárez Madrid-Barajas Airport and Barcelona-El Prat Josep Tarradellas Airport. Promotion of the use of a sustainable vehicle to access airports through a 15% discount for passengers who are partners of Club Aena who park their vehicle with an environmental 'zero emissions' mark in the airport parking lots. Provision of 1,063 charging points for plug-in electric or hybrid vehicles at Aena airports in Spain.	Commitment to the environment Social management of our Innovation value chain Responsible governance
Protecting the environment and efficient use of resources Minimise the environmental impact of operations and reduce their footprint through actions, objectives and goals aimed at reducing atmospheric pollution, water consumption and waste generated. Protect the biodiversity and natural wealth of the environment in which the Organisation operates . Develop a water management that addresses the loss of water availability and quality and carry out an integrated management of water supply sources and risks derived from climate change. Reach Zero Waste by 2040. Comply with the emission reduction commitments of the European programme to reduce the negative impact on the health of air pollution through innovative solutions. Limit the impact of noise on local communities. Protect and promote local and global biodiversity.		Sustainability Strategy. Strategic plan for water management. Calculation of water footprint. Promote the maximisation of recycling and minimise the volume of waste generated. Encourage collaboration and awareness in the circular economy. Air quality action line that covers emissions generated by own operations and by third parties. Implementation of the necessary actions to update the census of the Sound Insulation Plans of Alicante-Elche Airport and Palma de Mallorca Airport. Start of work for the implementation of the Noise Monitoring System at César Manrique-Lanzarote Airport. 27,827 isolated homes in the period 2000–2022 with an associated amount of €351,125,666 at Spanish airports and at London-Luton. Preparation of Phase IV Strategic Noise Maps for 13 airports Initiatives at airports to protect local fauna. Collaboration with the Saving the Amazon Foundation for planting more than 10,000 trees in the Amazon.	

Objectives and strategic benefits	SDGs	Outstanding actions and achievements	Report section
Relationship with the community Promote and exchange cultural values, participation in the community and contribution to social welfare. Promoting a positive impact on the environment, in order to actively contribute to the creation of more inclusive and sustainable cities in the areas where Aena operates, and mitigate possible negative impacts. Contribute to the development of the community in which the Organisation operates. Ensure respect for human rights throughout the Organisation and compliance with current regulations and best practices.		Aena with music: collaborations with Fundación Teatro Real, Fundación Gran Teatro Liceu, Taller de Músics and Pau Casals. Aena Project with Research. Agreements with universities. Inclusion of social clauses in procurement specifications. Updating the Human Rights Policy. Human rights due diligence procedure. + €3,230,490 in contributions to foundations and non-profit associations in Spain and UK	Safe, quality services Commitment to society and human rights Innovation
Innovative and safe infrastructures that promote diversity and social inclusion and sustainable use modalities Innovative, safe and quality services to ensure cohesion and connection throughout the territory and transport, ensuring the protection of all users and employees of airport facilities. Encourage the use of air transport by providing a safe and quality service, ensuring accessibility for all. Ensure the security and protection of all users of the Organisation's facilities and services and minimise any type of risk arising from a failure.		1,826,864 assistances for PRM (Spain, UK and Brazil). Investment in R&D&I projects has exceeded €27 million during 2022.. Use of electric vehicles on runways, and installing quick charging points. Implementation of Aena Maps at more airports. New edition of Aena Ventures, the Aena Start-up acceleration programme. More than 13,900 ambulance flights in Spain (11,050 in 2021). 786 employees with more than 19,641 hours on a specific training on innovation.	

Objectives and strategic benefits	SDGs	Outstanding actions and achievements	Report section
Strengthen alliances to achieve common sustainable objectives Providing solutions to global challenges thanks to everyone's collaboration. Recognising the importance of alliances, communication and transparency as tools for raising awareness and achieving our goals. Contribute with these alliances to reduce inequality. To jointly face the challenges facing the Company by sharing best practices with third parties. Improve dialogue and communication with all stakeholders.		More than 3,055 m^2 to solidary spaces to give voice to social entities and 7,970 m^2 dedicated to cultural exhibitions, representing a contribution in kind of 517,548 euros in 2022. € 3,230,490 million in contributions to Foundations and non-profit organisations (€347,000 in contributions from London Luton Airport and €2,888,405,75 in contributions from Spain). Updates to the Anti-Corruption and Fraud Policy and the Regulatory Compliance Policy. Continuous coordination and contact with the Ministry of Health, law enforcement bodies and security forces, and other agencies to offer the best service. Landing pages and specific platforms to improve stakeholder relationships.	Sustainable governance model Safe, quality services
Economic and sustainable growth and people management Generate diverse, safe and attractive work environments, in which employee care, development and training are priority objectives. Encourage diversity, inclusion and non-discrimination. Promote the retention and attraction of employees/talents. Increase the motivation and engagement of employees. Guarantee the health and safety of employees and improve accident rates.		Equality Plan 37.21% of the Company's employees are women in 2022. 44% of executive, middle management and graduate positions are occupied by women. Employer Branding Project. Promotion of work-life balance Telecommuting policy – remote work in Spain and hybrid work modality in the United Kingdom. Work Disconnection Policy in Spain. 1.53% employees with functional diversity. Call for integration into the labour market or job creation actions to be undertaken by social entities, foundations or associations: 90,000 €/ year. LGBTI Diversity and Inclusion Business Network. Psychological support. Wage gap below 3% in Spain.	Staff and social issues Social management of our value chain Commitment to society and human rights

1.5. Sustainable financing. Taxonomy

(GRI 3-3)

Aena is periodically evaluated by ESG providers and analysts. The results obtained reflect an improvement in the score received in recent years, showing its commitment to sustainability. In this line, with the aim of seeking financing alternatives that provide added value to society and the environment and incorporating ESG factors into its financing decisions, Aena currently has several financing instruments linked to the Company's sustainable commitments.[72]

ESG score provider	Score received		Associated Financing	Start date[73]	Product characteristics
	2021	2022			
SUSTAINALYTICS (Best score: 0)	11.2	8.6	**Sustainable Syndicated Credit Line for the amount of €800 Million**	2018	The economic conditions of this revolving credit line, which acts as a contingency line, are linked, in addition to the credit rating, to the ESG adjustment, based on the evolution of sustainability parameters, linked to Aena's ESG performance, which is evaluated by an external ESG supplier.
			Loan agreement with Intesa Sanpaolo for the amount of €500 million	2021	The economic conditions of the loan are linked, in addition to the ordinary interest rate, to the ESG adjustment, based on the evolution of sustainability parameters, linked to Aena's ESG performance, which is evaluated by an external ESG provider.
MOODY'S ESG Solutions (Best score: 100)	55	65	**Loan Agreement with ICO for the amount of €250 million**	2021	The economic conditions of the loan are linked, in addition to the ordinary interest rate, to the ESG adjustment, based on the evolution of sustainability parameters, linked to Aena's ESG performance, which is evaluated by an external ESG provider
MSCI (Best score: 10)	5.9	6.2	**Loan Agreement with ICO for the amount of €250 million**	2022	The economic conditions of this revolving credit line, which acts as a contingency line, are linked, in addition to the credit rating, to the ESG adjustment, based on the evolution of sustainability parameters, linked to Aena's ESG performance, which is evaluated by an external ESG supplier.
FTSE4Good (Best score: 5)	4.5	4.9	-	-	-
CDP DRIVING SUSTAINABLE ECONOMIES (Best score: A)	B+	A	-	-	-

[72] Information on the amounts drawn down and their costs in 2022 can be consulted in the Company's Annual Accounts.
[73] Effective as of the date of this report.



Taxonomy of sustainable finances

Introduction

Article 8, paragraph 1, of Regulation (EU) 2020/852 requires companies subject to Articles 19 bis or 29 bis of Directive 2013/34/EU of the European Parliament and of the Council to disclose the manner and the extent to which the company's activities are associated with environmentally sustainable economic activities. Article 8, paragraph 2, of Regulation (EU) 2020/852 requires non-financial companies to disclose information on the proportion of turnover, investments in fixed assets and operating expenses ('key performance indicators') of their activities related to assets or processes linked to environmentally sustainable economic activities.

In order to develop and specify the information to be published regarding the taxonomy of Article 8, in July 2021 the Commission adopted the Delegated Regulation (EU) 2021/2178, which in its Article 10, establishes that non-financial companies will disclose key performance indicators, including any accompanying information in accordance with Annexes I and II of said Delegated Regulations.

On the basis of the foregoing, Aena discloses in the following sections the information related to the key performance indicators, accounting policy, assessment of compliance with Regulation (EU) 2020/852 and the contextual information that is applicable to facilitate the understanding of this information.

The obligation to report this information in this fiscal year is different from that of the fiscal year 2021, insofar as in the latter year the proportion of eligible and ineligible economic activities was disclosed according to the taxonomy in its total volume of business, its investments in fixed assets, its operating expenses and the qualitative information referred to in section 1.2 of Annex I[74]. While, in the present year, in addition, information must be incorporated regarding whether the eligible economic activities are aligned or in accordance with the taxonomy in accordance with the provisions of the Delegated Regulation (EU) 2021/2139, that is, those economic activities that, being eligible, substantially contribute to one of the six environmental goals of the European Union, does not cause significant harm to any of the other five, and is carried out in compliance with minimum social guarantees.

Accounting policy

This section explains how turnover, fixed asset investments and operating expenses have been determined and allocated to the numerator and the basis on which the turnover, fixed asset investments and operating expenses have been calculated including, if applicable, any analysis in the allocation of revenue or expenses to different economic activities.

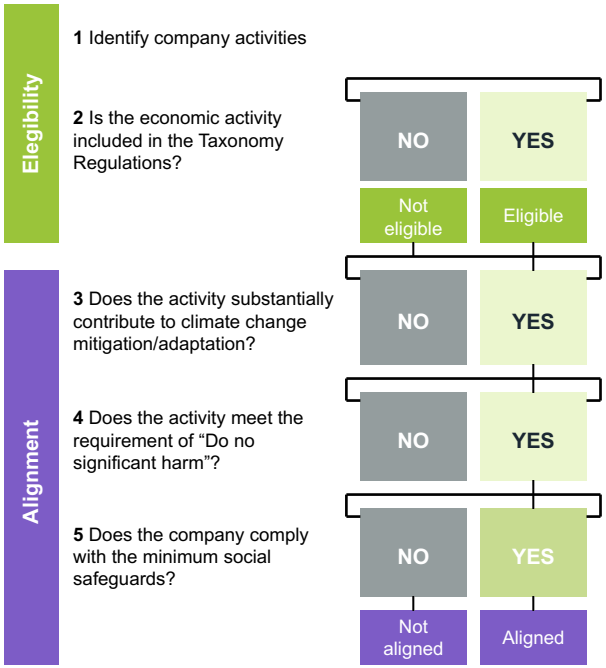
[74] See section "Links of interest."

	Turnover	CapEx	OpEx
Treatment of financial information for calculating the % of eligibility and alignment	The information is obtained by extracting the revenue from the accounting system classified by the code of each airport and the economic activity to which said revenue belonged. The corresponding average exchange rate has been applied with the different currencies, to convert the figures to euros. Negative revenue items (discounts, returns, etc.) appeared in the turnover breakdowns resulting in negative total results in some of the activities per airport. The answer to question 13 of the EU Taxonomy FAQs issued by the European Commission last October states, "Negative revenue can be treated as a value of 0% for taxonomy eligibility in the report". In this line and in order to carry out a homogeneous processing of the information, all negative items of revenue have been considered as zero value and this homogeneity has been applied both in the numerator and in the denominator, having an impact of 46.5 million euros.[75]	The information is obtained from the additions of tangible and intangible assets from the system of investments. The extraction incorporates the investment code, associated airport, description of the investment and the amount of assets added during the year. In addition, Aena has a CapEx plan in the 2022-26 horizon relating to Aena's regulated business. This Plan is governed by the Airport Regulation Document (DORA) approved by the Council of Ministers on 28 September 2021, in compliance with the provisions of Act 18/2014 and it regulates basic airport services: those provided to aircraft and passengers. Likewise, each year, the planned investments are reviewed and actions may be expanded or reduced based on the new needs that are reflected in the Operating Plans of each airport and which are approved by the Board of Directors of Aena. The data provided is based on actual performance and not planned, so there may be some variation from what is established in the DORA. With respect to investments derived from unregulated business, these are included together with the investments of the DORA in the Aena Strategic Plan 2022-26 approved by the Chairman, CEO and the two Managing Directors.	The information is obtained from the operating expenses (considered in the taxonomy) of the accounting system, corresponding to the items of the airports. The corresponding average exchange rate has been applied with the different currencies, to convert the figures to euros. The items of expenses included are as follows: a. Building renovation measures b. Short-term leases c. Maintenance and repairs d. Non-capitalized R&D investments Since extraction allows for the OpEx to be identified by airport, but does not allow for the same division by taxonomic activity, the answer to question 30 of the EU Taxonomy FAQs issued by the European Commission on 19 December 2022 has been considered, which indicates that "reporting entities must use a non-financial metric that provides an accurate allocation of CapEx to a taxonomy-aligned activity. [...] It must provide information on the allocation of the CapEx to multiple projects and the methodology for allocating the CapEx to activities aligned with the Taxonomy". Aena has applied this criterion to allocate the OpEx by means of an indirect allocation of OpEx costs based on the distribution of revenues by activity and airport, which allows for the analysis of eligibility and alignment by activity to be carried out.
Calculation of eligibility	Calculation of the denominator: net amount of the consolidated turnover of the Aena group. Calculation of the numerator: net amount of the turnover associated with the minimum management units (airports) analysed for which eligible activities have been identified (see section 4 a. Identification of eligible activities).	Calculation of the denominator: sum of the group's consolidated capital investments related to property, plant and equipment and intangible fixed assets. Calculation of the numerator: sum of the additions of capital investments associated with the minimum management units (airports) analysed, for which eligible activities have been identified (see section 4 a. Identification of eligible activities) linked to property, plant and equipment and intangible fixed assets.	Calculation of the denominator: sum of the consolidated costs of the group related to the maintenance of the business operation, which includes the items related to: a. Building renovation measures b. Short-term leases c. Maintenance and repairs, as well as all expenses associated with concession contracts that are part of the organisation's assets. d. Non-capitalised R&D investments To facilitate the extraction of the type of expenses, an association has been made to the ledger accounts 620. Research and development expenses for the year, 622. Repairs and conservation, and 621. Leases and royalties. Calculation of the numerator: sum of the costs associated with the minimum management units (airports) analysed, related to the maintenance of the business operation for which eligible activities have been identified.
Calculations of alignment	Calculation of the denominator: the same value as detailed in previous section is used. Calculation of the numerator: the following steps are applied to its calculation: 1. Assessment of full or partial compliance with the SC (Substantial Contribution) and DNSH (Do No Significant Harm) criteria in accordance with the interpretations contained in the following section of this document for each minimum management unit (airport). 2. Assessment of compliance with the minimum social guarantees at the Aena group level. 3. Sum of 100% or the proportional part (based on the degree of compliance with the SC criteria) of the amounts calculated as eligible for each minimum management unit (applied to each KPI) when: a. it has concluded that the minimum management unit tested meets SC and DNSH criteria. b. it has concluded that the group meets the criteria established in the minimum social guarantees.		

[75] Question 13 of the FAQ's of 2 February 2022 of the EC in reference to article 8 of the European taxonomy (see chapter "Links of interest").

Assessment of compliance with Regulation (EU) 2020/852

The process carried out by Aena to identify the eligible economic activities according to the taxonomy and to ensure that they conform to the taxonomy, is as follows:



a) Identification of eligible activities

In order to determine whether the economic activities carried out by Aena are eligible according to the EU taxonomy, an analysis has been carried out on the descriptions of the activities provided in Annexes I and II of the Climate Delegated Regulation 2021/2139 in order to assess whether the activity carried out conforms to said descriptions. Aena operates at 46 airports, 2 national heliports and 7 international airports (6 in Brazil and 1 in the United Kingdom). The nature of Aena's economic activities can be distinguished into three categories:

1. Aeronautical activity (regulated):
   a. Activities carried out on the airside: airfield landing and transit services; aircraft parking; use of airbridges; 400 hz power system; fuels and lubricants; ground support services; and other services.
   b. Activities carried out on the land side: check-in and self-service bag drop counters; automatic passenger check-in machines; and assistance for passengers, people with reduced mobility and security.
2. Commercial activity:
   a. Activity in the terminal building: lease of spaces for food and beverage and specialty shops; lease of advertising spaces; lease of spaces for the installation of vending machines, ATMs and other facilities; use of VIP zones and Fast Track services.
   b. Activity outside the terminal building: passenger parking lots; car rentals.
3. Real Estate activity: real estate leases; hangar leases; logistics vessel leases; land leases; other real estate operations.

Aena's main activity is airport management, which includes all services related to airport traffic and air transport. In the eligibility report for the fiscal year 2021, it was interpreted – according to the information available in relation to the regulations and the rest of the information published by the EC – that none of the sub-activities related to its main activity could be considered eligible under the activity 6.17 'Low-carbon airport infrastructure', whose description is the "Construction, modernisation, maintenance and management of infrastructure necessary for the operation of aircraft with zero CO2 emissions (exhaust emissions) or for the actual airport operations, as well as for the fixed supply of electrical power and air conditioning on land to parked aircraft", as they were not fully intended for emissions reduction. This is why Aena's main activity was not taken into account for the calculation of the turnover, CapEx and OpEx corresponding to activity 6.17.

The following clarifications published by the European Commission in the FAQ documents have been taken into account in the process of identifying activities eligible for the fiscal year 2022:

- Eligibility represents the potential for an activity covered by the Climate Delegated Regulation to be aligned in the future (contributing to the goal of mitigation and/or adaptation to climate change).
- To identify eligible activities in the company, it is not necessary to consider qualifiers or meet the criteria for substantial contribution.

In accordance with this interpretation and with the activities listed in delegated regulation 2021/2139, the economic activities carried out by Aena and which are eligible are identified in Annex I of activities that contribute to the mitigation of climate change:

- 6.15: "Infrastructure that allows for low-carbon road transport and public transport": Aena manages passenger car parks equipped with charging points that allow for the operation of them with zero emissions of road transport.

  Since there is no complete transition to zero-emission road transport, the current potential to accommodate all parking spaces is established from regulatory thresholds for parking spaces that must have charging points by 2025 and 2030.

- 6.17: "Low-carbon airport infrastructure": Aena manages infrastructures necessary for the operation of aircraft with zero CO2 emissions (exhaust emissions) or for the actual airport operations, including 400Hz and PCA (pre-conditioned air) supply, availability of walkways and aircraft parking spaces that could be equipped with 400Hz and PCA, as well as those own operations with the potential to be zero emissions (handling and catering).
- 7.7: "Acquisition and ownership of buildings": Aena purchases real estate and/or exercises the property rights thereof (activities developed within the terminal, and real estate activity outside the terminal building, except for the lease of land) that could be considered eligible under heading ction 7.7 of Annex I. According to FAQ 158 published in December 2022, the income derived from the ownership of buildings – for example, the rentals – can be considered regardless of the activities taking place in a building, specifically mentioning the revenue generated by airport managers in the course of their activity (specifically: duty-free shops, ground support operations). This activity includes leasing spaces and making facilities available to users in terminal buildings, cargo logistics centres, hangars, offices and other buildings owned by Aena.

On the other hand, Aena carries out the purchase of products/services linked to other taxonomy-eligible economic activities that do not generate a turnover, but do entail investments such as:

- 7.3: Installation, maintenance and repair of energy-efficient equipment.
- 7.4: Installation, maintenance and repair of electric vehicle charging stations in buildings and in parking spaces attached to buildings.
- 7.6. Installation, maintenance and repair of renewable energy technologies.

b) Identification of taxonomy-compliant activities (alignment)

To determine the understanding of the criteria for substantial contribution, DNSH and minimum social guarantees, Aena has carried out:

- Qualitative analysis of technical selection criteria (substantial contribution criteria, DNSH and social minimum guarantees).
- An interpretation to evaluate the technical selection criteria for each of the eligible activities.
- A monitoring and evaluation of interpretive approaches to SC, DNSH and minimum guarantees by the sector, as well as the performance of a comparative analysis on the published approaches of other companies with activities similar to those developed by Aena.
- A monitoring and evaluation of the clarifying information published by the European Commission through the FAQs.

After carrying out the described actions, it is concluded that there are certain limitations in the criteria described in the taxonomy to evaluate the alignment requirements, which give rise to potential interpretations on how compliance with said criteria should be evaluated. Therefore, under the interpretative margin, a series of assumptions described below have been made for each economic activity, which would be subject to possible changes as the European Commission pronounces or publishes possible clarifications on the application of the delegated regulation.

c) Evaluation of technical selection criteria by activity

i. Substantial contribution criteria

- 6.15: Infrastructure that allows for low-carbon road transport and public transport.

Annex I of the Delegated Regulation 2021/2139 refers to the activities that may contribute to the mitigation of climate change. This list includes activity 6.15 "Infrastructure that allows for low-carbon road transport and public transport", which encompasses activities that conform to the "Construction, modernisation, maintenance and management of infrastructure necessary for operating road transportation with zero CO2 emissions (exhaust emissions), as well as infrastructure intended for transshipments and urban transportation".

Regarding the substantial contribution criterion, the activity 6.15 identifies 1.a. electrical charging points as basic infrastructures required for the transportation of vehicles with zero CO2 emissions. In the case of Aena, it has been considered that these are necessary elements, since they are transshipment points between modes of transport, as is the case with airports. Likewise, advancing in measures that further the transformation of parking lots for fossil-fuel vehicles towards parking lots for zero-emission vehicles will depend largely on the availability of charging points or the promotion of the circulation of zero-emission vehicles through special pricing incentives (such as the Aena passenger parking, which have special charges for electric vehicles).

Given the foregoing, Aena considers that parking spaces are infrastructures with the potential to contribute to the mitigation of climate change (therefore, eligible for this objective), when they meet the criteria established by Annex I of the Delegated Regulation 2021/2139.

The evaluation of the technical criteria of substantial contribution of this activity has been carried out by airports considering the following:

Delegated Regulation 2021/2139	Evaluation of compliance with SC
1. The activity meets one or more of the following criteria:	
a. the infrastructure is intended for the circulation of vehicles with zero CO2 exhaust emissions: electric charging points, improvements in the mains connection, hydrogen fuelling stations or electric roads	The criterion applied by Aena to comply with the SC criteria is that the infrastructure (parking) has vehicle charging points installed in the parking spaces. It is interpreted that such compliance may occur partially, considering a degree of alignment that must be applied to the turnover and to the OpEx and CapEx associated with each parking lot, and which will be calculated as: number of parking spaces with electric charging points / Total number of parking spaces.
b. the infrastructure and facilities are intended for the transfer of goods between the modes of transport: terminal infrastructure and superstructures for the loading, unloading and transfer of cargo.	Not considered in the evaluation.
c. the infrastructure and facilities are intended for urban and suburban public transportation of passengers, including associated signalling systems for metro, tram and rail transportation systems.	The criterion applied by Aena to comply with the SC criteria is that the infrastructure is intended for the public transportation of passengers (only applicable to CapEx items related to the service of shuttles between airports etc.)
2. The infrastructure is not intended for the transportation or storage of fossil fuels	The criterion applied by Aena to comply with the SC criteria is that the managed infrastructure is not dedicated exclusively to the transportation or storage of fossil fuels.

- *6.17: Low-carbon airport infrastructure.*

Annex I of Delegated Regulation 2021/2139 includes activity 6.17 "Low-carbon airport infrastructure" which includes activities that comply with the "Construction, modernization, maintenance and operation of infrastructures necessary for operation with zero CO2 emissions (exhaust emissions) of aircraft or for airport operations, as well as for the fixed supply of electrical power and pre-conditioned air on the ground to parked aircraft."

Activity 6.17 does not specifically define which infrastructures this activity encompasses, referring to them as those "necessary for the operation with zero CO2 emissions (exhaust emissions) of aircraft or for the operations of airports". The parking points for aircraft and those of the gangway that are equipped with 400Hz electrical supply points and pre-conditioned air (PCA) on the airside contribute to the reduction of emissions by allowing them not to use other means of generating energy from fossil fuel. In relation to our own operations on the air side, the use of electric vehicles instead of combustion vehicles to carry out the operations of the handling agents, allows said operation to be carried out with zero CO2 emissions.

For all of the above, Aena considers that the activity it carries out in relation to the supply of 400Hz and PCA, available in aircraft parking spaces and those operations with the potential to be zero emissions, such as handling agents, They have the potential to contribute to climate change mitigation (therefore, eligible for said objective), when they meet the criteria established by Annex I of Delegated Regulation 2021/2139.

The evaluation of the technical criteria of substantial contribution has been carried out by airport considering the following:

Delegated Regulation 2021/2139	Evaluation of compliance with SC
1. The activity meets one or more of the following criteria:	
a. the infrastructure is intended for the operation of aircraft with zero CO2 exhaust emissions: electricity refuelling and hydrogen refuelling.	Not considered in the evaluation.
b. the infrastructure is intended for the fixed supply of electric power and pre-conditioned air on land to parked aircraft.	The criterion applied by Aena to comply with the SC criteria is that the infrastructure (parking stations) have 400Hz and PCA supply points installed. It is interpreted that such compliance may occur partially, considering a degree of alignment that must be applied to the turnover and the OpEx and CapEx associated with each airport, and which will be calculated as: number of contact parking stands (with walkway) and remote parking stands, equipped with PCA / Total parking stands
c. the infrastructure is designed for the performance of the airport's own operations with zero direct emissions: electric recharging points, improvements to the mains connection, hydrogen refuelling stations.	The criterion applied by Aena to comply with the SC criteria is that the infrastructure intended for airport operations (handling agents) has electrical charging points for electrical equipment and vehicles.
2. The infrastructure is not intended for the transportation or storage of fossil fuels	The criterion applied by Aena to comply with the SC criteria is that the infrastructure is not dedicated exclusively to the transportation or storage of fossil fuels. For its evaluation, it is verified that revenue from fuel and lubricants represents less than 5% of the total used at the airport. In addition, revenue from fuel and lubricant are considered ineligible and therefore are not part of the numerator in both the eligibility and alignment KPIs

- *7.3: Installation, maintenance and repair of energy-efficient equipment.*

Annex I of the Delegated Regulation 2021/2139 includes activity 7.3 "Installation, maintenance and repair of energy efficiency equipment", which encompasses activities that are adjusted with "Individual renewal measures consisting of the installation, maintenance or repair of energy efficiency equipment".

Activity 7.3 refers to those activities related to energy efficiency equipment and measures carried out to improve energy efficiency.

Given the foregoing, Aena considers that the measures carried out to improve energy efficiency are actions with the potential to contribute to the mitigation of climate change (therefore, eligible for this objective), when they meet the criteria established by Annex I of the delegated regulation 2021/2139.

The evaluation of the technical criteria of substantial contribution has been carried out by investment and by airport, considering the text included in Annex I of the Delegated Regulation 2021/2139, having not been necessary to make interpretations or assumptions in this regard.

- *7.4: Installation, maintenance and repair of electric vehicle charging stations in buildings (and in parking spaces attached to buildings)*

Annex I of the Delegated Regulation 2021/2139 refers to activities that are likely to contribute to the mitigation of climate change. This list includes activity 7.4 “Installation, maintenance and repair of charging stations for electric vehicles in buildings (and in the parking spaces attached to the buildings)”.

Activity 7.4 refers to those activities related to the installation, maintenance and repair of charging stations for electric vehicles in buildings and in parking spaces attached to buildings. For Aena, it considers all investments intended for this activity in both commercial and employee parking lots.

In view of the foregoing, Aena considers that the measures carried out to install, maintain and repair charging stations for electric vehicles in buildings and in parking spaces attached to the buildings are actions with the potential to contribute to the mitigation of climate change (therefore, eligible for this objective), when they meet the criteria established by Annex I of the delegated regulation 2021/2139.

The evaluation of the technical criteria of substantial contribution has been carried out by investment and by airport, considering the text included in Annex I of the Delegated Regulation 2021/2139, having not been necessary to make interpretations or assumptions in this regard.

- *7.6: Installation, maintenance and repair of renewable energy technologies.*

Annex I of the Delegated Regulation 2021/2139 refers to activities that are likely to contribute to the mitigation of climate change. This list includes activity 7.6 “Installation, maintenance and repair of renewable energy technologies”.

In this regard, Aena considers that the facilities related to the production of renewable energy are facilities with the potential to contribute to the mitigation of climate change (therefore, eligible for this objective), when they meet the criteria established by Annex I of the delegated regulation 2021/2139.

The evaluation of the technical criteria of substantial contribution has been carried out by investment and by airport, considering the text included in Annex I of the delegated regulation 2021/2139, having not been necessary to make interpretations or assumptions in this regard.

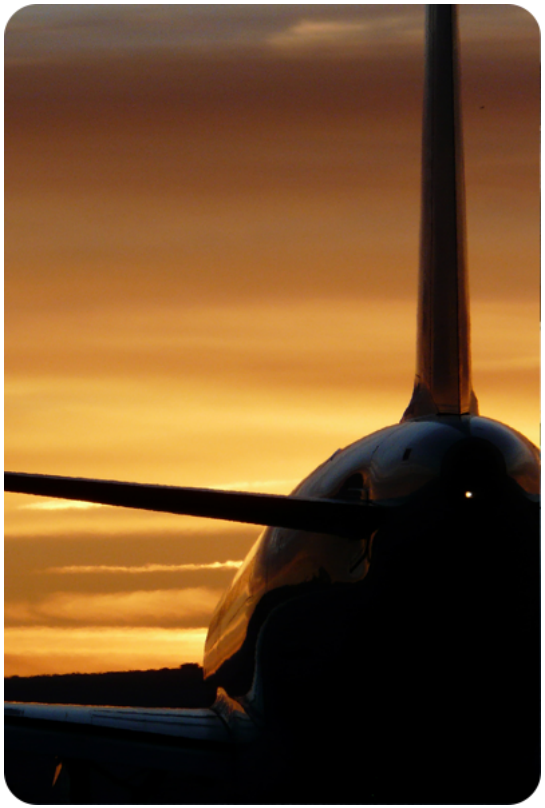
- *7.7: Acquisition and ownership of buildings.*

Annex I of the Delegated Regulation 2021/2139 refers to activities that are likely to contribute to the mitigation of climate change. This list includes activity 7.7 “Acquisition and ownership of buildings that encompass the acquisition of real estate and exercise of the ownership rights of those assets”.
According to FAQ 158 published in December 2022, revenue derived from the ownership of the building –for example rents from leases – can be considered regardless of the activities that are carried out in a building, specifically mentioning the revenue generated by airport managers in the development of their activity (specifically mentioned in their examples were: duty-free shops, ground assistance operations).

Aena generates turnover, OpEx and CapEx derived from the management of the ownerships rights of buildings, such as the different leases of spaces (food and beverage, specialty shops, vending machines, cashiers, advertising spaces, billing counters, etc.) and the availability of facilities (VIP zone, fast track service, passenger transit areas, security. etc.) in terminals or the lease of spaces in other buildings owned (hangars, logistics vessels, offices, etc.).

For all the above, Aena considers that the activity derived from the management of the buildings that it owns has the potential to contribute to the mitigation of climate change (therefore, eligible for said objective), when they meet the criteria established by Annex I of the delegated regulation 2021/2139.

The evaluation of the technical criteria of substantial contribution has been carried out by airports and buildings considering the following:



Delegated Regulation 2021/2139	Evaluation of compliance with SC
1. For buildings built before 31 December 2020, the building has a minimum Class A energy efficiency certificate. Alternatively, the building is part of the 15% of the most energy efficient buildings in the national or regional real estate park in terms of operational primary energy demand (PED), which is demonstrated by adequate testing, comparing at least the efficiency of the relevant property with the efficiency of the national or regional real estate park built before 31 December 2020 and establishing a difference at least between residential and non-residential	The criterion applied by Aena to comply with the SC criteria is that the building has an energy efficiency certificate greater than or equal to 15% of the most energy efficient buildings in the national real estate park. For the consideration of the 15% most energy efficient buildings, studies carried out by official and publicly accessible bodies are taken as a reference.
2. For buildings built after 31 December 2020, the building meets the criteria set forth in section 7.1 of this annex that are relevant at the time of acquisition	Not considered in the evaluation.
3. If the building is a large non-residential building (with heating systems, combined heating and ventilation systems, air conditioning systems, or combined air conditioning and ventilation systems rated above 290 kW), it is managed efficiently by controlling and evaluating the energy efficiency.	The criterion applied by Aena to comply with the SC criteria is they have an energy certificate for the buildings and certification of the current ISO 14001 standard.

ii. Principles of not causing significant harm to another environmental objetive (DNSH)

- *Adaptation to climate change.*

Activities that meet this DNSH principle: all activities that conform to the taxonomy identified by Aena, considering that these activities do not cause significant harm in relation to the objective of adaptation to climate change, performing the following analysis:

1. An assessment has been carried out to identify the physical climate risks of the managed infrastructure (managed airport), considering the hazards listed in the "Classification of Climate-Related Hazards" table specified in Annex I, Appendix A of the delegated regulation and it is concluded that said infrastructure is not exposed to any material risk related to the hazards listed in the table "Classification of climate-related hazards".
2. In the event that potential risks related to the hazards listed in said table have been detected, an assessment of vulnerabilities and physical climate risks has been carried out. For activities with an expected duration of more than 10 years – such as the case of the infrastructures managed by Aena – the assessment includes the following:
   a. Climate projections and assessment of the impacts of physical climate risks over a time horizon between 10 and 30 years.
   b. At least two of the potential scenario trajectories established by the Intergovernmental Panel on Climate Change (IPCC) (SmPC2.6, RCP4.5, RCP6.0 and RCP8.5) have been considered.
   c. Potential solutions have been evaluated to mitigate the any vulnerabilities and material risks detected.

- *Sustainable use and protection of water and marine resources, prevention and control of pollution and prevention and recovery of biodiversity and ecosystems.*

Activities that meet these DNSH principles: 6.15 "Infrastructure that allows for low-carbon road transport and public transport"; 6.17 "Low-carbon airport infrastructure", considering that these activities do not cause significant harm in relation to the objective of sustainable use and protection of water and marine resources, since Aena has one or more of the following:

- An environmental management system implemented and certified to ISO 14001, since it is assumed that with said certification the activity carried out is adequately (and in accordance with the guidelines established at the national and European level) managing the possible environmental risks derived from economic activity, including those related to water resources, given that, among others, aspects such as spill management or consumption management are evaluated.
- An environmental impact assessment in accordance with Directive 2011/02/EU and Directive 2014/52/EU amending Directive 2011/92/EU, relating to the assessment of the impact of certain public and private projects on the environment. In addition, if potential risks related to the use and protection of water resources have been detected, there is an environmental monitoring plan that includes actions to mitigate such impacts.
- *Transition to a circular economy.*

Activities that meet this DNSH principle: 6.15 "Infrastructure that allows for low-carbon road transport and public transport"; 6.17 "Low-carbon airport infrastructure", considering that these activities do not cause significant harm in relation to the objective of transition to a circular economy, since Aena has a non-hazardous waste recycling indicator for construction and demolition (RCDs) for work related to the expansion or construction of the managed infrastructure equal to or greater than 70%.

iii. Minimum social safeguards

Article 18, paragraph 1 of Delegated Regulation 2020/852 establishes that minimum guarantees shall be the procedures applied by a company that carries out an economic activity to ensure compliance with the OECD Guidelines for Multinational Enterprises and the United Nations Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions referred to in the International Labour Organization Declaration on Fundamental Principles and Rights at Work and the International Charter of Human Rights.

In accordance with the indications described in paragraph 52 of the delegated regulation, the Platform on Sustainable Finance must advise the Commission on the development of new measures to improve data availability and quality, taking into account the aim of avoiding unnecessary administrative burdens, as well as on the performance related to other sustainability objectives, such as social goals, as well as the operation of minimum guarantees and the possible need to supplement them. In this context, on 11 July 2022, the platform published a "Draft Report on Minimum Safeguards" and subsequently on 11 October, the "Final Report on Minimum Safeguards" was published, which provides recommendations for evaluating compliance with minimum social guarantees (minimum social safeguards).

This report proposes the minimum requirements to assess compliance with the criteria related to Social Minimum Safeguards based on different groups of entities, where Aena is identified within the group of "European companies that would fall within the scope of the CSRD (Corporate Sustainability Reporting Directive)".

As indicated in the report, failure to comply with one of the two criteria mentioned in each pillar (Human Rights, Corruption, Taxation and Fair Competition) would entail failure to comply with the requirements of the Minimum Social Safeguards.

Based on the published report, Aena has considered the following aspects to evaluate its compliance, applying it at the corporate level:

- *Human Rights*

This requirement is considered to be fulfilled if a Due Diligence process on Human Rights has been established, following the six steps of the "United Nations Guiding Principles on Business and Human Rights" and the "OECD Guidelines for Multinational Enterprises".

Aena adopts and incorporates a commitment to Human Rights through its Human Rights Policy, aligned with the principles set out in the United Nations Global Compact, the Guiding Principles on Business and Human Rights and the OECD Guidelines, and the Social Policy of the International Labour Organization, among others. In compliance with the provisions of said Policy, it establishes a human rights due diligence procedure, focused on facilitating the identification, prevention, mitigation, monitoring and remediation of possible adverse effects on human rights related to its activity, and in which the roles, responsibilities and actions of the areas involved in the process are defined. Within this framework, the Complaints Channel (or the counterpart in the subsidiaries – the Ethics Channel, Whistleblower Channel, etc.) becomes the main tool for individuals and groups potentially affected to raise concerns about adverse impacts, make inquiries or report possible risks or non-compliance in the various matters (see more information in section '1.2.10. Complaints channel' and '3.3. Human rights').

Additionally, there are no firm convictions for aspects related to employment law, human rights, data protection, consumer protection, humanitarian or criminal law. The Company's response to entities such as the NCP (National Contact Point) or BHRRC (Business & Human Rights Resource Centre) (where applicable) is considered evidence for compliance.

- *Corruption*

This requirement is considered to be fulfilled, since Aena has processes to prevent corruption such as: internal controls, codes of ethics and compliance programmes; measures to prevent and detect bribery; corporate policies; and the integral rejection of any fraudulent or corruption practices in bidding processes and training of structured personnel. Additionally, there are no firm convictions for aspects related to corruption or bribery.

- *Taxation*

This requirement is considered to be fulfilled, since Aena has measures to prevent the management of tax risks, such as policies, codes of good tax practice and the publication of tax performance reports, as well as registration with the European Transparency Register. Additionally, there are no firm convictions for aspects related to tax evasion.

- *Fair competition*

This requirement is considered to be fulfilled, since Aena has measures such as policies of conduct and corporate standards on competition, compliance with Act 9/2017 on Public Sector Contracts, adherence to the Airport Regulation Document (DORA), as well as training given to senior management through training courses and raising awareness among employees through information modules in this matter. Additionally, there are no firm convictions for violating competition laws.

Key performance indicators[76]

Alignment with taxonomy by activity and environmental objective															
Turnover				Substantial contribution criteria		Criteria for not causing significant harm ("Do No Significant Harm")									
Economic activities	Codes	Absolute turnover volume (Millions €)	Proportion of turnover (%)	Mitigation of climate change (%)	Adaptation to climate change (%)	Mitigation of climate change (Y/N)	Adaptation to climate change (Y/N)	Water and marine resources (Y/N)	Circular economy (Y/N)	Pollution (Y/N)	Biodiversity and ecosystems (Y/N)	Minimum guarantees (Y/N)	Proportion of turnover that complies with the taxonomy (%)	Category (facilitating activity) (F)	Category (transition activity) (T)
A. ELIGIBLE ACTIVITIES UNDER THE TAXONOMY															
A.1. Environmentally sustainable activities (that comply with the taxonomy) (eligible and aligned)															
Infrastructure that allows for low-carbon road transport and public transport	6.15	0.18	—%	—%	—%	Y	Y	Y	Y	Y	Y	Y	—%	F	
Low-carbon airport infrastructures	6.17	161.9	3.80%	3.80%	—%	Y	Y	Y	Y	Y	Y	Y	3.83%	F	
Installation, maintenance and repair of energy-efficient equipment.	7.3	0	—%	—%	—%	N/A	N/A	N/A	N/A	N/A	N/A	Y	—%	F	
Installation, maintenance and repair of electric vehicle charging stations in buildings (and in parking spaces attached to buildings)	7.4	0	—%	—%	—%	N/A	N/A	N/A	N/A	N/A	N/A	Y	—%	F	
Installing, maintaining and repairing renewable energy technologies	7.6	0	—%	—%	—%	N/A	N/A	N/A	N/A	N/A	N/A	Y	—%	F	
Acquisition and ownership of buildings	7.7	1,386.92	32.80%	32.80%	—%	Y	Y	Y	Y	Y	Y	Y	32.80%		
Turnover volume of environmentally sustainable activities (that comply with the taxonomy) (eligible and not aligned) (A.1)		**1,549.01**	**36.60%**	**36.60%**	**—%**								**36.60%**	**3.80%**	**—%**
A.2. Activities that are eligible according to the taxonomy but not environmentally sustainable (activities that do not comply with the taxonomy) (eligible and not aligned)															
Infrastructure that allows for low-carbon road transport and public transport	6.15	1.55	0.04%												
Low-carbon airport infrastructures	6.17	113.58	2.70%												
Installation, maintenance and repair of energy-efficient equipment.	7.3	0.00	—%												
Installation, maintenance and repair of electric vehicle charging stations in buildings (and in parking spaces attached to buildings)	7.4	0.00	—%												
Installing, maintaining and repairing renewable energy technologies	7.6	0.00	—%												
Acquisition and ownership of buildings	7.7	905.83	21.40%												
Turnover volume of activities that are eligible according to the taxonomy but not environmentally sustainable (activities that do not comply with the taxonomy) (A.2)		1,020.96	**24.10%**												
Total (A.1 + A.2)		**2,569.96**	**60.80%**										**36.60%**		
B. INELIGIBLE ACTIVITIES UNDER THE TAXONOMY															
Turnover volume of ineligible activities under the taxonomy (B)		1,658.66	**39.20%**												
Total (A + B)		4,228.62	**100.00%**										**37.00%**		

The eligible income under the taxonomic criteria in the 2022 financial year has risen to €2,569.96 million (60.8% of total income). Of these, €1,549M (36.6% of total revenue) are considered aligned according to the Taxonomy. These revenues come mainly from activity 7.7 pertaining to the acquisition and ownership of Aena buildings. The results differ with respect to those corresponding to the year 2021, since as indicated in the previous section "Assessment of compliance with Regulation (EU) 2020/852" of this report, during that year Aena did not report eligible income based on the interpretation of the information available in the published regulations, considering that none of the sub-activities related to its main activity could be established as eligible. Although, as a result of the new clarifications published by the European Commission in the FAQ documents of October and December 2022, the eligibility of income has been reassessed as presented for this exercise.

[76] Details of the 2021 indicators may be consulted in "Annex I: Taxonomy 2021."

Alignment with taxonomy by activity and environmental objective																
CapEx				Substantial contribution criteria		Criteria for not causing significant harm ("Do No Significant Harm")										
Economic activities	Codes	Absolute CapEx volume (Millions €)	Proportion of CapEx (%)	Mitigation of climate change (%)	Adaptation to climate change (%)	Mitigation of climate change (Y/N)	Adaptation to climate change (Y/N)	Water and marine resources (Y/N)	Circular economy (Y/N)	Pollution (Y/N)	Biodiversity and ecosystems (Y/N)	Minimum guarantees (Y/N)	Proportion of turnover that complies with the taxonomy (%)	Category (facilitating activity) (F)	Category (transition activity) (T)
A. ELIGIBLE ACTIVITIES UNDER THE TAXONOMY															
A.1. Environmentally sustainable activities (that comply with the taxonomy) (eligible and aligned)															
Infrastructure that allows for low-carbon road transport and public transport	6.15	2.00	—%	—%	—%	Y	Y	Y	Y	Y	Y		—%	F	
Low-carbon airport infrastructures	6.17	37.81	5.35%	5.35%	—%	Y	Y	Y	Y	Y	Y		5.35%	F	
Installation, maintenance and repair of energy-efficient equipment.	7.3	17.71	2.51%	2.51%	—%	N/A	N/A	N/A	N/A	N/A	N/A		2.51%	F	
Installation, maintenance and repair of electric vehicle charging stations in buildings (and in parking spaces attached to buildings)	7.4	3.81	0.54%	0.54%	—%	N/A	N/A	N/A	N/A	N/A	N/A		0.54%	F	
Installing, maintaining and repairing renewable energy technologies	7.6	0.79	0.11%	0.11%	—%	N/A	N/A	N/A	N/A	N/A	N/A		0.11%	F	
Acquisition and ownership of buildings	7.7	143.07	20.25%	20.25%	—%	Y	Y	Y	Y	Y	Y		20.25%		
CapEx volume of environmentally sustainable activities (that comply with the taxonomy) (eligible and not aligned) (A.1)		**203.20**	**28.76%**	**28.76%**	**—%**								**28.76%**	**8.51%**	**—%**
A.2. Activities that are eligible according to the taxonomy but not environmentally sustainable (activities that do not comply with the taxonomy) (eligible and not aligned)															
Infrastructure that allows for low-carbon road transport and public transport	6.15	0.20	0.03%												
Low-carbon airport infrastructures	6.17	16.26	2.30%												
Installation, maintenance and repair of energy-efficient equipment.	7.3	0.01	—%												
Installation, maintenance and repair of electric vehicle charging stations in buildings (and in parking spaces attached to buildings)	7.4	0.00	—%												
Installing, maintaining and repairing renewable energy technologies	7.6	0.00	—%												
Acquisition and ownership of buildings	7.7	166.92	23.63%												
CapEx volume of activities that are eligible according to the taxonomy but not environmentally sustainable (activities that do not comply with the taxonomy) (A.2)		183.38	**25.96%**												
Total (A.1 + A.2)		**386.58**	**54.72%**										**28.76%**		
B. INELIGIBLE ACTIVITIES UNDER THE TAXONOMY															
CapEx volume of ineligible activities under the taxonomy (B)		**319.94**	**45.30%**												
Total (A + B)		**706.52**	**100.00%**										**28.76%**		

Regarding the eligible CapEX, it has risen from €254 million in 2021 to €368.58 million (54% of total CapEX) in 2022. Of these, €203.20 million (28.76% of the total) have been considered aligned according to the European Taxonomy. The percentage of eligibility has also increased due to the fact that part of the CapEX allocated to actions in Terminal Buildings, previously considered ineligible, has been included in this analysis under activity 7.7.

Alignment with taxonomy by activity and environmental objective																
OpEx				Substantial contribution criteria		Criteria for not causing significant harm ("Do No Significant Harm")										
Economic activities	Codes	Absolute OpEx volume (Millions €)	Proportion of OpEx (%)	Mitigation of climate change (%)	Adaptation to climate change (%)	Mitigation of climate change (Y/N)	Adaptation to climate change (Y/N)	Water and marine resources (Y/N)	Circular economy (Y/N)	Pollution (Y/N)	Biodiversity and ecosystems (Y/N)	Minimum guarantees (Y/N)	Proportion of turnover that complies with the taxonomy (%)	Category (facilitating activity) (F)	Category (transition activity) (T)
A. ELIGIBLE ACTIVITIES UNDER THE TAXONOMY															
A.1. Environmentally sustainable activities (that comply with the taxonomy) (eligible and aligned)															
Infrastructure that allows for low-carbon road transport and public transport	6.15	0.01	—%	—%	—%	N/A	N/A	N/A	N/A	N/A	N/A	Y	—%	F	
Low-carbon airport infrastructures	6.17	11.81	4.10%	4.10%	—%	Y	Y	Y	Y	Y	Y	Y	4.14%	F	
Installation, maintenance and repair of energy-efficient equipment.	7.3	0.00	—%	—%	—%	N/A	N/A	N/A	N/A	N/A	N/A	Y	—%	F	
Installation, maintenance and repair of electric vehicle charging stations in buildings (and in parking spaces attached to buildings)	7.4	0.00	—%	—%	—%	N/A	N/A	N/A	N/A	N/A	N/A	Y	—%	F	
Installing, maintaining and repairing renewable energy technologies	7.6	0.00	—%	—%	—%	N/A	N/A	N/A	N/A	N/A	N/A	Y	—%	F	
Acquisition and ownership of buildings	7.7	83.36	29.20%	29.20%	—%	Y	Y	Y	Y	Y	Y	Y	29.23%		
Turnover volume of environmentally sustainable activities (that comply with the taxonomy) (eligible and not aligned) (A.1)		**95.19**	**33.40%**	**33.40%**	**—%**								**33.37%**	**4.15%**	**—%**
A.2. Activities that are eligible according to the taxonomy but not environmentally sustainable (activities that do not comply with the taxonomy) (eligible and not aligned)															
Infrastructure that allows for low-carbon road transport and public transport	6.15	0.11	—%												
Low-carbon airport infrastructures	6.17	6.95	2.00%												
Installation, maintenance and repair of energy-efficient equipment.	7.3	0.01	—%												
Installation, maintenance and repair of electric vehicle charging stations in buildings (and in parking spaces attached to buildings)	7.4	0.00	—%												
Installing, maintaining and repairing renewable energy technologies	7.6	0.00	—%												
Acquisition and ownership of buildings	7.7	69.94	25.00%												
Turnover volume of activities that are eligible according to the taxonomy but not environmentally sustainable (activities that do not comply with the taxonomy) (A.2)		77.00	**27.00%**												
Total (A.1 + A.2)		**172.19**	**60.40%**										**33.37%**		
B. INELIGIBLE ACTIVITIES UNDER THE TAXONOMY															
Turnover volume of ineligible activities under the taxonomy (B)		**113.03**	**39.60%**												
Total (A + B)		**285.21**	**100.00%**										**33.37%**		

Finally, in 2022, eligible OpEX has amounted to €172.19 million (60% of the total), of which €95.19 million (33.4%) are aligned, unlike in 2021 in which only 2.20% of OpEX was eligible. Again, following the clarifications published by the European Commission in the FAQ documents of October and December 2022, eligibility has been reassessed as presented in this exercise.

2. Commitment to the environment (GRI 2-22; 3-3)

Achievements in 2022

100% of activity in Spain and the United Kingdom is accredited in line with ISO 14001

Environmental risks included in the risk management system.

100% of electricity consumption from renewable sources in the Spanish network and London Luton Airport.

67% reduction in own CO2e emissions in the Spanish network (base year 2019)

27,827 isolated homes in the period 2000-2022 in the Spanish network and London Luton Airport

Aena and the climate emergency

Updated Report of the Climate Action Plan in Spain approved at the General Shareholders' Meeting.

Commitment to set reduction targets based on science (SBTI).

Analysis of climate change risks and opportunities in line with TCFD.

Specific actions to achieve decarbonisation targets as well as monitoring and follow-up mechanisms.

Obtaining Level A on the CDP (Carbon Disclosure Project) in recognition of the Company's management of climate change

Objectives

Achieve 2026 carbon neutrality in Spain and the United Kingdom and Net Zero Carbon by 2040 across the Aena group

Waste management and circular economy

Measurement and monitoring of waste.

Reduction of waste generated.

Use of sustainable materials.

Impulse given to segregation and recycling.

Energy recovery and composting.

Collaboration and awareness.

Objectives

Zero Waste by 2040 in Spain.

Reduce waste (excluding aircraft waste) to 0.12 kg/passenger at London-Luton Airport.

Improve the methodology for separating waste—including tenants—in Brazil, by 2023

Noise management

The Company's Strategy is to minimise sound levels and protect the quality of life of the surrounding populations through 3 key lines:

Measurement, reduction and control.

Sound insulation plans.

Communications.

Objectives

Maintenance and expansion of noise monitoring systems.

Achieve a total of 33,000 sound-insulated homes in Spain by 2030

Protecting biodiversity

The presence of vegetation, fauna and natural spaces that have some level of protection is harmonized with the operation of the airport by means of adopting various measures that aimed to prevent any compromising effects that may be caused over these natural environments.

Objectives

Protection of natural areas.

Study on the fauna of the environment and control services.

Control of vegetation in and around airports.

Planting more than 10,000 trees in the Amazon.

Air pollution

Air Quality Action Line.

Strategic projects for reducing pollution affecting air quality (NOx, SOx, PM10)

Characterisation, control, monitoring and correction of emissions through air quality monitoring networks.

Reduction objective

In spain, by 2030

22% of NOx emissions per passenger compared to 2019.

36% of SOx emissions per passenger compared to 2019.

15% of PM emissions per passenger compared to 2019.

In 2022

Develop an air quality strategy at London Luton Airport.

Carry out the inventory of atmospheric pollutant levels at ANB.

Water Management

Control of water use and efficiency measures.

Water footprint (Spain).

Initiatives for responsible water consumption.

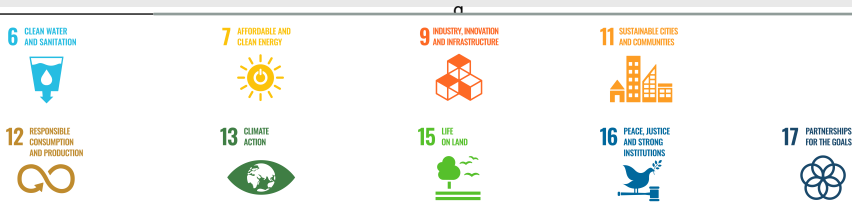
Objectives

Water consumption decreased by 10% per passenger in 2030 compared to 2019 (5% reduction in 2026) in Spanish airports.

Increase in the use of alternative water sources per passenger by 150% in 2030 compared to 2019 (50% increase in 2026) in Spanish airports.

Reduction of total water consumption to 6.98 litres/passenger in 2023 at the London Luton Airport.

Commitment to SDGs



2.1. Sustainable environmental management model

(GRI 3-3)

Current scenario

After overcoming the difficulties of the COVID-19 pandemic, the airport network has been strengthened, demonstrating high resilience and capacity to continue offering its services in compliance with the highest standards of safety, quality and sustainability.

Within the framework of the recovery of the aviation sector, the pillar of sustainability has been prioritised, taking advantage of the use of technological tools and the adoption of good practices

However, other major challenges persist and arise, such as recovering air traffic, the geopolitical environment, or managing the energy crisis – all with impacts on the environmental challenge.

For these purposes, in Spain, the 2022-2026 Strategic Plan incorporates sustainability as a cross-divisional factor in the Company's roadmap, granting it special relevance to the environmental efforts, in line with what has already been reflected in the DORA 2022-2026, the 2022-2030 Sustainability Strategy and the Climate Action Plan. In addition, in the UK, London-Luton Airport's Responsible Business Strategy includes minimising the environmental impact, through a series of specific annual objectives, as a strategic priority.

Through this roadmap, Aena reinforces sustainability as a key strategic axis, establishing the conditions for the sustainable development of the airport network, and providing the environmental standards necessary for the development of the sector to be carried out respecting its environment.

The contents of this chapter detail the governance, risk management, strategy, metrics, objectives and progress made in the different areas of environmental management.

Frameworks and areas of environmental management

The Sustainability Strategy and the Climate Action Plan[77] effectively land the above-mentioned commitment and serve as a guide for future action on the subject over the next 8 years, paying special attention to the following areas of environmental management:

- Climate change, energy efficiency and renewable energy
- Water footprint and efficient water management
- Circular economy
- Air quality
- Noise management
- Preservation of biodiversity

These aspects are included as a priority in the United Kingdom in the Responsible Business Strategy of the London-Luton Airport and in the Carbon Reduction Plan.

This management framework also serves as an inspirational principle in the definition and design of the road map for Aena airports in Brazil. In this way, we are working on the preparation of a Strategic Plan on sustainability, aligned with the main corporate objectives and adapted to the needs of the environment in which it operates.

Environmental governance

(GRI 2-9; 2-12; 2-13)

The Board of Directors of Aena considers sustainability and the fight against climate change to be priorities when managing the Company. As a reflection of this, during 2022, the development and implementation of the actions related to its climate strategy have been worked on, accounting to its shareholders for the progress and fulfilment of objectives through the Updated Report of the Climate Action Plan presented at the General Shareholders' Meeting (see section '2.2.1. Climate Action Plan'). This dynamic will be maintained in future fiscal years in order to ensure the correct execution of the Plan.

Duties of the Board of Directors of Aena include:

- Follow-up, reporting and approval of the Climate Action Plan as well as subsequent related Updated Reports.
- Guidance and control of the strategy, objectives, risks and results in matters related to the environment.
- Implementation of a remuneration model linked to environmental sustainability objectives.
- Providing support to the Audit Committee in the process of supervising the risk management system, ensuring the identification, management and communication of the main environmental risks within the planned levels.

For its part, the Sustainability and Climate Action Committee, under the Board of Directors of Aena, is responsible for ensuring the correct materialisation, implementation, reporting and supervision of compliance with the objectives of the Climate Action Plan and the Sustainability Strategy.

[77] The Climate Action Plan has been integrated into the Sustainability Strategy.



There is also the position of Chief Green Officer (CGO), whose goal is to make sustainability a fundamental element in Aena's decision-making and to reinforce commitment in this area to all stakeholders. The CGO is part of the Executive Management Committee and among its specific functions is the development and supervision of Aena's Sustainability Strategy, which includes the Climate Action Plan. The main responsibilities of this role are the incorporation of sustainability in all the business areas of the company and the communication – both to the Board and to employees – of any update and progress on sustainability of the company through the established communication channels.

Finally, an internal working group has been created to coordinate, cross-divisionally, the implementation of the strategy and support its implementation, encouraging the active and direct involvement of all areas and employees.

In the United Kingdom, the Chief Executive Officer of London Luton Airport Operations Limited (LLAOL) is responsible for these sustainability risks and opportunities. They also have a Sustainability Committee, chaired by the CGO of Aena.

In Brazil, the governance of environmental issues rests with the figure of the Quality and Environmental Manager, who coordinates the environmental policies – approved by the Board – obtaining the corresponding certifications of Aena airports in Brazil, as well as coordination with Aena, in Spain, in the definition of climate action plans and sustainability for the future. This management reports to the Directorate of Institutional Relations and Communications, with the Chairman Director being the most senior figure responsible for environmental matters.

Finally, it should be noted that, as evidence of the commitment to achieving objective, the Company links the approval at the General Shareholders' Meeting of the Updated Climate Action Report and the fulfilment of strategic objectives of the Climate Action Plan (PAC [Plan de Acción Climática]) at 25% of the variable remuneration of employees.



2.1.1. Natural capital management model[78]

(GRI 2-23)



Policies and strategies



Strategic Objectives

SPAIN, UNITED KINGDOM, BRAZIL

Sustainability Policy: Defines and establishes the principles, commitments, objectives and strategy to be followed by the Company to carry out its activity, optimising the contribution to sustainable development, creating long-term value, maximising positive impacts and minimising negative impacts on society and the environment throughout its value chain, using ethical and transparent behaviour. Its general principles of action include the integration of sustainability in all business areas and organisational levels of the Company, extending this culture to employees, customers, suppliers, value chain, partners and other stakeholders, while ensuring that suppliers and contractors engage in sustainable management and are in line with the social and environmental sustainability objectives, within the scope of the work they perform for Aena. It also refers to minimising environmental impacts by promoting a transition to the circular economy that includes all processes.

Integrated Management Policy for Quality, Environment, Energy Efficiency and occupational health and safety: It includes the guiding principles and reference framework for the Company's activity with respect to environmental issues, combined with standards of quality, health and security in the workplace. These include ensuring environmental protection and pollution prevention, integrating sustainable development criteria that contribute to reducing the impact of the activity, promoting sustainable use of resources and the fight against climate change in line with the objectives set out in the current Sustainability Strategy.

SPAIN

Sustainability Strategy. It marks the Organisation's road map in the period 2021-2030, with special attention to the organisation's commitment to fighting climate change, improving air quality, managing noise and water correctly, protecting biodiversity and promoting the circular economy. It establishes a series of sustainability measures and indicators to achieve them.

Climate Action Plan 2021-2030: Zero emissions route. It reflects Aena's commitment to protecting the environment, decarbonisation and the climate emergency as key issues in its management. Its objectives include achieving Net Zero Carbon by 2040 and achieving carbon neutrality by 2026, in line with the national and international regulatory framework (Paris Agreement, the objectives and commitments set out in the declaration of the Government of Spain in the face of the climate and environmental emergency, the 2021–2030 National Integrated Energy and Climate Plan, and the SDGs and recommendations of the TCFD).

Strategic Plan for water management. Includes the diagnostic survey of the water management situation at the airports, as well as the various improvement objectives, along with their corresponding actions and indicators. In this way, the plan will ensure correct water management, adapted to the demands of use, consumption and purification put forward by airport stakeholders, and aligned with the SDGs.

Environmental monitoring of suppliers (ISO 14001). Environmental assessment of the property portfolio and tenant operations.

Action Plans regarding noise pollution.

Achieve carbon neutrality by 2026 and be Net Zero Carbon by 2040.

Reach Zero Waste by 2040.

Reduce NOx emissions per passenger by 22% of 2019 levels.

Reduce SOx emissions per passenger by 36% of 2019 levels.

Reduce PM emissions per passenger by 15% of 2019 levels.

Decrease water consumption per passenger by 10% by 2030 compared to 2019 (5% reduction by 2026).

Increase the use of alternative water sources per passenger by 150% by 2030 compared to 2019 (50% increase by 2026).

Maintain and expand noise monitoring systems.

Increase the volume of insulated homes by 36%, reaching 33,000 insulated homes by 2030.

[78] Links to those public policies and strategies referenced in this section can be found in the 'Links of Interest' section of this report.

	Policies and strategies	Strategic Objectives
UNITED KINGDOM	**London-Luton Airport Energy Policy:** Aligned with ISO 50001, this Policy shows the airport's commitment to improving energy management and performance. **London Luton Airport Environmental Policy**: Recognises and accepts the airport's responsibility in minimising its environmental impact, and undertakes to continuously review its performance. **Responsible Business Strategy for London Luton Airport:** It establishes goals and actions for 2020-2025, in relation to climate change among other areas of sustainability. Specifically, it contains 6 lines of action, the first being focused on ensuring the care of the surrounding environment with responsibility and efficiency, and minimising the environmental impact of the Airport, through a series of specific objectives. **Noise Action Plan at London-Luton Airport 2019–2023.** **Inquiries and complaints Policy** regarding noise of aircraft at London-Luton Airport. **London Luton Airport Access Strategy**: London Luton Airport is the fifth most transited passenger airport in the United Kingdom, with excellent transport connections that connect it to London, the southeast, the east of England and the South Midlands. **Carbon Reduction Plan.** Airport road map for achieving decarbonisation targets.	Reduce greenhouse gas emissions, by self-sourcing and reducing scope 3 emissions in the supply chain, to achieve carbon neutrality by 2026 and Net Zero Carbon 2040. Reduce waste per passenger and achieve the Carbon Trust standard for zero waste landfill accreditation. Reduce water consumed per passenger to 6.98 litres by 2023, exploring where non-potable water can be used, improving water conservation and developing water-saving initiatives. Develop an air quality strategy and reduce NOx and PM air pollution. Minimise the impact of the deicing fluids, reaching 95% of thawed fuselages in designated catchment areas by 2024. Encouraging the use of sustainable mobility. Collaborate with airlines to reduce aircraft noise and improve noise management. Reduce the number and severity of potential airport spills. Collaborate with commercial partners at the airport for the reduction and disposal of single-use plastics, avoiding their use.
BRAZIL	**Fauna Risk Management Committee** **Aeronautical Noise Management Committee**	Commitment to ACI EU's Net Zero, to have zero net emissions by 2040. Reduction of carbon emissions through mapping of GHG inventory and initiatives related to work on infrastructures that will enable the achievement of the reduction objectives as well as foster the updating of more efficient and sustainable equipment. Air quality: keep air quality levels below limit values and enhance optimal control of emission sources and improve air quality monitoring. Water consumption: treatment and reuse of water. Protect and promote local biodiversity. Reduction of waste and increased recycling. Migration of all consumed electricity to the deregulated energy market that allows the purchase of green energy for airports of ANB. Generation of green electricity through the Photovoltaic Plan (available in 2026). Noise control and implementation of noise zoning action plans.

2.1.2. Environmental certifications

(GRI 3-3)

In Spain, Aena's environmental commitments are articulated through its Integrated Management System for Quality, Environment and Energy Efficiency (SGI). This system has been implemented since 2014, and aims to facilitate legal assurance, the assessment of environmental aspects, the minimisation of negative impacts, the identification of risks, communication with interested parties and the environmental monitoring of suppliers.

The Environmental Management System applicable to 100% of activity in Spain is certified with ISO 14001 and the Quality Management System applicable to all Central Services units and sites is certified with ISO 9001. In addition, Menorca Airport and Tenerife Sur Airport have EMAS certification.

In the United Kingdom, the London-Luton Airport has certifications ISO 14001, ISO 50001, and the certification of the Airport Carbon Accreditation program of ACI EUROPE.

Lastly, Aena's airports in Brazil plan to obtain ISO 14001, ISO 9001, ISO 50001 and ISO 14064 certifications between 2023 and 2024, together with the aforementioned Airport Carbon Accreditation.

	MANAGEMENT INSTRUMENTS	CERTIFICATIONS
Environment (ISO 14001)	It addresses the most significant environmental aspects linked to airport activity, including noise emissions, atmospheric pollution, greenhouse gas emissions, water consumption, energy consumption, hazardous and non-hazardous waste, spills, soil pollution and supplier environmental control. This certification covers 100% of Aena's activity. Continuous improvement of the environmental performance of its activity is guaranteed within the framework of the system and through audits of samples carried out regularly at the centres.	Spain and UK central services and airports certified. The next renovation is scheduled for July 2023. In the Aena airport network in Brazil, the Integrated Management System is in the process of being implemented, with certification expected in 2023. .
Quality (ISO 9001)	An international standard based on the management and the control requirements of processes, aimed at improving them, focusing on the detection and determination of the organisation's processes as a decisive activity for effective operations. Within the framework of the system, and by means of audits that are periodically conducted at the centres, continuous improvement of the quality of the processes is guaranteed, satisfying the needs and expectations of its customers.	All Central Services units and Aena centres have been certified in Spain. The next renovation is scheduled for July 2023. In the Aena airport network in Brazil, the Integrated Management System is in the process of being implemented, with certification planned in 2023.
EMAS Regulation	It defines an environmental management scheme and audits based on the ISO 14001 standard, and proposes an effective systematic approach to help organisations manage and continuously improve their environmental performance. EMAS contains its own requirements that make it a model of excellence for environmental management.	Menorca and Tenerife Sur airports. The date of the last validation being in 2021.
EFQM	Shows the logical connection between the purpose and strategy of an organisation and how it is used to help create sustainable value for its key stakeholders and to generate outstanding results.	Adolfo Suárez Madrid-Barajas Airport. Valid until July 2022.

	MANAGEMENT INSTRUMENTS	CERTIFICATIONS
Energy efficiency (ISO 50001) →	An international standard for energy management systems that provides a tool to systematically optimise energy performance and promote more efficient energy management.	Reus Airport (Next renovation scheduled for July 2023). Valladolid Airport (Next renovation scheduled for July 2023). SATE Adolfo Suárez Madrid-Barajas Airport (Next renovation scheduled for December 2023). Zaragoza Airport (Next renovation scheduled for July 2023). London Luton Airport (Next renovation scheduled for July 2023).
Standard ISO 20906 →	Specific standard to monitor the sound conditions by using the Noise Monitoring and Flight Path Systems of the airports. Obtaining this accreditation is another step towards ensuring the quality of data that Aena offers publicly. Aena was the first global operator to have noise data accredited in accordance with the ISO 20906 standard at the largest of its airports in Spain. Some airports are currently accredited for Noise Monitoring Systems.	Adolfo Suárez Madrid-Barajas Airport Alicante-Elche Airport Barcelona-El Prat Josep Tarradellas Airport Málaga-Costa del Sol Airport Palma de Mallorca Airport Valencia Airport (Certificates valid until November 2023)
ACI EU Airport Carbon Accreditation →	The carbon footprint certification programme of the Airport Council International (ACI), which certifies the calculation of the carbon footprint of airports and the evolution of the CO2 emission reduction commitments acquired. Aena has 9 Spanish airports accredited in the programme that account for about 91% of the network's emissions in Spain (as of 2020). In addition, London-Luton Airport is also accredited in the UK. Aena's goal is to reach level 4+ in 2026 at Adolfo Suárez Madrid-Barajas Airport and Barcelona-El Prat Josep Tarradellas Airport and level 3+ neutrality at major airports. Note that ACA certification is based on GHG Protocol.	Málaga-Costa del Sol Airport (Next renovation scheduled for May 2023) Palma de Mallorca Airport (Next renovation scheduled for May 2023) Barcelona-El Prat Josep Tarradellas Airport (Next renovation scheduled for May 2023) Adolfo Suárez Madrid-Barajas Airport (Next renovation scheduled for May 2023) César Manrique-Lanzarote Airport (Next renovation scheduled for May 2023) Menorca Airport (Next renovation scheduled for May 2023) Alicante-Elche Airport (Next renovation scheduled for June 2023) Santiago-Rosalía de Castro Airport (Next renovation scheduled for June 2023) Ibiza Airport (Next renovation scheduled for June 2023) London Luton Airport

2.1.3. Management of environmental risks and impacts

(GRI 3-3; 413-1)

Aena has several tools to identify, monitor and manage environmental risks, being able to highlight those related to environmental compliance, climate change (see section '2.2.3. Risks and opportunities related to climate change') or acoustic impact.

- As part of its Environmental Management System, the legal environmental requirements to which the Organisation is subject have been identified, facilitating the monitoring of compliance with these guidelines.
- This is complemented by Aena's own risk management system, supported by the risk map in which the applicable environmental and sustainability risks are identified. This system includes mechanisms for their management (see chapter '2022: A Year of Hope').

- Likewise, Aena integrates the environmental factor in its decision-making through the Environmental Impact Assessments of Master Plans and Projects, especially in those that may have a significant impact on the environment, as well as aiming to preserve natural resources, minimising potential risks or impacts to the expansion of its infrastructures (more information in the 'Protection of Biodiversity' section of this chapter).



Some indicators related to environmental management and the resources dedicated to the improvement of environmental management and the prevention of environmental risks (GRI 3-3)

		2021			2022		
		Spain	**United Kingdom**	**Brazil**	**Spain**	**United Kingdom[79]**	**Brazil**
Number of people assigned to environmental management		Central Services: 55 (Aena+AT) and 57 (airports, some of which are partially dedicated to environmental management)	6	2	Central Services: 63 (Aena+AT) and 57 (airports, some of which are partially dedicated to environmental management)	7	2
Investment allocated to the protection and improvement of the environment (€)		59,467,000 €	203,583.1 €	1,754,242 €	19,814,000 €	383,344€	2,388,066.28 €
Expense allocated to the protection and improvement of the environment (€)		16,039,000 €	634,798	1,447,554 €	€16,310,000	-	1,020,767 €
Investment in R&D&I to reduce the impacts generated by pollution, generation of waste or the use of resources (€)		329,470 €	449,046.1 €	n/a	288,336 €	-	928,048 €
Investment allocated to R&D&I activities in environmental and climate change matters (€)		937,090 €	-	-	185,830 €	-	10,653,666.96 €
Costs associated with impacts generated by pollution, generation of waste or the use of resources (€)		€5,249,301 (corresponding to waste management)	449,046.1 €	-	€7,292,832 (corresponding to waste management)	441,628.2	486,940€
Noncompliance with environmental legislation and regulations, including those related to water consumption	**Nº**	0	0	0	0	0	0
	€	0	0	0	0	0	0
Return on the environmental investments	**CAPEX**	See section 'Taxonomy of Sustainable Finances'.					
	OPEX						
Provisions and undertakings for environmental risks		See 2021 Consolidated Annual Accounts and Management Report			See 2022 Consolidated Annual Accounts and Management Report		

[79]Exchange rates as of 31/12/2022 used for Balance Sheet accounts:
EUR/GBP = 0.88693
EUR/BRL = 5.6386

2.1.4. Environmental inquiries[80]

(GRI 2-25; 2-29)

In Spain, Aena makes various platforms available to users so that they can make their requests for information, complaints and suggestions of an environmental nature:

- The Office of Environmental Care located on the website, through which they are responded to in a swift and transparent manner.
- The Office of Management of Sound Insulation Plans, specific to the receipt of noise-related issues.
- The Environmental Office of the Adolfo Suárez-Madrid-Barajas Airport ('OFIMA'), through which complaints that may occur in neighbouring populations to this specific airport facility are received.
- The Environmental Office of the Barcelona-El Prat Josep Tarradellas Airport ('SAIM'), similar to the previous one but relating to this airport specifically.
- The interactive noise map on the website, called WebTrak, tracks the journey of aircraft that take off or land at the airport and can make complaints about any sound events to investigate their origin and track their minimisation.
- The telematic services portal.

In addition, in the UK, the London-Luton Airport has an interactive noise map on the website called TraVis, from which environmental inquiries and complaints about aircraft noise can also be made. There are also other ways to contact for these purposes (via phone, email, etc.).

Finally, in Brazil, users of Aena airports and others who may be affected may make inquiries, suggestions, complaints and claims in this matter through the Ouvidoria Channel (online), among other tools (e-mails, customer service, etc.).

Among the main data related to the management of environmental queries, the following stand out:

- 33,512 complaints received by Aena regarding environmental matters.
- 99.92% of noise-related complaints in Aena.
- 100% Responses given.

Indicators of environmental complaints

	2021				2022			
	Spain	**United Kingdom**	**Brazil**	**Consolidated Total**	**Spain**	**United Kingdom**	**Brazil**	**Consolidated Total**
Environmental complaints	2,712	12,433	2	**15,147**	13,978	19,533	1	**33,512**
Noise related complaints	2,705	12,431	0	**15,136**	13,964	19,519[81]	0	**33,483**

[80] See links to the websites referenced in this section in the chapter 'Links of interest'.
[81] 83% of noise complaints received in the UK during 2022 correspond to 10 people.



2.1.5. Sustainability and value chain

Green leases

Aena introduces its commitment to environmental respect and care through the incorporation of environmental criteria throughout its value chain, including both its commercial activity and its relationship with suppliers.

In Spain, Aena incorporates practices known as green leasing in its real estate activity in order to minimise the environmental impact of such operations (reduction of energy consumption, generation of waste, emissions, etc.). To achieve this objective, mandatory clauses are included throughout the execution of the contract. Likewise, and with regard to the relationship with its suppliers, the contracting specifications introduce environmental issues as a criterion in the evaluation of potential bidders, and as an aspect of mandatory compliance, both at the time of signing the contract and during the execution thereof (clauses, special conditions of execution, etc.).

In the UK, London-Luton Airport also introduces environmental criteria throughout the tendering process that are evaluated for contracting purposes. In addition, work has been done throughout 2022 in the development of a Code of Conduct for Suppliers that, among other aspects, reflects the Company's expectations regarding environmental compliance, as well as in the implementation of a set of tools to ensure sustainability as a cross-divisional aspect in the supply chain. It is also worth noting the collaboration with the London School of Economics to assess the impacts of the supply chain and develop a series of recommendations on this. Finally, objectives related to the environmental management in the supply chain have been established, such as those detailed below:

- Allocate at least 25% of supply chain expenditure on suppliers based within a 20-mile radius from the airport.
- Include sustainability criteria in 75% of supplier contracts (by value).
- Develop a climate resilience plan for the supply chain by the end of 2023

In Brazil, Aena airports also incorporate environmental clauses in contracting processes, to ensure compliance with the country's environmental legislation for the purpose of contracting third parties. In addition, a specific analysis is carried out in order to know and mitigate the risks related to suppliers (including those of an environmental nature).

In all cases, failure to comply with environmental criteria or clauses established with suppliers and lessees may result in the imposition of penalties and sanctions.



Sustainability Policy	Integrated Quality, Environmental, Energy Efficiency and Occupational Health and Safety Management Policy	Real estate development white books	Environmental clauses in contracting specifications
Disseminates the culture of sustainability integration (climate change, air quality, noise management, water management, impact on biodiversity and waste management, along with social aspects) to all business areas along the value chain.	Establishes guidelines on issues arising from lessee transactions, addressing overall environmental issues (prevention of pollution, efficient use of resources and proper waste management) and reflects the commitment to establish measures to raise awareness and communicate to key stakeholders about this Policy and the potential environmental impacts associated with airport activity. Note that during 2022 this Policy has been updated by incorporating and adapting its principles to what is required by the main ESG analysts/suppliers.	Incorporates sustainability criteria in the considerations given to the urban and architectural design of future real estate developments in the main airports (Adolfo Suárez Madrid-Barajas Airport and Barcelona-El Prat Josep Tarradellas Airport). These documents will be supplementary to the tender documents for the construction projects of future Real Estate Plans, ensuring that the environmental sustainability component is incorporated into the general design guidelines and in matters related to urbanisation and landscaping.	The contracting specifications have environmental clauses in line with current legislation. Such environmental clauses establish requirements such as obtaining certifications in this area, such as ISO 14001. In the case of technical specifications for contracts of handling agent, for example, they formalise the need to carry out an equipment replacement plan with the objective of reducing their emissions. In this sense, it is worth noting the launch during 2022 of the world's largest tendering for handling services, in which handling agents have been required to have 49% of vehicles and electrical equipment by 2030 (starting from the current minimum percentage, set at 23%) as well as 78% of vehicles and sustainable equipment by 2030 (starting from the current minimum percentage, also set at 23%). Finally, equipment sharing is encouraged in order to increase efficiency in operations and a maximum age of the tools is established, consisting of 10 years for gardeners and 12 years for the rest. Likewise, the contracting specifications include environmental issues as a criterion in the evaluation of the bidder, and as a mandatory aspect to be fulfilled both at the time of signing the contract and during the execution thereof (clauses, special conditions of execution, etc.). Likewise, with regard to the specifications associated with the air navigation service in Spain, specific environmental conditions have been incorporated with the aim of aligning the sustainability performance of the supplier and Aena. Lastly, work has been done in 2022 on the inclusion of new compliance criteria for suppliers to improve the degree of alignment with the EU Green Taxonomy, taking the construction specifications as a starting point.

Supervision of environmental behaviour	Technical conditions for the leasing of commercial premises	Third-party awareness mechanisms and creation of a collaboration forum for sustainability	Code of Conduct for Suppliers in the UK and Brazil
The supervision of the environmental conduct of the companies (contracted and lessees) carried out by Aena is included in the specifications, as well as the support for the development of improvement initiatives in environmental management, especially in areas and activities with a potentially significant impact on the environment. Periodic follow-ups, facility visits and the review of aspects related to the Monitoring Plans are common and aim to: • Establish the rules and actions that the contracted companies and those third parties that carry out their activities at Aena's facilities must respect. • Identify and control the environmental aspects of the activities carried out in the facilities, sites and premises owned by Aena. • Verify the proper provision of the service. .	Include requirements for potential lessees regarding the incorporation of measures of an environmental nature (for example, measures for the correct management of waste, storage of hazardous substances, spills, etc.) as well as the supervision and strict monitoring thereof (see Chapter 3). These requirements must be considered in the proposal of their bids.	Aena makes good practices of environmental management available to contractors and lessees, promoting collaborative and responsible performance in their management. In this regard, during 2022, the following stand out: -Collaborative forums conducted with mobility agents to define initiatives related to sustainable mobility to and from the airport. -Environmental collaboration forum with major airport cargo carriers. -Work groups based on Eurocontrol's Collaborative Environmental Management in order to establish collaborative actions and detect synergies between the main airports and third parties, such as the air navigation supplier, waste collection and management agents or handling agents.	During the fiscal year 2022, the United Kingdom has worked on preparing the Code of Conduct for Suppliers, which lists all its expectations in various matters (including environmental) that the members of its supply chain must accept and follow in order to establish or continue the contractual relationship. This is also the case in Brazil, which requires the acceptance of its Code of Conduct for Third Parties (and, consequently, the environmental provisions it contains) by the bidders in order for them to submit bids (see Chapter 4 'Responsible Management').

Sustainable purchases

The adoption of new technologies and the progressive incorporation of more environmentally friendly standards are aspects promoted by Aena to ensure the improvement of its environmental performance, in collaboration with third parties. As initiatives, the following are noteworthy:

- The acquisition of electric vehicles or green cars in the new tender contracts for cars belonging to the Aena fleet in order to reach 100% sustainable vehicles by 2026.
- Purchase of electricity from renewable sources: In Spain and the United Kingdom, since 2020, 100% of their electricity purchased is guaranteed to have come from renewable sources, while in Brazil it is 35% in 2022 (81.4% in 2021). This energy, with a guarantee of sustainable source, is supplied to all leaseholders through the network and, therefore, to all the companies that work at the airports.

LIFE CYCLE



Infrastructure Planning

The environmental variable is integrated from the first stages of the planning process for airport infrastructures by conducting Strategic Environmental Assessments of the planning instruments (Master Plans and Special Plans).

Throughout this process, the Master Plans and Special Plans are analysed from an environmental perspective and undergo an assessment procedure, which ends with the corresponding resolution issued by the competent environmental body.

Once resolved by the competent body in environmental matters, the Environmental Reports integrate the environmental aspects to be considered in the proposal of the final Master Plans and Special Plans and in the monitoring of their compliance.

The Environmental Impact Assessment of Projects is a process or instrument that enables the introduction of the environmental variable in the decision-making process for projects that are expected to have a significant impact on the environment or for the preservation of natural resources. The result of the process of Environmental Impact Assessment (EIA) of projects is the final environmental resolution called the Environmental Impact Statement in Spain, or the Environmental Licence in Brazil.



Dismantling stage of facilities and infrastructure

Whenever the dismantling of a facility or infrastructure is carried out, the applicable environmental criteria are taken into account to maximise the separation of the different materials (wood, glass, metals, etc.) in order to facilitate their reuse and thus reduce the occupation of landfills



Operational Phase

The Operational Control process and the identification, assessment and evaluation of environmental aspects process allow Aena's units and centres to take into account the influence of their activity on the life cycle of the services and products used to provide said activity.

Low carbon products offered by Aena. Promotion of the use of a sustainable vehicle to access Spanish airports through a 15% discount for passengers who park their vehicle with an environmental 'zero emissions' mark in the airport parking lots.

Promotion of the use of SAF: in the field of sustainable aviation fuel (SAF), a collaboration agreement has been signed in Spain between Aena and Exolum to announce the AVIKOR initiative, which consists of the purchase of SAF by passengers to reduce emissions during their flight. Provision of energy guaranteed to be 100% from renewable origins for all tenants and agents working in Aena's airports.



Execution of construction projects

Environmental Monitoring of Works is used to monitor any works and ensure compliance with the established requirements, whether related to consumption, separation of materials or the final destination of waste.

The documents for the construction projects include clauses to encourage suppliers to use sustainable materials from their origin, manufacturing or sourcing, until the end of their useful life (e.g., easily recyclable or reusable materials).



Purchase of products/services

Aena establishes different environmental criteria in the contractual documents for the acquisition of products that are more environmentally friendly (e.g., computer equipment, paper, electrical energy supply, construction material, etc.). For example: the acquisition of energy-efficient products that do not contain hazardous materials, that minimise waste at the end of their useful life or that are products composed of reusable and recyclable materials at the end of its useful life (see previous section).

2.1.6. Environmental endorsements, partnerships and recognitions

(GRI 2-28)

Aena is part of several industry-wide, national and international associations related to the environment, actively participating in the following:

- Global Compact: Organisation of which Aena has been a partner since 2017, committing to its ten principles.
- Forética: Organisation referring to sustainability and corporate social responsibility in Spain. Its mission is to integrate social, environmental and governance aspects into the strategy and management of companies and organisations.
- For a sustainable recovery: An initiative supported by companies, NGOs, scientists, academics and citizens in general that urges the government to make the end of the economic crisis caused by the coronavirus lay the foundation for transformation into a more sustainable and robust economy, based on three fundamental pillars: digitization, decarbonisation and resilience.

Aena is also a member of different climate-specific partnerships in which it actively participates:

- Renewable And Low-Carbon Fuels Value Chains Industrial Alliance: Initiative to drive the production and supply of renewable and low-carbon fuels in the aviation and water sectors.
- For the Climate: Community comprising society, NGOs, companies and administration bodies conscious of the urgent need to act on climate change, to which Aena has been a member since 2017 with the commitment to reduce its GHG emissions.
- Toulouse Statement: Public-private initiative that supports the European aviation goal of achieving net zero CO2 emissions by 2050. This is also the first joint initiative of its kind globally, aligning all EU stakeholders on the principles and actions necessary to decarbonise and transform the aviation sector in Europe, representing a real breakthrough.
- European Climate Pact: EU initiative that invites participation in climate action, knowledge-sharing, learning about climate change, developing, applying and expanding solutions as an open and inclusive initiative in order to build a greener Europe.
- The Clean Skies for Tomorrow Coalition: This provides a critical global mechanism for senior executives and public leaders, through the aviation value chain, to align on a transition to sustainable aviation fuels as part of a meaningful and proactive path for the industry to achieve a carbon-neutral flight.
- European Clean Hydrogen Alliance: This brings together industry, authorities, civil society and other stakeholders to discuss the large-scale deployment of clean hydrogen technologies and what it requires: the hydrogen value chain, major obstacles to the large-scale deployment of clean hydrogen and proposed mitigation measures.
- ACI Europe: Sectoral association, chaired in 2022 by Javier Marín (Aena's Executive Director and Managing Director of Airports), which establishes objectives and commitments to minimise carbon emissions at member airports (such as that relative to reaching zero net emissions by 2050) as well as accreditations that reflect progress towards the aforementioned targets (Airport Carbon Accreditation program). Within the framework of ACI, Aena participates in various Task Forces and Working Groups linked to the sustainability of airports in order to discuss and align the different objectives and strategies in a homogeneous and consistent manner between the various participants.

Other notable initiatives in which Aena participates:

- CDP: This recognises Aena's environmental commitment by giving an assessment to companies that incorporate climate change as a strategic factor. Aena achieved the highest rating in the fiscal year 2022, an A, above the average in its industry.
- Science Based Targets: The Science-Based Targets initiative (SBTi) drives ambitious climate action in the private sector by enabling companies to set science-based targets for reducing emissions. Aena has been committed to this initiative since November 2021.
- Airport Carbon Accreditation: this is the carbon footprint certification program of the Airport Council International (ACI), which accredits the calculation of the carbon footprint of airports and the evolution of their CO2 emissions reduction commitments acquired (see expanded information regarding participation in this accreditation in section 2.2.1).
- Carbon Footprint Reduction Programme of the Spanish Ministry for Ecological Transition (MITECO): Adolfo Suárez Madrid-Barajas Airport has level 2 in this accreditation (reduction).

2.2. Aena and the climate emergency[82]

(GRI 3-3)



2.2.1. Climate action plan

(GRI 3-3; 201-2; 305-5)

At the General Shareholders' Meeting of 2022, the Board of Directors of Aena presented the Updated Report of the Climate Action Plan to a consultative vote, receiving 94.39% votes in favour. This vote consolidated the company as the first in Spain and of the few in the world to have held its shareholders accountable for its decarbonisation plan.

The main objectives of this Plan, which is part of the Sustainability Strategy and applies to Aena's Spanish network, are to achieve carbon neutrality by 2026 and to be Net Zero Carbon (0 net emissions) by 2040. In addition, the Climate Action Plan (PAC [Plan de Acción Climática]) engages Aena's stakeholders, with particular focus on airlines, to drive reduction of their scope 3 emissions.

These strategic objectives are aligned with the approved roadmap at London-Luton Airport in the United Kingdom, through the strategy called Reducing our Carbon Footprint, while in Brazil, Aena airports are designing a strategic plan that includes a framework of action to achieve these same targets in matters of decarbonisation.

The Climate Action Plan is aligned with the Sustainable Development Goals and meets the requirements of the TCFD

The Plan is divided into 3 strategic lines of action: Carbon Neutrality, Sustainable Aviation and Community and Sustainable Value Chain. In order to achieve these objectives, a set of effective actions and measures have been developed in matters of energy efficiency, the use of renewable energies, sustainable mobility, the reduction of third-party emissions and the decarbonisation of processes and activities. To this end, it is expected to invest around €550 million over the period 2021 to 2030[83].

The Company's decarbonisation targets have been developed in line with the commitment acquired in 2019 to adhere to the NetZero initiative of the ACI Europe (Airport Council International),which has currently been adopted by more than 200 European airports and which marks a significant milestone in the fight against climate change for the sector[84].

In its commitment to the Science-Based Targets initiative (SBTi), in 2022 Aena began working on setting science-based targets for reducing emissions, with the goal of validating them in 2023

In 2022, Aena earned the highest rating, level A, in the Carbon Disclosure Project (CDP)

[82] This section of the report, 'Aena and the Climate Emergency', includes information related to governance, strategy, risk and opportunity management, objectives, metrics and development related to climate change, thus following the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD).
[83] All actions, objectives and associated indicators for the monitoring of the PAC. See chapter 'Links of interest'.
[84] Mr Javier Marín, Managing Director of Aena Airports and executive member of the Board of Directors of Aena, was elected Chairman of ACI EU in 2021.

CLIMATE ACTION PLAN: STRATEGIC PROGRAMMES





ZERO CARBON

Scope 1 and 2

Become a carbon-neutral airport operator (2026) and lay the foundations for achieving Net Zero Carbon (2040)

Total Scope 1 and 2 emissions

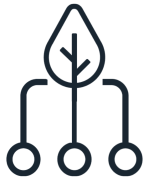


SUSTAINABLE AVIATION

Scope 3

Act as a driving force for other agents in the aviation sector to accelerate their decarbonisation

LTO and ground handling emissions



COMMUNITY AND SUSTAINABLE VALUE CHAIN

Scope 3

Improve the sustainability of the environment by collaborating with suppliers, tenants, transportation agents and the community

Transportation emissions to/from airport

Aena has been TCFD supported since 2022

Specific decarbonisation targets

(GRI 3-3)

The roadmap established by the PAC has annual strategic objectives aimed at reducing own emissions, producing renewable energy through self-consumption, purchasing energy from renewable sources, improving energy efficiency, distributing Sustainable Aviation Fuel (SAF) at airports, reducing emissions attributable to handling agents by increasing electric vehicles, sustainable fuel consumption and charging points, promoting sustainable mobility to and from airports and actively engaging supply chain and communities in driving sustainability.

	Spain	United Kingdom	Brazil
Short-term	**2022:** • Reduction of scope 1 and 2 absolute GHG emissions by 60% compared to the base year 2019 (with base year emissions being 136,631 tonnes of CO2eq and the year in which this base year and the PAC objectives were established was 2021) **2023:** • Purchase of electricity, 100% with renewable origin guarantee (ongoing objective since 2020). • Reduction of scope 1 and 2 absolute GHG emissions by 61% compared to the base year 2019. • Offset 8% of the non-reduced emissions.. **2026:** • Carbon neutral. • 100% self-supply of renewable electricity (Aena Photovoltaic Plan) from 2026 based on network capacity and administrative procedures. • Electrification of 26% of own fleet of vehicles (tourism cars and vans) and 100% sustainable vehicles (HVO electrification and consumption). • Establishment of 3,150 electric charging points in passenger, employee and air-side car parks. • Level 4+ Airport Carbon Accreditation by ACI EU at the Adolfo Suárez Madrid-Barajas Airport and Barcelona-El Prat Josep Tarradellas Airport. • 44% of the sustainable handling fleet (electrical equipment and sustainable fuel). • Implementation of new collaborative measures and improvements to optimise the efficiency of airport operations, as well as the congestion of European airspace, reducing waiting and flight times. • Fleet of shuttles between terminals in Madrid and Barcelona 100% electric.	**2022:** • Purchase of electricity with a 100% renewable origin guarantee. • 85% of lighting replaced with LED lights. • Developing a sustainable vehicle plan developed for launch and testing in 2023. **2023**: • Commissioning of DART (Direct Air-Rail Transit). **2026** • Carbon neutral • 25% of energy supply from renewable energies in own facilities. • Supporting airlines in decarbonising flights.	**2022:** • Energy efficiency actions • Purchase of energy with sustainable source guarantee • Pilot project for the use of one electric bus for Recife Airport. . **2026:** • Replace the types of gases used in air conditioning systems with gases that do not cause damage to the environment. • Purchase and use of green/clean energy for all airports in the Aena network in Brazil.. • Deploy photovoltaic plants in airports that have structural viability. • Conduct and analyse studies for the implementation of PCA and 400Hz systems. • Implement recharging plants for electric handling vehicles and in passenger parking lots. • 20% reduction in emissions from handling agents with the use of electric vehicles. • Generation of green electricity through the Photovoltaic Plan • Replacement of fossil fuels for the generation of power from air conditioning generators and yard and airport runway beacon generators, with LFP battery systems recharged with solar power

Medium/long term	**2030:** • Reduction of scope 1 and 2 absolute GHG emissions by 93% compared to the base year 2019 and offset the remaining emissions. • 10% reduction in electricity consumption per passenger. • 9% reduction of air conditioning energy consumption per passenger. • Use of 65% sustainable fuel in boilers and cogeneration. • 78% of the sustainable handling fleet (electrical equipment and sustainable fuel). . • Installation of hydrogen generators in the five main airports.	**2028:** • 50% of the air fleet of NEO or MAX3 models. **2030:** • 50% of energy supply from renewable energies in own facilities. • Increase in the number of electric charging points in parking lots.	**2040:** • *Net Zero Carbon*

2040: Commitment to ACI EU's Net Zero, to have zero net emissions

2022 MITIGATION ACTIONS AND MEASURES TO ACHIEVE THE DECARBONISATION OBJECTIVES

Improving efficiency of the facilities and uses of renewable energy

- The electricity consumed at Aena's centres in Spain and in the United Kingdom, at the London-Luton Airport, comes from sources with a 100% renewable origin guarantee. On the other hand, Aena's airports in Brazil have migrated 35% of the consumed electricity to the deregulated energy market (purchasing green energy for their facilities).
- In its goal to achieve 100% self-supply, Aena has awarded the photovoltaic plants of Adolfo Suárez Madrid-Barajas airport and Barcelona-El Prat Josep Tarradellas airport from 2026:
  - The construction and commissioning of the solar photovoltaic plant at Adolfo Suárez Madrid-Barajas Airport will provide clean energy to the Spanish airport network with a total installed power of 142.42 MWp and a nominal power of 120 MWn and will occupy a surface area of 176 hectares. With its more than 235,000 photovoltaic modules, it is expected to generate an energy of 212 GWh per year – equivalent to the average consumption of 65,000 homes per year – preventing the emission of 27,000 tonnes per year of CO2 into the atmosphere during the more-than 25 years in which its useful life is estimated.
  - In the case of Barcelona-El Prat Josep Tarradellas Airport, the awarded photovoltaic plant will have a total installed power of 12.48 MWp and a nominal power of 10 MWn. It will occupy a surface area of 17 hectares and will also be located within the airport enclosure.
- The energy efficiency measures include those linked to improving and maintaining the lighting, boilers, etc. In the United Kingdom, at the London-Luton Airport, 85% of the existing lighting has been replaced by LED lighting, and at Aena's airports in Spain, LED lighting continues to be implemented in their facilities with the aim of achieving 100% by 2026.

Airport Carbon Accreditation

- Over 91% of carbon emissions are accredited by the Airport Carbon Accreditation (ACA) programme:
  - The airports of Adolfo Suárez Madrid-Barajas, Barcelona-El Prat Josep Tarradellas, Palma de Mallorca and London-Luton have Level 3 'Optimisation'.
  - The airports of César Manrique-Lanzarote, Málaga-Costa del Sol, Alicante-Elche and Menorca have renewed the Airport Carbon Accreditation Level 2 'Reduction' certification, and Ibiza Airport has joined directly at this level.
  - The Santiago-Rosalía de Castro airport has renewed the Level 1 'Inventory'.
- As a goal for 2026, Adolfo Suárez Madrid-Barajas Airport and Barcelona-El Prat Josep Tarradellas Airport will reach the 4+ level of ACA.
- For their part, ANB is working on joining the programme, with its objective being to achieve level 3 of the Airport Carbon Accreditation programme of ACI EUROPE in 2023.



Sustainable fleet

- Replacement of Aena's fleet of cars and vans with cleaner and more efficient vehicles and expansion of the recharge point network for electric or hybrid vehicles, reaching 28.7% of electric vehicles of the fleet of cars and vans in the Spanish territory in 2022 and 1,063 recharge points in land and air locations at the airports in handling vehicles. The objective in Spain is to have 100% sustainable vehicles and more than 3,000 recharge points on the airside and landside by 2026.
- London-Luton Airport has developed a Sustainable Vehicle Plan for launch and testing in 2023.



Collaborations with third parties

- Fostering the use of sustainable aviation fuel: partnerships and active collaboration with bio-kerosene producers, airlines and other interested agents to increase the use of sustainable aviation fuel and promote production. For its part, the London-Luton Airport, in 2022, has promoted support for research projects financed by the government of the United Kingdom, such as the analysis of the impact caused to infrastructure by the use of hydrogen in different processes (refuelling, costs, processes), and the challenges of the transition to other new technologies (SAF, electric aircraft and their simultaneous use).
- Reduction of LTO and APU cycle emissions: implementation of A-CDM or CDM (Airport Collaborative Decision Making or Collaborative Decision Making) aimed at improving the overall efficiency of airport operations, reducing taxiway time and therefore, fuel consumption and emissions through the shared use of updated information of an operational nature. The A-CDM has been developed across 5 of the Spanish airports and it also has Advanced Towers in 10 of its airports.
- In relation to ENAIRE, Aena has participated in the development of the sustainability criteria of the new contract for the provision of air navigation services, establishing the conditions necessary to ensure they are in line with Aena in terms of sustainability. As an integral part of the documentation to be submitted in the offer, ENAIRE has presented a Sustainability Plan, which includes follow-up objectives, measures and KPIs, in line and compatible with the achievement of the Company's objectives.
- Supply of renewable electrical energy to aircraft: 100% of the gangway parking spaces in the Spanish airports have a 400 Hz electricity supply system. In 2022, progress has been made in the implementation of new outlets, replacement and substitution of old equipment and work is being done to implement these electrical supply systems in the aircraft apron stations in the near future. In addition, the electrical energy supplied by Aena to these aircraft has a 100% renewable origin guarantee.
- Sustainable Handling Fleet: tender for the new Ground Aircraft Assistance specifications with new sustainability criteria and objectives at Spanish airports.
- Pilot pooling project in handling vehicles at Palma de Mallorca airport: this project restricted to pushback vehicles has resulted in positive savings in usage time of 15%, which implies up to 1 tonne of CO2 per year per equipment in standard use.



Communication and reporting

- Commitment to the Science Based Target initiative (Net-zero science-based emissions reduction targets).
- Participation in the Carbon Disclosure Project (CDP), the main climate change reporting framework, where the Company has obtained the highest rating, level A, in 2022.
- Adherence to various initiatives in the field of combating climate change (see section '2.1.6. Participation in environmental associations').

Evolution and progress of established decarbonisation targets (GRI 305-5)

	Spain	United Kingdom	Brazil
	• 67% reduction in own greenhouse gas emissions (base year 2019) • Purchase of 100% renewable electricity: Aena España and its tenants have consumed renewable electricity with a 100% source guarantee at all its airports and offices since 2020. • Electrification of 28.7% of own fleet of passenger cars and vans. • 1,063 charging points for ground and air-side electric vehicles at network airports. • Currently, 23% of the handling fleet (vehicles and equipment) that operates at airports are electric. Additionally, during 2022, a tender was launched for Aircraft Ground Assistance teams with environmental criteria aligned with the most demanding PAC, which will progressively increase this percentage. • Award of photovoltaic plants at Adolfo Suárez Madrid-Barajas Airport and Josep Tarradellas Barcelona- El Prat Airport. • Nine Aena airports are certified by ACI EU Airport Carbon Accreditation (ACA). In 2022, the Palma de Mallorca airport went up to level 3 'Optimisation', while the Alicante-Elche and Menorca airports went to level 2 'Reduction' and Ibiza airport achieved certification for the first time at level 2 'Reduction'. • 5 airports with A-CDM and 10 airports with Advanced Towers.	• Identification of the risks associated with climate change and development of a resilience plan, integrating commercial risks into the assessment (planned for 2026). • Net Zero Roadmap Publication ('Reducing our Carbon Emissions'). • Launch of the Sustainable Supply Chain Charter. • Release of air quality strategy. • Purchase of 100% renewable electricity. • Preliminary work completed to introduce 25% renewable energy generation at owned facilities by 2026. • 85% LED lighting upgrade. • Obtaining ACA Level 3 (optimisation). • New non-stop express train between Kings Cross station and London-Luton Airport using electric trains	• 35% purchase of clean energy from the Deregulated Energy Market. • Conducting operational efficiency tests within the pilot project for the use of one electric bus for Recife Airport. • Meeting with the Ministry of Infrastructure and the Ministry of the Environment to discuss issues related to the provisioning of green fuels for aircraft, considering the areas and fuelling points at airports.

2.2.2. Supervision and monitoring of the Climate Action Plan

(GRI 2-9; 2-12; 2-13; 2-19)

Progressive compliance with the Climate Action Plan influences the remuneration of Aena's workforce in Spain, including the Chairman, members of the Management Committee and the rest of the Senior Management, linked through the performance management system.

	FUNCTION	PERIODICITY
GENERAL SHAREHOLDERS' MEETING	Consultative voting and monitoring of the Climate Action Plan	Annual
BOARD OF DIRECTORS	Approval of the PAC and annual and timely supervision Guidance and control of the strategy, policies, objectives, risks and results in matters related to climate action	
Appointments, Remuneration and Corporate Governance Committee	Remuneration model that includes linkage to Climate Action objectives	Annual
Audit Committee	Supervise the risk management system, ensuring the identification, management and communication of the main risks within planned levels	Annual
Sustainability and Climate Action Committee	Climate Action Plan Report, Supervision and Reporting	Quarterly
EXECUTIVE MANAGEMENT COMMITTEE	Monitoring of the Climate Action Plan	
Chief Green Officer	Make sustainability a fundamental element in the Company's decision-making and communicate to both the Board and the employees updates and advances in the company's sustainability through established communication channels.	
SUSTAINABILITY MANAGEMENT	Preparation and coordination of the Climate Action Plan	
CLIMATE ACTION PLAN WORK GROUP	Operational coordination of business areas for the deployment of the strategy	Bimonthly

2.2.3. Risks and opportunities related to climate change

(GRI 3-3; 201-2)

Climate risks are identified in the Company's risk map, which also takes into account the corresponding management, monitoring and control mechanisms[85] which in turn include indicators and measures linked to compliance with the PAC

In compliance with best practices in the field, Aena follows the recommendations of the Task Force on Climate-Related Financial Disclosures (TCFD) in its risk and opportunity analysis process, considering 3 climate scenarios[86].. The update and expansion of the Spanish network climate risk study is currently underway

- **Physical risks**: increased temperatures, more frequent heat waves, extreme precipitation, sea level rise and the risk of river or coastal flooding are the main physical risks identified that may have direct impact on infrastructure or management of medium to long-term transportation services. As a result of the materialisation of these risks, an increase in climate control expenses (OpEx) is expected as well as the need to incur investments to extend runways at some airports that avoid operational restrictions or to protect the facilities from extreme precipitation or sea level rises (CapEx), among others.
- **Transition risks**: Aena has conducted an assessment of the materiality of the identified short, medium and long-term risks, including:
- **Regulatory risks:**
  - Extension of the coverage and duration of the EU ETS system.
  - Fit for 55.
  - Flight ban with AVE alternative..
- **Technological risks:**
  - Replacing the aircraft with new technologies..
  - Participation in SAF production project.
  - Reduction of emissions in airport operations
  - Green airport infrastructure.
- **Market risks:**
  - Economic recession due to energy crisis.
- **Reputational risks:**
  - Stigmatisation of the sector.
  - ESG investment.
  - Failure to meet Net Zero commitments.

This assessment is being completed from the update of the quantification of the potential financial impact caused by these physical and transitional risks under different short and long-term transition climate scenarios. Following the recommendations of the TCFD, the impact on Aena on its income, operating costs, capital investments and capitalisation of its share, among others, will be evaluated according to the type of physical and transition risk. This assessment will allow an action plan to be carried out where the appropriate adaptation and mitigation measures based on the criticality of the risks are identified. This would complement the PAC, which currently forms Aena's comprehensive response to the management of risks and opportunities derived from climate change

- **Opportunities**: thanks to its risk management and the design and implementation of climate strategies and measures, Aena is updating the opportunities detected to ensure the long-term sustainability of its business model:
  - Renewable and low-emission energy: implementation and generation of renewable and low-emission energy to establish a new consumption model that reduces energy dependence.
  - Driving a sustainable aviation fuel market through SAF production.
  - Driving industry alliances and public-private collaboration agreements, as well as with local communities for the development of low-emission projects.
  - Development of services adapted to changes in consumer preferences.
  - Improvement in positioning in capital markets, participating in sustainability indices and climate-related certifications.

In its climate change adaptation report, London-Luton Airport also carries out an exercise to identify physical risks, transition risks and opportunities associated with climate change, which also provides an assessment of

[85] As this has been incorporated into the Company's risk map, it is supervised and reviewed by the Board of Directors, through the Audit Committee. Aena's Management Committee updates the risk map annually based on the monthly information provided by the different corporate management departments.

[86] When analysing physical risks, in line with the recommendations of the TCFD, the following climate scenarios have been considered:
- RCP Scenario 8.5 (Business as Usual scenario): corresponds to a trajectory in which emissions continue to rise at the same rate as they do today, assuming global warming that will probably not exceed 4°C.
- RCP Scenario 4.5 (strong mitigation scenario): corresponds to a trajectory where emissions would have been halved by 2080 and it is very likely that the 2ºC of global warming will not be exceeded.

When analysing the transition risks related to air traffic demand, the climate scenarios of the International Energy Agency have been used, as they provide information, data, and projections relating to air traffic in various time horizons. The study has focused on the following climate scenarios:
- Beyond 2 Degrees Scenario (B2DS Scenario): this is a scenario in which by the year 2100 the overall average temperature difference is around 1.75°C with respect to pre-industrial records.
- 2 Degrees Scenario (2DS Scenario): this is a scenario that foresees that the temperature gradient will be limited to 2°C.
- Reference Technology Scenario (RTS Scenario): this is a less restrictive scenario, with environmental policies and agreements that are at the same level as current ones (Paris Agreement, Green Deal, etc.), but that have not resulted in a massive deployment of green technology as would occur in the previous scenarios.

the potential impact on its assets, operations and strategic functions[87].

- **Physical risks:** Heavy rain and flooding of drainage infrastructure, increased temperature affecting working conditions, increased temperature affecting takeoff weight, cooler conditions increasing deicing requirements and decreased visibility that may impact airport operations.
- **Transition risks:** Compliance with regulatory requirements (as well as net zero strategies), technological developments that trigger substantial investments, potential decrease in demand and capacity limits, as well as reputational risks related to the environment.
- **Opportunities:** The transition to a lower-carbon economy provides an opportunity for the UK to take a leading role in aviation sector guidance. Also, the summer season could be longer. Options related to the low-carbon transition will also increase, while the frequency of fog and low temperatures decreases. Finally, offerings could be improved with newer technologies and better infrastructure.

In this regard, the Company has specific mitigation and adaptation measures to climate change[88] that will be supplemented with those derived from the updating of the study of climate risks and opportunities that are under development:

- **Mitigation measures:** consist of concrete measures designed to reduce the negative environmental impacts resulting from airport activity and to develop environmentally friendly means of transport, which in turn encourage the collaboration of airlines with other stakeholders.
- **Adaptation measures:** consist of specific actions for the adaptation of airports to the foreseeable evolution of climate variables, the possible impacts of climate change and the possible effects on airport infrastructures and operations, which are evaluated and assessed during the strategic environmental assessment of the Master Plans. This analysis covers intermediate time horizons up to the foreseeable development horizon[89].

Likewise, procedures are available to minimise the impact of emergency situations[90] linked, for example, to meteorological and geological events that have an impact on aircraft and/or facilities in operations. Thus, each airport has Action Plans to respond to adverse weather situations, such as the Winter Plan, which establishes the procedures to be followed by airports to maintain operational safety and minimise the impacts caused by ice and snow on air traffic. For the winter campaign initiated on 1 November 2022, the Plan has been allocated a budget of €2.2 million.

Regarding geological events, it should be noted that in the case of airports near areas at risk of volcanic eruptions, there are procedures for the removal of ash.

In the UK, emergency plans are available for weather events, in relation to:

- Action plans for extreme climate events.
- Winter action plans (elimination of ice):
- Greater maintenance frequency and intensity to reduce the risk associated with the impacts of climate change.
- Management plans for adapting to climate change in the long term, including ongoing monitoring and reviews.

[87] Risks and opportunities have been identified and assessed using a standardized risk assessment framework that considers impact thresholds, likelihood of events and severity of impacts. The framework has been expanded to include a high-level assessment of London-Luton Airport's transition risks to reflect current best practice by phasing in TCFD guidance. For more detail, see the London-Luton Airport Climate Change Adaptation Report (link available under "Useful links").
[88] For more detail, see Aena´s Climate Action Plan and the *Carbon Reduction Plan* of London´Luton Airport.
[89] Specifically, in Aena Brasil, as a result of the climate change risk analysis carried out, a series of adaptation measures have been concluded to be implemented in the airports to minimize the risks detected and their possible impacts, related to the adaptation of the airport Master Plans in a coordinated manner, and their inclusion in the works foreseen in the next time horizon.
[90] Since there are specific emergency plans for each airport, the local team is responsible for them. The procedures that develop the corresponding emergency plan are specific to each airport, supported by Central Services, and are certified and inspected by AESA. For more information see Chapter 6.

CLIMATE RISKS AND OPPORTUNITIES ANALYSIS IN SPAIN

Physical risks

- Temperature increase.
- Heat waves
- Extreme rainfall
- Increased sea levels.

Transition risks

Regulatory and legal

- Extension of coverage and tightening of the EU ETS.
- EU regulatory package 'Fit for 55'.
- Ban on flights with high-speed rail alternative.

Market

- Economic downturn due to energy crisis.

Reputation

- Stigmatisation of the sector
- ESG investment
- Non-compliance with Net Zero commitments

- Implementation of renewable energies in airports..
- Revenue from the sale of electricity at electric vehicle charging points.
- Promote a market for sustainable aviation fuels.
- Reduce energy dependence.
- Promote industrial alliances and public-private partnership agreements.
- Promote and increase ACA, CDP and other climatic certifications, which provide a great reputational benefit to the Company.

LONDON LUTON AIRPORT CLIMATE AND OPPORTUNITIES ANALYSIS

Physical risks

- Reduced visibility (fog, cloud cover, etc.)
- Extreme winds
- Flooding
- Extreme temperatures/snowfall
- Heat waves

Transition risks

Policies
Policies to restrict or mitigate actions that contribute to the adverse effects of climate change.

Policies that seek to promote adaptation to climate change

Technological

Competitiveness of the airport

Market

Changes in demand

Changes in market segments

Competing in terms of carbon options

Reputational

Change in customer or community perception of the contribution to the transition to a low carbon economy

- Extension of the summer season in some destinations.
- Capitalisation of efficiencies and improvements derived from supporting technological changes in the aviation sector.
- Capture market share of competitors by achieving future expansions of the airport that could be limited to airports with low carbon emissions intensities and greater infrastructure for new technologies.
- Capture passengers driven by sustainable tourism.

2.2.4. Metrics. Carbon footprint

(GRI 3-3; 305-1; 305-2; 305-3; 305-4; 305-5)

Aena tracks its carbon footprint to assess the effectiveness of the measures implemented. Thus, Spain's carbon footprint (Scope 1 and 2) has been reduced by 67% compared to the base year 2019[91], exceeding the objective established in the Climate Action Plan of reaching a 60% reduction in greenhouse gas (GHG) emissions.

Regarding scope 3 of Spanish airports, a reduction of 16.6% has been obtained compared to 2019 thanks to the implementation of collaboration initiatives with third parties and the efficiency in operations.

At a consolidated level, Scope 1 emissions have amounted to 21,087.76 tCO2 and with regard to Scope 2 (Market Based) emissions, they have totaled 30,428.92 tCO2. These values have increased compared to 2020 and 2021 due to the return to normality in operations, although it is lower compared to 2019 thanks to the purchase of electricity with a guarantee of renewable origin. This is derived from the implementation of mitigation and efficiency measures.

Evolution of GHG emissions (equivalent tonnes of CO2) (GRI 305-5)[92]

Intensity of GHG emissions, kg CO2e/ATU (Scopes 1 and 2) (Market Based) (GRI 305-4)[93]

	Spain	United Kingdom	Brazil	Consolidated Total
2020	0.22	0.61	-	-
2021	0.16	0.32	0.13	0.17
2022	0.09	0.09	0.17	0.10

[91] This base year was chosen because during the preparation of the CAP in 2021, 2019 was the last most normalized historical year in terms of the number of operations (during which 136,630.5 tCO2e were emitted). At London-Luton airport in the United Kingdom, 2019 was chosen for the same reason, with the corresponding emissions for Scope 1 and 2 for that year being 7,947 tCO2e.
[92] In addition, the following gases are included in the CO_2, CH_4 and N_2O calculation.
[93] ATU: A parameter that reflects the activity of an airport, taking its annual operations, passengers and cargo volumes into consideration. ATU = Passengers + (100 x Operations) + (10 x Tonnes of cargo).

Carbon footprint (GRI 305-1; 305-2; 305-3)[94]

	2020				2021				2022			
	Spain	United Kingdom	Brazil	Consolidated Total	Spain	United Kingdom	Brazil	Consolidated Total	Spain	United Kingdom	Brazil	Consolidated Total
Direct emissions (scope 1)[95]	17,112.50	2,326.00	—	**19,438.50**	14,313.60	2,032.20	558.6	**16,904.40**	17,603.88	2,256.88	1,227.01	**21,087.77**
Indirect emissions (scope 2) Market Based[96]	26,199.30	5,059.00	—	**31,258.30**	31,870.90	1,332.00	2,246.40	**35,449.30**	26,974.16	0.00[97]	3,454.76	**30,428.92**
Scope of emissions 3[98]	1,870,884.60	109,093.00	—	**1,979,977.60**	2,242,058.00	93,845.00	—	**2,335,903.00**	3,280,029.40	—	—	**3,280,029.40**

Retail areas at Spanish airports (concessionaires) are accounted for as part of Aena's total consumption and the generated emissions are considered its own. In any case, it provides 100% renewable electricity to the leaseholders, which means that their emissions associated with their electricity consumption, taking into account market-based criteria, are zero in Scope 2.

[94] To calculate Aena's emissions, the operational control approach is followed according to the GHG Protocol and the following sources have been used for the emission factors,, which are updated each year:
– Scope 1: MITERD, EMEP/EEA (Corinair), US EPA y US FAA.
– **Scope 2: R**EE y MITERD.
On the other hand, the source of the Global Warming Potentials (GWP) has been the MITERD (for Scope 1 and 2 emissions).
For UK emissions, the emissions factors and GWP are obtained from DEFRA.
The calculation methodology is based on the GHG Protocol (WRI&WBCSD)

[95] Direct emissions or scope 1. Direct emissions of from sources or processes and activities controlled by Aena at airports. The sources of GHG emissions are:
• Stationary combustion. Emissions generated by electric generators, portable generators, boilers, firefighting service activities (SEI [Servicio de Extinción de Incendios]) and auxiliary pumps of firefighting water tanks.
▪ Combustion from mobile sources. Emissions from vehicles belonging to the airports, both light and heavy.

[96] Scope 2 emissions have been calculated according to market-based criteria.
Indirect emissions or Scope 2. Indirect emissions produced by the generation of electricity or thermal energy acquired and consumed at airports from the activities carried out by airports for air conditioning, lighting and operation of various facilities.

[97] Scope 2 (Market Based) emissions at London Luton Airport are 0 as 100% of its purchased electricity is guaranteed to be of renewable origin, with no heat and cold energy being purchased.

[98] Indirect GHG emissions of scope 3. Indirect third-party emissions produced by the LTO cycle (Landing and Take-Off of aircraft from airlines operating in airports), APUs (Auxiliary Power Units that supply energy to aircraft when they are on the ground), vehicles and machinery that provide Handling services and others (ground access, employee travel, etc.). Indirect emissions of Scope 3 of Aena according to categories established in the CDP (Carbon Disclosure Project). Information not available in the UK and Brazil, in the absence of unifying calculation methodologies.

Direct GHG emissions (Scope 1) (GRI 305-1)

	2020				2021				2022			
	Spain											
	CO2	**CH4**	**N2O**	**CO2e**	**CO2**	**CH4**	**N2O**	**CO2e**	**CO2**	**CH4**	**N2O**	**CO2e**
Diesel	9,321.4	0.2	0.2	9,396.5	7,950.0	0.2	0.2	8,015.9	9,474.89	0.97	0.17	9,545.56
Petrol	129.2	0.04	0.01	132.8	138.5	0.04	0.01	142.2	138.26	0.03	0.0020	139.53
Natural gas	7,394.5	0.1	0.1	7,436.8	5,933.8	0.1	0.1	5,967.8	7,751.05	0.615	0.0123	7,771.53
Propane	35.1	0.0005	0.002	35.7	35.5	0.0005	0.002	36.2	36.37	0	0	36.37
Kerosene	109.6	0.003	0.004	110.7	149.9	0.004	0.005	151.5	110.22	0.015	0.0009	110.9
TOTAL	**16,989.8**	**0.4**	**0.4**	**17,112.5**	**14,207.7**	**0.4**	**0.3**	**14,313.6**	**17,510.79**	**1.62**	**0.18**	**17,603.88**
	United Kingdom											
Fuel/diesel	656.6	0.5	7.9	**665.1**	629	0.2	8	637.2	930.09	0.28	13.04	943.41
Natural gas	1,346.5	1.8	0.7	**1,349.0**	1,386	2	1	1,389	1,304.69	1.79	0.72	1,307.19
Propane	2.3	0	0	**2.3**	6	0.005	0.004	6	6.27	0	0	6.27
TOTAL	**2,005.3**	**2.3**	**8.7**	**2,016.4**	**2,021**	**2.2**	**9**	**2,032.2**	**2,241.05**	**2.07**	**13.76**	**2,256.87**
	Brazil											
Diesel	-	-	-	-	526.19	0.01	0.01	**526.2**	1,160.39	0.08	0.065	**1,178.0**
Petrol	-	-	-	-	32.42	0.01	0.002	**32.4**	47.11	-	-	**49.0**
Propane	-	-	-	-	-	-	-	-	-	-	-	-
Kerosene	-	-	-	-	-	-	-	-	-	-	-	-
TOTAL	**-**	**-**	**-**	**-**	**558.64**	**0.02**	**0.012**	**558.64**	**1,207.50**	**0.08**	**0.065**	**1,227**

Indirect GHG emissions (Scope 2) MARKET - BASED (GRI 305-2)												
	2020				2021				2022			
	Spain											
	CO2	CH4	N2O	CO2e	CO2	CH4	N2O	CO2e	CO2	CH4	N2O	CO2e
Electric power	0.0	-	-	**0**	0.0	-	-	**0**	0.0	-	-	**0**
Heating and cooling energy	26,199.3	-	-	**26,199.3**	31,870.9	-	-	**31,870.9**	26,974.16	-	-	**26,974.16**
TOTAL	**26,199.3**	**-**	**-**	**26,199.3**	**31,870.9**	**-**	**-**	**31,870.9**	**26,974.16**	**-**	**-**	**26,974.16**
	United Kingdom											
Electric power	3,364.99	10.49	20.1	**3,395.57**	1,244	-	-	**1,244**	0.0	-	-	**0**
Heating and cooling energy	-	-	-	**-**	-	-	-	**-**	-	-	-	**-**
TOTAL	**3,364.99**	**10.49**	**20.1**	**3,395.57**	**1,244**	**n/d**	**n/d**	**1,244**	**-**	**-**	**-**	**-**
	Brazil											
Electric power	-	-	-	-	2,246.4	-	-	**2,246.4**	3,454.76	-	-	**3,454.76**
Heating and cooling energy	-	-	-	-	-	-	-	**-**	-	-	-	**-**
TOTAL	-	-	-	-	**2,246.4**	**-**	**-**	**2,246.4**	**3,454.76**	-	-	**3,454.76**

The most relevant sources of Scope 3 emissions are those included in the following categories:

- Use of services provided by the organisation to airlines and handling agents, including LTO Cycle, APU and Handling emissions
- Capital goods
- Acquisition of goods and services

Of the above, the first ones (emissions derived from the Landing and Take Off (LTO) cycle of aircraft) are the most relevant to Aena, and make up approximately 55% of the total emissions (year 2022)[99]. This data includes emissions from the taxiing, climb-out and takeoff manoeuvres of aircraft on all flights originating at Aena airports, as well as emissions generated in the approaching, landing and taxiing manoeuvres of aircraft on all flights landing at Aena airports.

The emissions of auxiliary power units (APUs) are obtained by modelling the actual operations of aircraft at airports.

The emissions of handling agents have been provided by the main handling agents, where the calculation, reporting and reduction of their emissions has been established as a contractual requirement, encouraging the gradual replacement of the current fleet of vehicles with more efficient and environmentally friendly options.

For its part, the emissions due to the production of the goods and services purchased or acquired by Aena and the production of the capital goods purchased or acquired by Aena are calculated by means of an economic analysis of inputs/outputs using the economic data of the reporting period and relevant emission factors.

Finally, it should be noted that in 2022, biogenic CO2e emissions of Aena were not significant, with a practically zero value.



[99] Aircraft LTO cycle emissions are calculated using the Emissions Inventory of the Ministry for the Ecological Transition and Demographic Challenge of Spain.

2.2.5. Efficiency in the use of energy and use of renewable energy

(GRI 3-3)

Aena implements different actions focused on reducing energy consumption in its facilities. These include those related to the use of renewable energy (photovoltaic plan, geothermic power, etc.) and others aimed at improving energy efficiency. All of them contribute to reducing Aena's carbon footprint. They are also extremely relevant in today's energy environment, marked by a significant increase in the market prices of electricity.

Measures related to renewable energy usage

The electricity consumed at Aena's centres in Spain and the United Kingdom comes from sources with a 100% renewable origin guarantee, and 43% in the case of Brazil

The renewable energy generated and acquired is distributed both in the activity of the airports and to the licensees sharing in the facilities.

The Photovoltaic Plan will turn the Spanish grid in leaders in the production of renewable energy for self-consumption in its sector

With regard to its Photovoltaic Plan in Spain, during 2022, Aena has awarded the design and execution of the photovoltaic solar parks of the Adolfo Suárez Madrid-Barajas airport and the Barcelona-El Prat Josep Tarradellas airport. The facilities of the Adolfo Suárez Madrid-Barajas Airport will have more than 235,000 photovoltaic modules and will generate energy of 212 GWh per year – equivalent to the average consumption of 65,000 homes per year – preventing the emission of 27,000 tonnes of CO2 per year into the atmosphere during the more-than 25 years in which its useful life is estimated. The facilities of the Barcelona airport will have 20,800 photovoltaic modules, which will generate an energy of 19.90 GWh per year, equivalent to the average consumption of 6,000 homes per year, which will prevent the emission to the atmosphere of 2,300 tonnes of CO2 per year during the more than 25 years in which its useful life is estimated.

Feasibility studies have also been carried out for geothermal facilities at the three main Spanish airports in the network to cover 70% of the heating or cooling demand. The analysis carried out will be validated by conducting surveys and taking data in the catchment areas.

Measures aimed at improving energy efficiency

In order to reduce energy consumption at network airports, a process is carried out for the continuous identification of possible aspects of improvement, based on which a series of measures have been developed aimed at adapting and controlling the energy consumption in accordance with the actual operation of airports and technological improvement in terms of lighting and climate control (presence detectors, LED lighting replacements, renovation of air conditioning facilities and automatic lighting modulation), etc. By way of example, the following were carried out in Spain during 2022:

- The development of a pilot project in the boarding area of terminal 2 of the Valencia Airport for the installation of environmental sensors that allow the operation of the cold and heat production systems to be controlled. Through these measures, energy savings of between 15% and 25% have been achieved.
- At London-Luton Airport in the UK, lighting has been upgraded with energy-efficient LED technology, which has achieved an 85% extent of replacements. In addition, the temperature control and regulation systems in the check-in area have been reviewed, cooling equipment has been replaced with more efficient ones and a set of electrical standards has been developed that have allowed to maintain a minimum inventory of equipment, reducing inefficiencies in the process.
- Improvements and replacements in energy consumption resulting from the execution of works are being made at Aena airport facilities in Brazil.

Likewise, to properly manage energy consumption, Aena has provided smart meters to some of its facilities and across its property portfolio. For example, the Adolfo Suárez Madrid-Barajas Airport terminal has an energy management platform that allows a systematic analysis of energy consumption and, based on the results, develops measures to improve the energy efficiency of the terminal equipment.

In addition to the above, Aena conducts energy audits at airports, based on the study of buildings and other facilities, in order to obtain information on energy consumption in its facilities (especially those related to lighting and HVAC)[100], the corresponding possible aspects of improvement and, where appropriate, develop action plans.

In addition, the energy efficiency certifications of the buildings associated with the airports are being updated. During 2022, all auxiliary buildings for administrative use have been certified in Spain. The certificates for the Spanish terminal buildings, still in force, will be renewed during the first quarter of 2023. It should also be noted that the UK has renewed its energy management system certification in 2022 based on ISO 50001.

[100] An audit includes the assessment of both technical and economic aspects that influence the energy consumption of all installations and any other energy-consuming equipment. Its main objective is to understand how energy consumption is managed, to detect weak points and to propose improvement measures to reduce consumption and improve energy efficiency.

The savings achieved by implementing the actions included below in spanish airports has resulted in 59.96 GJ

ENERGY EFFICIENCY IN 2022
(GRI 3-3)

Some relevant related actions



HVAC systems



Lighting



Energy saving to improve energy efficiency

AIRPORT	ACTION	DESCRIPTION	MILESTONE
Adolfo Suárez Madrid-Barajas		Renovation of the HVAC system in the pre-gateway areas of Terminal T4	
Adolfo Suárez Madrid-Barajas		Replacing air handling units (UTAs) in the Millennium Zone	
Adolfo Suárez Madrid-Barajas		Replacing the TWR Este air compressors	
Adolfo Suárez Madrid-Barajas		Replacing T4 Terminal CGA Precision HVAC Equipment	
Alicante-Elche Miguel Hernández		Installing HVLS fans	
Alicante-Elche Miguel Hernández		Improving energy efficiency in UTAs	
Alicante-Elche Miguel Hernández		Supply and installation of solar filters in the control tower	
Bilbao		Replacement of the second heating boiler in the Terminal building	
Federico García Lorca Granada-Jaén		Comprehensive renovation of the technical block building.	
Federico García Lorca Granada-Jaén		Efficient HVAC in the technical block building.	
La Palma		Adaptation of cold production for the air conditioning of the passenger Terminal	
Palma de Mallorca		Renovation of HVAC equipment	
Palma de Mallorca		Replacement of HVAC equipment.	
Tenerife Norte-Ciudad de La Laguna		Installation of sunscreens in the curtain wall of the island boarding area.	
Valencia		Supply and installation of air curtains in different doors of the Terminal building.	
Valencia		Improved energy efficiency in the power plant.	

AIRPORT	ACTION	DESCRIPTION	MILESTONE
Madrid-Cuatro Vientos		Change of lighting to LED technology	
Fuerteventura		Change of lighting to LED technology	
Gran Canaria		Change of lighting to LED technology	
César Manrique-Lanzarote		Change of lighting to LED technology	
Valencia		Change of lighting to LED technology	
Palma de Mallorca		Change of lighting to LED technology	
Salamanca		Change of lighting to LED technology	
Tenerife Norte-Ciudad de La Laguna		Change of lighting to LED technology	
Tenerife Sur		Change of lighting to LED technology	
Adolfo Suárez Madrid-Barajas		Change of lighting to LED technology	
Josep Tarradellas Barcelona-El Prat		Change of lighting to LED technology	
Girona-Costa Brava		Change of lighting to LED technology	
Melilla		Change of lighting to LED technology	
Pamplona		Change of lighting to LED technology	

2.2.6. Renewable energies

(GRI 3-3)

The use of renewable energy (solar, wind, etc.) allows the Company to reduce the dependence on fossil fuels, thereby reducing greenhouse gas emissions.
As indicated above, in 2022 the design and execution of the photovoltaic plants at the Adolfo Suárez Madrid-Barajas airport and the Barcelona-El Prat Josep Tarradellas airport has been awarded, complementing the existing facilities at the Spanish airports.

% Electricity with renewable source guarantee			
	Spain	**United Kingdom**	**Brazil**
2020	100%	0%	0%
2021	100%	100%	84.1%
2022	100%	100%	35%

Renewable energy facilities at Aena (GRI 302-1)

		2020	2021	2022
Energy generated from renewable sources (GJ)	Wind power	6,855	7,594	6,878
	Solar power/photovoltaics	1,459	15,918	17,784
	Solar thermal energy	0	0	0
	Geothermal	221	213.86	88
	Subtotal	**8,535**	**23,726**	**24,750**

Energy consumed from renewable sources (GJ)	Wind power	6,353	7,067	6,421
	Solar power/photovoltaics	1,361	15,824	17,688
	Solar thermal energy	0	0	0
	Geothermal	221	214	88
	Subtotal	**7,936**	**23,105**	**24,198**
Energy sold from renewable sources (GJ)	Wind power	502	527	457
	Solar power/photovoltaics	97	94	95
	Solar thermal energy	0	0	0
	Geothermal	0	0	0
	Subtotal	**599**	**621**	**552**

Sources for fuel densities:
- Royal Decree 61/2006, of January 31, which determines the specifications for gasoline, diesel, fuel oil and liquefied petroleum gases and regulates the use of certain biofuels.
- Royal Decree 1088/2010, of September 3, which modifies Royal Decree 61/2006, of January 31, regarding the technical specifications of gasoline, diesel, use of biofuels and sulfur content of fuels for maritime use.
- Iberian association of natural gas for mobility
- GHG Protocol

Sources for lower heating values (LHV)
- MITERD:Emission factors: Carbon footprint registration, compensation and carbon dioxide absorption projects", data for the corresponding year
- IDAE:Chart of heating values of the main energy sources (see chapter "Links of interest)

Reduction of emissions through renewable energy facilities and energy efficiency measures[101]

(GRI 305-5)

The development of the aforementioned actions related to the installation of renewable energy technology or energy efficiency, as well as the purchase of electricity with renewable sources, has avoided the emission of 145,532 tonnes of CO2 during the fiscal year 2022.

[101] In the United Kingdom, no initiatives have been developed to date for the implementation of self-consumption renewables, although it falls within its planning for 2030. In Brazil, the implementation of self-consumption renewables is expected from 2026 onwards.

The amount of emissions avoided due to the Company's own renewable energy facilities and energy efficiency, as well as to the purchase of electrical energy from a renewable source (tonnes of CO2e)			
	2022		
	Spain	**United Kingdom**	**Brazil**
Tonnes of CO2e	139,428.00	4,199.63	1,905.00

NOTE: The CO2 calculation is obtained from the relationship established between the electricity generated by the indicated facilities and the estimated CO2 emission factor applicable each year.
Source of the electrical factor: REE
In 2022 the location-based emission factor (LB) is applied according to actual %GdO

Reduction in GHG emissions (Scope 1)

	2020		2021		2022	
Aena facilities	**kWh generated**	**tCO2e avoided**	**kWh generated**	**tCO2e avoided**	**kWh generated**	**tCO2e avoided**
Cogeneration plant at Bilbao Airport (thermal energy)	153,845	19	482,015	57	386,887	55.3
Reus Airport geothermal power plant	61,488	8	59,407	7	24,460	3.5
Total (Scope 1)	**215,333**	**26**	**541,422**	**64**	**411,348**	**58.8**

Reduction in GHG emissions (Scope 2)

	2020		2021		2022	
Aena facilities	**kWh generated**	**tCO2e avoided**	**kWh generated**	**tCO2e avoided**	**kWh generated**	**tCO2e avoided**
Wind turbines at La Palma Airport	1,904,174	234	2,109,511	249	1,910,688	273.2
Photovoltaic modules at Menorca Airport	72,862	9	64,591	8	149,864	21.4
Photovoltaic modules at Ibiza Airport	83,849	10	78,725	9	55,555	7.9
Photovoltaic modules at Alicante-Elche Airport	17,814	2	38,635	5	46,965	6.7
Photovoltaic modules at Adolfo Suárez Madrid-Barajas Airport	48,964	6	15,465	2	0	0
Photovoltaic modules at Madrid-Cuatro Vientos Airport	81,101	10	20,323	2	20,657	3.0

Photovoltaic modules at La Palma Airport	53,279	7	30,535	4	55,193	7.9
Photovoltaic modules at Valencia Airport	33,532	4	31,800	4	29,482	4.2
Photovoltaic modules at Vigo Airport	13,815	2	11,195	1	10,336	1.5
Self-consumption photovoltaic plant at Tenerife Sur Airport	NA	0	1,752,063	207	1,473,045	210.6
Self-consumption photovoltaic plant at César Manrique-Lanzarote Airport	NA	0	555,160	66	1,485,472	212.4
Self-consumption photovoltaic plant at Fuerteventura Airport	NA	0	1,823,289	215	1,613,305	230.7
Cogeneration plant at Bilbao Airport (electricity)	128,860	16	342,368	40	269,888	38.6
Total (Scope 2)	**2,438,250**	**300**	**6,873,659**	**811**	**7,120,449**	**1,018.2**

Main energy consumption indicators

(GRI 302-4)

In the last fiscal year, Aena's renewable energy consumption amounts to 24,198 GJ, which is an increase of 4.7% compared to the previous fiscal year. At the consolidated level, the consumption of renewable energy (purchase and production) reached a total of 3,531,709 GJ, 15% more than in 2021.

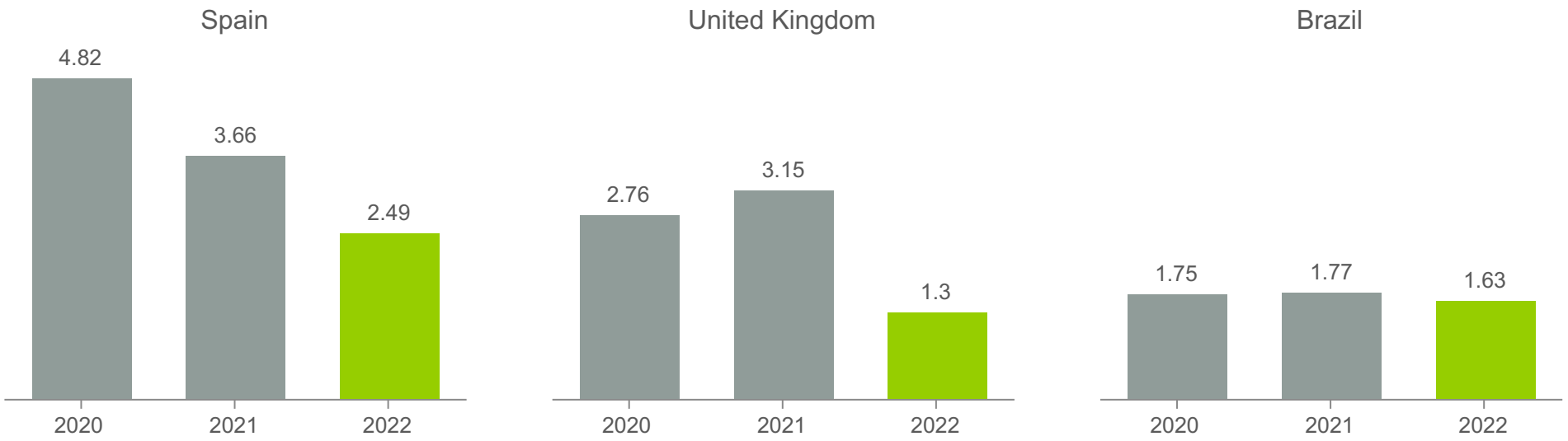
Finally, the Group's total energy consumption in the fiscal year 2022 was 4,566,766 GJ[102], which implies an increase of a 14% regarding 2021.

Energy performance and operational management of network airports, aimed at improving energy efficiency, are key indicators of sustainable design and building evolution.

[102] It includes the consumption of fuels, electricity, heating and cooling.

Energy intensity[103]
(GRI 302-3)

kWh/ATU[104]



[103] Includes consumption of fuel, electricity, heating and cooling.
[104] ATU: A parameter that reflects the activity of an airport, taking its annual operations, passengers and cargo volumes into consideration. ATU = Passengers + (100 x Operations) + (10 x Tonnes of Cargo).

Energy consumption within the organization
(GRI 302-1)

Consumption of non-renewable fuels (GJ)												
	2020				2021				2022			
	Spain	United Kingdom	Brazil	Consolidated Total	Spain	United Kingdom	Brazil	Consolidated Total	Spain	United Kingdom	Brazil	Consolidated Total
Fuel/diesel	128,154	9,528	1,871	**139,553**	109,872	9,162	7,578	**126,612**	129,780	13,871	10,290	**153,941**
Petrol	1,907	-	-	**1,907**	2,044	-	487	**2,531**	1,947	-	528	**2,475**
Natural Gas	132,092	26,413	-	**158,505**	105,999	29,329	-	**135,328**	138,313	25,780	-	**164,093**
Propane	551	38	-	**589**	558	102	-	**660**	554	104	-	**658**
Kerosene	1,501	-	-	**1,501**	2,054	-	-	**2,054**	1,542	-	-	**1,542**
Subtotal	**264,205**	**35,978**	**1,871**	**302,055**	**220.526**	**38.593**	**8,065**	**267,185**	**272,136**	**39,755**	**10,818**	**322,709**

Consumption of non-renewable fuels (GJ)												
	2020				2021				2022			
	Spain	United Kingdom	Brazil	Consolidated Total	Spain	United Kingdom	Brazil	Consolidated Total	Spain	United Kingdom	Brazil	Consolidated Total
Electricity	-	52,432	88,535	**140,967**	-	14,158	21,079	**35,237**	-	-	100,290	**100,290**
Heating	179,520	26,413	-	**205,933**	212,700	27,301	-	**240,001**	218,115	-	-	**218,115**
Cooling	343,021	-	-	**343,021**	392,902	-	-	**392,902**	406,280	-	-	**406,280**
Subtotal	**522.541**	**78.845**	**88.535**	**689,921**	**605.602**	**41.459**	**21,079**	**668,140**	**624,395**	**0**	**100,290**	**724,685**

Renewable energy consumption (GJ)

	2020				2021				2022[105]			
	Spain	United Kingdom	Brazil	Consolidated Total	Spain	United Kingdom	Brazil	Consolidated Total	Spain	United Kingdom	Brazil	Consolidated Total
Electricity	2,591,629	-	-	**2,591,629**	2,907,279	44,832	111,492	**3,063,603**	3,387,090	78,181	54,126	**3,519,397**
Heating/Cooling	221	-	-	**221**	214	-	-	**214**	88	0	-	**88**
Subtotal	**2.591.850**	**-**	**-**	2,591,850	**2.907.493**	**44.832**	**111,492**	3,063,817	**3,387,178**	**78,181**	**54,126**	3,519,485

Total energy consumption (GJ)

	2020				2021				2022			
	Spain	United Kingdom	Brazil	Consolidated Total	Spain	United Kingdom	Brazil	Consolidated Total	Spain	United Kingdom	Brazil	Consolidated Total
Total	**3,378,596**	**114,823**	**90,406**	3,583,825	**3,733,621**	**124,884**	**140,636**	3,999,141	**4,283,709**	**117,936**	**165,234**	4,566,766

[105] Aena's electricity consumption data includes the consumption of the concessionaires of the Aena Spanish network (100% of the centers), registering an electricity consumption during the financial year 2022 of 494,352 GJ, which constitutes 14.7% of consumption. of Aena in Spain. The data for the United Kingdom and Brazil for electricity consumption do not include consumption by dealers.

2.3. Pollution

(GRI 3-3)

2.3.1. Air pollution

The Company is committed to improving air quality in the environment in which it operates. This is reflected in Aena's Integrated Quality, Environment, Energy Efficiency and Occupational Health and Safety Policy and Sustainability Strategy, aligned with the Climate Action Plan, through which air quality issues are addressed by defining strategic projects that reduce CO2 emissions and other atmospheric contaminants (e.g. NO_x, SO_x and PM_{10}). Specifically, the strategic targets in Spain established for 2030 are as follows:



Own emissions

22% reduction in NOx emissions per passenger compared to 2019

36% reduction in SOx emissions per passenger compared to 2019

15% reduction in PM emissions per passenger compared to 2019



Third-party emissions

Aena will act as a driving force for other agents in the sector, contributing to the reduction of NOx, SOx and PM emissions from its operations

To achieve this, there are plans to implement a number of initiatives and measures focused on energy efficiency, renewable energy usage, sustainable mobility and the reduction of third-party emissions.

Specifically, Air Quality Control and Monitoring Programmes are carried out in the environment of the main airports, through which the concentration levels are monitored of the main substances, such as sulfur dioxide (SO_2), nitrogen oxides (NO_x) and suspended particulate matter (PM), emitted as a result of airport operations or other sources located in the environment. This allows continuous and automatic monitoring of air quality in the area of influence of various airports.

In Spain, these networks are implemented in the airports of Adolfo Suárez Madrid-Barajas, Barcelona-El Prat Josep Tarradellas, Palma de Mallorca, Alicante-Elche and Málaga-Costa del Sol[106]. In certain cases, measurement stations are integrated and form part of the municipal and/or autonomous community air quality surveillance networks.

In the UK, and in compliance with the Responsible Business Strategy, London-Luton Airport is working on a specific Strategic Plan to improve air quality in the environment. Measurement towards the achievement of its objectives will be made possible by data collection through air quality monitors, which assess trends in concentrations of contaminants[107] in the area.

To date, 19 different locations have been monitored – those having greatest impact – to verify NO_2 measurements. The concentration levels of particulate matter (PM) have also been measured in one location.

The monthly results report obtained are published and shared with local authorities, while the annual results of air quality levels are available as part of the Airport's annual follow-up report. In addition, improvement actions have been implemented to ensure the achievement of established goals. These include collaborations with third parties, such as the approval of a specific policy for buses and coaches, to improve air quality around the terminal area.

At Aena airports in Brazil, after analysing the simulation studies of atmospheric emissions resulting from aircraft and ground equipment operations carried out in 2022, a number of actions have been put in place to reduce the pollution of these gases resulting from aviation activities. These actions are linked to the use of sustainable fuels and include the use of electric buses, the implementation of electric charging points for passenger and handling vehicles, as well as the refurbishment of part of its own fleet to electric vehicles.

[106] The reports from the surveillance network of Adolfo Suárez Madrid-Barajas Airport, as well as the data from the stations around Barcelona-El Prat Josep Tarradellas Airport that are attached to the Catalan Government network, are publicly accessible. See chapter 'Links of interest'."
[107] Particulate matter (PM_{10}) and NO_2

Specific objectives regarding air pollution			
	Spain	**United Kingdom**	**Brazil**
Short-term	• Act as a driver for incentivising other agents in the sector, contributing to the reduction of NOx, SOx and PM emissions from their operations through pilot projects that allow us to reduce air pollutants through innovative solutions.	• Maintain average annual NOx and PM10 concentration levels below 40 ug/m3.	• Simulation studies of air emissions resulting from aircraft and ground equipment operations.
Medium/long term	2030: • 22% reduction in NOx emissions per passenger compared to 2019. • 36% reduction in SOx emissions per passenger compared to 2019. • 15% reduction in PM emissions per passenger compared to 2019.		• Keep air quality levels below limit values. • Improve optimal control of emission sources and improve air quality monitoring.

Evolution and progress of marked air pollution targets			
	Spain	**United Kingdom**[108]	**Brazil**
	• 12% reduction in NOx emissions per passenger compared to 2019. • 48% reduction in PM emissions per passenger compared to 2019.	• In the fiscal year 2022, an average annual concentration of 28.66 ug/m3 of NOx.	• After analysing the simulation studies of atmospheric emissions resulting from aircraft and ground equipment operations, a series of actions have been established to reduce the contamination of these gases resulting from aviation activities.

[108] Data obtained from the average of the measurements relative to the months of January to September 2022.

Air pollution indicators

(GRI 305-7)

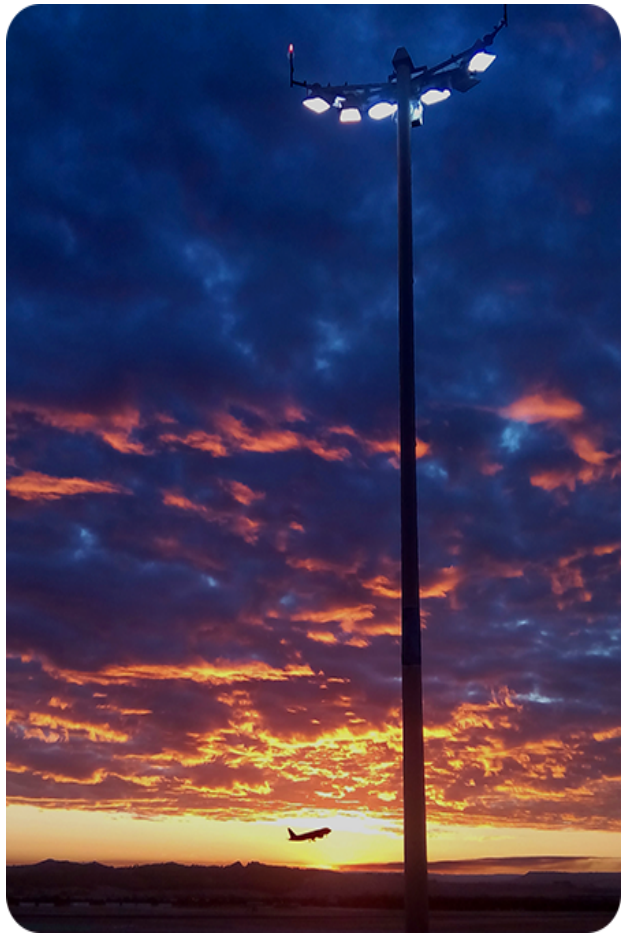
Nitrogen oxides (NOx), sulphur oxides (SOx) and other significant air emissions																		
	NOx(t)			SOx(t)			CO(t)			NMVOC(t)			PM10(t)			PM2,5(t)		
	ES	UK	BR	ES	UK	BR	ES	UK	BR	ES	UK	BR	ES	UK	BR	ES	UK	BR
2020																		
Diesel	50.7476	2.9627	N/A	4.5093	0.0849	N/A	16.0715	1.1549	N/A	3.7550	0.2228	N/A	3.2463	0.2422	N/A	3.0121	0.2368	N/A
Petrol	0.6328	0	N/A	0.0004	0	N/A	4.8804	0	N/A	0.5563	0	N/A	0.0015	0	N/A	0.0015	0	N/A
Natural Gas	9.7748	1.9071	N/A	0.0885	0.0173	N/A	3.8307	0.7474	N/A	3.0381	0.5928	N/A	0.1030	0.0201	N/A	0.1030	0.0201	N/A
Propane	0.0381	0	N/A	0.0003	0	N/A	0.0252	0	N/A	0.0213	0	N/A	0.0375	0	N/A	0.0375	0	N/A
Kerosene	0.1745	0	N/A	0.0353	0	N/A	23.3022	0	N/A	0.7011	0	N/A	5.2660	0	N/A	5.2660	0	N/A
Total 2020	**61.3679**	**4.8698**	**N/A**	**4.6338**	**0.1022**	**N/A**	**48.1100**	**1.9023**	**N/A**	**8.0719**	**0.8156**	**N/A**	**8.6543**	**0.2623**	**N/A**	**8.4201**	**0.2569**	**N/A**
2021																		
Diesel	45.6732	4.6450	N/A	3.5274	0.1251	N/A	14.6282	1.3590	N/A	3.4370	0.3210	N/A	2.8784	0.2336	N/A	2.7122	0.2296	N/A
Petrol	0.6694	0.0000	N/A	0.0005	0.0000	N/A	5.9875	0.0000	N/A	0.6030	0.0000	N/A	0.0017	0.0000	N/A	0.0017	0.0000	N/A
Natural Gas	7.8439	1.9091	N/A	0.0710	0.0173	N/A	3.0740	0.7481	N/A	2.4380	0.5934	N/A	0.0827	0.0201	N/A	0.0827	0.0201	N/A
Propane	0.0393	0.0030	N/A	0.0003	0.0000	N/A	0.0230	0.0163	N/A	0.0192	0.0149	N/A	0.0278	0.0548	N/A	0.0278	0.0548	N/A
Kerosene	0.2388	0.0000	N/A	0.0483	0.0000	N/A	31.8897	0.0000	N/A	0.9595	0.0000	N/A	7.2066	0.0000	N/A	7.2066	0.0000	N/A
Total 2021	**54.4646**	**6.5570**	**N/A**	**3.6476**	**0.1424**	**N/A**	**55.6023**	**2.1234**	**N/A**	**7.4567**	**0.9293**	**N/A**	**10.1972**	**0.3085**	**N/A**	**10.0310**	**0.3046**	**N/A**
2022																		
Diesel	54.7810	6.8409	7.7891	8.1600	0.1235	0.3858	14.3033	1.6820	1.1114	3.4471	0.4279	0.4166	3.0752	0.3706	0.2556	2.8360	0.3706	0.2556
Petrol	0.5421	0.0000	1.9144	0.0094	0.0000	0.0023	5.6677	0.0000	20.6758	0.5734	0.0000	2.1426	0.0031	0.0000	0.0046	0.0028	0.0000	0.0046
Natural Gas	10.2351	1.8217	0.0000	0.0927	0.0165	0.0000	4.0111	0.7139	0.0000	3.1812	0.5662	0.0000	0.1079	0.0192	0.0000	0.1079	0.0192	0.0000
Propane	0.0409	0.0008	0.0000	0.0004	0.0000	0.0000	0.0161	0.0045	0.0000	0.0128	0.0041	0.0000	0.0007	0.0152	0.0000	0.0007	0,0152	0.0000
Kerosene	0.1112	0.0000	0.0000	0.0225	0.0000	0.0000	14.8475	0.0000	0.0000	0.4467	0.0000	0.0000	3.3553	0.0000	0.0000	3.3553	0.0000	0.0000
Total 2022	**65.7103**	**8.6635**	**9.7034**	**8.2850**	**0.1400**	**0.3881**	**38.8456**	**2.4005**	**21.7872**	**7.6613**	**0.9982**	**2.5592**	**6.5422**	**0.4049**	**0.2602**	**6.3028**	**0.4049**	**0.2602**

This table includes the most relevant air polluting emissions, not including those remaining that are not significant
The source regarding the emission factors used for the calculation of the different contaminants from the fuels used are the following in the case of Luton Airport and Spanish airports: EMEP/EEA, US EPA and US FAA.
In the case of Aena Brasil airports, information relative to years 2020 and 2021 are not available.

2.3.2. Light pollution

(GRI 3-3)

All Aena airports, regardless of their location, comply with current regulations regarding operational safety with regard to the exterior lighting of their buildings.



2.3.3 Noise

(GRI 3-3)

Among the main impacts of airport activity on the local environment is noise pollution.

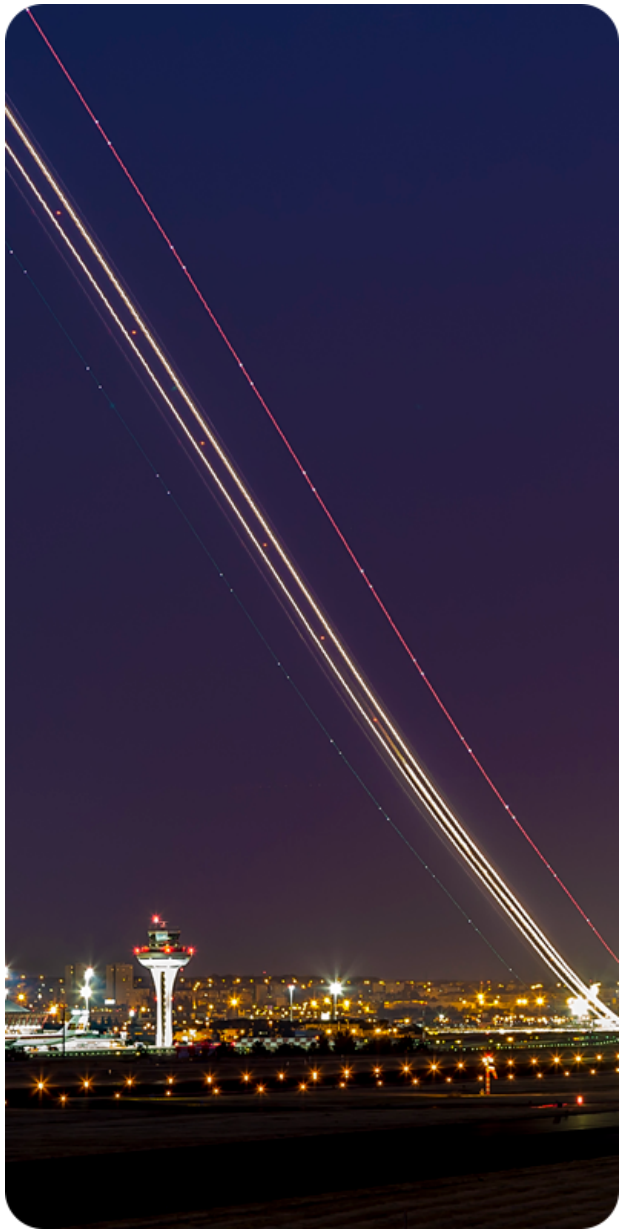
Therefore, Aena integrates noise management into the Sustainable Community and Value Chain programme of the Sustainability Strategy 2021-2030 with the strategic objective of limiting and reducing the acoustic impact on local communities and protecting the quality of life of the populations in the environment.

Among the main aspects, Aena in Spain has continued to work on improving the measurement, control and minimisation of noise, using active and two-way communications with all stakeholders involved. All this with the aim of air traffic being carried out in a respectful and sustainable context within the environment.

London-Luton Airport introduced its Noise Strategy in 2019, which encompasses five priority areas:

1. Improved operating procedures.
2. Quieter aircraft.
3. Operational restrictions.
4. Land use planning.
5. Work with the local community and industry partners.

At Aena airports in Brazil, efforts are mainly made to improve the measurement and monitoring of aircraft noise, as well as to monitor this information by creating External Committees with different actors from the local communities. However, and since no noise complaints have been recorded during the 2022 fiscal year, no additional actions have been proposed to be implemented



Specific objectives in reducing noise levels			
	Spain	**United Kingdom**	**Brazil**
Short-term	• Maintenance and expansion of noise monitoring systems in airports with substantial noise situations, in order to share information with interested parties in the future, improving transparency and communication with its surroundings. • Collaboration with ENAIRE to improve air navigation procedures.	• Prohibition of 'Chapter 3' Noise Standard aircraft· • 100% of 'Chapter 4' Noise Standard aircraft operating at the airport • Evaluate adoption and implementation of slightly more pronounced approaches by 2023. • Conduct a survey of local communities regarding LLA's approach to noise management and complaint service • 92% compliance with continuous descent approach operations	• Establishing noise committees with stakeholders
Medium/ long term	• Continuation of the Sound Insulation Plans, with a forecast of increasing the volume of insulated homes, reaching 33,000 insulated homes by 2030.	• Modernising LLA airspace to ensure operator efficiency and reduce noise • Develop a strategy for reducing the noise footprint in the day and night scenario	• Carry out noise mitigation measures with the surrounding community

Evolution and progress of the objectives set in terms of reducing noise levels			
	Spain	**United Kingdom**	**Brazil**
	2022: • 27,574 sound-insulated properties since 2000. €350,346,471 million has been the amount destined for the sound insulation of properties since 2000. • Conclusion of the first soundproofing actions associated with the Vitoria Airport Sound Insulation Plan and processing of soundproofing requests relating to the Sound Insulation Plans of the César Manrique-Lanzarote and Tenerife Sur airports • Implementation of the necessary actions to update the census of the Sound Insulation Plans of Alicante-Elche Airport and Palma de Mallorca Airport. • Preparation of the Strategic Noise Maps Phase IV in 13 airports. • Work started for commencing operation of the Noise Monitoring System at César Manrique-Lanzarote Airport, which will be added to the airports that already have this system	**2022:** • Total of 253 insulated dwellings realised in the period 2016-2022 with an associated amount of €780,195. • Review of noise abatement take-off procedures to assess their effectiveness and work with airlines to identify and implement improvements. • Completion of the Slightly Steeper Approaches study.	• Conduct noise measurements and monitoring at critical points in the airport environment. • Set up the External Aeronautical Noise Committees, made up of Municipal, Environmental, Aeronautical and Air Space Control members, among others.

Measurement, reduction and control

(GRI A07)

Airports with more than 50,000 operations per year carry out Strategic Noise Maps (SNMs) based on European regulations. These maps are intended to diagnose noise exposure in the vicinity of airports globally. This maintains noise control in the environment, as well as taking steps to reduce or improve the acoustic impact within required legal levels.

During 2022, in compliance with the deadlines established in the legislation, Phase IV of the Strategic Noise Maps has been prepared at 13 airports in Spain. The following tables detail the results of the SNMs in force in Spain and in the United Kingdom, and can conclude that the data of the affected population is well below the corresponding data in previous phases of the SNMs.

Evolution of the number of people exposed to noise in the Spanish airport network

SNM PHASE I:													
Noise Levels	**Gran Canaria**	**Lanzarote – Arrecife (*)**	**Tenerife Sur**	**Tenerife Norte**	**Alicante - Elche**	**Bilbao**	**Barcelona**	**Ibiza (*)**	**Madrid**	**Málaga**	**Palma de Mallorca**	**Valencia**	**Sevilla (*)**
Lday 65 dB(A)	191	-	0	1,049	84	24	11	-	2,058	299	90	10	-
Levening 65 dB(A)	66	-	0	825	90	23	19	-	1,957	314	98	8	-
Lnight 55 dB(A)	614	-	120	0	172	23	24	-	708	605	336	52	-

SNM PHASE II:													
Noise Levels	**Gran Canaria**	**Lanzarote – Arrecife (*)**	**Tenerife Sur**	**Tenerife Norte**	**Alicante - Elche**	**Bilbao**	**Barcelona**	**Ibiza**	**Madrid**	**Málaga**	**Palma de Mallorca**	**Valencia**	**Sevilla**
Lday 65 dB(A)	57	-	0	475	61	29	23	9	1,824	232	110	3	0
Levening 65 dB(A)	0	-	0	198	60	506	18	9	149	240	110	3	0
Lnight 55 dB(A)	42	-	45	0	112	0	26	637	38	348	152	19	0

SNM PHASE III:													
Noise Levels	**Gran Canaria**	**Lanzarote – Arrecife**	**Tenerife Sur**	**Tenerife Norte**	**Alicante - Elche**	**Bilbao (*)**	**Barcelona**	**Ibiza**	**Madrid**	**Málaga**	**Palma de Mallorca**	**Valencia**	**Sevilla (*)**
Lday 65 dB(A)	282	304	20	252	86	-	13	14	1,751	319	177	1	-
Levening 65 dB(A)	0	294	0	13	62	-	14	14	1,497	255	187	1	-
Lnight 55 dB(A)	308	0	90	0	201	-	13	591	1,754 (**)	1,520	515	91	-

(*) The SNM was not prepared as the threshold of 50,000 annual operations had not been reached at the time. The preparation and management of SNMs is regulated both by Directive 2002/49/EC and its corresponding transposition to national regulations.
(**) The increase in night-time values at Adolfo Suárez Madrid-Barajas Airport is due to maintenance being carried out on runway 32R-14L. These actions have forced the use of the non-preferred runway (32L-14R) during 2016. The Lday, Levening and Lnight levels correspond at all times to applicable regulations.

SNM PHASE IV													
Noise Levels	**Gran Canaria**	**Lanzarote – Arrecife**	**Tenerife Sur**	**Tenerife Norte**	**Alicante - Elche**	**Bilbao**	**Barcelona**	**Ibiza**	**Madrid**	**Málaga**	**Palma de Mallorca**	**Valencia**	**Sevilla**
Lday 65 dB(A)	0	144	0	166	64	16	11	16	4	212	124	2	0
Levening 65 dB(A)	0	7	0	17	65	2	21	16	0	206	73	2	0
Lnight 55 dB(A)	0	0	-	-	70	0	19	14	50	409	131	49	0

Evolution of the number of people exposed to noise in the UK

Noise Level	SNM Phase I	SNM Phase II	SNM Phase III
Lden 55 dB(A)	8,600	14,300	17,000
Lday 66 dB(A)	<100	<100	<100
Levening dB (A)	<100	0	<100
Lnight 57 dB (A)	2,300	900	600

Associated legislation:
- (Defra Action Plan Guidance For Airport Operators).
- Civil Aviation Act.
- EU Environmental Noise Directive 2002/49.

In Spain, the level of noise incidence in the territory defines the Acoustic Easements (AEs). To this end, the acoustic impact generated in the airports is evaluated and its evolution is predicted.

While the conclusions drawn from the SNMs and the AEs are favourable, measures are still being developed and will focus on the evaluation, prevention and reduction of noise in the environment. Taken together, all this is included in the corresponding Action Plans. In the United Kingdom, the London Luton Airport also has a 2019–2023 Action Plan against noise corresponding to its SNM.

Aena also collaborates with other stakeholders to reduce noise at its point of origin, improve operating procedures, determine operational restrictions for certain aircraft, develop measures to deter noisy aircraft and support air traffic control and discipline.

Finally, in Spain, routes and noise levels are monitored in various airport environments using the Noise Monitoring System (NMS). The system is currently available at the following airports: Adolfo Suárez Madrid-Barajas Airport, Alicante-Elche Airport, Bilbao Airport, Gran Canaria Airport, Ibiza Airport, Barcelona-El Prat Josep Tarradellas Airport, Málaga-Costa del Sol Airport, Palma de Mallorca Airport, Sevilla Airport, Tenerife Norte-Ciudad de La Laguna Airport, Tenerife Sur Airport, Valencia Airport and London-Luton Airport. In the case of Aena airports in Brazil, noise measurements were carried out during 2022 at critical points in the airport environment.

Sound Insulation Plans[109]

(GRI 203-1; 203-2)

The actions of measuring, reducing, controlling and reporting noise levels are complemented by the execution of Sound Insulation Plans (SIPs) in the airport environment. This is a corrective measure to reduce the discomfort caused by aircraft noise and it guarantees the acoustic quality objectives within the buildings, in turn complying with the provisions of Royal Decree 1367/2007 and in accordance with the procedure and requirements established in Act 5/2010, of 17 March, as well as with the corresponding Environmental Impact Statements.

During 2022, Aena has continued to carry out actions associated with the management and execution of the SIPs assigned to its airports. Thus, in Spain, the following can be highlighted:

- The set of actions carried out during this year has allowed us to exceed the levels of sound insulation plans implemented and amount of investment made in previous years, with 1,862 homes and an acoustically soundproofed geriatric residence during 2022, exceeding the amount of €10 million.
- Work has started on the actions to update the census of the SIPs for the Alicante-Elche airport and the Palma de Mallorca airport. This set of actions will allow for the inclusion in these plans of an approximate amount of 2,225 new homes and sensitive-use buildings.
- 17 meetings were held to monitor the actions of the SIP with the participation of the Ministry for Ecological Transition and Demographic Challenge, as well as Autonomous Governments, Local Administrations and Aena.
- Completion of the first soundproofing actions associated with the SIP of Vitoria Airport and processing of soundproofing requests relating to the SIP of the César Manrique-Lanzarote Airport and Tenerife Sur Airport.

In all these actions, the SIP Management Office in Spain, made available to the affected population, continues to exercise a key role, performing a task of management and giving technical and administrative advice on the actions inherent to this activity.

Through the SIPs, Aena responds to its commitment to improving the quality of life of residents in the environment of its airports and thus to the sustainability of airport activity, minimising the acoustic impact caused by aircraft traffic

In the United Kingdom, at London Luton Airport the cumulative investments made from the start date of the actions until 31 December 2022 amount to €780,195, with a total of 253 households benefiting.

Communications

(GRI 2-29)

The noise management actions in the Spanish airport network are reported through the following various tools:

- Through WebTrack, users can make use of Interactive Noise Maps installed at 12 airports in the Spanish network.
- They are published monthly on the public website of the monthly Acoustic Reports in the case of Spain, which present an analysis of the dispersion of the trajectories within the municipalities of the airport environment, as well as the monthly evolution in the use of the southern layout and the incidents and distribution of aviation operations along the published main routes.
- Publication of annual follow-up reports on the Action Plans pertaining to noise pollution.
- Environmental Monitoring Committees of the SIPs and Joint Committees created to establish the Acoustic Easements and their associated Action Plans.

[109] In Brazil, no acoustic insulation action has been carried out to date.

- Specific Management Office for the information, execution, control and management of the SIPs.

In the case of Londre-Luton Airport in the UK, a website for recording complaints and suggestions is made available to users, as well as the telephone or email contacts, the online flight tracking system and an interactive Noise Map called TraVis.

They also have an Advisory Committee, made up of the local authority, community groups, airport users and other stakeholders. In this way, a formal mechanism is established to engage with the local community and to discuss these aspects.
In addition, quarterly and annual reports on aircraft movements are published, as well as the monitoring of noise and complaints generated by the activity itself.

In the case of Aena airports in Brazil, External Aeronautical Noise Committees have been set up, composed of municipal, environmental, aeronautical and airspace control agents, among others.



Airport	No. of soundproofed buildings (2000-2022)	Amount allocated (€) (2000-2022)
A Coruña	807	7,019,916
Alicante-Elche	3,180	42,285,092
Barcelona-El Prat	50	2,966,717
Bilbao	1,681	22,023,392
Cesar Manrique - Lanzarote	-	92,660
Girona-Costa Brava (*)	-	50,902
Gran Canaria	616	10,021,200
Ibiza	611	6,443,377
La Palma	22	402,329
Adolfo Suárez Madrid-Barajas	12,922	170,489,221
Málaga-Costa del Sol	814	16,323,476
Melilla	-	-
Menorca	11	227,779
Palma de Mallorca	1,176	18,803,359
Pamplona	43	1,224,084
Sabadell	-	13,633
Santiago de Compostela	15	296,997
Sevilla	320	1,265,017
Tenerife-Norte	1,099	25,837,961
Tenerife-Sur	-	56,244
Valencia	3,953	20,676,121
Vigo	247	3,659,147
Vitoria	7	167,847
Londres-Luton	253	780,195
Total 2000-2022 (Aena and Luton)	**27,827**	**351,126,666**

2.4. Sustainable use of resources: water

(GRI 3-3)

2.4.1. Water management

(GRI 303-1)

The optimisation of water consumption constitutes a strategic commitment for Aena, taking into account the large volume of passengers, employees and users who travel through the network airports every day, where water is found to be the main natural resource that is consumed (mainly for human consumption, irrigation of green areas, cleaning, fire service and execution of works).

Therefore, one of the lines of action has been the implementation of a Strategic Plan for Water Management, whose perimeter covers all the centres of the network in Spain and is focused on achieving the following strategic objectives:

- Develop water resource management to address reduced freshwater availability and quality as a result of climate change by reducing water consumption by 10% per passenger by 2030 compared to 2019 (5% reduction by 2026).
- Integrate management of water sources and climate risks, encouraging and increasing the use of alternative water sources per passenger by 150% by 2030 compared to 2019 (50% increase by 2026).

Aena's strategic water management objectives are in line with one of the principles of action defined in the Integrated Quality, Environmental and Energy Efficiency Management Policy and, in particular, with the need to: "Ensure the protection of the environment and the prevention of pollution, integrating sustainable development criteria that contributes to reducing the impact of our activity, promoting the sustainable use of resources"

The first step adopted in Spain, in line with the objectives contemplated in the Strategic Plan for Water Management, has been to obtain a detailed analysis of the airport situation. For this purpose, detailed information on water management at Aena sites has been collected through the study of the different phases of water cycle management at airports:

- Water consumption (sources of supply, distribution and storage systems, consumption).
- Wastewater (source, networks, treatment systems, discharge and control, sludge generated by treatment systems).
- Rainwater (activities with risk of potential pollution, networks, treatment, discharge and control systems).

Likewise, communications, participation and awareness about water issues have been evaluates, along with external risks, weaknesses, strengths and areas for improvement.

Water consumption is divided into four large groups, depending on their source of supply:

- Sea water
- Well water
- Drinking water from the network
- Regenerated water (purchased from third parties).

This diagnosis has made it possible to establish areas of improvement related to different aspects related to water management:

1) Sourcing (e.g. water quality, infrastructure and sourcing equipment);

2) Management (e.g. control, savings measures, supply to third parties, communications and awareness);

3) Wastewater (e.g. treatment plants and network watertightness);

4) Rainwater (e.g. leaks and treatment systems); and

5) External risks (e.g. outage in times of drought and flooding).

Likewise, the water footprint has been calculated taking into account 100% of its sites in Spain. The calculation year selected was 2019 and both the calculation and the assessment of their sustainability, have been based on the methodology of the Water Footprint Network (WFN).

In 2022, 100% of Spanish airports have their water footprint calculated and have their corresponding Action Plans.

Based on all of the above, in recent years, a series of internal measures have been implemented, focused on improving water efficiency, such as the incorporation of taps with automatic sensors to make the outflow more efficient, and to promote the reduction of consumption, such as the regenerated water plant at Alicante-Elche Airport.

It also collaborates with the value chain on responsible water management through a number of initiatives. In Spain, Aena has signage installed to raise awareness of the responsible use of water for customers, and it introduces clauses in lease agreements that seek to acquire the commitment of these parties to reduce their water consumption, which is monitored at the network level.

At London-Luton Airport in the UK, the Responsible Business Strategy includes efficient water management as a strategic pillar. In this context, measures and systems have continued to be implemented in 2022 to achieve more efficient use, as part of the maintenance and improvement of the airport base. Also noteworthy, is the appointment of a third party to manage water usage as efficiently as possible, as well as establishing a commitment to Thames Water and the Environmental Agency to re-bid the water contract with a focus on optimising its usage efficiency.

Finally, Aena airports in Brazil plan to implement water reuse and supply control projects in 2023. In the medium to long term, water resource management is expected to be quantified through telemetry, which will enable more efficient management of this resource and help monitor reductions in its consumption.

Water management objectives

The strategic objectives apply to all activities and services provided by Aena, both in the airport facilities and in the rest of the buildings and infrastructure managed by the Company. These objectives are detailed below:

Water management objectives			
	Spain	**United Kingdom**	**Brazil**
Reduction of consumption	**2026:** • Reduction of water consumption by 5% per passenger compared to 2019 • Increase in the use of alternative water sources per passenger by 50% compared to 2019. **2030:** • Reduction of water consumption by 10% per passenger compared to 2019. • Increase in the use of alternative water sources per passenger by 150% compared to 2019.	**2023:** • Reduction of total water consumption to 6.98 litres/ passenger. • Identify and quantify processes that use drinking water, being able to use non-potable water.	**2023:** • Installation of on-site water treatment plants at airports. **2024:** • Installation of rainwater collection and treatment stations for reuse

Evolution and progress of the objectives set in water management			
	Spain	**United Kingdom**	**Brazil**
Reduction of consumption	**2022:** ◦ Total water consumption per passenger stands at 19.8 liters/passenger and reused water consumption is 0.5 liters/passenger.	**2022:** ◦ Currently, the total water consumption per passenger is 8.2 litres/passenger.	

2.4.2. Initiatives for responsible water consumption

During the aforementioned diagnosis, good practices in water management were identified at several Aena airports and which have the potential to be transferred to other centres in the network, among which are the following: the implementation of automated leak detection systems, network maintenance and surveillance or improvement of consumption control systems, which allow for efficient water control.

Some network airports, such as Menorca Airport, have a complete system of flow meters with energy-efficient wireless transmission that improve water flow measurement at various points in the water network, as well as consumption control and leak detection, increasing efficiency in managing this resource.

Another initiative already implemented at airports established in territories with greater water stress, such as islands, consists of the reuse of clean wastewater, which is used to water the green areas. This prevents the additional consumption of water from the grid and intended for this purpose.

On the other hand, and as already mentioned, in Spain, two white papers are available for the airports of Adolfo Suárez Madrid-Barajas Airport and Barcelona-El Prat

Josep Tarradellas Airport that incorporate sustainability criteria into the urban and architectural design of property developments that may be carried out in the aforementioned facilities. Specifically, these criteria relate to the sustainable consumption of resources, as well as to the reuse of water through different routes (collection of rainwater in the roofs of buildings and their use, the implementation of separative networks and the promotion of sustainable urban drainage, for example).

In the case of island airports, such as those in Fuerteventura, Ibiza and César Manrique-Lanzarote, the Company takes advantage of the circumstances of the environment and uses water from the sea through desalters. In this regard, Aena collaborates with institutions in order to promote water consumption reduction initiatives in their facilities.

In addition, taking into account that part of the water expenditure is due to human consumption, it is considered relevant to inform and raise awareness among users of the Aena facilities. In this sense, specific signage has been installed in the services, urging passengers, third parties and the Company's own employees to make responsible use of water.

In addition to carrying out specific measures such as those described in the previous paragraphs, and in order to achieve the established objectives, an action plan has been defined for each Spanish airport in terms of sustainable water management. Action Plans are articulated from six lines of action that encompass 30 projects, grouped mainly into the following lines of action:

- Water footprint calculation: Measurement of the water footprint to know its impact on sustainability and adapt the water cycle management at airports (see section '2.4.1. Water Management').
- Increased water reuse: Supply of alternative sources (regenerated waters from wastewater treatment plants [EDAR, Estaciones Depuradoras de Aguas Residuales], desalinated water, rainwater, etc.) and use of regenerated water to supply irrigation, among others.
- Adapting procedures to climate change: Projects for defining or changing work procedures and preparing water management standards.
- Awareness and communication: Preparation of a Communications Plan aimed at stakeholders concerned with water issues, to inform them about the water situation of each airport, and the measures aimed at improving the water management, directed at all groups that perform their tasks at the airport (subcontractors, passengers, etc.).
- Efficiency in drinking water consumption: Projects aimed at reducing water consumption by detecting drinking water leaks in existing networks, improving the facilities that make up the networks and real-time management and monitoring of drinking water, among others.
- Neutral hydraulic balance: Projects focused on the identification of water pollutants currently discharged into the grid, as well as smart treatment and improvement of wastewater and rainwater quality with the goal of offsetting 100% of water retracted from the water catchment area.

The resulting Action Plans have been prepared from the consolidation of actions identified for each of the airports in the Aena network, which include a description of the measures to be carried out, as well as their execution time, cost and level of prioritisation.

A number of measures have also been implemented at London-Luton Airport in the UK to reduce water consumption. The extensive installation of water meters allows opportunities to improve the use of this resource to be identified, as well as to repair leaks faster. The installation of low-flow, double-flush faucets in cisterns has also been worked on in the construction of the new terminal. In addition, the recent water supply contract bid includes water conservation improvement requirements. Some of these actions have been carried out in collaboration with third parties.



WATER MANAGEMENT INITIATIVES AT AENA

Initiatives aimed at reducing water consumption in the network's airports and minimising the generated spills to preserve nearby ecosystems.

Rainwater Networks
(use of rainwater, etc.)

INTERNAL COMMUNICATIONS

RAINWATER TREATMENT SYSTEMS

WATER SUPPLY AND SAVING SYSTEMS
(employment of regenerated water, various supply sources, water management standards, etc.)



SUPPLY WATER NETWORKS
(Leak detection systems, network differentiation, etc.)

Environmental Awareness And Communication Campaigns

Wastewater Networks
(leak detection, etc.)

WASTEWATER TREATMENT SYSTEMS
(WWTP, water regeneration, cesspool water treatment, etc.)

Water consumption indicators

(GRI 303-2)

In 2022, water consumption has totalled 6.410,31 m^3. The following table breaks down the total water consumption by the airport network per group by origin, as well as in regions with water scarcity:

Water Extraction/Consumption – Thousands of m3 (GRI 303-3; 303-5)

	2020				2021				2022[110]			
	Spain	United Kingdom	Brazil	Consolidated Total	Spain	United Kingdom	Brazil	Consolidated Total	Spain	United Kingdom	Brazil	Consolidated Total
Desalting water/ Sea water (thousands of m3)	154.93	—	n/a	154.93	202.18	—	—	202.18	519.47	—	n/a	519.47
Well water/ Groundwater (thousands of m3)	1,324.47	—	63.3	1,387.77	1,399.14	—	65.06	1,464.20	2,367.53	—	75.17	2,442.7
Drinking water from the grid (thousands of m3)	2,181.9	52.7	70.6	2,305.20	2,689.73	48.20	161.88	2,899.81	3,162.53	108.46	116.37	3,387.36
Consumption of regenerated water purchased from third parties and from a regenerated water network/Municipal water supply or from other water companies (thousands of m3)	91.9	—	—	91.9	110.93	—	—	110.93	89.61	—	—	89.61
Total water consumption (thousands of m3)	**3,753.20**	**52.70**	**133.9**	**3,939.80**	**4,401.98**	**48.20**	**226.94**	**4,677.12**	**6,139.14**	**108.46**	**191.54**	**6,439.14**
Reused water/ Rainwater collected directly and stored/ Purified wastewater (thousands of m3)	282.1	—	—	282.1	297.12	—	—	297.12	412.85	—	—	412.85

Water-stressed regions (GRI 303-5)

	2020				2021				2022			
	Spain	United Kingdom	Brazil	Consolidated Total	Spain	United Kingdom	Brazil	Consolidated Total	Spain	United Kingdom	Brazil	Consolidated Total
Water consumption (thousands of m3)	2,522.30	52.70	—	2,575	2,828.49	48.20	—	2,876.69	4,354.74	108.46	—	4,463.2
% Water consumption in water-stressed regions over total[111]		65%				62%				62%		

[110] Water consumption by the tenant companies of Aena's Spanish airport network corresponds to 23% of Aena's global consumption in 2022 reported here (total consumption and reused water), which corresponds to 1,508 M m3. In the case of Brazilian airports, the water supplied to the concessionaires constitutes 5% of the total water consumed.

[111] The regions considered to have water stress have been obtained from the Aqueduct of the World Resources Institute (WRI), which are those that are 40% (extreme and high level) above the stress threshold, corresponding to the location of 33 airports of Aena's network – 32 locations in Spain and one in the United Kingdom.

The percentage of water consumption by Aena's leasing companies (Spanish network) corresponds to 23% of Aena's global consumption in 2022, which corresponds to 1,508 million m^3.

With regard to water spills, the units and centres of the Aena network carry out a follow-up through periodic analyses of compliance with the parameters established in the corresponding spill authorisations, both for wastewater and rainwater, in order to contribute to the conservation of the Public Domain Waters (DPH, Dominio Público Hidráulico) and the Maritime-Ground Public Domain Waters (DPMT, Dominio Público Marítimo-Terrestre). In this regard, the minimum quality criteria for the discharge of effluents are established by the applicable local legislation and governed by the corresponding discharge authorisations. It should also be noted that all discharges are moved through the pipeline networks until reaching their corresponding water treatment systems or facilities (outdoor or indoor) before their final discharge. For potentially contaminated rainwater discharges, they are cleared through hydrocarbon separating plants, while uncontaminated waters are discharged directly to the DPH or DPMT. Partial breaches are continuously monitored by establishing the corresponding improvement actions[112].

Wastewater discharges by water type – Thousands of m3 (GRI 303-4)

	Final destination	2022
Spain	Fresh water	16,456.74
	In areas of hydraulic stress	14,931.33
	Other types of water	323.1
	In areas of hydraulic stress	219.0

Information reported for the first time in this report.
Data related to Spanish airports. In the case of the airports of Luton and Brazil, this categorization is not currently available, but work is underway to have the information available in future reports.

Wastewater discharges by destination – Thousands of m3 (GRI 303-4)

	Final destination	2020	2021	2022
Spain	Surface waters	269.92	371.68	655.16
	In areas of hydraulic stress	-	-	525.36
	Groundwater	40.59	47.83	35.13
	In areas of hydraulic stress	n/a	n/a	35.03
	Seawater	-	0	0
	In areas of hydraulic stress	-	0	0
	Water of third parties	1,720.45	2,433.53	16,089.53
	In areas of hydraulic stress	-	-	14,589.89

[112] In the event that the measures carried out are not effective, they would receive a fine as established by the competent administration.

United Kingdom	Surface waters	-	-	-
	In areas of hydraulic stress	-	-	-
	Groundwater	-	-	-
	In areas of hydraulic stress	-	-	-
	Seawater	-	-	-
	In areas of hydraulic stress	-	-	-
	Water of third parties	-	-	104.13
	In areas of hydraulic stress	-	-	-
Brazil	Surface waters	-	-	-
	In areas of hydraulic stress	-	-	-
	Groundwater	-	-	-
	In areas of hydraulic stress	-	-	-
	Seawater	-	-	-
	In areas of hydraulic stress	-	-	-
	Water of third parties	118.5	120	153.24
	In areas of hydraulic stress	-	-	-
Consolidated Total	Surface waters	269.92	371.68	808.40
	In areas of hydraulic stress	-	-	525.36
	Groundwater	40.59	47.83	35.13
	In areas of hydraulic stress	-	-	35.03
	Seawater	-	-	0.00
	In areas of hydraulic stress	-	-	0.00
	Water of third parties	1,838.95	2,553.53	16,346.90
	In areas of hydraulic stress	-	-	14,589.89

Information for 2020 and 2021 in the UK is not available.

2.5. Protecting biodiversity

(GRI 3-3)

2.5.1. Biodiversity management and protection model

(GRI 304-1)

The rapid and continuous loss of biodiversity poses potentially significant global risks, intimately related to the climate crisis.

As a result, Aena reflects its commitment to harmonizing airport activity with the protection and conservation of natural habitats existing in the environment and their biodiversity, in the Sustainability Strategy, the Sustainability Policy and the Integrated Quality, Environmental, Energy Efficiency and Occupational Health and Safety Management Policy, applying as much to Aena companies as well as companies that work within the airport enclosures.

Biodiversity protection, communication and awareness-raising initiatives as well as volunteering actions are the key lines of action of Aena in the field of biodiversity conservation.

To achieve these commitments, it carries out actions such as the protection of natural areas, the study of the fauna of the environment and the control of vegetation in and around airports or through actions linked to combating the trafficking of wild species. For this purpose, the geographical dispersion of airports is taken into account, as well as the diversity and typology of the ecosystems existing in their entirety, adapting the initiatives to the reality of the environment.



2.5.2. Protected spaces[113]

(GRI 304-1; 304-3; 304-4, 413-1: 3-3)

The presence of vegetation, fauna and natural spaces that have some level of protection is harmonized with the operation of the airport by means of adopting various measures that aimed to prevent any compromising effects that may be caused over these natural environments.

Specific objectives in biodiversity protection			
	Spain	**United Kingdom**	**Brazil**
Short/Medium/Long term	Protect and promote local and global biodiversity		

Evolution and progress of the objectives set in terms of biodiversity protection			
	Spain	**United Kingdom**	**Brazil**
	• Initiatives for the protection of local fauna in collaboration with third parties • Monitoring and control of the presence of fauna in the airport area • Preparation of Fauna and Habitat Studies of 12 airports • Tree planting projects	• Collaborations with third parties to contribute to the protection and restoration of other habitats • Tree planting projects	• Collaborations with third parties to contribute to the protection and restoration of other habitats

In this regard, Aena incorporates the sustainability criteria into the strategic decision-making process, through the environmental evaluation of the Master Plans of its airports of general interest. Likewise, through the environmental impact assessment of the projects of its airport infrastructures, it guarantees adequate prevention of the specific environmental impacts that may be generated during their execution, while establishing effective prevention and correction mechanisms. Environmental evaluations, both plans and projects, are subject to several principles, with special emphasis on the protection of biodiversity and protected spaces, the integration of environmental aspects into decision-making, caution and precautionary action and on properly ensuring the channels of public information and participation. Once the environmental Resolutions that finalise the environmental impact assessments are issued, a monitoring process is carried out, during the execution of construction projects and in the development of planning instruments, in order to verify compliance with preventive measures, required corrective and/or compensatory measures as well as assessing the degree of compliance with established environmental objectives. This ensures that the any unforeseen adverse effects can be identified and thus allow for the adoption of the new appropriate measures.

In order to ensure transparency, Aena publishes the environmental resolutions obtained on its website[114] as well as its environmental monitoring reports, which provide information on the nature of the significant direct and indirect impacts on biodiversity in relation to pollution, the possible reduction of species or the transformation of the habitat.

When infrastructure and operational actions are carried out in areas of critical biodiversity, the Company follows an

[113] Both London Luton Airport in the UK and Aena's airports in Brazil are not located in protected areas. In Spain, protected areas are located within Aena's properties.
Subsurface and sub-surface land is owned by Aena.
The type of operation is airport.
[114] See chapter 'Links of interest'.

evaluation process based on avoiding, minimising, restoring and compensating, where appropriate, the damage carried out.

Likewise, these environmental impact studies, for both master plans and projects, also analyse the direct and indirect significant positive and negative impacts related to the following:

- the affected species;
- the extent of the impacted areas;
- the duration of the impacts;
- the reversibility or irreversibility of the impacts.

In this regard, the protected and restored areas are located mainly in some of the Spanish airports, so that the restoration, conservation or offsetting measures that have affected these areas can be consulted in the environmental resolutions mentioned above. In this regard, during 2022, in Spain, the following environmental resolutions have been obtained by the Ministry for Ecological Transition and Demographic Challenge:

- 'New pipeline and replacement of high-voltage lines' at Barcelona-El Prat Josep Tarradellas Airport.
- 'Paving and urbanization of the area for the deposit of car rental vehicles' at Seve Ballesteros-Santander Airport.
- 'Urbanization of land plots in cargo area. Phase II' at Zaragoza Airport. Published Environmental Impact Report in BOE No. 117 of 17/05/2022.

2.5.3. Studies on the fauna of the environment and control services

(GRI 304-2; 304-3; 304-4)

The management of fauna is carried out at all airports under the framework of operational safety, which allows the protection of natural heritage to be compatible with the maintenance of the safety and quality standards inherent in the sector. In this context, and in compliance with the provisions established by the EASA, ICAO and National regulations, the Fauna and Habitats Study is periodically prepared for each airport in Spain, validating the results with the collaboration of local and autonomous entities, and the State Air Security Agency (AESA). In this regard, it should be noted that in Spain, during 2022, the Fauna and Habitats Studies of 12 airports have been prepared.

Specifically, Aena carries out a monitoring and control of the presence of fauna in the airport enclosure, and develops various measures to keep them out of the operating areas, adapted to the situation of each site. By way of example, one of the measures involves the use of mechanical means, such as the bloodless capture with traps and the use of sounds and pyrotechnics. Additionally, biological means are applied with the use of trained falconry birds, which fly over the airfields to deter the entrance of the birds that surround the airports. This method is currently being applied in 35 airports and 1 heliport in Spain.

It is worth noting certain initiatives regarding the protection of local fauna in collaboration with third parties. As an example, La Gomera Airport collaborates with the Government of the Canary Islands in the monitoring and conservation of the fish eagle or the Osprey, an iconic species, residing in the Canary Islands, which is currently threatened. The project, co-funded by the FEDER Canary Islands Operational Programme (2014-2020), is carried out by a technical team of the Ornithology and Natural History Group of the Canary Islands. The ornithologists, accompanied by the technical coordinator of fauna at La Gomera Airport, have installed the necessary material for the monitoring of this bird in order to improve the available knowledge about the conservation problems of the species, particularly in these coastal enclaves, where the Osprey has been raised since immemorial times. Also noteworthy is the collaboration with the Consell Insular de Menorca, by having a pond at the Menorcan airport that is used by the Balearic toad for reproduction. This species is threatened and endangered and the Airport collaborates with the Consell to provide the appropriate pond conditions, since it is one of the most important breeding centres on the island. The environmental technicians of the Island Council there perform census studies and tag samples each season.

2.5.4. Other highlights

With regard to other collaborations with third parties to contribute to the protection and restoration of other habitats in the United Kingdom, London-Luton Airport has agreed to work with the Marston Vale organisation on volunteer projects for the planting of trees. It has also participated in the Tree for Free programme, which is part of the Queen's Green Canopy initiative and has resulted in the donation of 70 trees, 16 of which will be donated to local schools. Additionally, the Greener Future initiative has been launched to support local community groups and charities that demonstrate a commitment to biodiversity and address carbon reduction. Thus, organisations based and working within five miles of the airport can apply for grants up to £10,000. The fund will be managed by the Bedfordshire and Luton Community Foundation (BLCF) on behalf of the Luton airport as part of the airport's BLCF grant programme. All this with the aim of funding local community groups that allow for the development of innovation programmes and environmental education initiatives designed to protect biodiversity, among other environmental aspects.

Aena airports in Brazil plan to replant 1,300 trees around airports as an environmental restoration measure after removing about 300 trees as part of the works being carried out at João Pessoa, Campina Grande and Recife airports. It is also worth mentioning two commissions that

are held every year, which address aspects related to biodiversity together with those interested in each airport. Finally, tools are available for the management of fauna risks, among which the Identification of Fauna Hazards (IPF, Identificación de Peligros de Fauna) is highlighted, as well as the Fauna Risk Management Programme (PGRF, Programa de Gestión de Riesgos de Fauna), together with its corresponding Aerodrome Fauna Management Plan (PMFA, Plan de Gestión de Fauna de Aeródromo).

Aena's airports in Brazil participate in the National Commission for the Management of Fauna Risk, composed of representatives from various civil and military aviation entities. Its purpose is to serve as a forum for debate and subsequent integrated action of the aeronautical community.

In relation to Spanish airports, 87 coordination meetings have been held during 2022 with authorities in the scope of the Fauna Risk Management Programme (PGRF, Programa de Gestión de Riesgos de Fauna) In Spain, it is also worth noting the initiative launched in 2022 with the Saving the Amazon Foundation, consisting of planting more than 10,000 native trees in the Porto Extrema region (Brazil), with the aim of contributing to the restoration and protection of the Amazon and the fight against climate change.

Aena controls and protects fauna with the help of innovation as a key tool, with the Radar Aviar project in Spain being a noteworthy example. This pilot project carried out in 2021 consists of a radar-based system for detecting bird movements in the airport environment, compatible with airport equipment and systems. The use of this technology in the airport environment reinforces operational safety and improves information on the ethology of fauna, helping to identify and characterise bird movement patterns as well as identifying particular areas of attraction for the birds. In 2022 the equipment was commissioned at Bilbao Airport and, after initial testing, could definitely be included for this site. This acquisition will be accompanied by the development of new procedures to integrate the information provided by the team into decision-making, and the application of mitigating measures against any hazards to wildlife detected.

2.5.5. Control of vegetation in the environment of the airports

Aena tracks the incidence of environmental habitats in the airport's operating areas, encouraging collaboration with the entities in charge of its management, and carries out control of the vegetation. To do this, it executes specific measures that promote the care and respect of the environment with guarantees on operational safety.

In addition, as part of the collaboration with third parties, agreements are established with farmers, companies and cooperatives that promote the agricultural development of land and ensure the preservation of vegetation. In this sense, it is worth noting the participation of La Palma Airport in the LIFE IP Azores Natura European project, together with the World Biosphere Reserve of the Canaries Foundation and the Government of Azores. This project aims to promote the maximum possible participation and consensus of all the actors involved (the scientific community, the political-institutional domain, ports, airports, the general public) in the creation of an operational framework for the prevention, early warning and rapid response to species of invasive exotic flora on the island of La Palma.



2.6. Waste management and circular economy in airport facilities

(GRI 3-3)

Aena is committed to the development of a circular economy in the airport environment to minimise the volume of waste generated, promote its proper segregation and contribute to maximising its valorization. To this end, in line with what is defined in the Sustainability Strategy 2021-2030, the necessary resources are dedicated to ensuring adequate waste management in all its phases.

2.6.1. Waste management and circular economy model

(GRI 306-1; 306-2)

The following types of waste are generated in the Aena units and centres, either by the facilities themselves or by the licensees using the spaces at the airport:

- Non-hazardous waste (domestic or commercial): NHW.
- Hazardous waste (industrial or non-industrial): HW.
- Sanitary waste.
- Construction and demolition waste, in the case of works.

At Aena airports in Spain, a waste list is drawn up, updated and filed, in which the waste normally generated by the activities and services of the unit/site in question is categorised and contains the following data (at a minimum):[115]:

- Nature of the waste (indicating if it is hazardous or not).
- Selective collection points for such waste.
- Destination (indicating whether it is valued, including reuse or recycling, or destroyed).

The above is accompanied by the preparation and update of the chronological file of waste removals (hazardous or not), which includes:

- Nature (e.g. used filters, sanitary waste, etc.).
- EWC code (European Waste List).
- Origin (e.g., car or group maintenance, medical service, etc.).
- Destination (manager to whom they are delivered).
- Amount removed.
- Method of treatment.
- When applicable, means of transport (vehicle registration) and collection frequency.

The documentation associated with the removal of waste by third parties may also be filed by the maintenance personnel and/or those responsible for files that contemplate such removals.

Likewise, Aena units and sites guarantee compliance with the legal requirements associated with the waste that apply to it, such as: the submission of a four-year HW Minimisation Study, the Annual HW Declaration and the corresponding Annual Packaging Declaration to the Autonomous Community.

The following are general guidelines for the control and management of the main types of waste generated:

- Non-hazardous waste (NHW): Non-hazardous waste, similar to household waste, is delivered to the local entity or authorised manager. The Representative Manager of the Information Management System (RDSGI, Representante de la Dirección ante los Sistemas de Gestión de la Información) and/or the archiving manager of the unit or site keeps a copy of the records of waste deliveries to the waste managers and/or of the invoices or waste collection charges of the local entity. These waste items are collected selectively in the general urban waste containers (paper-cardboard, glass, containers or organic matter and the rest) or in the specific containers of each selectively collected waste item (scrap, wood, pruning remains, toners, etc.) and are removed with the appropriate frequency for each case, but in such a way that the maximum storage time is not exceeded (two years if they are used for valuation and one year if they are used for disposal).
- Hazardous Waste (HW): Internal management of generated hazardous waste (such as used mineral oils, cells and batteries, fluorescents, absorbents contaminated from carrying hydrocarbons, and contaminated empty containers, among others) must meet certain storage, packaging and labelling conditions. In addition, in accordance with the provisions of the legislation, the treatment to be given to HW should preferably be, in order of priority: prevention (of its generation), reuse, recycling, valuation (including energy) and, finally, disposal. In any case, whenever possible, the site delivers the HW to managers who value the waste in some way, preventing its destination from being the disposal.
- Sanitary waste: Sanitary waste is managed, in its own right or by established agreements, according to the specific Sanitary Waste regulations/autonomous legislation, if any.
- Construction and Demolition Waste (CDW): Waste generated in small works that they are carried out by

[115] On the other hand, Aena waste produced by suppliers and contractors will be removed under their responsibility, and they must provide the Aena units and sites with evidence of their proper management, in accordance with the provisions of the corresponding procedure, provided that there is no prior agreement with the site that specifies another form of management

the units or sites are stored in containers and moved to an authorised landfill or delivered to an authorised waste manager. The RDSGI/ Manager of the works of the unit or site files a copy of the corresponding delivery records. The CDW generated in the rest of the works are managed by the contracted company, as required by the applicable legislation in each case, and are controlled as indicated by procedure.

In he United Kingdom and Brazil, a management is carried out similar to that of Spain but adapted to the particularities of the legislation that applies in each country. Thus, in the United Kingdom all waste is managed on site, except for airline waste. This includes waste from the terminal, retail and restaurant concessions, airport operations, and maintenance and construction activities. Likewise, the contract with the waste manager covers the comprehensive management of waste and includes the requirement that zero operational waste be sent directly to the landfill. In this way, for example, it is guaranteed that the segregated waste streams are operated at the airport with specialized contractors and that waste classification is carried out on site.

Regarding waste management in Brazil, a set of planned and implemented procedures is followed, taking into account technical, regulatory and legal considerations, focused on minimizing waste production and managing waste generated safely and efficiently, protecting workers and preserving public health, natural resources and the environment.

During the waste management process, the contracted management companies are required to send electronic waste measurement reports with details, among other things , of the day, time and amount of waste collected and treated with the corresponding application documents such as They are the so-called MTR (Waste Transport Manifest), CDF (Final Destination Certificate) and Waste Treatment Certificate.



WASTE GENERATION AT THE AIRPORT FACILITIES

Significant examples

Service	Groups involved	Examples of waste produced	Treatment	Party in Charge	Relationship
Commercial					
Maintenance					
Cleaning facilities					
Use of the facilities					
Handling charges					

Groups involved	Concessionaire	Customers	Airport workers	Crews	Airlines	
Examples of waste produced	Plastic containers	Glass containers	Packaging	Light bulbs and fluorescents	Cleaning products	Used mineral oils
	Electrical and electronic devices	Tyres no longer in use	Metals	Dust and various leftovers		
Treatment	Recycling	Reuse	Municipal solid waste – Remaining fraction			
Party in Charge	Aena	Concessionaire				
Relationship	Indirect	Direct				

2.6.2. Zero Waste Objective by 2040

Within the Sustainability Strategy, a specific line of action has been developed in Spain that will allow it to improve waste management until reaching the Zero Waste commitment by 2040[116]. The actions linked to this objective are framed in the following fields of action:

- Measurement and monitoring of waste;
- Reduction of waste generated;
- Use of sustainable materials;
- Impulse given to segregation and recycling;
- Energy recovery and composting;
- Collaboration and awareness.

In addition, one of the priorities of the Responsible Business Strategy in the UK is, within the context of waste management and a circular economy, to increase the percentage of recycled waste and avoid its sending to landfill. The following lines of action are proposed for such purposes:

Through the waste contractor, provide additional waste classification and segregation, and expand the collection of new types of recyclable materials.

Involve the airport's lessees to implement improvements in recycling, providing easily accessible separation containers and on-site assistance from the waste contractor.

Set a recycling rate target to reduce waste and promote recycling.

Operate a segregated waste stream throughout the airport, with a waste contractor to ensure they are handled in accordance with applicable regulations.

In Brazil, the main strategic objectives in terms of waste management include the implementation of a system that is in line with the agreed international frameworks, and that manages to minimise negative impacts on human health and the environment. Likewise, by 2030 it is expected that waste generation will have been substantially reduced through prevention, recycling and reuse actions.



[116] Objective focused on recurrent non-hazardous waste, excluding construction waste and hazardous waste

Objectives for waste management and promotion of the circular economy			
	Spain	**United Kingdom**	**Brazil**
Short/medium/long term	**2040:** • Zero Waste target	**2023:** • Reduce waste to 0.12 kg/passenger • Obtain the Carbon Trust Standard – Zero waste to landfills • Ship less than 5% of construction/demolition waste (based on weight) to landfill.	**2024:** • Educate, raise awareness and improve the potential of lessees and institutional teams in order to improve waste management. **2026:** • Achieve environmental waste management in line with agreed international frameworks throughout their lifecycle **2030:** • Substantially reduce waste generation through prevention, reduction, recycling and reuse.

Evolution and progress of the objectives set in the area of waste management			
	Spain	**United Kingdom**	**Brazil**
	2022: • 76% of non-hazardous waste recovered and 49% recovered in the case of hazardous waste.	**2022:** • Only 0.11% of non-hazardous construction/demolition waste (based on weight) has been sent to landfill. • For the fifth consecutive year, a recycling percentage of more than 60% has been reached (100% recovery of hazardous and non-hazardous waste). • Ratio of 0.131 kg of waste produced per passenger	**2022:** • Organic waste composting and recyclable waste segregation actions. • Installation of containers for the receipt of packaging in terminal buildings that promote segregation, rewarding users for their responsible environmental behaviour • Rollout of environmental educational activities.

2.6.3. Initiatives for the reduction, reuse, recycling of waste and the correct treatment of hazardous waste

(GRI 306-2)

Conservation of natural resources is supported, among other pillars, by the proper management of waste generated by the network airports. As such, Aena is driving initiatives at its airports and working with stakeholders to move towards a circular economy. In addition, some sites implement more specific actions based on their particular casework.

In line with what has been established in previous years, the Company has specific signage in its terminal buildings and technical blocks that seek to raise awareness about the importance of the disposal of used gloves and masks in the appropriate containers as well as promoting better segregation of these waste items.

Waste treatment and recycling

Several airports have a non-hazardous waste transfer plant for centralise waste management and improving the conditions of its temporary deposit, especially the non-segregated portion of waste similar to household waste. In addition, there are points for the temporary deposit of hazardous waste, which have pollution prevention measures due to their nature. In these areas, waste is selectively deposited in containers until they are removed by authorised waste managers.

Airport environmental departments carefully monitor all waste generated from its origin and storage until it is removed and transferred to an authorised waste manager for external processing. In order to verify that the waste generated by Aena has been properly managed, Operational Control performs periodic follow-ups of the activities carried out. On the other hand, the verification of the proper management of waste generated by contractor and lessee companies is carried out within the framework of the periodic monitoring established in the Environmental Monitoring Plan of these companies[117]. Likewise, as a general rule at Aena airports, waste managers are contractually required to:

- Whenever possible, the destination of the waste is the taken through the process of valorization and recovery.
- In cases where the final destination is disposal, the waste manager must duly justify each case.

By way of example, it is applicable at Adolfo Suárez Madrid-Barajas Airport, where the waste manager is also required by contract – taking as a reference the immediately preceding year – to progressively improve the waste valorization percentages during the term of the contract, or maintain them in the case of 100% of them already being valorized.

The UK works closely with tenants to facilitate waste segregation through their contracts. In this regard, the classification of waste is carried out on-site with the help of specialised external waste managers, who have contributed a greater number of operators in 2022 in order to ensure good performance in this regard. It is also worth noting the launch during the last fiscal year of a project whose objective is to increase the recycling of cups and coffee grounds in the food and beverage area.

As a new development in Brazil in 2022, it is worth noting the change in the scope of their waste management contract, thanks to which it aims to ensure the future composting of organic waste, improve the segregation of recyclable waste and install machines for the receipt of waste in terminal buildings in exchange for a reward given to its users for better environmental behaviour. In this sense, companies contracted to manage waste generated in airport facilities in Brazil are subject to all applicable laws, safety regulations and obligations stipulated in the tendering documents, which is ensured by the inclusion of clauses in the awarded contracts. Likewise, contractors are obliged to send periodic measurement reports, as well as other documentation (certificates of treatment, final destination, etc.) that enables the performance of the contractors and of the Company to be monitored in this regard.

Reuse of waste

Aena has waste reuse initiatives, being able to highlight the reuse of sewage sludge as a compost in landscaped areas or the generation of compost from the food and beverage waste or gardening debris, such as that carried out at the Bilbao Airport.

Excavation material is reused in the UK as part of construction contracts and whenever possible.

Removal of single-use plastics

Aena incorporates a specific clause in the food and beverage contracts that formalises the commitment to reduce the volume of plastic waste generated, avoid the use of single-use plastics and promote the use of products manufactured with biodegradable or recyclable materials[118].

[117] See section '2.1.5. Sustainability and value chain' and 'Chapter 4'.
[118] See sections 2.1.2 and 2.1.5

2.6.4. Initiatives with third parties in terms of waste reduction, reuse and recycling

(GRI 306-2)

Collaboration with companies authorised in waste management – which are responsible for the collection and subsequent processing of waste – is framed as a fundamental feature in this matter, as well as the development of specific management systems according to the type of waste.

In Spain, the Company has collaboration agreements with Ecoembes, Ecovidrio and ERP to ensure that waste is managed properly. Likewise, Barcelona-El Prat Josep Tarradellas Airport works closely with the Trinijove Foundation, an entity responsible for the collection and segregation of assessable waste from this facility.

In the UK, the services of Cawleys have been contracted, which will be worked with to achieve the goal of recycling 70% of the waste generated (all of which are managed at the airport itself).

On the other hand, waste management is carried out in Brazil in compliance with the National Solid Waste Policy (PNRS), a Federal Law that establishes a set of guidelines and environmental management objectives that must be achieved throughout the national territory, among which the importance of selective collections at the Company's 6 airports applies. Therefore, in Brazil, the following priorities have been established in waste management: non-generation, reduction, reuse, recycling, solid waste treatment and final disposal, which is done in an environmentally appropriate manner.



2.6.5. Waste Indicators

Generated waste (GRI 306-3), waste not destined for disposal (GRI 306-4) and waste for disposal (GRI 306-5)[119]

	2020				2021				2022			
	Spain	United Kingdom	Brazil	Consolidated Total	Spain	United Kingdom	Brazil	Consolidated Total	Spain	United Kingdom	Brazil	Consolidated Total
Hazardous (t)	301	12	42	**355**	440	13	82	**535**	730	20.8	29	**779.8**
Valorized (t)	162	10	-	**172**	332	12	-	**344**	354	20.8	-	**374.8**
Valorized (%)	54%	83%	0%	**48%**	75%	92%	0%	**64%**	48,5%	100%	0%	**48.1%**
Eliminated (t)	139	2	42	**183**	108	1	82	**191**	376	0	29	**405**
Eliminated (%)	46%	17%	100%	**52%**	25%	8%	100%	**36%**	51,5%	0%	100%	**51.9%**
Non-hazardous (t)	59,656	860	489	**61,005**	21,631	587	1,227	**23,445**	35,433	1,619.2	1,545	**38,597.2**
Valorized (t)	51,882	415	-	**52,297**	13,858	358	57	**14,273**	26,982	1,619.2	37	**28,638.2**
Valorized (%)	87%	48%	0%	**86%**	64%	61%	5%	**61%**	76,1%	100%	2.4%	**74.2%**
Eliminated (t)	7,774	445	489	**8,708**	7,773	229	1,170	**9,172**	8,451	0	1,508	**9,959**
Eliminated (%)	13%	52%	100%	**14%**	36%	39%	95%	**39%**	23,9%	0%	97,6%	**25.8%**
Total	**59,957**	**872**	**531**	**61,360**	**22,071**	**600**	**1,309**	**23,980**	**36,163**	**1,640**	**1,574**	**39,377**

In 2022, the total non-hazardous waste generated amounted to 38,597.2 tonnes, higher than in the previous two years, due to the increase in the volume of air traffic and normalisation to pre-pandemic levels. However, it should be noted that in Spain a percentage of non-hazardous waste recovery was achieved equal to 76% and 100% in the case of London-Luton airport for both NHW and HW.

During 2022, 74.5% of the non-hazardous waste has been recycled/valorized (61% in 2021).

[119] In order to account for the total amount of waste generated at Aena by type as well as the recycling percentages, the data reported by the different units and airports that are stored in the database of the Aena Certified Integrated Quality and Environmental Management System (SGI). This database allows to compile information on the amount of waste generated by differentiating in more than 30 different types of waste and its degree of valorization by distinguishing whether it is estimated that more than 90% is valorized, between 20% and 90% or less than 20%. It also records the user who has recorded the data and the date it was updated. Likewise, Aena has an internal procedure in which, for all primary data related to waste, the unit, department or area involved and the person responsible and periodicity of the report are specified. In the specific case of the primary data necessary for the preparation of the Non-Financial Information Statement, the aforementioned procedure establishes that the data report is made in January of each year for the data corresponding to the previous year and on a monthly basis.
In the United Kingdom, all waste is managed at the facility (except for those for airlines), while in Brazil, this information has been obtained through the measurement reports that waste managers submit monthly, and that contain all the information related to the removal of waste from airports by type of waste..

3. Commitment to society and human rights (GRI 2-22; 3-3)

Principles that drive social sustainability	Aena's commitment to Human Rights	Impact of the activity on society and the environment
Contribute to and be a direct participant in the socio-economic development of the communities in which the Company operates. Protection of human rights. Creation of shared value, linked to the business model. Collaboration with local and national entities and actively participate in the social development of the immediate context. Acts of international cooperation. **The Aena Strategic Plan aims to triple the amount allocated to social action initiatives by 2026 compared to 2019. And 1% of net profit by 2030.** **Specific line on involvement in the community included in the Responsible Business Strategy at London-Luton Airport.**	Human rights policy. Modern Slavery Statement in the UK. Code of Conduct, Sustainability Policy. Implementation of the human rights due diligence process. Complaint and reporting mechanisms. Corporate culture. Opposition to child labour and forced labour.	Creating jobs. Improving social integration. Promoting local businesses. Economic value generated and distributed. Tax contributions. **Three main areas of action:** Human rights. Sponsorship and social action. Education and research. Specific initiatives, goals, and indicators aligned with business objectives.

Main areas and initiatives of social action in 2022

More than €3,230.490€contributed to foundations and non-profit organisations in 2022

Aena with music.
Aena with research.
National Alliance for Zero Childhood Poverty of the High Commissioner against Childhood Poverty.
Donations and assistance to organisations.
Commitment and platform for voicing social concerns.
Guided tours and familiarisation days.
Environmental actions of a social nature.

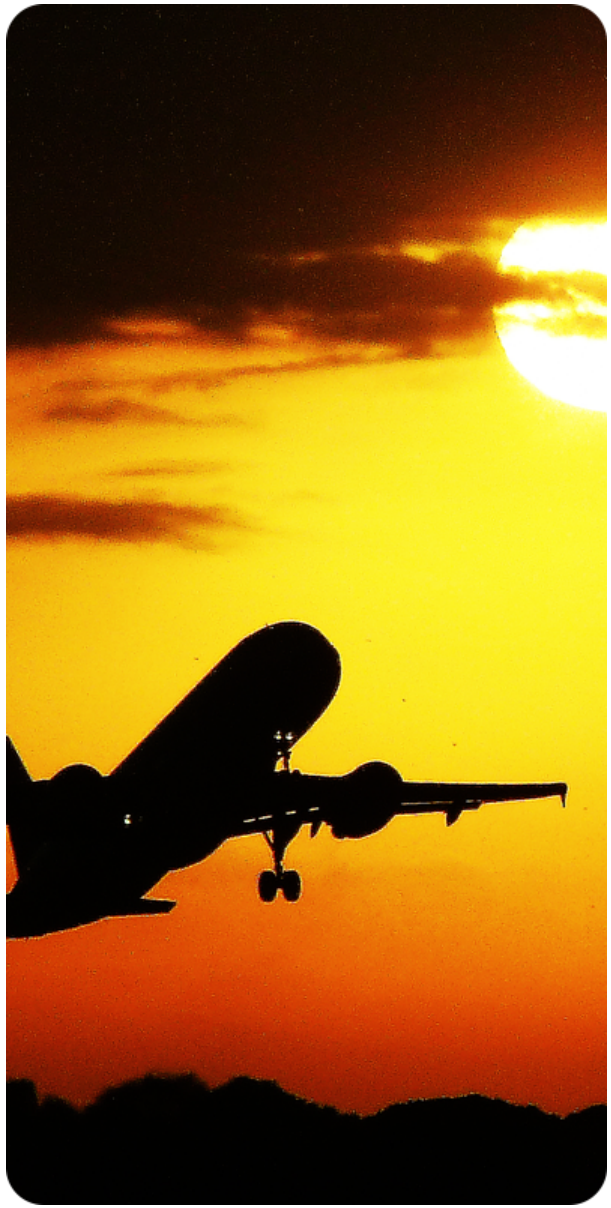
Volunteering actions.
Donations to the community (Community Trust Fund) in the UK.
Charitable Partners at London-Luton Airport – Corporate Solidarity.
Customer donations.
In Brazil, assignment of land to families for agricultural use.

Areas that support social action
Synergies:
Social innovation.
Transparency.
Training and employment.
Healthy lifestyle.
Support for social causes.

Research, education and innovation.
Emergency flights.
Commitment to the environment.
Corporate responsibility best practices.
Inclusion.
Workforce integration.
Equality and accessibility.

Commitment to SDGs





3.1. Commitments to sustainable development and society

(GRI 2-23; 2-28; 2-29; 3-3; 413-1)

Aena establishes its commitment to social sustainability and socio-economic development of the companies with which it operates in its Sustainability Policy, applicable to Aena in Spain and to any of the companies integrated in its group.

This commitment is implemented through the corresponding sustainability strategies, which adapt to the social realities of each country to effectively respond to local needs [120].

In this regard, Aena's Strategic Plan recognises social sustainability and community relations as one of its key aspects and incorporates ambitious objectives in the field. Among these, is the goal to triple the amount destined for social action initiatives by 2026 relative to 2019. And to bring this up to 1% of net profit by 2030.

In Spain, the Sustainability Strategy 2021-2030 includes the 'Relationship with the Community' line of action aimed at creating shared value and contributing to the economic and social development of the companies with which the Company operates[121]. To this end, three axes of action have been defined, aligned with the business model, which revolve around the promotion and respect of human rights, patronage and social action and the promotion of education and research.

For each of these actions, a number of goals and indicators and a specific budget have been established. All of this is aimed at facilitating and ensuring the measurement of the social impact generated, and reinforcing mechanisms of transparency and accountability.

In the UK, London-Luton Airport has approved its Responsible Business Strategy for the period 2020-2025, which is aligned with the Sustainability Strategy. Part of its social action programme, the following three lines of action are included: Health in the present times, training for the future and poverty relief. The main objective is to create a positive impact locally.

For the implementation and development of the various actions, both in Spain and the United Kingdom, collaboration are entered into with other institutions, both public and private.

Within the framework of the Responsible Business Strategy, a number of objectives and indicators have also been established, which are useful for measuring the impact generated.

Additionally, Aena adapts its social sustainability actions to the needs of socio-economic reality, in order to respond to new social challenges.

[120] At Aena airports in Brazil, although a Sustainability Strategy of their own is not yet available, they do carry out activities of this nature.
[121] The applicable mechanisms of control, monitoring, supervision and governance are those defined in the Sustainability Strategy (see Chapter 1).



Contribute and be a direct participant in the socioeconomic development of communities

- Promote social action activities in collaboration with various public and private institutions with the objective of proposing social action aligned with the business strategy, which contributes to its consolidation and response to the requirements of all stakeholders, especially local communities, while also promoting their socio-economic development



Anticipate social trends focused on the protection of human rights and disadvantaged groups

- Provide value in the geographical areas in which the Company operates, promoting participation in communities, promoting integration in the territory and contributing to the social well-being and improvement of people's quality of life, to promote, among others, education, employment, cultural wealth, health, research and inclusion of the most disadvantaged groups.

Principles that support social sustainability at Aena



Create shared value

- To support the adhesion of the Company to projects or initiatives of proven reputation and credibility that, both nationally and internationally, are intended to promote responsible practices in business organisations and sustainable development, as well as to adopt and disseminate the principles emanating from these initiatives.



Collaborate with local and national entities and actively participate in social development of the immediate context

- Foster innovation and continuous improvement, taking the Company's strategy as a lever for development.
- Establish channels of communication, participation and dialogue with stakeholders and adhere to responsible communication practices.

LINES OF ACTION FOR THE COMMUNITY RELATIONS PROGRAMME

The organisation assumes its responsibility as agent and force for change, as a key element for collaborating and improving the lives of people.
And this task becomes tangible through the implementation of specific actions. Aena shares values with the community and the surrounding environment, and contributes to the common development and progress of all.

SPAIN			UNITED KINGDOM	
Human rights "To have the appropriate mechanisms to identify, prevent, mitigate and account for how they address their impact on human rights"	**Sponsorship and social action** "To support vulnerable groups in order to guarantee their inclusion in society, providing them with facilities for their development, as well as providing them with tools to achieve greater visibility of the social causes defended"	**Education and research** "To contribute to the generation of economic activity and employment in the community by transferring knowledge and support in local business activities""	**Health in the present times, training for the future and poverty relief**	↑
Implementation of the human rights due diligence process	Vulnerable groups	Aena with research	• Annual contribution of €150,000 per year to the community fund. • Promote employee collaboration campaigns for fundraising (Nómina Solidaria). • Support for local and regional initiatives • Training and skills development programme for local schools. • Promoting volunteering.	**Communication with stakeholders**
Value chain	Social environmental projects	Knowledge transmission		
Corporate culture of human rights	Assigning spaces	Supporting impactful entrepreneurship		
• Synergies. • Social innovation. • Transparency. • Training and employment.	• Value chain. • Voluntary. • Commitment to the environment • Corporate responsibility best practices.	• Workforce integration. • Equality and accessibility. • Zero tolerance to violence • Human rights. • Art, music and culture.	• Healthy lifestyle. • Support for social causes • Research and innovation. • Inclusion. • Diversity.	↓

3.1.1. Social action: Contributions to foundations and non-profit organisations

(GRI 203-1; 413-1)

To ensure the effective development of its social actions, Aena collaborates with public and private institutions of a diverse nature, in order to create shared value, in line with the principles that underpin Aena's Sustainability Policy and the strategies approved in each country.

In Spain, it is worth noting the collaboration with institutions of relevance in the field of sustainability such as: the United Nations Global Compact, of which Aena is a signatory; Forética; Fundación Seres; Initiative of companies for a society free of gender-based violence; Community for Climate; Manifesto for a sustainable recovery; and the Alianza País Pobreza Infantil Cero against child poverty[122].

In addition to the above, in 2022, actions of a social nature have been carried out, some of a continuous nature and others focused on responding to the needs arising from the new context. These actions have consisted of both financial and in-kind contributions.

- Among the monetary and ongoing contributions in Spain, it is worth noting those under the Aena with Music programme, through collaboration with reference entities for the promotion of music and culture (Fundación Teatro Real, Fundación Pau Casals, Fundació del Gran Teatre del Liceu and the Taller de Musics Music School).
- In 2022, the collaboration with the Spanish Confederation of Autism ended, aimed at improving the accessibility of airports for people with ASD.
- On the other hand, in order to help alleviate the humanitarian crisis of Ukrainian displaced people, various contributions have been made – some with the collaboration of employees under the solidarity contribution scheme Nómina Solidaria – such as collaboration with UNHCR and other specific ones, such as that made to Airlink in coordination with other members of ACI Europe.
- Likewise, and in line with the main purposes of the Sustainability Strategy, social environmental collaborations have been initiated through the Saving the Amazon Foundation.
- In the UK, London-Luton Airport has maintained its economic contribution to the Community Trust Fund, through which funds are managed for the benefit of the 7 surrounding communities. In addition, the workers have chosen the Luton Food Bank and East Anglian Air Ambulance service as entities to fund in a shared manner between the Airport and the workers. Smaller one-off contributions are also made to other local organisations and initiatives.

The amount allocated to foundations and non-profit organisations amounts to more than €3,230,490 (€3,032,521.64 in 2021) of which €2,883,405.75 correspond to Spain and more than €347,000[123] to London-Luton Airport.

As for in-kind contributions, 2022 has been marked by the possibility of resuming actions there were paralysed in previous years as a result of COVID-19.

- Thus, in Spain, the programme for solidarity spaces, the conduct of guided tours of airports, the installation of exhibitions, the collection of food and toys for vulnerable groups and the Vacation in Peace programme, among others, have all resumed.

The social support programme has also been continued through awareness-raising and enlightenment campaigns to commemorate International Days and other causes. In addition, free flights have been promoted for people displaced by the conflicts of Syria and Ukraine.

All of them have been developed in collaboration with various organisations and social entities.

In the terminals of Spanish airports, more than 3,055 m2 are allocated to solidarity spaces, in order to give voice to social entities, and 7,970 m2 dedicated to cultural exhibitions, assuming an in-kind contribution of more than €517,548 in 2022[124].

- Corporate volunteering initiatives have been developed in the UK. In addition, also due to the crisis in Ukraine, an information centre was made available to provide assistance to refugees, in collaboration with other institutions. School visits have resumed.

At London-Luton Airport, employees have the opportunity to enjoy two working days for volunteer work

In Brazil at the Joao Pessoa Airport, 50 families have been able to benefit from the allocation of land for agricultural use, contributing directly to local and economic development.

[122] Details of the agreements and collaboration agreements signed by Aena can be found on the corporate website. See chapter 'Links of interest'.
[123] Closing exchange rates used for balance sheet accounts: EURvsGBP= 0.88693.
[124] This type of contributions are not made in the United Kingdom and Brazil. Likewise, this information is not available for 2021.

Main areas and initiatives of social action in 2022

Aid given to people displaced by the Ukraine crisis

In 2022, numerous actions have been carried out to help those affected by the humanitarian crisis in Ukraine, in coordination with public and private institutions.

- Contributions of €25,000 through the campaign that ACI Europe has launched to help in the humanitarian emergency of Ukraine. The Crisis Airport Response initiative has been conducted in partnership with Airlink, a non-profit organisation specialising in channelling aviation sector expertise and resources in these types of crisis situations.

- Collaboration with the Spanish UNHCR Committee on the 'Ukraine Humanitarian Emergency Project'.

- At several Spanish airports and the London-Luton Airport in the United Kingdom, lounges have been allocated to welcome, serve and support displaced people from Ukraine.

- Additionally, in some Spanish airports, solidarity spaces have been set up to inform about the country's situation, which has also been disclosed through internal communication channels, while building facades have been illuminated with the Ukrainian colours and food and toy collection campaigns have been carried out.



Nómina Solidaria – employee solidarity contributions

Within the framework of the humanitarian crisis in Ukraine, Aena employees in Spain have collaborated with UNHCR to support their work. Through it, this social entity provides assistance to people who have been forced to travel, both inside and outside the country itself, ensuring that everyone has asylum and finds safe haven.

Donation of €100,000 (€42,810 from employee donations and €57,190 contributed by Aena)



Social support and contributions to extreme events

In response to its commitment as a public service, Aena has collaborated on several occasions during 2022 in the management and coordination of air emergency resources displaced to different locations in Spain (Tenerife, Logroño and Pamplona) for smothering fires that have affected different municipalities.

Aena with music

Sponsorship and collaboration programme to support the training of young artists and groups at risk of exclusion, promoting talent and bringing music closer to airports, in collaboration with the Fundación Teatro Real, the Fundación Pau Casals, the Fundació del Gran Teatre del Liceu and the Taller de Musics Music School.

Aena with autism

In 2022, the collaboration with the Confederation of Autism Spain to improve the accessibility of people with ADS has ended. As a result, various materials have been produced to facilitate cognitive accessibility of people with autism and the friendly use of airport infrastructures. Materials are available on the Aena website.

National Alliance for Zero Childhood Poverty of the High Commissioner against Childhood Poverty

Aena joins this initiative, which aims to change the situation of child poverty in Spain by fostering joint participation with administrations, companies and foundations and the tertiary sector to achieve a country that provides equal opportunities to all citizens and breaks the circle of child poverty.

Promoting volunteering

In Spain, through internal communication channels, Aena has promoted among its employees the support of social causes, giving voice to the experiences of workers or specific volunteering initiatives organised by different organisations.

Likewise, the F.G.L. Granada-Jaén Airport and the Hospital Universitario Clínico San Cecilio in Granada collaborate through the volunteer project 'Flying Together', in which a group of volunteers from this airport, together with the collaboration of the firefighters of Granada and the collaboration from Civil Protection, try to make the children's stay in the hospital more convenient for a few hours.

In the UK, the London-Luton Airport has developed corporate volunteering initiatives. As an example, in support of the Queen's Green Canopy, more than 70 employees have collaborated in planting more than 400 trees along with local partners for 3 days.

Commitment to social and cultural causes: Assignments of spaces

-Participation in the lighting of facilities and buildings in the commemoration of International days: Rare Diseases, Women's, Autism, Dyslexia, Breast Cancer or Elimination of Violence Against Women, Earth Hour, etc.

-Dissemination of social causes to all employees through internal communication channels.

- Allocation of space for the display of exhibitions of various kinds at some of the airports in the network, in collaboration with social entities or recognised artists.

- Allocation of solidarity spaces to social entities to give a platform to NGOs and help them in the dissemination of social causes.

Guided tours and familiarisation days

Guided tours at Spanish airports and at the London-Luton Airport in the United Kingdom aimed at different groups. These include high school, vocational and university students, youth in employment programmes and children with special needs, as well as professionals from various sectors or entrepreneurs participating in local forums.

Some airports have also resumed the traditional days of open doors for Aena staff and their family members.

Healthy life and support for beneficial causes

Aena combines sport and charitable causes supporting sports and events for social purposes.

Aena against misogynist-motivated violence

Aena has signed an agreement with the Ministry of Equality for setting up Violet Points, dedicated to creating safe and informational spaces for women in the face of harassment in modes of transport. These actions are complemented by awareness-raising actions, including building lighting, internal communications, etc.



Humanitarian flights

In Spain, a total of 13,902 ambulance flights have been carried out (compared to 11,050 last year), to respond to emergency situations and the transfer of organs and medical equipment.
In Brazil, Aena has entered into a Technical Cooperation Agreement with the Ministry of Health, aviation authorities and airport operators to eliminate the payment of airport charges on the ambulance flights included in the agreement.



Vacation in Peace programme

Several airports in the network – including: Valladolid Airport, Bilbao Airport, Seville Airport, Vigo Airport, Tenerife Sur Airport, Tenerife Norte-Ciudad de La Laguna Airport, Gran Canaria Airport, Fuerteventura Airport, César Manrique-Lanzarote Airport, La Palma Airport, Barcelona-El Prat Josep Tarradellas Airport, Alicante-Elche Airport and Málaga-Costa del Sol Airport – have welcomed children from the Sahara up to 12 years of age, activating their devices to help organisations promoting the Vacation in Peace initiative (allocation of spaces, etc.).

Environmental actions with a social nature

- Aena has partnered with the Saving the Amazon Foundation to plant more than 10,000 native trees in the Porto Extrema region (Brazil), with the aim of contributing to the restoration and protection of the Amazon and the fight against climate change.

  Through the 'Aena Forest' project, the company has agreed to plant a tree for each of the employees of the Aena Group (which includes Aena workers in Spain, Brazil and the United Kingdom).

  Local indigenous communities will be responsible for planting and caring for the trees, which will contribute to the economic and social development of those communities.

- Cleaning up waste in the Mediterranean Sea: 10 employees of Palma de Mallorca Airport collaborated with the collection of waste in the area of Port Adriano and Malgrat Islands on the MareNostrumDM22 day.

London-Luton Airport

- Volunteers of the Airport: support given to the Queen's Green Canopy, more than 70 employees have collaborated in planting more than 380 trees along with local partners for 3 days
- Donations to the community (Community trust fund)
- Sponsor and member of Community Interest charity & awards
- Sponsor and member of Love Luton charity & awards member
- Collaboration with educational centres (Connect programme)
- Collaboration with The Prince's Trust and The Launch Group to offer youth the opportunity to acquire skills, tools and a first work experience.
- Collaboration with Luton Food Bank and East Anglian Air Ambulance organisations through fundraising

Aena in Brasil

Fifty families have been able to benefit from the allocation of land for agricultural use at Joao Pessoa Airport, contributing directly to local and economic development.

Donations

- Valencia Airport has made a donation of €5,000 to Cáritas de Manises and the Empar Project, giving €2,500 to each. Both Cáritas de Manises and the Empar Project Association will allocate the donated money to help people in need and to achieve their projects, including education, supported employment and inclusive leisure activities, among others. The amount donated comes from money found at the airport in 2019 and not claimed.
- Salamanca Airport is collaborating with the Grand Food Collection organised by the Food Bank.
- Fuerteventura Airport has joined the Red Cross toy and food collection campaign for Christmas. An initiative that aims to make it possible for all boys and girls between the ages of 0 and 16 to have a new, non-warrior, non-sexist toy as a Christmas gift

3.2. Impact of the activity on society and the environment

(GRI 2-28; 3-3; 413-1)

3.2.1 Creating social value

(GRI 203-1; 203-2)

Generation of resources in the community (social cash flow)
(GRI 201-1)

Creating jobs	Improving social integration	Promoting local businesses	Economic value generated and distributed	Tax contributions
9,230 employees. more than 87.7 million jobs worldwide generated by the air transport sector. 23 current agreements: 15 with universities (public and private), 4 with study, training or business centres and 4 with business schools, allowing that 69 bachelor's and master's degree students and 11 vocational training students have completed curricular or extracurricular internships in 2022 in Spain [125]	1.53% of people with functional diversity in the workforce Support sessions for entities that carry out integration into the labour market initiatives and job creation campaigns for persons with disabilities: €90,000 per year. Collaboration with third sector organisations to promote the integration of people with special needs (Spanish Autism Confederation, CERMI, etc.). PRM service at airports (almost 1,826,864 people assisted in 2022)	Aena Venture: programme for accelerating ideas for financing and implementing pilot projects. Contracting local suppliers (local employment): • 99.54% in Spain • 53% in the United Kingdom • 100% in Brazil	€4,237.5 million in economic value generated (revenue) (€2,393.3 million in 2021). €514.6 million Staff costs (€459.8 million in 2021).	This has amounted to €526.5 million. • €469 million in Spain (89.1%). • €32.5 million of taxes paid in the United Kingdom (6.2% of the total). • 24.9 in Brazil (4.7%). Taxes borne: €455.7 million.

Aena's activity generates a social and economic impact in the countries where it operates, which can be measured in quantitative and qualitative terms, playing a key role in terms of territorial cohesion and connection. These include:

[125] Of which 30,000 were generated by airport management.
Source: ATAG. COVID-19 analysis fact sheet, ed. Sept. 2021. See chapter 'Links of interest'.

- The generation of direct and indirect jobs, derived from the activity carried out by Aena, the infrastructure and transportation sector, or by third parties. As well as employment at the local level. In this regard, it is worth noting Aena's participation in both Spain and the United Kingdom at local job fairs and in the work of disseminating vacant positions through various platforms.
- The positive impact generated through responsible tax contributions[126].
- The training of future industry professionals.
- Social integration actions. For example, in the UK, London-Luton Airport supports the training of children and the employment of unemployed youth, through the Prince's Trust organisation.
- Promoting social innovation initiatives and supporting pilot project development.

Luton City Hall recognises London-Luton Airport as one of the area's leading employers and disseminates vacancies at the airport and its concession companies on its website.

- Promotion and assistance in the recovery of the tourism sector and the local environment, developing an effective social contribution. As an example, in Spain, various institutions collaborate for the promotion of tourism, through regular participation in specific meetings (for example, FITUR) and signing agreements with public bodies. As a result of these, offices have been installed at the airports for the promotion, information and service for tourism or local products.

Social impact indicators (GRI 201-1)	2021 (Millions of €)	2022 (Millions of €)	Notes
A. Direct economic value generated (revenue)	2,502.5	4,237.50	
B. Economic value distributed	-3,535.6	-3,632.52	
Operating costs	-2,748.4	-2,439.23	Total expenses, except staff costs
Wages and employee benefits	-459.8	-514.59	Staff costs
Payments to capital providers	-39.4	-149	Financial results and payment of dividends
Government payments (by country)	-285.0	-526.50	Tax contributions
Investments in the community	-3.0	-3.20	Contributions to foundations and non-profit organisations
C. Economic value retained	-1,033.1	604.98	C=A-B

[126] See section 'Tax strategy' in Chapter 1. Business Model.

3.2.2. Impact on local populations and on the territory

(GRI 2-29; 203-1; 203-2)

Aena provides essential service in terms of territorial mobility, cohesion and co-ordination at the local level, acting as a catalyst for socio-economic development in the regions in which it operates, while in turn being a key actor of tourism and transportation.

- **Promoting sustainable mobility**, through the support of more sustainable transport alternatives and intermodal travel, which contribute to the reduction of travelling and waiting times, resulting in energy savings and reduction of emissions.

  In Spain, in collaboration with other organisations, progress continues to be made in promoting infrastructures that have fast, efficient and sustainable accesses and that are integrated with other modes of transport, especially public transport, improving accesses, urban planning and the combination with other infrastructures. In the last decade, access to airports by private vehicle has been gradually reduced, increasing the use of public transport.

  At Adolfo Suárez Madrid-Barajas Airport, a new terminal for regular-line and discretionary-transport buses has opened in T4. In addition, the first steps of the project have been taken that contemplates the connection of the high-speed network – in standard width – with Terminal 4 of Barajas

  In the United Kingdom, the 'Airport Surface Access Strategy for 2018-22' is available, which promotes the use of sustainable transport by both passengers and workers.

- **Conduct periodic air mobility surveys (EMMAs)**, aimed at passengers, to know the type of user, reason for travel and mode of access to the airport. In 2022, airport workers are also involved, in order to detect specific needs and promote sustainable mobility.

- **Application of insularity criteria for airport charges** in the Canary Islands and Balearic Islands to promote territorial cohesion and guarantee access to a fundamental means of transport for inhabitants of island areas.

- **Establishment of new discounted routes and development of hub airport,** to enhance the connectivity of the aviation sector between the main cities of the world.

- **Master plans and environmental impact studies**[127]. Aena conducts environmental impact studies of its projects. These studies, which are publicly accessible, are made available to the different stakeholders for their consultation and opinion, guaranteeing their participation in decision-making. In this way, Aena prioritises in its actions the care and expectations of the environment and local communities, including specific analyses on the impact that infrastructure and airport activity have on the environmental and social environment and adequately ensuring the channels of public information and participation.

  Sustainable coexistence with society and the environment requires considering, where necessary, the assessment of specific measures and proposals for urban regeneration to avoid any negative impact arising from the execution of works or the development of new projects (for example, the environmental resolutions of the Environmental Master Plans can be consulted[128]).

- **Collaboration with third parties to improve the airport environment. In the United Kingdom**[129], projects with direct benefits are promoted locally, carried out by non-profit organisations and community groups, contributing to the sustainable development of the nearest environment and their communities.

- **Promote SmartCities & SmartAirports in property developments**, in collaboration with various municipalities. The objective is to generate information exchanges between airports and cities, in such a way as to improve the traveller's experience, enhance synergies through their information systems and thus advance towards the smart airport and the smart city of the future, promoting the coordinated action of the airport with its surroundings – city or adjoining cities – and improving sustainable development actions. . In this sense, the Airport City of Adolfo Suárez Madrid-Barajas[130] is taking its first steps and has completed, by tender, the process of selecting a partner for the incorporation of a joint venture (a Corporation) with Aena, under the terms detailed in the tender itself, which will be destined for the logistics activity.

Operations with significant negative impacts

(GRI 2-6; 413-2)

Communities near airports can be affected by aircraft noise, one of the most significant impacts of airport activity, and which primarily affects the areas bordering the facility. Acoustic impact mitigation and limiting its impact on local communities is a strategic objective, as reflected in the Sustainability Strategy in place.

Chapter 2 of this report describes the short- and medium-term objectives, the resources and mechanisms used

[127] The directive programmes are airport planning documents that define the major guidelines for airport management and development and describe the actions that should be carried out to ensure they adapt to the demand expected in the short, medium and long term, while at the same time maintaining an adequate level of service to customers and users in general.
[128] See chapter 'Links of interest'.
[129] See chapter 'Links of interest'.
[130] See chapter 'Links of interest'.

and the actions carried out in the area of Sound Insulation Plans (SIPs). In addition, in section "3. Risks and their management" of the chapter "2022: A year of hope", also addresses the mechanisms developed to minimise other potential negative impacts that may be associated with airport management.

Promotion and conservation of historical-artistic and archaeological heritage

Aena actively participates in the recovery and conservation of the historical-artistic and archaeological heritage, related to its infrastructures and its environment.

In the environment of Ibiza Airport, since 2017, Aena has carried out conservation works of archaeological heritage resulting in the protection of more than 100,000 m2 and the recovery of more than 200,000 historical fragments[131]. For this purpose, more than €4 million has been invested.

The work carried out has culminated with the opening of the exhibition 'Ibiza, a meeting point since ancient times' at Ibiza Airport in 2022.

For its part, in Brazil, Aena has launched two initiatives related to the promotion of historical heritage. On the one hand, work has begun in the process of protecting and preserving two state-owned panels with paintings by the artist Lula Cardoso Ayres, protected by the historical heritage of Pernambuco, located inside the former terminal of Recife Airport. On the other hand, there is a collaboration with the Municipality of Recife for the restoration of the Plaza Salgado Filho (Receife Airport), designed by architect Burle Marx and considered a federal artistic heritage.

International cooperation

In 2022, several international cooperation initiatives were carried out.

On the one hand, through collaboration with the Saving the Amazon Foundation, it has participated in a social environmental initiative (see section '3.1.1. Social Accion').

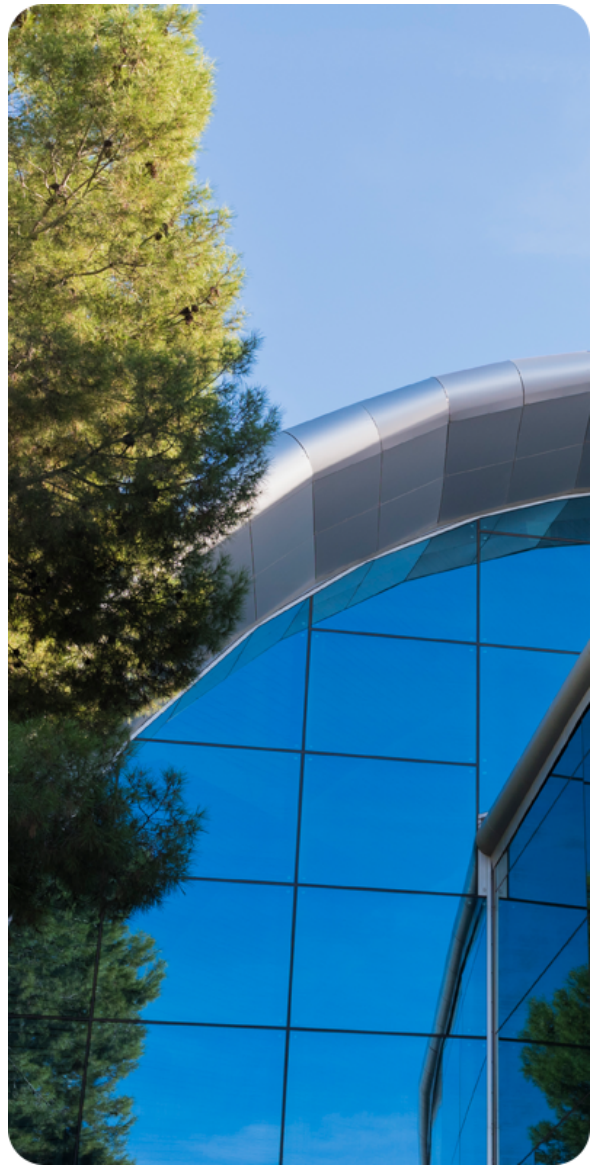
On the other hand, Aena's International Cooperation Programme is composed of a set of training activities aimed at aeronautical professionals, mainly from the Ibero-American public sector, focused on improving the training of participants in aeronautical matters, and thus enhancing the development of their countries.

All the activities carried out in the framework of this programme are conducted in collaboration with national and international organisations, and institutions of renowned prestige, such as the Spanish Agency for International Development Cooperation (AECID), a body affiliated with the Ministry of Foreign Affairs, European Union and Cooperation, the Technical Cooperation Bureau of the International Civil Aviation Organisation (ICAO), and the School of Aeronautical and Space Engineering at the Technical University of Madrid (UPM), as well as other institutions.

In this way, the programme also contributes to consolidating the reputation of Spanish industry and its hallmark of excellence, as well as showcasing Aena's best practices abroad.

In 2022, this Programme continued in maintaining the virtual format of all the training activities carried out (specific training course and seminars). In this way, 170 air transport professionals from several countries have been involved, for which more than €52,000 has been allocated (compared to 212 participants and €76,800 in 2021).

Over the past five years, the International Cooperation Programme has contributed to the training of 848 aviation professionals from 21 different countries. For this, €540,000 has been invested.



[131] Currently deposited at the Archaeological Museum of Ibiza and Formentera.

3.3 Human Rights

3.3.1. Formal commitment to Human Rights

(GRI 2-23; 2-24; 3-3)



Aena's commitment to fundamental conventions regarding human rights

International Charter of Human Rights
Declaration of the International Labor Organization (ITO) and the eight fundamental conventions that supplement it
Children's Rights and Business Principles
Adhesion to the Principles of the United Nations Global Compact
United Nations Guiding Principles on Business and Human Rights
Tripartite Statement of Principles for Multinational Enterprises
National and International Standards and regulations in force in the countries where it operates
National constitutions and laws that recognise or enforce human rights
Sustainable development goals
ILO Social Policy
Lines and Guidelines for Multinational Enterprises

Main impacts of Aena's activity on Human Rights and Labour Rights	Principles of the UN Global Compact
Occupational health and safety of people	1, 2
Equality and non-discrimination	1, 2, 6
Decent work	3, 4, 5, 6
Child labour	5
Protection of the environment	7, 8, 9
Commitment to customer/suppliers	8, 10
Freedom of association	3
Ethics and integrity	10

As a signatory to the United Nations Global Compact, Aena expresses its intention and undertakes to support, develop and defend the Ten Principles of Human Rights, Labour. Rights, the Environment, and the fight against corruption. In the same way, it incorporates the Global Compact in its corporate strategy, corporate culture and conduct by means of concrete proposals.



Aena formalises its commitment to human rights, at the highest level of the Organisation, through the Human Rights Policy, approved by the Board of Directors in 2019 and updated in 2022.

This Policy taken the following as a reference, among others: the principles set out in the International Charter of Human Rights, the United Nations Global Compact, the Guiding Principles on Business and Human Rights, the Sustainable Development Goals, the Convention on the Law of Children, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, the eight core conventions that complement it, the Tripartite Statement of Principles for Multinational Enterprises and the Lines and Guidelines for Multinational Enterprises, as well as national constitutions and laws that recognise or apply human rights.

In 2022, Aena has updated its Human Rights Policy, in line with the main frameworks.

With it, Aena establishes the main commitments and specific principles of the Organisation in human rights, which may affect its work practices, the services offered and its relationship with the environment and the community. It also includes the Company's commitment to disseminate the Policy throughout its value chain, encouraging its suppliers, contractors, business partners and other collaborating companies to formalise their commitment to Human Rights and, in the event that they do not have their own policy, to sign up to that of Aena. Finally, it lays the foundation for ensuring proper development, supervision, control and review.

The Organisation's commitment to human rights is also formalised through other internal standards and tools, including the Code of Conduct, Sustainability Policy and the Modern Slavery Statement in the UK[132].

[132] Internal policies and standards are available on the Company's website. See section 'Links of interest' in the section 'About this report'.

Aena principles and commitments to Human Rights established in the Corporate Policy on Human Rights

Employ and promote a respectful and dignified work environment	Promote Equal Opportunity, Diversity and Non-Discrimination
No tolerance for forced labour, illegal trafficking and human trafficking or modern slavery in any form	Facilitate freedom to joint labour unions, associations and collective bargaining
Promote the development of people	Fair and Equal Remuneration
Right to rest and take time off and the right to family and personal life	Protecting the health and safety of people, the right to life and freedom
Respecting the rights of minors and rejection of the use of child labour	Right to freedom of opinion, information and expression, as well as data privacy and private life
Secure, excellent and quality service	Relationship with customers based on the principles of transparency, privacy, confidentiality, freedom of expression and non-discrimination
Maintaining safety and rights in communities	Contribute to environmental protection and reduce environmental footprint
Contribute to maintaining honesty and integrity, ethical and good relationships and good tax practices, and rejection of corruption and anti-competitive practices	

Aena's other principles and commitment to Human. Rights.

The Sustainability Policy includes among its principles that of respecting and promoting internationally recognised fundamental human rights (union freedom, right of association and collective bargaining, nonexistence of child labour, elimination of forced or mandatory labour, etc.), declaring the absolute opposition of the Company to modern slavery and human trafficking, and any other practice that may imply a violation of individual or collective dignity.

Specifically, in the United Kingdom, the London-Luton Airport has a Statement that rejects any form of slavery or forced labour, a Policy of Ethics in Business and a Code of Conduct that includes, among its basic principles, respect for the human rights of all company employees.

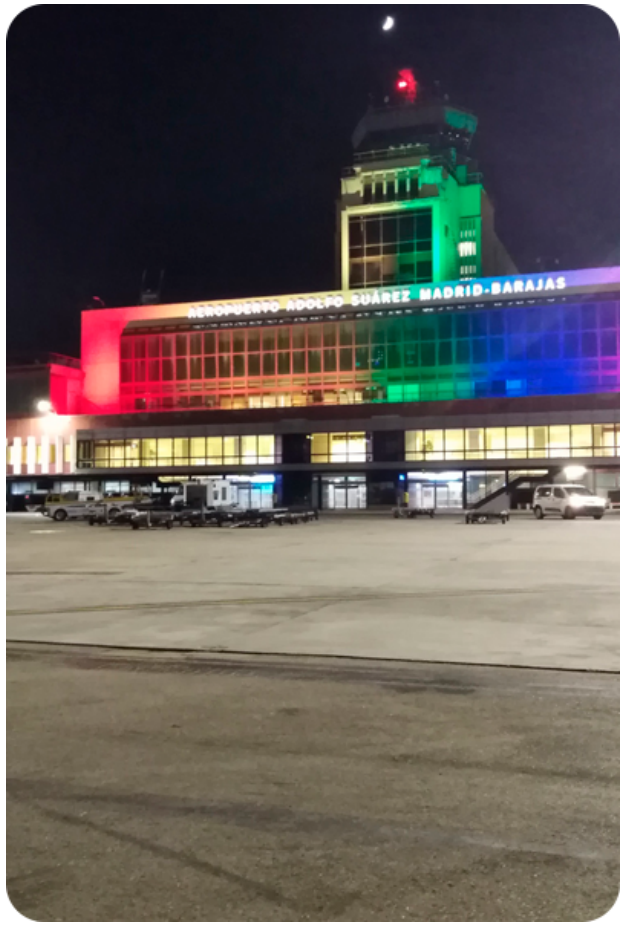
It also works to renew its Ethical Business Policy, in line with expanding its operations.

The Policy on Human Rights of Aena, is applicable to those companies in which Aena has a majority stake.

In both Brazil and the United Kingdom, Aena has a Code of Conduct for suppliers, which includes environmental and social aspects. In Spain, compliance with the applicable regulations guarantees the consideration of these issues.

To ensure its effective development, the action line "Community relations", included in Sustainability Strategy 2021-2030, establishes as a priority the development of a human rights due diligence procedure that allows to identify, prevent, mitigate and remediate its possible impacts on the subject, and make available to potential affected parties the appropriate grievance mechanisms. During 2022, Aena has made progress in its development and implementation.

During 2022, Aena developed a human rights due diligence procedure.



3.3.2. Human rights due diligence procedure

(GRI 3-3; 2-25)

During fiscal year 2022, the Organisation has developed its own human rights due diligence procedure, based on the 'protect, respect and remedy' pillars of the UN Guiding Principles and aligned with the frameworks and reference standards (see previous section).

This procedure lays the groundwork for facilitating the identification, prevention, mitigation, monitoring and remedying of possible adverse effects on human rights and the environment, related to the activity of Aena, that of its subsidiaries and its value chains.

For this purpose, within the same framework, the roles, responsibility and actions of the different areas of the Company involved are defined, as well as the methodology for identifying possible risks of violation, the need to adopt appropriate prevention and/or mitigation measures, if necessary, and the necessary provision of mechanisms for submitting claims about any violations.

The Sustainability and Climate Action Committee has the powers to inform, promote, guide and supervise the objectives, action plans, practices and policies of the Company in environmental and social matters, ensuring that such policies identify and include, among others, the principles, commitments, objectives and strategy regarding the respect of human rights

With the foregoing, Aena is reinforcing the tools already available in the Company that contribute, directly and indirectly, to avoiding possible risk of violation of human rights or the environment, and are developed within the framework of its system of regulatory compliance[133],risk management and control, integrated quality and environmental management and energy efficiency, prevention of occupational risks, information security and operational safety, among others[134].



[133] Among the control, prevention and monitoring mechanisms contemplated by the Compliance System, the following can be cited:

- Prevention control: responsibility of ensuring compliance by all members of the Organisation with the Company's internal policies and regulations, as well as identifying areas of improvement that allow for the implementation or correction of procedures as deemed appropriate.
- Action control: obligation to report any event that could constitute a possible criminal offence, legal breach or irregularity of which it becomes aware by means of the channels established for such purpose, including the Complaints Channel.
- Supervision control: with this task being carried out by the Compliance Supervision and Control Body and the Internal Audit Division.

[134] Consideration must be given to their appropriate adaptations in each country in which the Company operates.

Aena´s commitment to Human Rights

After formalising its commitment to human rights, Aena is evaluating and assessing any possible noncompliance, and seeking solutions to eradicate it.

Commitments	Due diligence	Defence mechanisms	Training and communication
Established in the Human Rights Policy and endorsed by other internal regulations	Identify, prevent, mitigate and respond to possible risks in the area of human rights	Internal and external complaints channel	Via internal and external channels

Commitments transferred to the value chain

Government and departments involved in the human rights due diligence procedure

Sustainability and Climate Action Committee
Appointments, Remuneration and Corporate Governance Committee
Corporate and Operational Departments
Audit Division
Legal Affairs and Regulatory Compliance Division
Innovation, Sustainability and Customer Experience Management
The staff of the Company's workforce

Identification and evaluation of risks in Aena and subsidiaries, risk prevention and mitigation measures

(GRI 3-3; 407-1; 408-1; 409-1)

The Human Rights Due Diligence Procedure outlines the methodology for assessing potential risks of human rights and environmental violations[135], based on the analysis of the probability of occurrence and the possible impact it would cause, if materialised.

For this purpose, based on the Human Rights Policy, after cross-checking with the frameworks and sources of reference, possible risks of violation associated with labour practices, the services offered, the impact on the environment and society and the activity of suppliers have been identified.

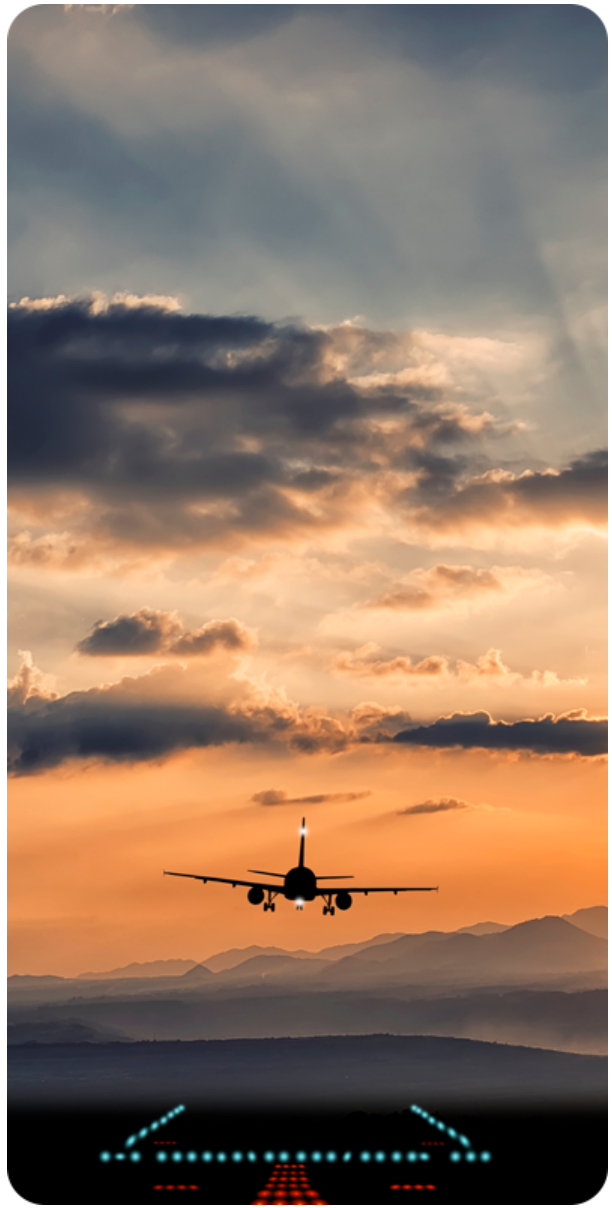
With this, and based on an analysis of external references and internal sources[136], the following could be evaluated:

- On the one hand, probability, based on the probability of the country, sector and the control environment.
- On the other hand, the impact, by assessing the scale or magnitude of the potential harm it would cause, the scope, and the remediability.

Having assessed the probability and impact of each potential risk of violation, the outcome of the assessment is then determined and analysed.

As a result, and by way of summary, the risk of possible human rights or environmental violations (including collective bargaining, forced labour or child labour) by Aena and its suppliers is generally is considered low as a result of, among other things, establishing formal commitments in the corresponding internal regulations (Code of Conduct, Human Rights Policy, etc.) and the prevention and control measures already implemented by the Organisation, in the different geographic areas in which it carries out its activities (the aforementioned management systems, mostly third-party certified, development of plans, tools, procedures, etc., which ensure its correct implementation, among others).

Notwithstanding the foregoing, and in order to reinforce the control and prevention mechanisms, it is proposed to develop a series of additional internal control measures in Brazil during 2023, mainly related to labour practices, as well as for suppliers. Likewise, in Spain, in 2023, a specific clause on human rights and social sustainability is planned to be introduced in the contracting specifications, which must be complied with by the suppliers. Finally, in the UK, it is proposed to reinforce the Code of Conduct for suppliers with ESG issues.



[135] The analysis has been developed at the country level.
[136] For this purpose, different areas of the Organisation have been involved, both in Spain and in the United Kingdom and Brazil.

Human rights	Management and compliance systems that cover the organisation's commitment to non-violation	Control, mitigation, prevention and remediation measures	Results of the assessment
Work practices			
Employ and promote a respectful and dignified work environment	Mechanisms of prevention, action and monitoring developed within the framework of the Regulatory Compliance System in Spain, or the corresponding regulatory and legal risk matrices of the subsidiary companies, which guarantee compliance with current legislation and international standards, such as ILO principles. These include: • Prevention control: responsibility of ensuring compliance by all members of the Organisation with the Company's internal policies and regulations, as well as identifying areas of improvement that allow for the implementation or correction of procedures as deemed appropriate. • Action control: obligation to report any event that could constitute a possible criminal offense, legal breach or irregularity of which it becomes aware by means of the channels established for such purpose, including the Complaints Channel. • Supervision control: with this task being carried out by the Compliance Supervision and Control Body and the Internal Audit Division.	Aena guarantees stability and quality in employment, as set out in the Collective Bargaining Agreements, and this is demonstrated through concrete actions, such as the Equality Plan, the Complaints Channel procedure and taking a stand against workplace and sexual harassment, keeping workday records, sending weekly communications (Brazil) and specific training on modern slavery (UK), making adaptations to promote proper participation in job requisitions and screening tests for all individuals, establishing parental leave, and setting up labour union bodies and committees and union commissions, furthering relationship with union organisations, union elections, etc. Likewise, the company rejects any form of forced or illegal labour and discrimination in the workplace and commits to rigorous compliance with international standards, such as the United Nations Global Compact, with the aim of promoting a work environment that respects human rights.	Low probability and impact
Equal opportunity, diversity promotion and non-discrimination			
No tolerance for forced labour, illegal trafficking and human trafficking or modern slavery			
Facilitate freedom to joint labour unions, associations and collective bargaining		Through union committees and the stable maintenance of relations with union organisations, the holding of periodic meetings between the company and union organisations, the Company guarantees the right of its workers to freedom of association and union, collective bargaining and union representation for the promotion and defence of their economic and social interests, without this involving any discrimination. All of this is included in the Collective Agreement of Spain, in the Collective Agreement of Brazil and in the employee's handbook in the United Kingdom.	

Fair and Equal Remuneration	Mechanisms of prevention, action and monitoring developed within the framework of the Regulatory Compliance System in Spain, or the corresponding regulatory and legal risk matrices of the subsidiary companies, which guarantee compliance with current legislation and international standards, such as ILO principles. These include: • Prevention control: responsibility of ensuring compliance by all members of the Organisation with the Company's internal policies and regulations, as well as identifying areas of improvement that allow for the implementation or correction of procedures as deemed appropriate. • Action control: obligation to report any event that could constitute a possible criminal offense, legal breach or irregularity of which it becomes aware by means of the channels established for such purpose, including the Complaints Channel. • Supervision control: with this task being carried out by the Compliance Supervision and Control Body and the Internal Audit Division.	Aena's remuneration model is based on the principles of remuneration transparency, equality and non-discrimination, as set out in the Collective Agreement in Spain or the Collective Agreement in Brazil. To this end, beyond the measures implemented within the framework of the Regulatory Compliance System and the appropriate financial controls, measures are developed aimed at promoting equal treatment and opportunities between men and women in matters of professional selection and promotion, training, remuneration, prevention of sexual harassment, and at promoting information, communication and awareness. Likewise, in Brazil, the Internal Audit Division supervises and controls the remuneration model. With regard to the United Kingdom, the absence of salary discrimination is guaranteed due to gender or age and the pay gap is reported annually, in accordance with the appropriate requirements. In this regard, a gradual reduction of the pay gap should be advanced, in line with the results of the last years. In all countries in which Aena operates, the minimum level of professional salaries is far exceeded	Low probability and impact
Right to rest and take time off and to family and personal life		The Company develops family and personal life balance measures that go beyond those required at the regulatory level in each country (paid leaves, flexible working hours, protection of victims of gender-based violence, employee aid, etc.). Likewise, tools are available in Spain and Brazil to ensure the correct recording of the workday and overtime. Also in Spain and the UK, hybrid working models are promoted, with a guide on hybrid working also available at London-Luton Airport.	
Rejection of child labour		Aena rejects any form of child labour and commits to rigorous compliance with international standards, such as the United Nations Global Compact, with the aim of promoting a work environment that respects human rights. The fulfilment of this commitment – for example explicitly included in Spain in the Collective Agreement – is specified by the implementation of specific actions, such as the request, delivery and review of the timely guarantor documentation in the corresponding selection processes (the minimum age limit established is an indispensable requirement to participate in the recruitment rounds). In the UK, it is reinforced by training and awareness of staff.	
Right to freedom of opinion, information and expression, as well as data privacy and private life of the workers		A set of tools and measures have been implemented aimed at protecting the privacy and private life of workers, as well as their freedom of opinion, in this case by establishing various clear and transparent internal communication channels, as well as the corresponding committees. In Spain, as well as in the United Kingdom and Brazil, training activities are carried out in this regard.	

Service commitments			
Safe, accessible and quality service	Prevention, action and follow-up mechanisms developed within the framework of the Quality, Environmental and Energy Efficiency Management System, as well as the Operational Safety System, Airport Safety System and Health Safety Measures	Among the Company's strategic objectives is to ensure the quality and safety of its services, in compliance with the best standards and the expectations of users, highlighting, among other things, the improvement of airport accessibility. For this purpose, there is a wide variety of mechanisms and tools (policies, procedures, standards, etc.), as well as monitoring indicators that allow for the identification of possible risks and opportunities, their prevention and remediation. Likewise, mechanisms and channels for making complaints and claims are available and, where appropriate, the corresponding financial compensation derived from property-related claims is made.	Low probability and impact
Relationship with customers based on transparency, privacy, confidentiality, freedom of expression and non-discrimination	Prevention, action and monitoring mechanisms developed within the framework of the Information Security System	The Company's data protection and privacy compliance model and the mechanisms established within the framework of the Information Security System, in Spain – and the corresponding measures implemented in the United Kingdom and Brazil – form a robust framework to ensure the privacy and confidentiality of users. In addition, actions are being carried out in different areas focused on ensuring inclusive communications, such as training on non-discrimination, development of a Guide for inclusive communications (in Spain), etc. Financial compensation mechanisms for complaints and claims are also available.	
Commitments to the environment and community			
Respecting the rights of communities and minorities	Mechanisms of prevention, action and monitoring developed within the framework of the Quality, Environmental and Energy Efficiency System, the Regulatory Compliance System and, the measures, action plans, objectives and monitoring indicators to be developed within the framework of the Sustainability Strategy and Climate Action Plan	From the mechanisms implemented within the framework of the corresponding Management Systems – certified in accordance with ISO 14001,9001, EMAS, ACA, 14064, etc. (as applicable) – the Company guarantees the implementation of appropriate procedures, mechanisms and tools to minimise the environmental impact on the environment. Likewise, the objectives contemplated in the Sustainability Strategy, Responsible Business Strategy, the Climate Action Plan, etc. ensure a positive contribution to the environment, both socially and environmentally. In Brazil, due to its possible greater impact on the community, some measures must be reinforced both in social and environmental matters	Low probability and impact
Environmental Footprint			
Anti-corruption, unfair competition, ethical relations and good taxation practices	Mechanisms of prevention, action and monitoring developed within the framework of the Regulatory Compliance System in Spain, or the corresponding regulatory and legal risk matrices of the subsidiary companies	The formal commitment to ethical, good governance and compliance practices is demonstrated through the corresponding due diligence procedures, which ensure correct identification and prevention of risks, the correct implementation of control measures, prevention and mitigation in the matter, the development of training actions, communications and awareness-raising, investigation of incidents, repair and corrective proposals	

Commitment to Human Rights by suppliers (employment, environmental and service practices)	The Code of Conduct of Aena – along with the Code of Conduct for suppliers and third parties in the United Kingdom and Brazil – establishes the ethical principles and values, integrity, legality and transparency that must guide the conduct of all people who are included within its scope of application. Not only between each other, but also in their relations with customers, shareholders, suppliers and, in general, with all people and entities, whether public or private, with which they may come into contact while carrying out their professional duties. At the same time, it also seeks to promote effective compliance with the standards that apply to all those activities, guided by the principle of zero tolerance for any kind of illegal behaviour. Internal contracting standards, aligned for example in the case of Spain with the applicable regulations that incorporate ESG issues throughout the contracting process.	Inclusion of social and environmental clauses in the mandatory contracting specifications in the formalisation of the contract and the execution of the works (see Chapter 4). In addition, penalties and causes for termination of the contract in the event of non-compliance are included. Also, in Spain, the prohibition of contracting with Aena is introduced if they have been convicted through final sentencing for any of the following crimes: terrorism, constitution or integration of a criminal organisation or group, illicit association, illegal funding of political parties, human trafficking, corruption in business practices, influence peddling, bribery, fraud, crimes against the Tax Authorities and Social Security, crimes against workers' rights, prevarication, embezzlement, prohibited negotiations with officials, money laundering, crimes related to land management and urban planning, the protection of historical heritage and the environment, or under the penalty of special disqualification from practice, office, industry or trade. The Sustainability Strategy reinforces this action, including among its actions the inclusion of human rights clauses in agreements with suppliers to ensure joint responsibility between Aena and its ecosystem. In the United Kingdom, the airport stands by a zero tolerance policy on human trafficking and slavery, which extends to all its contractual relationships. Likewise, in Spain, through the Technical Evaluation Guide and in the United Kingdom, environmental and social assessment criteria and technical solvency are incorporated, basing the choice of the supplier in question on financial and quality criteria (including environmental and sustainability considerations). The documentation associated with tender processes has a clear scoring system that is used in order to evaluate not only suppliers, but also established social and environmental standards. In Brazil, they have tools to control the procurement process by requesting documentation, recording working hours, etc., which contribute to mitigating the risk of violation (e.g. forced or mandatory labour).	Low probability and impact

Corporate culture on Human Rights

Both the Human Rights Policy and the Sustainability Strategy include the Organisation's commitment to promoting a culture of respect for human rights among its workers, in all areas in which it operates. It also includes the promotion of alliances with reference institutions within the framework of the promotion of human rights.

In this regard, during 2022, the following specific communications and internal awareness-raising actions were implemented:

- In Spain, through the internal newsletter, several awareness-raising modules have been published about human rights in general and the duty of companies to adhere to them.
- In Brazil, during 2022, specific communication and internal awareness actions have likewise taken place on the importance of the Organisation's compliance system and regulatory framework, which are reflected in the protection and prevention of possible human rights violations.
- For its part, in the United Kingdom, training has been carried out through its usual channel, related to compliance with the law on data protection, modern slavery and anti-bribery practices, among others.

In addition, Aena has maintained its collaboration with the Onuart Foundation, a reference institution in the promotion of human rights.

In 2022, Aena has strengthened and increased its human rights awareness-raising actions. In addition, collaboration has been maintained with the Onuart Foundation for the promotion of human rights.

Beyond the Group's ecosystem, Aena collaborates with non-governmental organisations and other institutions to develop its established principles of action.

Aena seeks to contribute to the development of projects with social repercussions and the deployment of environmental policies, taking into account the right of everyone to a clean environment.

Complaints mechanisms: reporting human rights violations

(GRI 2-26; 406-1; 411-1)

The Complaints Channel (or the counterpart in the subsidiaries – Ethics Channel, Whistleblower Channel, etc.) – becomes the primary tool for potentially affected individuals and groups to communicate or report any issues related to potential human rights or environmental violations. For the management thereof, the provisions of the 'Aena Complaints Channel Management Procedure' are followed.

During 2022, no complaints referring to human rights violations were recorded (same as in the previous year).



4. Responsible value chain management (GRI 2-22; 3-3)

Sustainable acquisition and purchasing process

Risk assessment

Code of Conduct.

Sustainability policy.

Anti-corruption and fraud policy.

Human rights policy.

Integrated Quality, Environmental and Energy Efficiency Management Policy.

Occupational Risk Prevention Policy.

Operational Safety Policy.

Inclusion of ESG issues in the bidding procedures and in their execution.

Inclusion of ESG issues in the processes.

Continuous improvement: actions and results

1. **Acquisition planning**
2. **Internal approval.** Inclusion in the purchasing processes of social issues, gender and environmental equality and consideration in relations with suppliers and subcontractors of their social and environmental responsibility
3. **Tendering and publication on the contracting portal.**
4. **Receipt of offers and evaluation.**
5. **Selection of the successful bidder and signing of the contract.**
6. **Supply of the good or service.**
7. **Systematic consideration of environmental and social matters throughout the bidding process:**
8. **Payment of the invoice**

The value chain at Aena

Necessary infrastructure.

Operations.

Customer services.

Marketing, communication and relationships with the environment.

Cross-divisional and support activities.

Transparency and dialogue with suppliers Sustainable value chain management

Internal and external framework

Legislation of each country.
Internal codes and regulations.
Assessment and improvement tools.
Ethical culture.
Aena's Sustainability Strategy.
Responsible Business Strategy of the London Luton Airport.

99.54% of suppliers in Spain are local, 53% at the London Luton Airport and 100% at ANB

Commitment to SDGs

8 DECENT WORK AND ECONOMIC GROWTH

9 INDUSTRY, INNOVATION AND INFRASTRUCTURE

11 SUSTAINABLE CITIES AND COMMUNITIES

16 PEACE, JUSTICE AND STRONG INSTITUTIONS

17 PARTNERSHIPS FOR THE GOALS

In terms of contracting, Aena is subject to the regulations applicable in the countries in which it operates, as well as its own internal regulatory framework.

In Spain, the main rules governing the contracting of Aena suppliers are the following:

- Royal Decree-Law 3/2020, of 4 February, on urgent measures incorporating various European Union directives into the Spanish legal system regarding public procurement in certain sectors; on private insurance; on pension plans and funds; on taxation and tax litigation (hereafter, RDL 3/2020).
- Act 9/2017, of 8 November, on Public Sector Contracts, which transposes into the Spanish legal system the Directives 2014/23/EU and 2014/24/EU of the European Parliament and of the Council of 26 February 2014, on procurement processes (hereafter, Act 9/2017).
- Internal Procurement Guidelines, which apply to the Concession Company of AIRM and ADI.
- Aena's Internal Commercial Procurement Standard – which has been updated at the end of the 2022 fiscal year in order to adapt the criteria of the regulations in force – regulates the bidding procedures for the commercial spaces of the airports in the network, with full respect for the principles and values of transparency, participation, efficiency, legality, advertising, confidentiality and sustainability.

Although Aena does not have a specific code of conduct applicable to suppliers, the specifications and other contractual documentation include clauses on social and environmental matters that suppliers must respect after signing.

In the UK, London-Luton Airport is subject to Find a Tender obligations which replace those corresponding to the Utilities Contracts Regulations 2016 of the European Union due to the materialisation of Brexit. In addition, own contracting rules and procedures are available, applicable to both suppliers (for works, services, supplies, etc.) and third parties in the commercial field. It is worth mentioning, in this area, the Contractors Code of Practice (CCoP), focused on ensuring compliance with standards in matters of safety, the environment or occupational health, in addition to ensuring their adherence to the UK Modern Slavery Act by the third parties who carry out their activity in the airport facilities.

In Brazil, Aena airports have their local Contracting Standard to regulate bidding procedures in supplier contracts and commercial spaces, thus respecting the principles and values of transparency, participation, efficiency, legality and confidentiality in the process[137]. In addition, the Third-Party Code of Conduct, available in its own specific software, must be accepted by vendors to submit their proposals.

In addition, in both the UK and Brazil, there is a general contracting strategy that contributes to compliance with the applicable regulation and the scope of the defined objectives.

In the UK, London-Luton Airport's strategy in this area is primarily focused on sustainability, value for money, promoting equality and corporate social responsibility and is primarily focused on training the workforce. By way of example, employees who perform their work in the area should be members of the Chartered Institute of Procurement (CIPS) or be studying towards it.

In Brazil, the contracting strategy aims to comply with the concession contract, as well as to seek the best suppliers and business partners in order to meet existing needs, including environmental, social and good governance (ESG) objectives to the extent that these are linked to compliance with employment, environmental and fiscal regulations, among others. Specifically:

- Full technical compliance with the requested scope;
- Highest quality of services to meet needs
- Compliance with commercial criteria (term of payment, delivery conditions, insurance, etc.);
- Best possible economic conditions, contributing to the business result;
- Compliance with all legal, employment, civil and environmental obligations.

4.1 Criteria applicable to procurement at AENA

(GRI 3-3)

In accordance with the applicable regulations, for all of its procurement processes, the Company demands, both of its suppliers and agents, efficiency and respect for the principles of equal treatment, non-discrimination, transparency, proportionality, competition, publicity, confidentiality and integrity, with the aim of ensuring that contracts are awarded to the bidder who submits the best bid.

The pillars on which Aena lays the foundations of its relations with its value chain are: efficiency, transparency, legality and respect for external and internal regulations

In this sense, the tools available to Aena allow it to transfer its social and environmental commitments (mandatory compliance from the awarding of the contract when materialised through related clauses, until the end of the contractual relationship) to the value chain.

[137] Aena's airports in Brazil are not subject to any regulations governing the contracting process.



4.1.1. Description of the supply chain

(GRI 2-6; 2-8; 204-1)

In Spain, in accordance with the applicable regulations, Aena promotes equal treatment, non-discrimination, proportionality and participation among its suppliers. In the UK, concrete actions have been developed to specially encourage the contracting of local suppliers, based on the aforementioned principles and ensuring, in any case, non-discrimination and equal participation in the contracting processes. Likewise, in Brazil, compliance with legal, financial, employment, social and environmental requirements, among others, linked to applicable regulations, continues to be guaranteed.

The types of suppliers that make up Aena's supply chain respond to the purpose of the contract and the associated need. Thus, they are mainly differentiated, on the one hand, between works – activities related to construction, improvement, expansion and maintenance of airport terminals, etc.; services – consultations, maintenance, etc.; and the provisioning of supplies; and, on the other hand, commercial activities[138]. In any case, the correct execution of the tasks entrusted, regardless of their type and geographic location, has significant repercussions and generates a great impact on the activity of the Company.

The financial contribution that the Company generates can be maximised in the communities where it operates, thus strengthening their business network and social development through the creation of indirect jobs.

The nature of business relationships with suppliers can be short, medium or long term, always respecting, in any case, the maximum limit established (in Spain, for example, this is five years). In Brazil, these are mostly between 2 and 3 years, while in the UK they vary mainly between 3 and 5 years.

In relation to the geographic location of the suppliers, this varies according to the country in which the companies that are members of the Aena Group operate.

In 2022, the percentage of local[139] suppliers in Aena was 98.70% in Spain (98.72% in 2021), 25.86% in the United Kingdom (11.33% in 2021) and 100% in Brazil (100% in 2021).

In addition, Aena's share of spending on local suppliers was 99.54% in Spain, 53% in the UK and 100% in Brazil

Likewise, in 2022, there were 55,433 workers[140] (48,536 in Spain and 6,897 in Brazil) who are not employees (i.e., employees of Aena's service providers who have performed work at its facilities and, therefore, have been controlled by the Company).

Locations that have significant operations are all those countries in which Aena is present – that is, those in which all the companies in which Aena has a stake and over which it exerts management control are located.

[138] A more detailed differentiation of supplier types can be found in the Common Procurement Vocabulary (CPV), common at European level.
[139] In Spain, given the location of the network airports, in practically all regions of the country, for this purpose the local supplier is understood as the national supplier. The same concept applies in Brazil. For its part, in the United Kingdom it considers a local supplier to be one located a maximum distance of 25 miles from the airport.
[140] Data not available for the United Kingdom. Likewise, said information has been reported for the first time in fiscal year 2022.

	SPAIN		UNITED KINGDOM		BRAZIL*	
	2021	**2022**	**2021**	**2022**	**2021**	**2022**
Suppliers (number)	**2,604**	**2,350**	**3,732**	**3,039**	**633**	**1,358**
New (number)	931	397	53	173	292	-
Local (number)	911	2,313	423	157	633	1,358
Tenders managed (number)	**1,390**	**1,145**	**83**	**607**	**261**	**617**
Amount awarded to tenders (€m) [141]	**1,694.3**	**1,601.16**	**51.7**	**89.66**	**201.78**	**18.43**
Corresponding to services and works (%)	84.1%	84.74%	98%	—%	97.54%	71.2%
Corresponding to materials and equipment (%)	15.9%	15.26%	2%	—%	2.42%	28.8%
Centralised volume of procurement (€m)	1,560.5	1,499.05	51.5	89.66	201.72	18.43
Decentralised volume of procurement (€m)	133.8	102.11	0.1	0.24	0.06	0.01
Total volume of procurement allotted associated with leases for commercial activity (€m)	38.3	96.16	-	-	10.53	3.74
Allotment of minor contracts (€m)	**16.2**	**15.4**	**0.1**	**0.24**	**6**	**0.01**

*The data related to contracts in Brazil in 2021 was reported in Brazilian reais, which when converted to euros (closing rates as of 12/31/2021 - EURvsBRL= 6.3779) would be:
- Amount awarded to files (M€): 31.63
- Centralized contracting volume (M€): 31.62
- Volume of decentralized contracting (M€): 0.01
- Total volume of contracts awarded related to leases for commercial activity (M€):1.65
- Award of minor contracts (M€): 0.9

[141] Closing exchange rates as of 31/12/2022 used for Balance Sheet accounts:
EUR/GBP = 0.88693
EUR/BRL = 5.6386

4.1.2. Main procurement milestones in 2022

In 2022, the criteria established in the Guide for the technical evaluation of supplier contracts have begun to be applied in Spain, which aims to serve as a reference to the various proposing units of Aena in the choice of technical evaluation criteria for contracts of any nature. These objective technical evaluation criteria refer to both exclusionary criteria and technical evaluation criteria of bids, from a two-fold perspective: they set a minimum threshold, whose non-compliance entails exclusion, and, at the same time, they rate the degree of compliance with that criterion on behalf of the bidders.

In addition to including practical guidelines and parameters, the Guide seeks to strengthen the evaluation of suppliers based on ESG criteria, paying special attention to the inclusion of this criteria in the process, to incorporate examples of objective technical criteria into the contract templates.

All centralised contracting records are reviewed for compliance with these conditions. In addition, a first phase of training has been conducted in the methodology of the Guide for all employees (available online).

Apart from the above, and as mentioned above, in 2022, the Internal Supplier Contracting Standard has been revised, which updates criteria that had been established in the previous one, adjusting to the regulations in force.

Meanwhile, in the UK, efforts have also been made to increase the consideration of ESG issues in the contracting processes in 2022, which have increased in line with the growth of the number of passengers since COVID-19. In addition, the actions focused on contracting local suppliers, including all types of companies, regardless of their size, have been reinforced. Finally, the UK Contracting team has earned CIPS accreditation during the fiscal year 2022, and has received a Diversity and Inclusion Award at the UK CIPS Awards 2022.

In the case of Brazil, Aena airports have implemented a tool to facilitate communication with suppliers. In addition, as part of the obligations of the concession contract, airports are in the process of expansion works, resulting in the implementation of various tendering processes.

Training

(GRI 3-3)

In Spain, in order to ensure the implementation and correct use of the aforementioned Guide and other specific tools, in 2022 the focus has been on the development of specific training courses[142], aimed at the drafters of contracting specifications and users thereof, while at the same time contributing to promoting the proper incorporation of social and environmental criteria into the value chain and improving knowledge in the use of applications. In addition, a general training course covering aspects related to Public Procurement has been developed.

In 2022, awareness-raising actions have been carried out for the entire workforce about the application of the principle of equality, transparency and free participation in the different phases of the contracting process

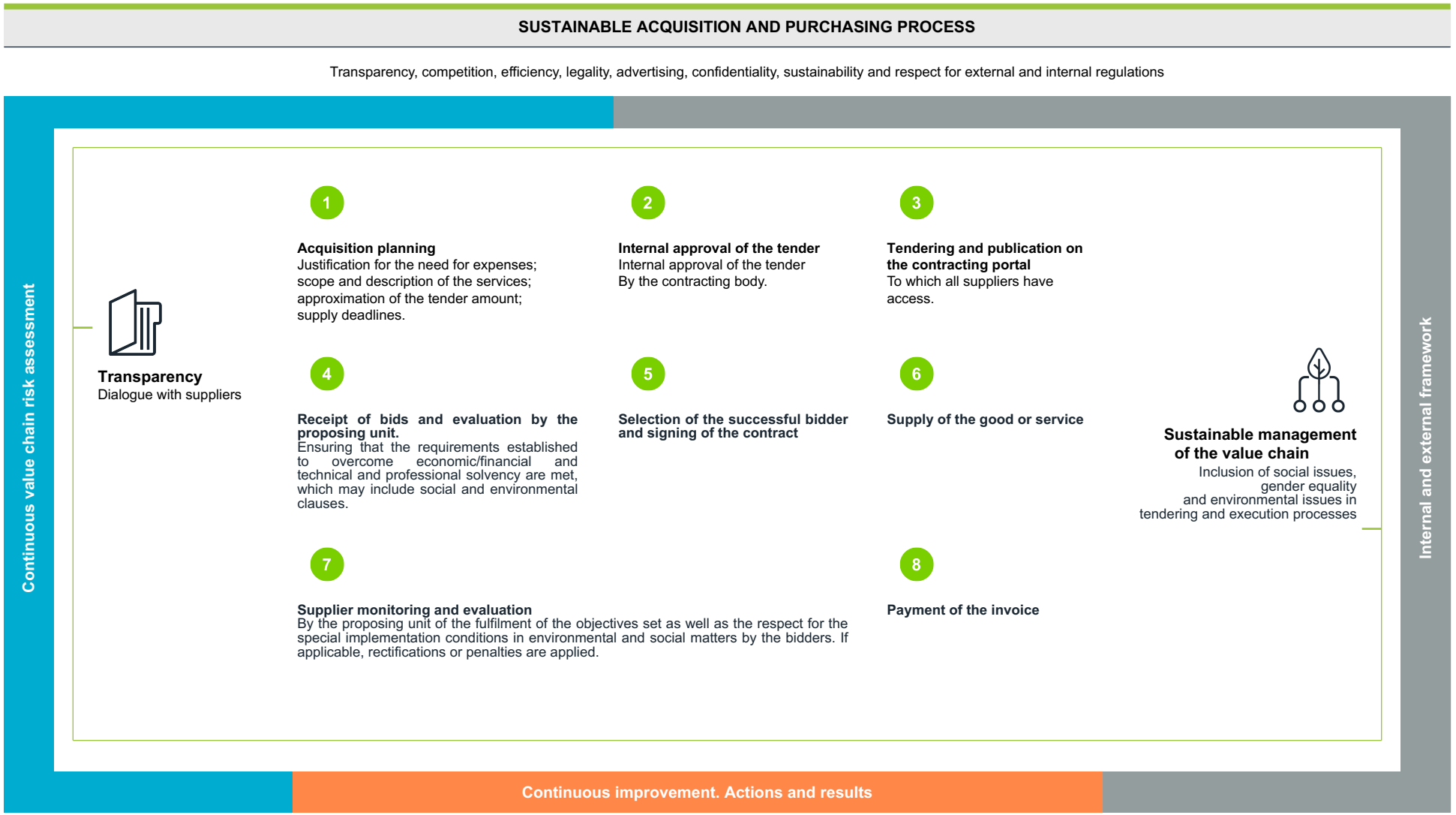
In the United Kingdom, a contracting training plan is available, with 6 having been carried out during 2022.



[142] In the UK, training programmes in contracting matters are available. In the meantime, Brazil does not have any specific training in terms of contracting.

4.2. Sustainable value chain management

(GRI 3-3)





4.2.1. General aspects

Transparency and dialogue[143]

(GRI 2-29)

Aena continuously updates relevant information regarding its procurement procedures on the Company's website and adapts its procurement system to digitisation requirements. It thus makes the bidding specifications available to the bidders, along with other relevant documentation, with virtually all of the supplier procurement procedures carried out in electronic format.

Other tools, such as the user manual, the support centre or the mailbox for real-time inquiries, reinforce mechanisms in the digitisation process and aim to facilitate communication with suppliers and lessees in order to avoid potential issues arising from lack of familiarity with electronic resources.

In Spain, they have two specific landing pages, a Contracting Portal and the Aena Companies Portal, where the minor agreements and contracts, bids, commercial tenders, awards and other additional information related to the tendering are published[144]. Likewise, the Public Sector Contracting Platform publishes the various advertisements for supplier contracts. In addition, the platform for submitting electronic bids and a support centre are available (with response via email from the support centre to questions or technical-functional issues in the process of submitting offers by the bidders). All of the above is complemented by specific contact email addresses:

- portalcontratacion@aena.es, available for information on the process of participating in the bids from suppliers, and their counterparts, comercial@aena.es or facturacion@aena.es for business contracts.
- PortalClienteSoporteTecnico@aena.es for technical support for the resolution of questions or issues in case of technical problems.
- Contact addresses for the units responsible for the tenders.
- As far as Murcia Airport is concerned, there is a dedicated recruitment portal. And for any queries related to customers and invoicing, suppliers can contact rmufacturacion@aena.es

In the UK, London-Luton Airport has its own electronic tender portal (In-Tend Procurement Portal). After contracting the supplier, there is also the possibility to establish communication with the supplier through online or in-person meetings.

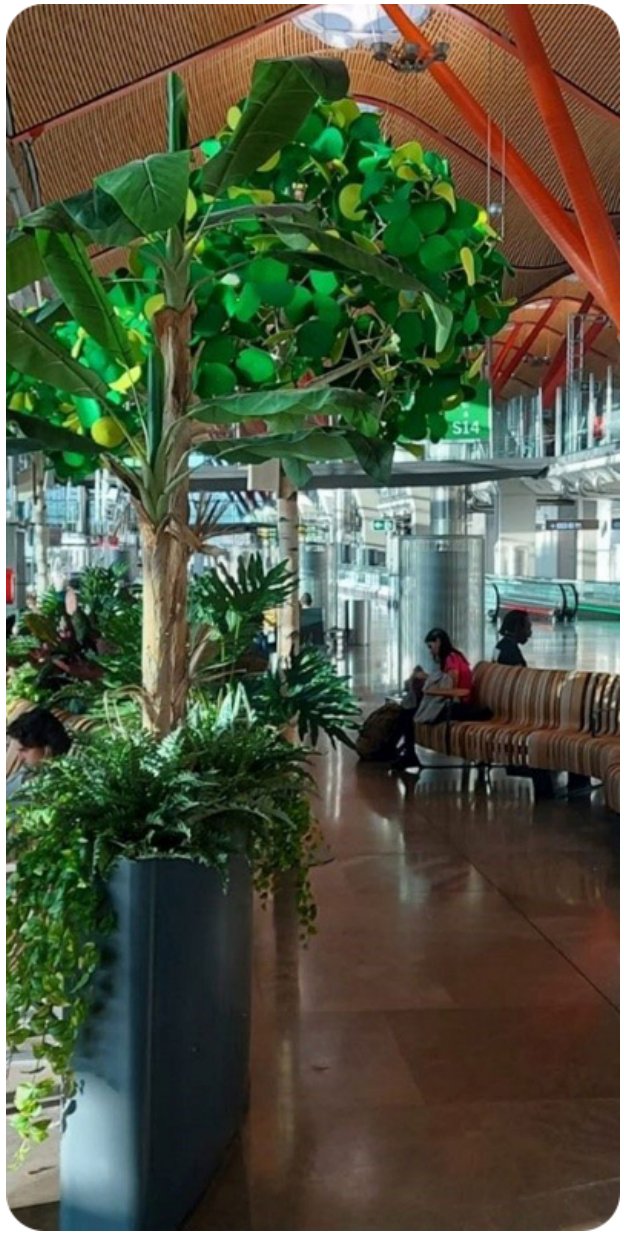
In Brazil, Aena airports make emails and sites available to suppliers on SharePoint for query resolution. Since 2022, the SAP Ariba tool has also been available to facilitate communication with suppliers.

Continuous value chain risk assessment

The Company's risk management and control model identifies risks associated with the contracting of third parties, associated with the contracting process itself or the execution of the contract[145].

[143] See chapter 'Links of interest'.
[144] In addition, in accordance with Act 19/2013, of 9 December, on transparency, access to public information and good governance, the Public Sector Procurement Platform publishes all information related to the procurement of commercial suppliers, minor contracts awarded and statistical data for awarded contracts.
[145] The Airport also has several tools to ensure the control, supervision and mitigation of risks associated with the value chain. For example, in Spain, the risks of the scope of contracting suppliers are defined and incorporated in the table of the Internal Control over Financial Reporting System (ICFR) of the Aena Procurement Division, with the periodicity of execution and monitoring established in each of them. In the UK, risks are identified in the contracting risk register. Likewise, all bidding documents include specific questions for assessing possible associated risks

Main potential risks associated with the supply chain related to:	Tools for their control, monitoring and mitigation	Main mitigation and control measures adopted
Work practices: Respectful and dignified work. Equal opportunities, diversity and non-discrimination. Forced labour, illegal trafficking and human trafficking or modern slavery. Labour unions and freedom of association and collective bargaining. Fair and equal remuneration. Health and safety. Child labour. Freedom of opinion, information and expression.	**Code of conduct**	• Inclusion of ESG issues in the bidding procedures and in their execution ◦ This includes the obligation to act within the most demanding levels of safety, occupational risk prevention and environmental respect. It specifies the rejection of any fraudulent practice or corruption. ◦ Specific clauses are incorporated on the corporate responsibility of suppliers, contractors and lessees, as well as social, environmental and governmental performance and respect for human rights. ◦ Includes specific environmental, social and good governance requirements required in the execution of the contract ◦ They incorporate possible penalties in the event of non-compliance, which may even lead to contractual termination. • Qualification and evaluation of suppliers and customers. • Before initiating binding commercial relations, suppliers and customers are required to have, to the extent possible, anti-corruption protocols and controls and to sign an anti-corruption clause (unless the proposing unit considers it unnecessary due to the nature of the relationship or other circumstances). • Mandatory clauses are included in the procurement specifications about the prevention of occupational risks, environmental protection, operational and airport safety, and other social and labour conditions and obligations. • Annex of Social Security registration verification. • Definition of prohibitions and incompatibilities in contracts with Aena (firm penalty for serious infringement, falsification of competence, integration of employment and equal opportunities and non-discrimination of persons with disabilities, for very serious environmental infringement, etc.).. • Certified for the implementation of environmental management and quality assurance systems (ISO 14001 and ISO 9001 or similar), guarantee of compliance with the fundamental Conventions of the International Labour Organization, as well as technical solvency criteria in some specification of the contracts. • Exchange of good environmental practices to promote the continuous improvement of the products/services provided and contribute to sustainable development. • Supplier evaluation system: evaluation of environmental and social programmes implemented by bidders in the technical assessment process. • Civil liability policy and accident insurance, be up to date with Social Security, Tax Agency, Civil Registry payments, etc. • Adoption of Aena's Human Rights Policy in the event that it does not have its own policy (and, therefore, the Principles of the Global Compact—the initiative of which Aena is a part and whose observance is expressly contained therein), as well as all the specific commitments. • Monitoring of the supplier by the contract manager during the term of the contract and verification of compliance with the special conditions of execution. • Monitoring of indicators on health and safety • At the Aena airports in Brazil, control and supervision is carried out by means of external audits (documentation, record of working hours, etc.), contributing to mitigating the risk of forced or mandatory labour. • Due to the nature of its supply chain, the risk of child labour is considered insignificant. • The legal framework applicable to the geographical areas where Aena operates makes it less likely for significant risks to be identified regarding violations of the rights of freedom of association and collective bargaining
Secure, excellent and quality service.	**Code of Conduct for Suppliers in the UK and Brazil**	
Principles of transparency, privacy, confidentiality, freedom of expression and non-discrimination with customers.	**Sustainability policy**	
Safety and rights in communities.	**Anti-corruption and fraud policy**	
Environmental protection and reduction of environmental footprint.	**Human rights policy**	
Ethical relationships and good tax practices, and rejection of corruption and anti-competitive practices.	**Integrated Quality, Environmental, Energy Efficiency and Occupational Health and Safety Management Policy**	
	Operational Safety Policy	
	Information Security Policy	



Other risks associated with the value chain:

- Privacy of employees: In monitoring the policy established for this purpose, and in accordance with current legislation[146], Aena informs the staff of collaborating companies about the processing of their personal data by the companies of the Aena Group or their service providers (for more information, see Chapter 1).
- Protecting the health and safety of suppliers: The inclusion of specific clauses in specifications – through which the successful bidder undertakes to comply with the stipulated obligations derived from the law, and other applicable regulations and standards (see Chapter 5) – serves to mitigate this risk associated with the value chain.
- Operational and Airport Security: with the objective of establishing the requirements that apply to third parties to comply with the Operational Safety Management System and current regulations on Airport Security, as well as determining the criteria that govern the relationships between the airport and external suppliers in this matter (see Chapter 6), the corresponding clauses are also included in the specifications. .
- Employment conditions: the specifications of administrative clauses include a series of clauses that guarantee the obligation to respect aspects such as the employment and promotion of a respectful and dignified work environment, equal opportunities and non-discrimination, the non-admission of forced labour, illegal trafficking and trafficking in persons or modern slavery in any form and fair and equal remuneration, among others. Likewise, in the event of non-compliance by third parties, these same specifications include penalties.

Similarly, in the UK, contracts are reviewed on an individual basis at London-Luton Airport to identify potential risks, which are registered in the Procurement Risk Register. For mitigation, a number of criteria are incorporated into the contracting specifications, including those related to ESG aspects. Likewise, while the contract is in force, the service areas monitor and supervise the possible risks, in order to prevent them from materialising.

For its part, in Brazil, economic, financial and employment solvency analyses of suppliers are carried out, using representative indicators, in order to ensure the correct execution of the works. In particular, with regard to the evaluation of legal/employment aspects, monthly monitoring is carried out – especially for those suppliers who carry out their work in the airport facilities – and on a monthly basis, proof of correct compliance with the payment of salaries is required. In environmental matters, compliance with the requirements and obligations in this matter has begun to be reviewed externally during the fiscal year 2022.

[146] Regulation (EU) 2016/679 of the European Parliament and of the Council, of 27 April 2016, on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (GDPR) and Organic Act 3/2018, on Personal Data Protection and Guarantee of Digital Rights.

4.3. The acquisition and purchasing process

(GRI 3-3)

Aena's commitment to sustainability is transferred throughout its value chain, incorporating social, environmental and innovation and development considerations (qualitative and/or quantitative) throughout the entire contracting process, from its initial phase – the tendering process, in which the need is defined and the contracting of the services is carried out – to the phase in which the contract is executed.

Sustainable acquisition and purchasing process							
Compliance with current legislation	**Purpose of the contract**	**Definitive guarantee**	**Economic and financial solvency**	**Technical or professional solvency**	**Exclusion criteria**	**Technical evaluation**	**Civil liability policy and accident insurance, Social Security, Tax Agency, Civil Registry payments, etc.**
Act with respect to the regulations in force in each of the jurisdictions in which the Company conducts its business.	Special attention is given to those agreements in which technological, social or environmental innovations are included.	The obligation to constitute a final guarantee may be waived by the successful bidder.	A way to ensure that the supplier is able to meet the commitments made	The mandatory compliance criteria can be supplemented with additional technical solvency criteria based on that specified by the proposing unit, such as the 'Certificate of Implementation of the Environmental Management System (ISO 14001 or similar)', the 'Certificate of Implementation of the Quality Management System (ISO 9001 or similar)', or the guarantee of compliance with the fundamental Conventions of the International Labour Organization.	Fundamental to the correct execution of the contract.	By means of technical endpoints with which the bids are analysed, they must be formulated objectively, with full respect for the principles of equality, non-discrimination, transparency and proportionality, while also including environmental and social criteria.	Indispensable in certain contracting cases that respond appropriately to the circumstances.

4.3.1 Inclusion of social and environmental issues in bidding procedures

(GRI 308-1; 414-1)

Determination of the purpose of the contract

The purpose of the contract must be determined based on the specific needs or functionalities that are intended to be fulfilled, without closing one particular solution. Therefore, when preparing the specifications, aspects of an innovative, technological, social or environmental nature must be taken into account, with the aim of improving the efficiency and sustainability of the goods, works or services that are intended to be contracted.

In this line, the specifications are prepared taking into account accessibility or environmental protection criteria, among others. A noteworthy example, are the specifications for contracting the services of Handling agents in Spain, which include the obligation to reduce their emissions by at least 74% by 2030, with the 2019 emissions taken as the base year (see section '2.1.5. Sustainability and Value Chain').

In addition, in the certificates of commencement of the contract, the contract manager is obliged to indicate the possibility of reserving the contract for special employment centres and Insertion companies regulated by Act 44/2007, of 13 December, in order to favour the integration of workers with disabilities.

Technical or professional solvency criteria

The methodology to ensure that technical solvency criteria are incorporated and applied by bidders who participate in Aena's contracting processes in Spain, depending on the nature of each contract, is also established in the Guide for the technical evaluation of supplier contracts. The determination and application of this criteria is the responsibility of the proposing unit, which vary based on the nature and type of the contract (work, service, supplies or commercial contract). Once included as a solvency criterion, its compliance is mandatory in order to be eligible for the contract.

To prove technical solvency, qualitative criteria can be incorporated with environmental or social considerations within the criteria for awarding the specifications. For example:

- **Environmental**: experience or performance in this regard can be accredited by requesting management certificates from the bidding companies – certificate of implementation of the Environmental Management System or the Quality Management System (ISO 14001, ISO 9001 or similar) – or issued or approved by an entity accredited for this purpose by Spanish or Community legislation. For commercial procurement, the technical bidding specifications for leases specify that the performance of works must include the monitoring of environmental procedures and requires the submission of the Environmental Monitoring Plan, duly completed with the bidding specifications.
- **Social affairs:** certain supply bidding specifications may require a certificate of compliance with the fundamental conventions of the International Labour Organization through a declaration committing to apply supply chain management systems. Likewise, both in the specification of works and of services and supplies, a statement can be requested as a criterion of technical solvency by means of a commitment of the academic and professional qualifications of the business owner and the company's directors required in the specifications of the bidding documents and, in particular, of the person or persons responsible for the execution of the contract, as well as of the technicians directly in charge thereof.

These types of practices are also carried out in the UK and in Brazil as part of their selection processes.

- At London-Luton Airport in the United Kingdom, the contracting specifications include social and environmental technical solvency requirements, to be accredited through certifications, references, etc,. and subject to analysis and evaluation.
- At Aena airports in Brazil, the Template of Specific Administrative Clauses ('PCAP') describes the legal and economic solvency requirements to be met by the suppliers, determined by the requesting area. Other aspects include those related to ESG. As a result, they must prove their technical capacity to participate in the bidding process and consequent awarding of the contract. In addition, a process of verification (background check) of the supplier's practices and records is carried out, in which records and their previous performance are assessed, with possible claims due to corruption, slavery practices, or non-compliance with employment obligations (where these are materialised in a high number of processes and convictions, etc.). After this, the so-called mobilisation process is implemented, which verifies whether the employment links between employer and worker are regular and comply with current legislation.

Technical evaluation of offers[147]

ESG criteria are also determinant for technically evaluating bids submitted.

The applicability of these criteria and their weighting in the overall score depends on the need, nature and type of contract (work, service, supply or commercial contract). That is, its use is linked to the fact that important aspects are considered for the execution of the contract in question.

In Spain, with the entry into force of the 'Guide for technical evaluation' during the fiscal year 2022, the application of criteria that take into account social, innovation and environmental aspects is encouraged.

[147] Not applicable to Aena airports in Brazil, since ESG criteria are generally not considered in the technical evaluation of proposals, except in contracts that have specific requirements in this regard (waste management, works, etc.).

These are aligned with the strategic objectives set out in Sustainability Strategy 2021-2030:

- Environmental criteria. The guide includes standard clauses related to decarbonisation, sustainable water management and the use of resources. For example, the use of construction materials/products/equipment with regulatory eco-labels, the reuse of materials/ products and/or recycling of non-hazardous construction and demolition waste on site of the works or in other locations, etc.

  Depending on the degree of demand and compliance with these requirements, the score given in the technical assessment is increased. This benefits suppliers who ensure better sustainability performance.

  During 2022, in Spain, 29 suppliers have been evaluated by environmental and social criteria, which represent 25% of the total awarded. In the United Kingdom, 100% of these criteria have been filtered by this type of criteria[148].

  In this regard, as of 2023, the obligation to use environmental sustainability criteria in the supplier selection process is established, assuming at least 8% of the score for works, as well as at least 6% of the score for services and supplies.

  With regard to commercial contracting specifications, it is worth noting the new tender for lease agreements for spaces intended for duty-free shops, which includes ESG aspects for the purposes of their valuation in the technical offer, assuming 10% of the overall score.

- Social criteria: specific criteria may be included, such as having an SA 8000 Social Responsibility Management certificate, ISO 45.001 Occupational Safety and Health certificate, or an AENOR Gender Equality/ Equal Pay certificate. This type of criteria is intended to assess the availability of proven systems and methodologies in the application of various aspects in addition to those traditionally used as technical solvency criteria (certificates of environmental management and quality assurance systems).

- Criteria related to innovation. Technical evaluation criteria are taken into account, such as the use of innovative technology that has been developed by the company, accredited with an R&D&I certificate and which is directly applicable to the work, or having an ISO 166.002 R&D&I Management System certificate, among others.

In this way, the awarding of contracts is carried out based on the best value for money (economic and qualitative criteria)[149].

Along the same lines, in the UK, London-Luton Airport also includes ESG aspects for the assessment of offers, the weight of which can be instrumental in the choice of the supplier.

In Spain, the Guide anticipates that 100% of new suppliers contracted as of fiscal year 2023 must pass selection filters according to environmental criteria.

Inclusion of tiebreaker clauses

In Spain, Article 147 of Act 9/2017 and Article 66.11 of RDL 3/2020 provide for tiebreaker clauses in those cases where two or more offers have obtained the same score (with similar economic offer). Through the aforementioned tiebreaker clauses, companies are favoured to ensure the implementation of sustainable and responsible practices in their regular performance and management. These clauses are also incorporated into the contracting specifications in the UK.

The new Equality Plan contemplates the introduction in the specifications of Act 9/2017 and Royal Decree Law 3/2020 of the following tiebreaking criteria: Higher percentage of women employed in the workforce of each of the companies.

Exemption from providing a definitive guarantee

Following current Spanish regulations, the Company's Contracting Body has the possibility in certain cases to exempt the successful bidder from the obligation to constitute a definitive guarantee.Supplies of consumable goods, whose delivery and receipt must be made before payment of the price, are specifically affected, as are contracts dedicated to the provision of social services or social and labour inclusion of people belonging to groups at risk of social exclusion.

4.3.2. Contract execution processes

(GRI 3-3)

Formalisation of the contract

The signing of the contract by the successful bidder (contractor or lessee) reflects its commitment to accept the content of the specifications, which include, among others, specific provisions on social matters (prevention of occupational risks, physical security and operations) and environmental protection[150]. This is coupled with the promotion by Aena of good practices that, although not contractual in nature, contribute to the promotion of the sustainability of the products and in the provision of services.

All successful bidders must comply with the clauses contained in the contracts, being subject to penalties in the event of their breach. Among the sustainability obligations assumed, the following stand out:

[148] At Aena airports in Brazil in 2022, no supplier has been selected based on these criteria. Nevertheless, 100% of suppliers are subject to compliance with environmental or social clauses.
[149] Contracts are awarded based on the best quality-price ratio (financial and qualitative criteria).
[150] In general, these are set out in clauses 39, 40, 41 and 42 of the procurement specifications, corresponding to RDL 3/2020, and clauses 42, 43, 44 and 45 of the provisions of Act 9/2017.

- **Environmental protection:** to comply with environmental legislation, as well as the conditions established in the specifications regarding, for example, the proper management of waste, the storage of hazardous materials and substances, the conditions of use of vehicles/machinery and atmospheric emissions or waste.
- **Labour and social obligations**: among which, it is established with the contractors to commit to having minimum percentages of fixed workers on the workforce and employees with functional diversity, and to comply with the wage conditions of workers as per their applicable sectoral collective bargaining agreement and with the legislation on labour matters.
- **Prevention of occupational risks:** compliance with current legislation on occupational health and safety[151], aimed at guaranteeing that suppliers ensure the protection of workers' health and safety in the development of works, supplies and services.
- **Airport and operational security[152]:** comply with all current legislation on security, as well as strictly adhering to the orders and instructions issued by the airport authority aimed at ensuring the security of activity.

Likewise, all suppliers in the United Kingdom must comply with local current regulations in matters of employment (slavery, minimum wage, equality, etc.) and the environment. In the event that the ESG criteria indicated in the contract are not met, London-Luton Airport reserves the right to terminate the contract, although the Services area (responsible for monitoring contract compliance) usually meets with suppliers to find solutions and establish corrective action plans for any non-compliance.

In this regard, in Brazil, employment and environmental obligations and requirements are set out in the specifications and/or contractual documents, expressly establishing that any breach thereof by the supplier may result in the suspension and/or withholding of payments (after sending an initial formal notification) until they conform to complying with them again. Likewise, all continuous service providers who have workers in the airport facilities must send monthly documentation that proves compliance with all employment obligations, guaranteeing the payment of all labour taxes, as well as the payment of wages and benefits to their employees. It is also mandatory that they undergo the mobilisation process for Occupational Safety and Health, ensuring that professionals will work with all protective equipment appropriate to the type of work to be performed. The commencement of work is only authorised when the mobilisation process of each individual professional has been approved. Finally, for some types of services it is mandatory to submit government certificates such as the AFE ('Authorisation for Operation'), issued by the Brazilian National Health Monitoring Agency for providers of waste management and cleaning services at airports.

In addition, with regard to commercial contracting, the specifications of some clauses include ESG conditions:

- Environmental requirements related to the operation and maintenance of the spaces.
- The obligation to include an Environmental Monitoring Plan duly completed by the lessee in the project specifications.
- Provision of a plan for reducing single-use plastics or the promotion of the energy efficiency of the facilities, which is considered in the assessment of the technical offer.
- The legal specifications include:
  - The commitment to comply with health and airport and environmental safety regulations – including those related to, among others, the use of single-use plastics, emissions, waste management, effluents, usage of machinery, etc.
  - The obligation to present an Environmental Control Programme agreed upon with Aena, prior to the start of the activity, which details the way in which the potential impacts of the activity on the environment will be managed and controlled, identifying the organisational structure in charge of management, planning activities, responsibilities, practices, procedures, processes and resources dedicated to eliminating or reducing potential impacts (see more information in Chapter 2).
  - Regular monitor carried out by Aena in compliance with the agreed Environmental Control Programme or any other aspect of the company that could affect the Company's Integrated Management System (IMS).

Both the specific and legal specifications[153], have disciplinary and sanctioning measures that are applied in the event of detecting any non-compliance with environmental, public health and epidemic, social or occupational obligations.

Special conditions of contract performance

The bidding processes carried out by Aena in Spain incorporate special conditions of execution in social, employment, ethics or environmental matters and mandatory compliance by the contractors, both when formalising the contract and throughout the term of the contract. These conditions are indicated both in the

[151] Act 31/1995, of 8 November, on the Prevention of Occupational Risks, and other standards and regulations applicable within the scope of this Prevention.
[152] See Chapter 6: Safe, Quality Services.
[153] The Director of the Aena Centre in which the activity performed by the lessee is carried out will notify the company in writing of the infraction committed and the penalty that it would entail, granting it a period of ten calendar days to submit as many arguments and evidence as it deems pertinent. In view of the same, the Director of the Aena Centre will proceed to impose the penalty that may be applicable or to close the proceedings and, in the event that he or she is not competent according to this contract, he or she will make a proposal to impose the penalty to the competent Aena body.

bidding announcement and in the PCP (specifications of particular clauses), they cannot be discriminatory in nature and must be compatible with community law.

Special conditions of execution include ESG conditions that the supplier must comply with, both when entering into the contract and during the execution of the works. These are included in all of the contracting records

The controls applicable in relation to compliance with the conditions of public contracts are established in the contracting regulations, in the same way that it incorporates the opportunity to establish, in the event of a breach, financial penalties that may even result in termination of the contract.

This mechanism is regarded as one of the best ways to guarantee compliance with the standards and criteria, both environmental and social, included in the contracting specifications.

All Aena contracts include environmental, employment or social clauses among the special conditions for the performance of the contract, which may result in penalties or termination of the contract in the event of non-compliance. Supervision of the correct execution of the dossier, in accordance with the established special conditions of execution, is the responsibility of the proposing unit.

SPECIAL CONDITIONS OF CONTRACT PERFORMANCE

These include aspects such as: a minimum percent of fixed staff in the company or of staff with disability or social exclusion; timely payment of wages to staff; reduction, reuse and recycling of waste products; sustainable water management; environmental vigilance system; or being up to date in payments to subcontractors and suppliers

Labour and social obligations

They include issues such as: enforcing the rights recognised in the United Nations Convention on the Rights of Persons with Disabilities, to a higher percentage than that required by national legislation; promoting the employment of persons with special difficulties of insertion in the labour market, in particular people with disabilities or in a situation or risk of social exclusion; eliminating inequalities between men and women in that market.

Occupational risks prevention obligations

Compliance with mandatory aspects in the prevention of occupational risks in accordance with current legislation, in order to ensure safety and health at work and compliance with sector agreements, as well as the implementation of measures to prevent workplace accidents.

Environmental obligations

They include aspects related to the reduction of greenhouse gas emissions; the maintenance or improvement of environmental values that may be affected by the execution of the contract; more sustainable water management; the promotion of the use of reusable containers; the promotion of product recycling.

Some examples of special execution conditions that appear in the tender documents

- Employ a percentage of fixed workers equal to or greater than 20% in the execution of the contract.
- Employ in the execution of the contract a percentage of workers who, on the total of new jobs that are performed, is equal to or greater than the national average in the construction sector, provided that the availability of the construction labour market allows it.
- Employ in the execution of the contract a percentage of workers with disabilities, or in a situation or at risk of social exclusion greater than 1%, provided that the availability of the construction market allows it.
- Prompt payment of wages to personnel and compliance with the applicable wage conditions derived from the collective agreement.
- Employ in the execution of the contract a percentage of workers who, across all new jobs that are carried out, are equal to or higher than the national average in the sector of engineering and technical study offices, etc.).
- The contractor must be up to date with the payment of subcontractors or suppliers participating in the contracts.
- Perform the work in strict compliance with the legislation on occupational risk prevention.
- Provide workers who perform the work with adequate information and training on the risks of the activity they are carrying out, with preventive measures and personal protective equipment or other means of protection necessary for their execution..
- Promoting the reduction, reuse and recycling of waste.
- Establishing an environmental monitoring system that guarantees compliance with the indications and protective and corrective measures, related to the purpose of the contract. The contractor will establish a series of indicators that provide a way to estimate the performance of these measures and their results.
- Recycling of products and the use of reusable containers.
- Sustainable water management.

Supplier monitoring and evaluation

In Spain, the mechanisms for monitoring compliance with the clauses of contracts for suppliers and lessees are determined in the contracting specifications themselves, as well as the disciplinary measures to be applied in the event of non-compliance.

In the case of supplier specifications, the Contract Manager stands as responsible for the monitoring the performance of the contract, which involves the monitoring, supervision and verification that the requirements (social and environmental criteria) and quality levels defined in the technical specifications of the file are fulfilled. If this were the case, the Contract Manager generates the corresponding performance compliance certification, based on the frequency established in the contract.

In particular, there is a procedure for the control and monitoring of companies, adapted to the reality of some airports, where instructions are available to ensure the correct control and monitoring of the suppliers' environmental performance. Among the measures it incorporates, it includes some such as the duty for suppliers, contractors and lessees to be familiar with the Integrated Quality, Environmental, Energy Efficiency and Occupational Health and Safety Management Policy, and to establish a Monitoring Plan, where the appropriate terms are determined for each company based on the environmental aspects that the different activities of the companies may generate, and the degree of suitability to the current legal requirements regarding environmental management in which the corresponding company is located. It also includes how to proceed if any irregularities are detected and the measures to be applied. Thus, for example, if during the conduct of the monitoring repeated misconduct is detected that is attributable to lack of training, the company will be requested to provide training its staff. To ensure the correction of the deficiencies identified, the person responsible for environmental monitoring must check in

future monitoring exercises whether the company has taken the appropriate measures to remedy the situation.

With regard to the commercial contracting specifications, it is the Airport Management, as representative of Aena, that imposes the penalties established, if applicable. On the part of the lessee company, it undertakes to comply with any measures that may be taken by said Airport Management within the framework of the security of the Airport and for the public service to which it is intended.

The performance of suppliers in the United Kingdom is monitored by the Services departments through agreements on the level of services provided or on the basis of key performance indicators, with these areas being obliged to report on the quality of the services, supplies or works executed by the supplier after the termination of the contract. Any potential incidents with suppliers are addressed by setting up meetings or visits.

In Brazil, Aena airports carry out monthly monitoring of the performance of the works. To do so, the contractor must submit, digitally, documentation evidencing compliance with the obligations included in the contract, as well as certificates of being up to date with the payment of taxes. In the event of non-compliance, or if the supplier does not achieve compliance greater than 90% in demonstrating fulfilment of said obligations, payments may be suspended until the sending of documentation that proves the regularity of the same obligations resumes.

Failure to comply with ESG clauses may result in termination of contract

Negative impacts in the supply chain

(GRI 2-6; 2-26; 308-2; 407-1; 414-2)

The reporting of negative impacts on the supply chain is carried out in Spain through the Contract Manager, and in the United Kingdom and Brazil through the whistleblower channel or the Ethics Channel respectively (see section 1.2.9. 'Complaints Channel'). Additionally in Brazil, complaints processed through their social networks are also accepted by some departments and, in the case of environmental impacts, by the external committees of aircraft noise management and fauna risk management.

In addition, the UK proactively identifies and monitors the potential significant negative impacts that may arise from contracts with third parties. Specifically, all contracts (with special attention to those related to construction services, civil engineering, water and gas works, among many others) are identified as potential projects for causing significant negative environmental impacts (including excess energy usage, non-renewable energy usage or pollution).
In the fiscal year 2022, there were no reports of any suppliers whose activity resulted in a significant negative environmental impact, nor were there any incidents processed through the various channels resulting in improvement agreements, cancellation of orders or termination of contracts with suppliers due to negative environmental impacts.

Similarly, there were no reports of any suppliers whose activity has resulted in a significant negative social impact (including unemployment as well as lack of training and development opportunities, being mitigated through measures such as clauses in contracts), no incidents have been processed through the various channels that have resulted in any improvement agreements, in the cancellation of orders or in the termination of contracts with suppliers of the Aena Group due to negative social impacts.

In this regard, during the 2022 fiscal year, no incidents have been identified in relation to rights of freedom of association, collective bargaining, employment of child labour or forced labour or unconsented labour in any contract with suppliers, nor is there any evidence of having received complaints for the reasons detailed above.

Supplier and customer satisfaction study

Aena's client satisfaction assessment procedure in Spain describes the system followed at the Company's units/ sites and includes an analysis of the level satisfaction of lessees and contractors. The main tool used to carry out this analysis consists of conducting surveys, after which the corresponding improvement actions are determined and implemented. .

Other tools and channels are also available to understand the needs and expectations of:

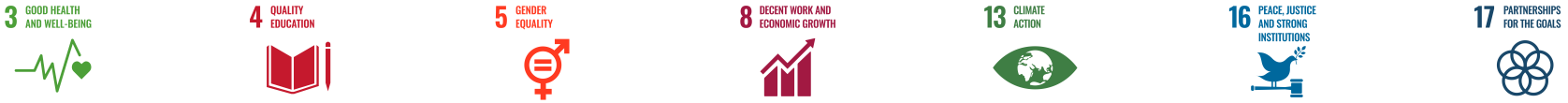
- **Suppliers**: meetings with contractors, working parties for information exchange and service improvement, meetings, user committees, monitoring and management of complaints, suggestions and compliments, DORA indicators, etc. Based on these channels, it has been possible to detect, among other expectations, the need to improve contractual requirements, including clear, achievable and stable objectives; improvement of transparency; promotion of equal treatment; and streamlined processing.
- **Partners providing services to clients of Aena and other lessees:** working parties for information exchange and service improvement; analysis of results of the service provided (commercial attributions of ASQ surveys and monitoring the management of complaints, suggestions and compliments); VIP Lounge surveys; parking and commercial services; meetings with lessees; and meetings with handling agents. The expectations identified include the implementation of standards of conduct, acceptable requirements and stability.

5. Staff and social issues (GRI 2-22; 3-3)

Priorities	Health and well-being	Stable and quality employment	Organisation of work time and disconnection
Job stability and professional development. Fair employment conditions and remuneration model. Work-life balance and motivation. Diversity and inclusion. Talent attraction and retention. Continuous training and education. Two-way and continuous communication. Comprehensive occupational well-being and flexibility. Health and safety. New technologies and collaborative tools. Equality and sustainability.	Occupational health and safety model, championed at the highest level of the Organisation. Proactive approach to maintain the highest levels of security and minimize risk exposure. Health and safety objectives. Reduction in the number of accidents. Work/life balance measures and promotion of health and well-being for all employees.	Aena is committed to employability and professional development: **9,230** employees. **926** new recruits. **91.4%** permanent. **95.5%** work on a full-time basis.	Teleworking policy. Work disconnection policy.

Promotion of diversity and inclusion	Promotion and development of talent, skills and knowledge	Remuneration system
Gender diversity Women represent: **37.21%** of the workforce. **y el 40%** Board of Directors. **Equality Plan II** **Generational diversity** Encouragement of training and employment of training among the youngest through participation in employment fairs, agreements with universities, etc.	**Employer Branding strategy.** Responsible Business Strategy of the London Luton Airport. Promotion of employment in the local environment. **Development programmes** Leaders creating leaders' Mentoring programme. 'Reciprocal Mentoring' programme. Coaching programme. Digital and cultural transformation programme. **100% of Spain's workforce participate in the Performance Management system**	Promotes equal treatment for employees, with no gender or personal differences of any other kind. **2.2% pay gap in 2022 (Spain)** €3,163,757.05 investment in training programs. 99.8% employees have received training. 56 hours of training per year per female employee and 74 hours of training per year per male employee.

Commitment to SDGs



Introduction

(GRI 2-23; 3-3)

People management is at the heart of Aena[154]. It is a key enabler to make network airports the safest, most efficient, sustainable and welcoming in the world, as well as catalysts for economy and tourism and value drivers for all stakeholders, while responding to the needs of an increasingly changing and demanding work environment.

In this line, in Spain, the 2022-2026 Strategic Plan includes the main lines of action in terms of human resources:

- Cultural and organisational change: evolution to a more sustainable culture and a more streamlined and collaborative organisation through technology and new ways of working.
- Capacity building: promoting employability and professional development through specific training programmes.
- Diversity and inclusion: firm commitment to equal opportunities and non-discrimination; embodied in Aena's Equality Plan II.
- Public image: ambitious Employer Branding programme.

In the UK, it highlights the local commitment to providing a high quality, professional work environment to help employees reach their full potential. It is also worth highlighting the goals set in this area, which can be grouped into the following categories[155]:

- Facilitating talent.
- Diversity and inclusion.
- Well-being.
- Fair pay.
- Internal commitment.
- Achievement of the proposed objectives.

For its part, in Brazil, strategic priorities are related to the retention and recruitment of personnel by carrying out motivational actions that involve employees and foster a sense of belonging, strengthening the Aena brand in Brazil ('Soy Aena Brasil' [I am Aena Brazil] campaign).

Personnel management risks

(GRI 3-3)

While in Spain, there are certain restrictions on staff recruitment and talent development (given Aena's status as a state-owned company), these are reflected in the Company's risk map. In this regard, in the UK and Brazil, although airports are not subject to these limitations, the main risk in this regard is also related to the recruitment and retention of talent, as well as the consolidation of the corporate culture specifically in Brazil.

The monitoring of Key Risk Indicators (KRIs), related to the aforementioned risks, allows for their annual assessment, with no significant impact in this area having materialised during the last fiscal year. In any case, and aware of the problems that this may pose, Aena advances in the implementation of measures and objectives to mitigate the identified risks (as reflected in its Strategic Plan and in the Sustainability Strategy). As an example, when it comes to action plans, it is worth noting the Succession Plan, participation in Remuneration Studies and the Potential Detection and Employer Branding Programmes. The latter are focused on promoting the identification, recruitment and development of the best talent, as well as equipping their employees with the tools and knowledge necessary to adapt to this changing environment.



[154] In Spain, the responsibility for personnel management and the promotion of a quality working environment ultimately rests with the Organisation and Human Resources Management division. In the UK, this responsibility is entrusted to the local Human Resources department. Finally, in Brazil this responsibility is assigned to the local Human Resources Management division.
[155] The people management strategy is specified in the People Guide.

Regulations

Priorities

Spain:

- Job stability and professional development.
- Fair employment conditions and remuneration model.
- Work-life balance and motivation.
- Diversity and inclusion.
- Talent attraction and retention.
- Continuous training and education.
- Two-way and continuous communication.
- Comprehensive occupational well-being and flexibility.
- New technologies and collaborative tools.
- Equality and sustainability.

United Kingdom:

- Facilitating talent.
- Diversity and inclusion.
- Well-being.
- Fair pay.
- Internal commitment.
- Performance measured against goals.

Brazil:

- Retention and uptake.
- Fostering a feeling of belonging.

Policies and other tools

Spain, UK and Brazil::

- Sustainability Policy.
- Human Rights Policy.
- Policy of relationship with stakeholders.
- Code of Conduct.
- Quality, Environmental, Energy Efficiency and Occupational Health and Safety Policy.
- Selection policy for Board Member candidates.

Spain

- Training Policy.
- Competition Verification Policy.
- Travel Policy.
- Company cars and fuel costs policy (for managers and representation).
- Housing Policy (for managers).
- Policy on remuneration and benefits of expatriate personnel.
- Bases of the Performance Management System.
- Best Practices Code: Outsourcing of services.
- Regulatory policy on remote working.
- Regulatory policy on digital disconnection.

United Kingdom

- Disciplinary procedure.
- Complaints procedure.
- Social Media Policy.
- Resignation and Termination Policy.
- Retirement Policy.
- Study leave and sponsorship policy.
- Flexible Working Policy.
- Equal Opportunities Policy.
- Recruitment Policy.
- Whistleblowing Policy.
- Maternity and Paternity Policy
- Training and Development Policy.
- Performance Management Procedure.
- Unpaid parental leave guide.

Sustainability Strategy: people management

Action plans

Spain:

- Equality Plan II
- Personal Potential and Career Planning Management Programme
- Employer Branding strategy.
- Training and development of skills: updating and motivation.
- Dialogue and negotiation: new Collective Agreement.
- Digital and cultural transformation.
- Health and safety.
- Mentoring and coaching programmes.
- Sustainable Employment Pension Plan.
- Integration and coordination plan, providing well-being and prevention resources for employees.
- Flexible Compensation programme.
- Cultural change plan.
- Training and/or awareness actions related to carbon footprint reduction, environmental legislation and energy efficiency.

United Kingdom

- Talent strategy.
- "Get into Airports" programme.
- Talent attraction events.
- Inclusion strategy.
- Well-being strategy.
- Mental health training.
- Internal communication of internal goals and values.

Brazil:

- Motivational actions.

Objectives

Spain:

- 45% minimum female Directors in Central Services (2026).
- 25% minimum female Directors in airports (2026).
- Maintain or exceed 40% of women on the Board of Directors in 2023 and subsequent years.
- Getting started: Creating the Aena Campus (own training centre).
- 7.71 accident incidence rate in 2023.

United Kingdom:

- In partnership with Prince's Trust, offer at least two 'Get into Airports' programmes, each with 15 or more people, ensuring a positive result greater than 75%.
- Complete ten professional and work events for schools in the most disadvantaged neighbourhoods, including airport and school events.
- 60% of staff feeling they have a say in what's going on at the airport.
- Increase executive team visibility and profile with at least 80% of staff knowing team members.
- Support and enable managers to become better communicators with at least 60% communicating with their teams 'regularly' or 'very regularly'.

5.1. Stable and quality employment[156]

(GRI 3-3)

5.1.1. Main details about the workforce

At the end of the 2022 fiscal year, Aena's workforce amounts to 9,230 people[157], 419 more than the previous year, of which 37.2% are women.

88.8% of the workforce is located in Spain (89.6% in 2021). Moreover, employees at London-Luton Airport in the UK account for 7.4% (7.1% in 2021) and those at Aena airports in Brazil for 3.8% (3.3% in 2021)
Also:

- 91.4% are permanent (92.6% in 2021).
- 8.6% are temporary (7.4% in 2021).
- 95.5% work on a full-time basis (96% in 2021).

Total number and distribution of employment contract types by gender and region (as of 31 December)* (GRI 2-7)

	2021									2022								
	Total workforce	Permanent				Temporary				Total workforce	Permanent				Temporary			
		Part-time		Full-time		Part-time		Full-time			Part-time		Full-time		Part-time		Full-time	
		W	M	W	M	W	M	W	M		W	M	W	M	W	M	W	M
Spain	7,892	125	70	2,506	4,545	44	15	211	376	8,196	152	103	2,567	4,617	40	19	278	420
United Kingdom*	628	63	37	177	351	0	0	0	0	685	58	31	216	380	0	0	0	0
Brazil[158]	291	0	0	96	192	0	0	1	2	349	0	0	103	208	10	5	11	12
Total	**8,811**	**188**	**107**	**2,779**	**5,088**	**44**	**15**	**212**	**378**	**9,230**	**210**	**134**	**2,886**	**5,205**	**50**	**24**	**289**	**432**

*Of the 89 permanent part-time employees in the UK, 13 have a 'Not Guaranteed' contract modality, of which 6 are women and 7 are men.

[156] All the data presented corresponds to the end of the fiscal year, 31 December 2022, except in those cases in which another date is expressly specified. Likewise, in those cases in which its consolidation has not been possible, its scope is specifically indicated.
[157] Data posted in terms of headcount (staffing).
[158] The fluctuations in the number of employees at the end of the fiscal year compared to the previous fiscal year in Spain were due to the recovery of activity after the pandemic and the elimination of the restrictions in force during the same.

Total number and distribution of employees by gender, age, region and professional category (as of 31 December) (GRI 2-7)

2022

	Spain						United Kingdom						Brazil						TOTAL (gender – age)						TOTAL (by gender)	
	< 25 years old		Between 25 and 45 years old		> 45 years old		< 25 years old		Between 25 and 45 years old		> 45 years old		< 25 years old		Between 25 and 45 years old		> 45 years old		< 25 years old		Between 25 and 45 years old		> 45 years old			
	W	M	W	M	W	M	W	M	W	M	W	M	W	M	W	M	W	M	W	M	W	M	W	M	W	M
Senior Management	0	0	1	1	5	4	0	0	0	0	0	0	0	0	0	0	0	0	**0**	**0**	**1**	**1**	**5**	**4**	**6**	**5**
Executives and graduates	0	0	383	476	560	674	1	1	29	47	19	34	0	0	7	13	3	9	**1**	**1**	**419**	**536**	**582**	**717**	**1,002**	**1,254**
Coordinators	0	0	50	143	325	736	0	0	12	2	5	2	0	0	15	37	0	5	**0**	**0**	**77**	**182**	**330**	**743**	**407**	**925**
Technicians	0	15	404	1,082	1,056	1,818	0	2	5	28	0	30	3	3	15	83	0	5	**3**	**20**	**424**	**1,193**	**1,056**	**1,853**	**1,483**	**3,066**
Support staff	0	0	87	60	166	150	16	10	113	167	74	88	12	6	64	56	5	8	**28**	**16**	**264**	**283**	**245**	**246**	**537**	**545**
Total	**0**	**15**	**925**	**1,762**	**2,112**	**3,382**	**17**	**13**	**159**	**244**	**98**	**154**	**15**	**9**	**101**	**189**	**8**	**27**	**32**	**37**	**1,185**	**2,195**	**2,218**	**3,563**	**3,435**	**5,795**

2021

	Spain						United Kingdom						Brazil						TOTAL (gender – age)						TOTAL (by gender)	
	< 25 years old		Between 25 and 45 years old		> 45 years old		< 25 years old		Between 25 and 45 years old		> 45 years old		< 25 years old		Between 25 and 45 years old		> 45 years old		< 25 years old		Between 25 and 45 years old		> 45 years old			
	W	M	W	M	W	M	W	M	W	M	W	M	W	M	W	M	W	M	W	M	W	M	W	M	W	M
Senior Management	0	0	1	1	4	6	0	0	0	0	0	0	0	0	0	0	0	0	**0**	**0**	**1**	**1**	**4**	**6**	**5**	**7**
Executives and graduates	0	0	375	457	507	628	0	0	11	24	7	19	0	0	7	12	2	6	**0**	**0**	**393**	**493**	**516**	**653**	**909**	**1,146**
Coordinators	0	0	62	146	305	698	0	0	6	14	9	16	0	0	12	32	0	1	**0**	**0**	**80**	**192**	**314**	**715**	**394**	**907**
Technicians	0	1	403	1,122	992	1,739	0	1	2	34	3	26	1	0	20	84	0	4	**1**	**2**	**425**	**1,240**	**995**	**1,769**	**1,421**	**3,011**
Support staff	0	0	92	72	145	136	10	3	121	157	71	94	3	1	52	46	0	8	**13**	**4**	**265**	**275**	**216**	**238**	**494**	**517**
Total	**0**	**1**	**933**	**1,798**	**1,953**	**3,207**	**10**	**4**	**140**	**229**	**90**	**155**	**4**	**1**	**91**	**174**	**2**	**19**	**14**	**6**	**1,164**	**2,201**	**2,045**	**3,381**	**3,223**	**5,588**

Annual average of contracts according to their type* by gender, age, and professional category (consolidated) (GRI 2-7)

	2021						2022					
	PERMANENT		TEMPORARY		TOTAL		PERMANENT		TEMPORARY		TOTAL	
	Full-time	Part-time	Full-time	Part-time	Full-time	Part-time	Full-time	Part-time	Full-time	Part-time	Full-time	Part-time
Men	5,158	100	316	15	5,474	115	5,233	96	357	21	5,590	117
Women	2,783	187	165	38	2,948	225	2,880	187	244	43	3,124	230
Total by gender	**7,941**	**287**	**481**	**53**	**8,422**	**340**	**8,113**	**283**	**601**	**64**	**8,714**	**347**
Senior Management	12	0	0	0	12	0	12	0	0	0	12	0
Other executives and graduates	1,948	25	37	0	1,985	25	2,105	29	46	0	2,151	29
Coordinators	1,246	19	2	0	1,248	19	1,277	26	9	0	1,286	26
Technicians	3,883	111	391	41	4,274	152	3,865	116	470	44	4,335	160
Support Staff	852	132	51	12	903	144	854	112	76	20	930	132
Total by professional category	**7,941**	**287**	**481**	**53**	**8,422**	**340**	**8,113**	**283**	**601**	**64**	**8,714**	**347**
Over 45 years old	4,898	147	182	22	5,080	169	5,217	150	247	26	5,464	176
25–45 years old	3,021	132	299	31	3,320	163	2,867	129	346	29	3,213	158
Under 25 years old	22	8	0	0	22	8	29	4	8	9	37	13
Total by age	**7,941**	**287**	**481**	**53**	**8,422**	**340**	**8,113**	**283**	**601**	**64**	**8,714**	**347**

(*) Note: aggregated data of the consolidated total workforce.

Recruitments

(GRI 401-1)

In 2022, 370 women and 556 men were hired, a total of 926 people (489 in 2021 and 549 in 2020). In relation to the distribution of recruits by professional category and age, 51% focus on technician positions (54% in 2021). With regard to the percentage of job openings filled by employees internally, this amounted to 38.4% (37.4% in 2021).

Recruits by gender, age, professional category and region

2022

	SPAIN						UNITED KINGDOM						BRAZIL						TOTAL					
	< 25 years old		Between 25 and 45 years old		> 45 years old		< 25 years old		Between 25 and 45 years old		> 45 years old		< 25 years old		Between 25 and 45 years old		> 45 years old		< 25 years old		Between 25 and 45 years old		> 45 years old	
	M	**W**	**M**	**W**	**M**	**W**	**M**	**W**	**M**	**W**	**M**	**W**	**M**	**W**	**M**	**W**	**M**	**W**	**M**	**W**	**M**	**W**	**M**	**W**
Senior Management	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	**0**	**0**	**0**	**0**	**0**	**1**
Executives and graduates	0	0	75	60	19	18	1	1	11	12	4	2	0	0	2	1	2	0	**1**	**1**	**88**	**73**	**25**	**20**
Coordinators	0	0	1	0	1	4	0	0	0	2	0	2	0	0	7	2	1	0	**0**	**0**	**8**	**4**	**2**	**6**
Technicians	15	0	222	71	62	62	2	0	9	1	4	0	3	2	16	3	0	0	**20**	**2**	**247**	**75**	**66**	**62**
Support staff	0	0	10	12	13	26	8	10	30	31	9	8	5	11	22	23	2	5	**13**	**21**	**62**	**66**	**24**	**39**
Total	**15**	**0**	**308**	**143**	**95**	**111**	**11**	**11**	**50**	**46**	**17**	**12**	**8**	**13**	**47**	**29**	**5**	**5**	**34**	**24**	**405**	**218**	**117**	**128**

2021

	SPAIN						UNITED KINGDOM						BRAZIL						TOTAL					
	< 25 years old		Between 25 and 45 years old		> 45 years old		< 25 years old		Between 25 and 45 years old		> 45 years old		< 25 years old		Between 25 and 45 years old		> 45 years old		< 25 years old		Between 25 and 45 years old		> 45 years old	
	M	**W**	**M**	**W**	**M**	**W**	**M**	**W**	**M**	**W**	**M**	**W**	**M**	**W**	**M**	**W**	**M**	**W**	**M**	**W**	**M**	**W**	**M**	W
Senior Management	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	**0**	**0**	**0**	**0**	**0**	**0**
Executives and graduates	0	0	35	55	13	35	0	4	0	0	1	4	0	0	3	1	0	0	**0**	**4**	**38**	**56**	**14**	**22**
Coordinators	0	0	0	1	3	0	0	0	0	0	0	0	0	0	1	2	1	0	**0**	**0**	**1**	**3**	**4**	**2**
Technicians	0	1	49	107	39	49	0	0	0	0	0	1	1	0	7	6	1	0	**1**	**1**	**56**	**113**	**40**	**57**
Support staff	0	0	11	7	12	11	4	2	0	0	3	0	1	1	20	8	0	0	**5**	**3**	**31**	**15**	**15**	**8**
Total	**0**	**1**	**95**	**170**	**67**	**95**	**4**	**6**	**0**	**0**	**4**	**5**	**2**	**1**	**31**	**17**	**2**	**0**	**6**	**8**	**126**	**187**	**73**	**89**

Opportunities for internal mobility

Aena periodically promotes processes for internal deployments that enable the professional promotion of employees and their career development within the Company.

In Spain, the internal deployment processes are regulated in the Collective Agreement[159] and their control, quality and uniformity, as well as the assurance of compliance with employment legislation and the principles of equal opportunities, merit, capacity and job advertising rests on the corresponding committee[160].

Access to these opportunities is made available to all employees by sending email communications by the Company. Likewise, through a specific section on the corporate intranet, access is available to calls for internal deployments existing at all times, the number and characteristics of the vacant positions, as well as all the requirements and issues related to each process.

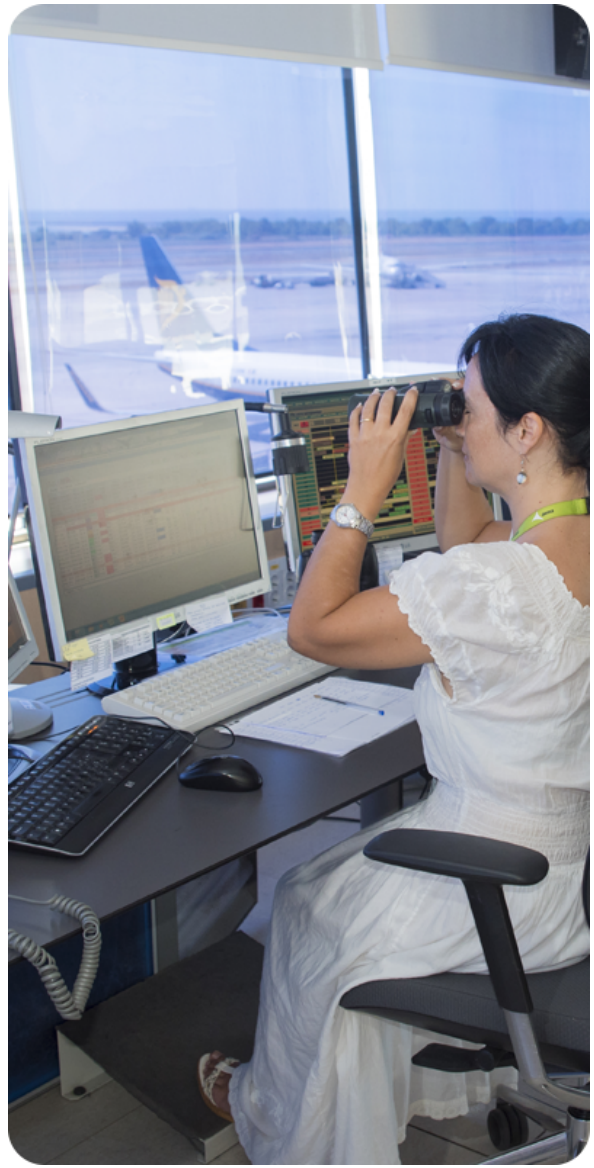
On the other hand, employees are normally offered the possibility of applying for positions of responsibility (structure) on a monthly basis. In this way, internally, career development and promotion is encouraged. To this end, also in order to guarantee the principles of equal opportunity, merit, capacity and job advertising, a process is carried out similar to the one described above. In other words, communications are sent to all workers, who in turn have access to a detailed description of the position, the functions entrusted and the associated profile on the intranet.

The Company has defined the technical and behavioural competencies – including the knowledge, skills and attitudes – required to proceed to other jobs, with these being defined in the occupation pages. In addition, the aforementioned occupation pages include the set of functions and tasks that each professional must carry out, including the mission, the main functions, the means, and the requirements for the performance of the occupation. In this way, employees have access and the ability to know what competencies and knowledge may be required to access other positions.

In Spain, during 2022, the internal deployment process rolled out in October 2021 has ended, in which the offer of 262 positions of technicians and coordinators in the various work centres has been made available to the employees. With regard to graduate occupations, a total of 17 positions have been covered through the promotion of workers throughout this fiscal year. In addition, Aena employees have been eligible for 35 positions of responsibility in 2022.

In the UK, the People Council meets once a month to review and approve internal vacancies and the needs of different areas. Internal vacancies are then emailed, communicated in weekly briefings and advertised through the internal communications system to ensure all employees have access to them. In any case, internal talent is prioritised, making way for new opportunities.

For its part, in Brazil, most open vacancies are filled with internal staff, after their announcement and the participation of employees in the corresponding selection processes. They have the participation of the Human Resources Management, which evaluates all internal promotions and selections with the aim of ensuring adequate control, quality and uniformity of the processes. Reflecting the above, over the past 3 years, the rate of internal promotions among employees has been 33%.



[159] Articles 18-19-20 and 21 of the collective agreement.
[160] Joint Promotion and Selection Committee (consisting of representatives of the company and representatives of union organisations).

Dismissals[161]

(GRI 401-1)

During fiscal year 2022, the number of dismissals amounted to 28, that is 5 more than than the previous fiscal year (23 and 39 dismissals in 2021 and 2020, respectively). The number of women who make up the total number of dismissals amounts to 9, that is, 32.1% (12 women, corresponding to 52% of dismissals in 2021, and 12 women and 30.1% in 2020), compared to 19 men, which additionally represents 67.9% (11 men and 48% in 2021 and 27 men and 60.9% in 2020). Regarding the distribution of dismissals by professional category and age, 50% are concentrated in support staff positions (57% and 69.2% in 2021 and 2020, respectively).

Dismissals by gender, age, professional category and region

2022

	Spain						United Kingdom						Brazil						TOTAL					
	< 25 years old		Between 25 and 45 years old		> 45 years old		< 25 years old		Between 25 and 45 years old		> 45 years old		< 25 years old		Between 25 and 45 years old		> 45 years old		< 25 years old		Between 25 and 45 years old		> 45 years old	
	M	W	M	W	M	W	M	W	M	W	M	W	M	W	M	W	M	W	M	W	M	W	H	W
Senior Management	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Executives and graduates	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	1	0	0	0
Coordinators	0	0	0	0	1	0	0	0	0	0	0	0	0	0	3	1	0	0	0	0	3	1	1	0
Technicians	0	0	0	0	3	0	0	0	0	0	0	0	0	0	3	2	0	0	0	0	3	2	3	0
Support staff	0	0	0	0	0	0	0	0	3	2	2	1	0	0	3	3	0	0	0	0	6	5	2	1
Total	**0**	**0**	**0**	**0**	**4**	**0**	**0**	**0**	**3**	**2**	**2**	**1**	**0**	**0**	**10**	**6**	**0**	**0**	**0**	**0**	**13**	**8**	**6**	**1**

2021

	Spain						United Kingdom						Brazil						TOTAL					
	< 25 years old		Between 25 and 45 years old		> 45 years old		< 25 years old		Between 25 and 45 years old		> 45 years old		< 25 years old		Between 25 and 45 years old		> 45 years old		< 25 years old		Between 25 and 45 years old		> 45 years old	
	M	W	M	W	M	W	M	W	M	W	M	W	M	W	M	W	M	W	M	W	M	W	M	W
Senior Management	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Executives and graduates	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1	1	0	1	0	0	1	1	1	1
Coordinators	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1	0	1	0	0	1	1	0	1
Technicians	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	1	0	1	0	0	1	1	0	1
Support staff	0	0	0	0	1	0	0	1	2	2	4	1	0	0	0	1	0	1	0	1	2	3	5	2
Total	**0**	**0**	**0**	**0**	**1**	**0**	**0**	**1**	**3**	**2**	**5**	**1**	**0**	**0**	**2**	**4**	**0**	**4**	**0**	**1**	**5**	**6**	**6**	**5**

[161] Labour force adjustment plans: in 2022, no dismissals were made under the Labour Force Adjustment Plan (ERE [Expediente de Regulación de Empleo]), neither permanent nor temporary dismissals, which reinforces the Company's willingness to maintain working conditions and stability in employment.

Turnover rate

(GRI 401-1)

The low turnover rates guarantee the good work and the fulfilment of the commitments acquired by the Company in relation to the management of its human capital, as well as the excellent deployment and implementation of specific actions and plans.

Turnover rate of staff by age, gender and region

2022

Turnover rate (%)	Spain			United Kingdom			Brazil			TOTAL		
	W	M	Total	W	M	Total	W	M	**Total**	**W**	**M**	**Total**
Over 45	1.54%	3.68%	2.87%	7.78%	14.84%	12.24%	0.00%	5.26%	4.76%	**1.81%**	**4.20%**	**3.30%**
25–45	1.71%	4.12%	3.30%	17.14%	13.10%	14.63%	20.88%	16.09%	17.74%	**5.07%**	**6.00%**	**5.68%**
Under 25	0.00%	100.00%	100.00%	30.00%	50.00%	35.71%	25.00%	0.00%	20.00%	**28.57%**	**50.00%**	**35.00%**
Total	**1.59%**	**3.86%**	**3.03%**	**14.17%**	**14.18%**	**14.17%**	**20.62%**	**14.95%**	**16.84%**	**3.10%**	**4.96%**	**4.28%**

(*) Turnover: Number of employees who leave the organisation voluntarily or due to dismissal, retirement or death while having an active status.
Turnover rate % = (Employees who leave the company due to some turnover criteria during the year / Total number of employees for that year)
Information regarding turnover rate by age, gender and region as of 31 December 2021 can be found in the NFIS 2021, page 132.

Voluntary turnover rate* of staff by age, gender and region

2022

Turnover rate (%)	Spain			United Kingdom			Brazil			TOTAL		
	W	M	Total	W	M	Total	W	M	Total	W	M	**Total**
Over 45	0.51%	0.56%	0.54%	3.33%	9.03%	6.94%	0.00%	0.00%	0.00%	0.64%	0.95%	0.83%
25–45	1.71%	3.89%	3.15%	15.71%	11.79%	13.28%	14.29%	9.77%	11.32%	4.38%	5.18%	4.90%
Under 25	0.00%	100.00%	100.00%	30.00%	50.00%	35.71%	25.00%	0.00%	20.00%	28.57%	50.00%	35.00%
Total	**0.90%**	**1.78%**	**1.46%**	**11.67%**	**11.08%**	**11.31%**	**14.43%**	**8.76%**	**10.65%**	**2.11%**	**2.67%**	**2.46%**

(*) Voluntary turnover rate: Number of employees who leave the organisation voluntarily.
Voluntary turnover rate % = (Employees who leave the company due to some turnover criteria during a fiscal year / Total number of employees in that fiscal year)
Information regarding voluntary turnover rate by age, gender and region as of 31 December 2021 can be found in the NFIS 2021, page 132.

5.1.2. Remuneration model

(GRI 2-20; 401-2; 3-3)

The principles of remunerative transparency, equality and non-discrimination – with this being understood to be in its broadest term (gender, age, nationality, etc.) – as well as the applicable legal standards, define the remuneration model of Aena, which incorporates the standards and principles of national and international best practices in the matter.

With regard to Aena employees in Spain and Brazil, the remuneration model varies based on their level of responsibility as well as the achievement of previously defined objectives, combining the following[162]:

- Fixed salary[163]: determined according to professional level, profession and level of individual responsibility. Other applicable supplements (night shift, workday etc) are included in this salary.
- Variable remuneration: this is based on a certain percentage of the fixed salary (which in turn considers the above factors) that depends on the results of the performance appraisal and achievements accomplished by employees.

For its part, London-Luton Airport in the United Kingdom includes several occupations within each category, each with an equal base salary for men and women, as well as for recruits of any age range. In addition, after completing 2 years of service, employees receive an extra bonus, regardless of occupancy. Through this system of remuneration, equality and non-discrimination in remuneration is promoted. In turn, transparency and communication in the establishment and review of salaries are ensured, as well as recognition of individual results and achievements.

In 2022, employees benefited from the following salary increase:

- In Spain, 3.5%[164].
- In the UK, 6% (and €2,254.9 of profit sharing[165]).
- In Brazil, 7%.

At the same time, Aena offers its professionals in Spain, in the United Kingdom and in Brazil various benefits such as health insurance, life insurance, pension plans and restaurant vouchers. Specifically in Spain[166], social aid is also offered for employees aimed at covering study expenses, work-life balance (camps and children's schools), health, births, disability, etc. in 2022, a total of €1.4 million has been allocated to this social aid.

Through its remuneration system, the Company promotes equal treatment for employees, ensuring non-discrimination

Thus, Aena's remuneration model guarantees:



Decent living remuneration and payment of social contributions



Transparency and communication, when setting and reviewing remuneration



Recognition of individual and team results and achievements

Supervision and control mechanisms:

- The Auditors of Accounts, Within the framework of exercising the prevention of money laundering, carry out a review of contracts, payrolls, social security contributions and transfers, among others.

[162] In Spain, Aena and the representation of workers participate in the approval of annual salary tables, as established in the applicable legislation and regulations. In Brazil, salary tables are updated annually by the Human Resources department in accordance with the local Collective Bargaining Agreement, with this department being solely responsible for defining the initial and promotional remuneration without receiving external advice. At London-Luton Airport in the UK, employee remuneration is periodically evaluated with labour unions, together with agreements approved by the CEO, CFO and the local Board of Directors. This remuneration model is reviewed by the airport Human Resources management division.
[163] Information on the compensation by professional category at AENA S.M.E., SA. and SCAIRM is available to the public and can be consulted in Annex II of the 1st Collective Agreement of Aena. See chapter 'Links of interest'.
In the case of ADI, this information is also publicly available and can be consulted in the salary tables contained in the Collective Agreement for Offices and Bureaus of the Community of Madrid. Similar to the previous case, other applicable supplements (activity, availability, etc.) are added to this salary published in Annex I of the Collective Agreement. In Brazil, the reference document is the First Collective Agreement, signed on 23 July 2020.
In the UK, each category encompasses different occupations, which have an assigned base salary, regardless of gender or age.
[164] In Spain, as established in the LPGE [Ley de Presupuestos General del Estado (General Budgets of the State Act) and Royal Decree Act 18/22 of 18 October, which approves, among other things, measures regarding remuneration of public sector personnel
[165] Euro/Pound exchange rate in 2022: EUR/GBP = 0.88693
[166] At Aena S.M.E., S.A., and AIRM.

- Likewise, in compliance with articles 5 and 7 of Royal Decree 902/2020, of 13 October, on equal pay between women and men, the Company prepares a Pay Register and a Pay Audit. Said audit, whose validity is defined by the Equality Plan II, aims to verify that the Company's remuneration model complies with the effective, cross-cutting and complete application of the principle of equality between women and men in terms of pay. The results of this audit include a diagnosis of the company's remuneration situation, with a position assessment that guarantees the principle of equal pay for positions of equal value, as well as the analysis of other relevant factors and the establishment of an action plan to correct possible inequalities. In this regard, the Joint Committee on Equality stands as the body responsible for monitoring these deviations as well as for the proposal of measures that are considered necessary to remedy the situation.
- In Brazil, it is worth mentioning the role played by the Internal Audit function in the continuous supervision and control of the remuneration model, which uses the tables of Human Resources internal controls as the main mechanism for this purpose.
- In the United Kingdom, at London-Luton Airport, the remuneration model is supervised by those responsible for the human resources area.

Average remuneration and pay gap [167,168]

In Spain, Aena, In its commitment to enforce the right to equal treatment and non-discrimination between women and men in terms of pay, specific measures are incorporated to identify and guarantee equality in this area and promote the conditions necessary for its effectiveness. For this purpose, a Pay Registry has been set up in Spain (under Royal Decree 902/2020, of 13 October, on remuneration equality between women and men) that allows for guaranteeing equal pay and ensuring its transparency and monitoring. For this purpose, it has used the tools and usage guides published by the Institute of Women – a body under the Ministry of Equality – which, not being mandatory, do allow for the homogenization of data analysis and comparison with other companies, regardless of their size, sector, etc.

For the analysis of the remuneration model has entailed the analysis of total pay, which includes all remuneration items, such as base salary, occupation salary, length of service bonus, variable remuneration, shift dynamics, night shift, medical insurance, life and accident insurance, pension plans, transportation, housing, food allowances and commuting, among others.

Based on the above, the average remuneration has been calculated as the arithmetic mean so that they are effectively comparable. For this purpose, the 'Standardised Remuneration' has been used, which is defined as that which, considering all concepts of the remuneration model, the person would obtain if they had been contracted full-time throughout the entire fiscal year.

Likewise, and based on the average remuneration, the **pay gap,** has been calculated as an indicator to analyse the salary differences based on gender, using the following formula:

Wage gap = (Average men's remuneration – Average women's remuneration) / Average men's remuneration.

As a result of the analysis carried out, it is concluded that in Spain there is a wage parity between men and women, obtaining a value for the wage gap of 2.2% (1.7% in 2021), with the representation of women making up 37% of the workforce.

The pay gap is mainly caused by the weight of the salaries received by groups (such as the Fire-fighting Service, Maintenance and Information Systems) in which women are under-represented (despite having a high percentage of representation in the overall workforce) and in whose selection processes few female candidates apply.

This difference has been accentuated in 2022, with respect to 2021, (from 1.7% to 2.2%) due to the impact of the pandemic at the beginning of the year and the exhaustion of the pool of candidates for certain groups (mainly the Fire Service), which has led to a significant increase in expenditure on overtime compared to 2021, in groups where there is a greater under-representation of women.

In the UK, London-Luton Airport responds to the regulatory requirement for reporting on the wage gap. In this line, the annual Gender Pay Gap report is published annually.

From the table of average remunerations by gender, age and professional category, a pay difference of 23% (22% in 2021). has been extracted. mainly due to the high turnover of women in senior positions in the last year. To this end, the implementation of measures for the inclusion of diversity criteria in future recruitments is foreseen. In any case, it should be recalled that, although the quantitative data on average salaries show the existence of such a pay gap, there is no wage discrimination based on gender or age.

In Brazil, the Company applies defined salary tables without making any gender distinction in order to enforce the right to equal treatment and non-discrimination between women and men in terms of remuneration. In any case, the difference in pay in Brazil, deduced from the figures of average remunerations for men and women, is 17.3%. mainly due to the under-representation of women in the sector when it comes to recruitment.

[167] The salary differences have been calculated using the equation: Wage gap = (Average men's remuneration – Average women's remuneration)/Average men's remuneration.
The British government requires companies to report on the pay gap between men and women. This can be viewed on the UK government webpage and on the London Luton Airport page. See chapter 'Links of interest'.
[168] Location with significant operations' is considered the same as in the rest of the Report. For more information see section 'About this report'.

Average remuneration and its evolution broken down by gender, age and professional categories or equal value
(Fixed + variable salary) (*) (**) (GRI 405-2)

		2021								2022 (***)							
		< 25 years old		Between 25 and 45 years old		> 45 years old		Average remuneration		< 25 years old		Between 25 and 45 years old		> 45 years old		Average remuneration	
		W	M	W	M	W	M	M	H	W	M	W	M	W	M	W	M
SPAIN (***)	Executives and graduates	0	0	46,780	48,288	54,203	56,426	**51,442**	**53,390**	0	0	49,333	50,625	58,023	60,693	**54,871**	**56,945**
	Coordinators	0	0	37,493	39,433	40,964	42,745	**40,502**	**42,298**	0	0	39,900	43,088	43,764	46,122	**43,359**	**45,750**
	Technicians	0	(*)	32,402	34,397	35,004	36,941	**34,330**	**36,061**	0	30,803	34,642	36,453	37,271	39,978	**36,634**	**38,732**
	Support staff	0	0	29,690	29,879	30,269	31,368	**30,058**	**30,917**	0	0	31,785	32,398	32,384	34,222	**32,216**	**33,754**
	Total	**0**	**(*)**	**38,039**	**38,088**	**40,740**	**41,827**	**39,967**	**40,650**	**0**	**30,803**	**40,799**	**40,502**	**43,474**	**45,222**	**42,763**	**43,725**
UNITED KINGDOM	Executives and graduates	0	0	66,248	73,356	90,102	128,980	**75,525**	**97,934**	(*)	(*)	59,897	71,434	65,540	108,746	**61,762**	**86,584**
	Coordinators	0	0	43,647	50,886	44,140	60,800	**43,943**	**56,173**	-	-	36,677	41,624	48,056	36,139	**40,024**	**38,882**
	Technicians	0	(*)	58,685	49,820	40,341	55,237	**47,679**	**51,884**	-	33,328	43,812	57,180	0	62,191	**43,812**	**58,891**
	Support staff	21,857	24,495	29,102	31,734	32,175	32,735	**29,824**	**32,019**	31,156	30,878	34,203	41,536	36,894	39,904	**34,944**	**40,591**
	Total	**21,857**	**27,096**	**33,067**	**39,952**	**38,149**	**51,204**	**34,506**	**44,315**	**31,917**	**32,349**	**39,378**	**49,091**	**43,017**	**59,396**	**40,217**	**52,422**
BRAZIL	Executives and graduates	-	-	62,504	53,715	39,431	90,296	**57,377**	**65,909**	-	-	70,509	76,498	121,940	120,920	**85,938**	**94,670**
	Coordinators	-	-	22,988	24,422	-	21,027	**22,988**	**24,319**	-	-	30,164	31,297	-	30,521	**30,164**	**31,205**
	Technicians	(*)	-	4,223	4,307	-	(*)	**4,223**	**4,303**	5,848	5,848	5,848	5,848	-	5,848	**5,848**	**5,848**
	Support staff	4,963	(*)	8,414	9,524	-	11,741	**8,226**	**9,810**	3,218	4.012	10,370	12,371	11,443	16,344	**9,377**	**12,109**
	Total	**4,778**	**(*)**	**13,576**	**12,793**	**39,431**	**35,454**	**13,746**	**14,985**	**3,744**	**4,624**	**16,806**	**17,623**	**52,880**	**51,884**	**17,554**	**21,214**

Euro/Pound exchange rate in 2022: EUR/GBP = 0.88693
Euro/Brazilian Real exchange rate in 2022 = 5.6386

(*) In those cases in which there is only one person in a specific category, the remuneration is not shown, to avoid their identification, although it has been taken into account for the purposes of calculating the total average pay..
(**) The remuneration of Senior Management is included in the Corporate Governance chapter. This has been taken into account for the purposes of calculating the total average remuneration.
(***) Included is the wage review conducted in 2022, which has resulted in an increase of 3.5% in Spain, 6% in the United Kingdom and 7% in Brazil.

Pay gap (*) (GRI 405-2)

		2021	2022
		Average Remuneration	Average Retribution
SPAIN	Executives and graduates	3.6%	3.6%
	Coordinators	4.2%	5.2%
	Technicians	4.8%	5.4%
	Support staff	2.8%	4.6%
	Total	**1.7%**	**2.2%**
UNITED KINGDOM	Executives and graduates	22.9%	28.7%
	Coordinators	21.8%	-2.9%
	Technicians	8.1%	25.6%
	Support staff	6.9%	13.9%
	Total	**22.1%**	**23.3%**
BRAZIL	Executives and graduates	12.9%	9.2%
	Coordinators	5.5%	3.3%
	Technicians	1.8%	0.0%
	Support staff	16.1%	22.6%
	Total	**8.3%**	**17.3%**

(*) Pay gap = (Average men's remuneration – Average women's remuneration)/Average men's remuneration.

Comparison with inter-professional minimum wages [169]

(GRI 202-1)

The salary pay of the standard starting category is determined by the level and by the nature of the role to be fulfilled, without distinction by gender.

At the end of the 2022 fiscal year, Aena's minimum wage is higher than the minimum wage in all countries in which it operates:

- In Spain, Royal Decree 152/2022, of 22 February, establishes a minimum wage of €1,000 per month (which is equivalent to €14,000 per year). In addition, the lowest matched average salary received at Aena companies in Spain has been €25,090 for men, and €23,549 for women. Therefore, the lowest matched average salary for men represents 79% over the Interprofessional Minimum Wage and the lowest matched average salary for women represents 68% over the Interprofessional Minimum Wage (in 2021, the lowest equalised wage was 65% of the minimum wage).
- In the UK, the average hourly wage is €34.15 for men and women, while the minimum and living wage requirements set by the UK government is €10.71[170] per hour. Therefore, men's average salary represents 219% of the minimum and living wage required and women's average salary represents 219% of the minimum and living wage required (in 2021 it represented 243%). In this regard, in 2022 the certification granted by the Real Living Wage Foundation was obtained and, in addition, the airport is working to expand this commitment to its value chain and ensure its fulfilment.
- In Brazil, the lowest salary has been €224.3 per month for men and women, both of which therefore exceed the legal minimum (set at €214.9) by 4.4% (55% in 2021). These salaries, as well as the rest of the minimum wages by category, are established in the local Collective Agreement.

Aena recognises the right to a decent living remuneration, in accordance with applicable regulations and legislation and the socio-economic context

Annual total compensation ratio[171]

(GRI 2-21)

The annual total pay ratio is 4.6 in Spain (4.7 in 2021), 8.5 in the UK and 29.6 in Brazil[172]. This indicator is calculated as the ratio of the annual total pay of the Company's best paid person to the median annual total pay of all employees (excluding the best paid person).

[169] Note: except best paid person
Euro/Pound exchange rate in 2022: EUR/GBP = 0.88693
Euro/Brazilian Real exchange rate in 2022: EUR vs BRL= 5.6386
In the UK, the average wage at London Luton Airport is £30.29 and the government minimum is £9.5. At Aena airports in Brazil, the average monthly wage is R$1,265 and the government minimum is R$1,212.
[170] See chapter 'Links of interest'.
[171] Locations with significant operations are considered to be the same as in the rest of the report. For more information see section "About this report".
[172] Information not available for the UK and Brazil in 2021.

5.1.3. Organisation of work time and disconnection

(GRI 3-3)

Working day

- Spain: in the case of AENA S.M.E., S.A., and AENA SCAIRM, SME, S.A., the working time is regulated in compliance with current employment legislation and with the provisions of the 1st Collective Agreement of the Aena Group. This agreement defines a daily working day of 7 hours and 30 minutes for personnel with normal working days, with the right to 30 minutes of rest, which is calculated as effective work time, as well as flexibility in the start time of the normal daily working day of up to 1 hour and 30 minutes. Likewise, the staff who provide services on a shift basis have an annual workday of 1,711 hours (Article 57 of the 1st Collective Agreement of Aena). The current Collective Agreement provides for a minimum of 7 days per year of leave of absence of Personal Matters. Thus, in the case of staff with a shift regime, the duration of leave – unless it has been deducted – will be the equivalent in hours of the normal working day, without prejudice to other paid leave categories regulated in said agreement or in the legal regulations, and the compensation of overtime is determined on this basis. On the other hand, the organisation of working time at ADI complies with the guidelines of the Collective Agreement for Offices and Bureaus of the Community of Madrid[173], which establishes an effective annual maximum working day of 1,765 hours (Article 28).

  A system of recording workdays has been implemented in both the physical offices and on the corporate intranet, prior to the approval of Royal Decree Act 8/2019, of 8 March, on urgent measures of social protection and the fight against job insecurity during the workday[174]. This system allows for the daily movements of workers to be monitored, being able to extract the historical overview of the same. To facilitate accessibility to the portal, several clarifying documents have been provided as well as a direct link.

- United Kingdom: the established working hours comply with all related legislation, including the Working Time Regulations 1998, allowing employees to limit their working time to 48 hours per week. Although there is no system for recording workdays for employees, there are specific clauses on the workday in the contracts. In addition, the family-friendly policies implemented at this airport allow employees to request flexible work or reduced hours of work. Some operational departments, including Security and Cargo, allow for the option to establish minimum hour contract that support greater work flexibility around family commitments of employees. In any case, the units of the Organisation and Human Resources Management carry out the supervision of the compliance of the workday based on the applicable regulations mentioned above.

- Brazil: working time is determined as established in Brazilian legislation, and in the Collective Agreement in which a weekly workday of 44 hours or 220 hours per month is established. In addition, for those employees whose workday is shift-based, they are allowed to change their default workday to one consisting of 12-hour shifts for 2 consecutive days, followed by 2 days off. In addition, it provides for overtime to be worked by employees governed by the shift regime, with the corresponding wage payment.

  For its part, those employees who are governed by the administrative workday of 44 hours per week may be compensated by performing overtime or days off, or even receive a separate paycheque on a semi-annual basis.

  The workday is recorded in an external electronic system, and its supervision is carried out by the Organisation and Human Resources Management units in charge of it.

Digital disconnection

In Spain, Aena has the Digital Disconnection Policy[175] as one of the formal instruments of an internal nature aimed at enhancing the right to a balance of work activity with personal and family life.

The document establishes guidelines and recommendations regarding digital disconnection, including:

- Promotion of measures that contribute to work-life balance through recognition of the right to digital disconnection.
- Imposing limits on holding meetings – both in person and remotely – outside working hours, unless due to force majeure or urgent need.
- De-incentivise the sending of emails or other communications during non-working hours, unless absolutely necessary.
- Promoting responsible use of digital tools.
- Guarantee of the right to digital disconnection during vacations and other non-business days, under the terms provided in the current policy.
- Commitment to the absence of negative impact on the possibilities of promotion or the imposition of disciplinary sanctions due to the exercise of the right to digital disconnection.

[173] See chapter 'Links of interest'.
[174] Article 10 of Royal Decree Act 8/2019, of 8 March, on urgent measures of social protection and the fight against job insecurity in the working day. See chapter 'Links of interest'.
[175] This is also applicable to ADI.

- Organisation of training and awareness-raising activities on the protection and respect of the right to digital disconnection.

In the UK and Brazil, airports do not have a digital disconnection policy. Although, London-Luton Airport has implemented a number of measures aimed at ensuring disconnection, such as compliance with WTR regulations to ensure employees do not exceed their working hours, issuing communications aimed at preventing workers from checking their emails and phones outside of work.

Teleworking policy

In Spain, the Employment Policy promotes managing the balance between work, personal and family life, and provides greater autonomy to employees in planning and fulfilling their professional activities and objectives with the implementation of tools to modernise the work organisation.

The requirements necessary to access teleworking are reflected in this policy (mainly related to the position/ occupation, technical requirements, material means and workplace) as well as the subsequent conditions for the performance of the work through this modality. Since its start-up, approximately 80% of the people who can telework based on their position/occupation, have joined the teleworking system, thus reflecting the success of its implementation.

In order to ensure the prevention of occupational risks in teleworking, necessary information and training have been provided to all persons under this modality (reaching 100% coverage) so that their work activity continues to be carried out in health and safe conditions.

For its part, in the UK, some employees have the possibility of adopting the hybrid work modality, estimated at 24% of the workforce in 2022. For this purpose, there is a specific Guide that includes, among other aspects, guidelines to ensure the best health and safety conditions for employees who enjoy this modality. Likewise, in this regard, meetings or events are periodically organised with the various work teams and self-assessments are carried out, to monitor the status of this working mode.

In Brazil, the teleworking modality is not implemented.

5.2. Diversity and inclusion

(GRI 3-3)

Aena's framework of action and management in terms of equality, diversity and non-discrimination is composed of a set of standards and tools.

The Company's new Strategic Plan includes, for the first time, specific equality goals.

London-Luton Airport is part of partnerships to promote diversity with LBC through Luton Rising as well as the Employers Network for Equality and Inclusion.

Aena's main specific equality objectives

Aena's Strategic Plan and Sustainability Strategy. Reach 45% of female managers of central services and 25% of female managers at airports by 2026.
.

Equality Plan II: objectives, more than 40 monitoring measures and KPIs.

The Responsible Business Strategy of the UK aims to create a diversity and inclusion strategy to improve diversity and inclusion in aviation, with a particular focus on achieving greater female representation.

In the UK, London-Luton Airport is committed to diversity and inclusion based on the Equality Act 2010, rather than the provisions of the aforementioned ILO conventions, considering them broader. This legislation encompasses 9 areas as protected characteristics: age, gender, race, disability, pregnancy, marital status, sexual orientation, gender change and religion. In addition, employees are required to adhere to the Code of Conduct and to maintain professional behaviour at all times by following the local disciplinary policy to punish instances of any harassment that may arise.

Additionally, local HR policies are designed to ensure employees are supported equally. For its part, the HR department is committed to ensuring that the matters and situations of employees, whether professional or personal, are treated in an inclusive and confidential manner. These matters are overseen by HR Business Partners and generally do not need to be escalated to the Board level.

In Brazil, a local diversity and inclusion policy is being worked on. However, the Internal Standards Manual that

each employee must accept, establishes the rejection of discrimination both in the workforce and towards customers.

Disciplinary measures outlined in the Manual include verbal or written warnings and may also result in the suspension of the worker. Likewise, the supervision of the non-discrimination measures implemented in Brazil is carried out mainly in conjunction with the union to which the Company is linked, with the participation of the Board of Directors if necessary.

Aena conceives diversity in its broadest and most plural sense (race, nationality, age, social origin, gender, marital status, sexual orientation, religion, political ideology, disability or any other personal, physical or social condition)

A firm commitment to equal opportunities and non-discrimination extended throughout the value chain

Workers

- Rejection of any type of discrimination.
- Equal opportunities, respect and promotion of diversity among its workers, at any stage of the development of their employment relationship..
- Training on discrimination and harassment in the workplace.
- Inclusive culture ensuring the elimination of barriers and equal access to work.
- Multiple and diverse teams (skills, experiences, knowledge, values and attitudes).
- Selection and promotion based on objective criteria of merit and skills.
- Development of workers with disabilities under equal conditions.

Supply chain

- Transparency. Non-discrimination and equal treatment between male and female bidders
- Selection and award criteria that promote equality and diversity.
- Obligation to adhere to the Company's health and safety practices.
- Control measures aimed at ensuring compliance by third parties with current employment legislation, ensuring dignified and fair treatment, and a work environment in which respect for human rights, diversity, inclusion and non-discrimination is promoted.

Clients

- Relationship with customers based on the principles of transparency, privacy, confidentiality, freedom of expression and non-discrimination.
- Accessibility and adaptation of airport facilities for everybody. Development of specific measures in airport facilities.
- Quality service that guarantees all people can enjoy air transport, whatever their degree of functional diversity.
- Use of inclusive language.

Society

- Promotion of plans and actions that result in the improvement of economic, social and cultural rights, equal opportunities, diversity, inclusion and non-discrimination, as well as initiatives and programmes that involve a positive contribution to human rights and SDGs.
- Special attention to groups that are in a vulnerable situation (integration of young people into the labour market, the contracting of services with special employment centres, etc.).

…which is made effective through a set of standards and tools.

Workers

Collective Agreement: Commitment to offer the same opportunities in access to work and professional promotion for all personnel. Rejection of any type of discrimination.

The Collective Agreement of ANB: Includes clauses to protect women from sexual harassment.

London Luton Airport Sustainability Strategy and Responsible Business Strategy: formalises the organisation's commitment to diversity through concrete actions and specific objectives in terms of inclusion, non-discrimination and promotion of equality.

Equality Plan: During 2022 and in compliance with RD 901/2020, of 13 October, the new Aena Equality Plan has been formalised. A diagnosis of Aena's current situation has been made for its preparation and a series of measures have been established to help meet the specific objectives for each of the areas in which Aena can improve in terms of Equality.

Protocol for acting on sexual harassment: Measures to prevent and avoid harassment situations, and the procedure to follow in the event of a complaint about sexual or gender-based harassment.

For its part, Brazilian law establishes **equal rights for men and women**.

Aena and ANB Code of Conduct: Commitment to ensure equal opportunities in access to work and professional promotion, avoid any type of discrimination, as well as the prohibition of any type of harassing behaviour in the work environment and the promotion of a work environment and climate compatible with the personal and family lives of workers.

Board of Directors Regulations: raises diversity and non-discrimination to the highest level of the organisation, explicitly assuming the commitment to establish a representative objective for the least represented gender and report on it. It also includes, among the competencies of the Sustainability Committee, informing, driving, guiding and supervising diversity objectives, action plans, practices and policies, among others.

Selection policy for Board Member candidates: It recognises diversity as a key factor for the selection and proper functioning of the Board, and considers achieving gender and age diversity as differentiating factors.

Sustainability Policy: Includes among the principles of action that of providing a safe and healthy work environment characterised by equal opportunities and non-discrimination, the promotion of diversity, talent management, and the reconciliation of professional and personal life, paying special attention to the difficulties faced by people with special needs.

Human rights policy: reflects the commitment to reject any type of discrimination and ensure equal opportunities, respect and the promotion of diversity among its workers. Commitment that extends to the relationship with customers, suppliers and the community.

Stakeholder relations policy: protects the rights and interests of stakeholders and guarantees equal treatment with regard to information, participation and exercise of their rights.

Disability policy: reflects the company's commitment to contribute to building a society where everyone without exclusion and, in particular, for disability issues, has their place. London Luton Airport policy, aligned with the Company's framework of action, assumes, among others, the commitment to safeguard the interests of persons with special needs (users, visitors, other agents, or employees) and to guarantee access to the employment of any person
regardless of their condition.

Applicable regulations on contracting (Act 9/2017): Provides for the inclusion of diversity clauses in tenders, as well as monitoring mechanisms of the degree of compliance with them (and penalty measures, if applicable).

Supply Chain

Supervision mechanisms and tools for reporting incidents included in the **System of regulatory compliance**, due diligence procedure, internal procedures to ensure compliance with the diversity and equality clauses included in the bidding specifications, among others.

Corrective/disciplinary actions in case of non-discrimination and harassment, and sanctions for noncompliance, included in the **protocol of action against sexual harassment and the Code of Conduct**.

Communications and reporting: through the complaints channel.

Training actions on diversity, equality and non-discrimination.

Effective measures to promote flexibility, equality and reconciliation (childcare, maternity/paternity leave beyond what is legally established, etc.).

Supervision mechanisms

Appointments, Remuneration and Corporate Governance Committee: explicitly undertakes to establish a representation objective for the least represented sex on the Board of Directors, to prepare guidelines on how to achieve said objective and to inform the Board on gender diversity issues, ensuring that it is reported in the annual Corporate Governance Report.

Sustainability and Climate Change Committee: its competencies include knowledge, promotion, orientation and supervision of objectives, action plans, practices and policies on diversity, among others.

Specialised committees, such as the Equality Committee, in charge of ensuring the monitoring and compliance with the Equality Plan, analysing the best practices for its possible implementation, as well as carrying out awareness-raising and information campaigns.

5.2.1. Gender diversity

(GRI 3-3)

In line with Sustainability Strategy 2021-2030, in Spain, after a review and diagnosis process, the Negotiating Committee approved in December 2021 the Aena Equality Plan II, being registered on 4 January 2022.

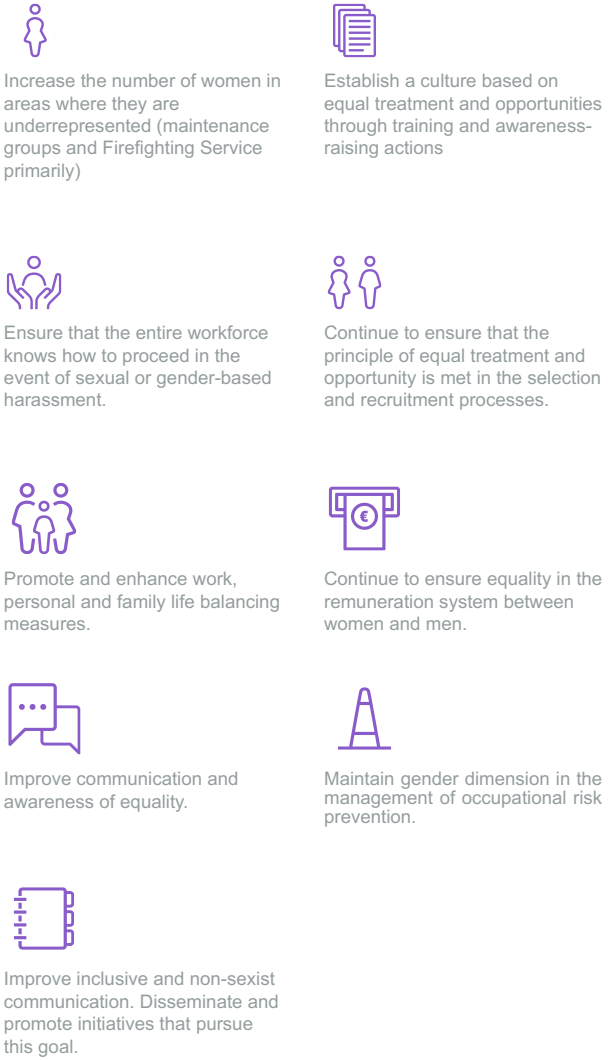
Although the analysis of the situation concluded that there is no discrimination, through the aforementioned Plan it advocates to continue promoting and guaranteeing equal treatment and opportunities between women and men through an orderly set of objectives and more than 40 measures in the following matters:

- Professional selection and promotion.
- Training.
- Employment conditions.
- Joint responsible in the balance of family and personal life.
- Under-representation of women.
- Prevention of sexual and gender-based harassment.
- Communications.
- Procurement.

Examples of specific objectives include: maintaining pay transparency, advancing awareness, reviewing the language used in company documents and portals, or improving social tiebreaker criteria for recruiting.

For the achievement and monitoring of these specific objectives, a series of KPIs have been defined, whose supervision is carried out by the Joint Committee on Equality.

MAIN OBJECTIVES OF THE EQUALITY PLAN II



The Plan is valid until 2025 (as is the Pay Audit mentioned in section 5.1.2. 'Remuneration Model'). In 2022, some of the measures contemplated in the Plan were implemented, among which the following is worth noting:

- Creating a space on the intranet to group all Equality information so that it is easily accessible.
- Preparation of the remuneration register.
- Creation of images and logos specific to equality communications.
- Review of the selection calls taking into account inclusive and non-sexist language.
- Equality and Bias Elimination Training for specific teams and areas of the organisation..
- Creation and dissemination of a decalogue for the dissemination of inclusive and non-sexist language

In Brazil, although a specific equality plan is not available, the commitment is included in the Company's internal standards. These include the Code of Conduct and the Sustainability Policy.

In the UK, and in order to promote gender diversity, the Human Resources team has been restructured and a Culture and Engagement Manager has been hired for the first time to pay attention to the employee experience. There is also a Rewards Manager and an Employee Services Manager who support workforce development and ensure equal opportunities. The main objective pursued is to create a diversity and inclusion strategy to improve this aspect in the aviation sector, with special attention to achieving greater female representation.

Aena's main specific equality objectives

Aena's Sustainability Strategy: Reach 45% of female managers in central services and 25% of female managers at airports by 2026.

Develop specific actions to promote programmes aimed at women and promote and participate in campaigns and events related to equality.

The Responsible Business Strategy of London-Luton Airport, even though at present it may not have specific goals and actions in place, is being revised to align with the new corporate strategy.

Gender diversity in the company's organisational structures

Women make up 37.2% of the Group's workforce (37% in 2021), 40% of the Board (26.7% in 2021) and 44% of management, middle management or graduate positions (as in 2021). In addition, 33.1% hold STEM positions (34% in 2021) and 39.5% of those who contribute directly to revenue generation (37% in 2021).

Cases of discrimination and corrective actions

(GRI 2-26; 3-3; 406-1)

During 2022, 3 harassment complaints were received in Spain (5 in 2021), 0 in the United Kingdom (0 in 2021) and 3 in Brazil (0 in 2021).

In this regard, in Spain[176], the Protocol for dealing with Harassment and the Protocol for deadline with Sexual and Gender-Based Harassment are available, as well as the reference documents in the event of any circumstance of this nature arising.

With regard to the procedure for managing any reports of this nature that may be received, both Protocols provide for an initial phase of inquiry and assessment. In the event that there are any indications of discriminatory action, the corresponding processing will continue, initiating a comprehensive investigation, disciplinary actions, etc.

In this line, all the complaints received have been evaluated by the organisation, of which the harassment protocol has been activated in two cases and a report is pending, and in one case it has been determined that it is not appropriate to activate the harassment protocol.

Likewise, within the framework of the Equality Plan II, the actions already implemented include the creation of a specific email address, in order for those affected by a situation of sexual or gender-based harassment to be able to submit their complaint, thus activating the protocol of sexual and gender-based harassment.

In the UK, London-Luton Airport follows the formal complaints procedure established by ACAS (Advisory, Conciliation and Arbitration Service), which establishes the steps to be followed:

1. Understand the options.
2. File a formal complaint.
3. Respond to the complaint filed.
4. Meet to understand and evaluate the report.
5. Decide on the verdict.
6. Activities after the reporting procedure.

In Brazil, as described in the Collective Agreement, any conduct that may result in harassment is not tolerated. Investigations of reported reports are also conducted and, if deemed warranted, appropriate disciplinary action is taken.

Equality training

- In 2022, in Spain, 364 workers have had access to training programmes in content related to the promotion of equality between women and men, 170% more than the previous year (135 workers trained in this subject). Similarly, 100% of the workforce, including staff in management and positions of responsibility, has participated in this type of training over the last five years.
- Several training sessions have been organised for the selection and communications teams, aimed at eliminating bias and promoting the use of inclusive and non-sexist language. In addition, an online course entitled 'Fight your biases' has been disseminated to the entire workforce, to raise awareness and promote this type of action.

[176] Aena S.M.E., S.A. and AIRM

Percentages of workforce by gender, age and professional category (as of 31 December) (GRI 405-1)

2022

	Spain						United Kingdom						Brazil						TOTAL					
	< 25 years old		Between 25 and 45 years old		> 45 years old		< 25 years old		Between 25 and 45 years old		> 45 years old		< 25 years old		Between 25 and 45 years old		> 45 years old		< 25 years old		Between 25 and 45 years old		> 45 years old	
	W	M	W	M	W	M	W	M	W	M	W	M	W	M	W	M	W	M	W	M	W	M	W	M
Senior Management	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%
Executives and graduates	0.0%	0.0%	4.1%	5.2%	6.1%	7.3%	0.0%	0.0%	0.3%	0.5%	0.2%	0.4%	0.0%	0.0%	0.1%	0.1%	0.0%	0.1%	0.0%	0.0%	0.045 %	5.8%	6.3%	7.8%
Coordinators	0.0%	0.0%	0.5%	1.5%	3.5%	8.0%	0.0%	0.0%	0.1%	0.0%	0.1%	0.0%	0.0%	0.0%	0.2%	0.4%	0.0%	0.1%	0.0%	0.0%	0.8%	2.0%	3.6%	8.0%
Technicians	0.0%	0.2%	4.4%	11.7%	11.4%	19.7%	0.0%	0.0%	0.1%	0.3%	0.0%	0.3%	0.0%	0.0%	0.2%	0.9%	0.0%	0.1%	0.0%	0.2%	4.6%	12.9%	11.4%	20.1%
Support staff	0.0%	0.0%	0.9%	0.7%	1.8%	1.6%	0.2%	0.1%	1.2%	1.8%	0.8%	1.0%	0.1%	0.1%	0.7%	0.6%	0.1%	0.1%	0.3%	0.2%	2.9%	3.1%	2.7%	2.7%
Total	**0.0%**	**0.2%**	**10.0%**	**19.1%**	**22.9%**	**36.6%**	**0.2%**	**0.1%**	**1.7%**	**2.6%**	**1.1%**	**1.7%**	**0.2%**	**0.1%**	**1.1%**	**2.0%**	**0.1%**	**0.3%**	**0.3%**	**0.4%**	**12.8%**	**23.8%**	**24.0%**	**38.6%**

2021

	Spain						United Kingdom						Brazil						TOTAL					
	< 25 years old		Between 25 and 45 years old		> 45 years old		< 25 years old		Between 25 and 45 years old		> 45 years old		< 25 years old		Between 25 and 45 years old		> 45 years old		< 25 years old		Between 25 and 45 years old		> 45 years old	
	W	M	W	M	W	M	W	M	W	M	W	M	W	M	W	M	W	M	W	M	W	M	W	M
Senior Management	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%
Executives and graduates	0.0%	0.0%	4.3%	5.2%	5.8%	7.1%	0.0%	0.0%	0.1%	0.3%	0.1%	0.2%	0.0%	0.0%	0.1%	0.1%	0.0%	0.1%	0.0%	0.0%	4.5%	5.6%	5.9%	7.4%
Coordinators	0.0%	0.0%	0.7%	1.7%	3.5%	7.9%	0.0%	0.0%	0.1%	0.2%	0.1%	0.2%	0.0%	0.0%	0.1%	0.4%	0.0%	0.0%	0.0%	0.0%	0.9%	2.2%	3.6%	8.1%
Technicians	0.0%	0.0%	4.6%	12.7%	11.3%	19.7%	0.0%	0.0%	0.0%	0.4%	0.0%	0.3%	0.0%	0.0%	0.2%	1.0%	0.0%	0.0%	0.0%	0.0%	4.8%	14.1%	11.3%	20.1%
Support staff	0.0%	0.0%	1.0%	0.8%	1.6%	1.5%	0.1%	0,0%	1.4%	1.8%	0.8%	1.1%	0.0%	0.0%	0.6%	0.5%	0.0%	0.1%	0.1%	0.0%	3.0%	3.1%	2.5%	2.7%
Total	**0.0%**	**0.0%**	**10.6%**	**20.4%**	**22.2%**	**36.4%**	**0.1%**	**0.0%**	**1.6%**	**2.6%**	**1.0%**	**1.8%**	**0.0%**	**0.0%**	**1.0%**	**2.0%**	**0.0%**	**0.2%**	**0.2%**	**0.1%**	**13.2%**	**25.0%**	**23.2%**	**38.4%**

	2021	2022	Target
Women in the workforce (%)	**36.6%**	**37.2%**	
Women on the Board (%)	**26.7%**	**40.0%**	**Maintain or exceed 40% in 2023 and beyond**
Women in positions of management or graduates (%)	44.2%	44.5%	
Women in pre-managerial positions in management careers (%)	41.7%	44.5%	
Women in organisational positions regarded as STEM	33.7%	33.1%	
Women in positions that directly contribute to revenue generation (%)	36.6%	39.5%	

(*) Over the total number of men and women in each group

Most relevant actions carried out in the area of gender diversity in 2022[177]

- Preparation of the 'Guide to more inclusive communication'.
- 'Leaders creating leaders' Mentoring Programme, in which 102 women participated, representing 41% of the total number of participants, among which 42% took on the role of mentors. In the edition that started in 2022, 38 people participated, of which 15 were women (39.5% of participants) and 32% were mentors.
- Highly specialised training programmes, mainly aimed at positions of responsibility and taught by prestigious business schools such as IESE, ESADE, IE, CUNEF and at different Universities. In 2022, 3 managers have attended these types of programmes, in which they have received training in matters such as Finance, Public Procurement, Competition Law, among others.
- Joining the STEAM Alliance for Women's Talent 'Girls making a mark in Science', a protocol of intention signed by the Ministry of Professional Education and Training and the Ministry of Transport, Mobility and Urban Agenda and companies, entities and institutions under this ministry, with the goal of driving STEAM vocations (Science, Technology, Engineering, Arts and Maths) among girls and young people, as well as narrowing the gender gap in these types of disciplines.
- Hosting a virtual talk with two of the authors of the Cervantes Institute's Non-Sexist Communication Guide.
- Dissemination and/or collaboration in initiatives related to gender equality and diversity developed by public and private institutions:
  - International Women's and Girl's Day in Science, International Women's Day in Engineering.
  - The Airport Manager of Barcelona-El Prat Josep Tarradellas Airport participated in the conference organised by Sheleader, an entity specialised in the empowerment of women both in the professional and personal field and collectively; as well as in the seminar 'The direction of public transport in Catalonia: female in plural'.
  - The Vigo Airport Manager has participated in the first edition of the business forum on 'Women who lead the current and future company', and in the programme of interviews on 'In Female in the Singular', aired on Televisión Galicia.
- Lighting of some of the airports in the network in celebration of 'Women's Day'.
- Aena plans to provide online training on the prevention of sexual harassment to the entire Aena workforce.

[177] In Brazil, no specific actions have been taken in this regard, because the policy on this matter is in the process of formalisation.



- Exhibition of exhibiting samples at airports to support different commemorations, such as the 'Women on a Rural Island' exhibition at Gomera Airport in observance of International Rural Women's Day, or the 'Women: A Patchwork of Life' exhibition at César Manrique-Lanzarote Airport in observance of the International Elimination of Violence against Women Day.

- Aena ratifies her inclusion in the IBEX Gender Equality Index, which recognises and promotes gender equality, launched by the Spanish Exchanges and Markets company (BME, Bolsas y Mercados Españoles). The requirements to be listed on the index require female representation between 25% and 75% on its Board of Directors, as well as between 15% and 85% in Senior Management.
- In the UK at London-Luton Airport:
  - Joining ENEI (Employers Network for Equality & Inclusion), a non-profit organisation that helps businesses build and maintain diverse teams as well as inclusive cultures through training and consulting services.
  - Development of an internal report on Equality, Diversity and Inclusion. Preliminary findings aim to reshape the recruitment process, develop career channels, create a brand proposition and focus on the growth mindset.
  - Scope during the fiscal year 2022 of various commitments originally acquired with signing of the Women in Aviation Charter in 2019, such as the establishment of a strategy and objectives to promote diversity as well as the external reporting thereof.

Coinciding with March 8, ACI Europe has included Aena as an example in its campaign to show how airports in Europe are implementing their sustainability strategy aligned with the SDGs.



5.2.2. Universal accessibility to employment for people with disabilities

(GRI 3-3)

Aena, both in Spain as well as in the United Kingdom and Brazil, makes as many adaptations as necessary to guarantee and promote the adequate participation in the employment calls and screening tests of all people, regardless of their condition, paying special attention to those who may have any disability, in any of its forms.

In Spain, internally, the development of specific initiatives for the training and awareness of the workforce in matters of disabilities is also promoted. For its part, London-Luton Airport in the UK carries out activities such as holding and promoting accessible job fairs, as well as posting vacancies through local platforms such as Connect 2 Luton, the employment page of the LBC website and local newspapers (as agreed between the airport and the respective bodies and organisations from time to time), in order to promote and ensure access to employment among all persons. In addition, specific job vacancies for people with disabilities are posted on the local website in Brazil (specifically in the section 'Trabalhe Conosco').

At the end of the 2022 fiscal year, the company has 1.53% of employees with functional diversity Specifically, in Spain, they account for 1.46% and in Brazil, 3.15%.

Also, the employability of individuals with functional diversity is also indirectly promoted through the hiring of special employment centres, as an example of alternative measures[178], This is in compliance with Article 42 of Royal Legislative Decree 1/2013, of 29 November, approving the Consolidated Text of the General Law on the rights of persons with disabilities and their social inclusion, as it relates to the agreed ratio of jobs reserved for people with a disability.

Employees with disabilities (*) (GRI 405-1)

	Manpower (**)		% of total workforce	
	2021	2022	2021	2022
Spain	114	120	1.44%	1.46%
United Kingdom	-	-	-	-
Brazil	7	11	2,41%	3.15%
TOTAL	**121**	**131**	**1.48%**	**1.53%**

(*) Employee disability status is not currently recorded in the UK as it is considered confidential information. The total headcount in the United Kingdom at the end of the 2022 fiscal year amounted to 685, which represents 7.4% of the total workforce, so its exclusion from the data does not significantly affect it.
(**) See footnote.

[178] Data corresponding to the actual number of employees with disabilities in the workforce as of 31 December, without considering the equivalent number resulting from compensatory measures. According to current legislation, the percentage of employees with disabilities is calculated based on the actual number of people with disabilities in the workforce as of 31 December, and the equivalent number of people resulting from the compensatory measures approved by the Resolution of the General Directorate of the Public Service of State Employment (SEPE) on the Declaration of exceptionality and adoption of alternative measures for the fulfilment of the reserve quota in favour of workers with disabilities. The actual number of employees with disabilities in Spain, as of 31 December 2021, was 114 (1.44%) and in 2022, it was 120 (1.46%). However, as of the date of publication of this report, the Resolution from the competent body regarding the Declaration of exceptionality corresponding to the fiscal years of 2020, 2021 and 2022, which allows for the corresponding total percentage of employees with disabilities to be included.

5.2.3. Accessibility of the services

(GRI 3-3)

Aena has facilities and work centres that facilitate the access of employees, customers, suppliers and users incorporating adaptations that are objectively necessary in the work environment and offering a specific service at airports for people with reduced mobility (PRM).

Likewise, in order to incorporate the best measures into its Company facilities and adapt them to the possible needs that may be required, Aena collaborates with reference organisations (for example, in Spain, CERMI or the Spanish Confederation of Autism).

For its part, in the United Kingdom, London-Luton Airport collaborates with Occupational Health providers to ensure that, as necessary, reasonable accommodations are carried out for those employees who require them (as in the recruitment process , as mentioned in section 5.2.2 above "Universal accessibility to employment for people with disabilities").



5.2.4. Diverse and inclusive work environment

Like the rest of the public companies of the MITMA group[179], Aena belongs to the LGTBI Enterprise Network for Diversity and Inclusion (REDI, Red Empresarial por la Inclusión LGTBI), whose mission, as established in the protocol signed by its constituents, is to promote the diversity and inclusion of the LGBTI group in the field of the State Public Sector, promoting awareness and the appropriate environment for the execution of specific initiatives.

Having laid the basis for the protocol, the continuation of progress in the normalisation and visibility of the LGTBI group is framed as the main line of action to eradicate discrimination as well as to facilitate the integration of the group in an adequate work environment within companies such as Aena.

Aena reaffirms its commitment against discrimination and promotes awareness and the appropriate environment for the effective inclusion of the LGBTI group in the work environment.

5.2.5. Cultural diversity in governing bodies and employees

Aware of the value of the confluence of different cultures and nationalities in the workplace and corporate field, Aena seeks to promote and maximise the diversity of its team, having HR policies that ensure equal treatment. In this regard, the Company workforce has, as in 2021, a total of 18 different nationalities.



[179] Adif, Adif-AV, ENAIRE, INECO, State ports and Renfe Operator.

Distribution of employees in the workforce by nationality (*)				
	% of the workforce		% in managerial and director positions	
	2021	2022	2021	2022
Spanish	95.98%	95.41%	98.35%	98.22%
Brazilian	3.50%	4.01%	1.15%	1.26%
Italian	0.12%	0.11%	0.15%	0.05%
French	0.06%	0.11%	0.05%	0.09%
German	0.06%	0.07%	-	0.05%
Venezuelan	0.05%	0.06%	0.15%	0.19%
British	0.04%	0.05%	-	0.00%
Swedish	0.04%	0.04%	-	0.00%
Others	0.16%	0.15%	0.15%	0,14%
TOTAL	**100%**	**100%**	**100%**	**100%**

(*) The nationality of employees is not currently recorded in the United Kingdom, so this information is not included in the table.

5.2.6. Generational diversity, age management and the promotion of the integration of young people in the workplace

(GRI 3-3)

Aena boosts employment and training among younger people and the generational diversity of the workforce:

- The average age of the workforce in 2022 is 47.63 years for men and 48 years for women (47.75 for both men and women in 2021).
- In 2022, various initiatives have continued to be developed to promote the integration of young people in the workplace. These include:
  - In Spain, at the close of the fiscal year:
    - 23 agreements in force: 15 with universities (public and private), with 4 study, training or business centres and 4 vocational training centres, enabling 69 bachelor's and master's degree students and 11 vocational training students to carry out curricular or extracurricular internships in Spain during 2022.
    - Participation in 5 job fairs.
    - The creation of a network of brand and diversity ambassadors has been reactivated through the Company's 'Employer Branding' strategy, which seeks to value its heterogeneity among other aspects. Specifically, the 1st Workshop of Brand and Diversity Ambassadors of Aena has been held, with almost 90 ambassadors from different sites, who have been appointed with consideration given to equality and diversity in terms of age, gender, occupation, professional level, length of service in the company and workplace.
    - In addition, career development plans have been rolled out and an analysis of the

Succession Plan is conducted on an annual basis for key positions.

- In the UK, generational diversity in the workforce continues to represent an aspect promoted by London-Luton Airport, with its workforce having an age range from 22 to 72 years (with the average age being 42 years). In this regard, it is guaranteed that age is not an impediment to the selection process.
- In addition, by way of example, in collaboration with The Prince's Trust and The Launch Group, the opportunity is offered to young people in the area to enjoy an approximately five-week airport experience to promote employability and enhance job skills.
- In Brazil, the commitment to generational diversity is reflected in the development of the Jovem Aprendiz programme, which seeks to promote the employability of young people from 18 years of age.

Distribution of the workforce by age ranges (%) (Consolidated)

	2021	2022
< 30 years old (%)	2.75%	3.77%
30-50 years old (%)	57.38%	55.36%
> 50 years old (%)	39.87%	40.87%

	Agreements with universities	Agreements with business schools	Agreements with professional training centres
BALEARIC ISLANDS	University of the Balearic Islands		
CADIZ	University of Cadiz		
CATALONIA	Polytechnic University of Catalonia		
GALICIA	University of Vigo		
LEON	University of Leon		
MALAGA	University of Malaga		
MADRID	Carlos III University Polytechnic University Autonomous University Complutense University Rey Juan Carlos University University of Alcalá de Henares Pontifical University of Comillas Puerta de Hierro Hospital	CUNEF Garrigues Study Centre The College for International Studies	IES Virgen de la Paloma IES Francisco Tomás y Valiente ISFP Claudio Galeno IFP Vigiles
SEVILLA	University of Seville	Cajasol Institute of Studies	



5.3. Promotion and knowledge evelopment of talent, skills

(GRI 3-3)

5.3.1. Commitment to talent attraction, development and retention

The new Strategic Plan recognises Culture and Talent as key enablers for achieving the Company's stated goals, and the best performance of the Plan itself. This is also stated in Sustainability Strategy 2021-2030, in the line of 'Career Development', focused on talent attraction and training of workers in order to detect and promote high performance, motivation and engagement. All of the above also results in the improvement of the Aena brand image.

In the UK, the Responsible Business Strategy of London-Luton Airport, aligned with the Sustainability Strategy, contains among its objectives the attraction and acquisition of talent as well as guaranteeing the professional development of employees.

In Brazil, the HR strategy incorporates local commitment to internal development and promotion, as well as benefits that encourage talent retention. All of this results in the improvement of the corporate climate.

5.3.2. Attracting, developing and retaining talent

(GRI 404-2)

To make it effective, a number of specific actions are proposed, such as:

- Employer Branding Strategy: with the aim of fostering a feeling and pride of belonging, as well as attracting and retaining the best talent to meet future challenges.
- Brand and diversity ambassadors, to make the strengths of the company visible and improve its appeal in the field of professional development, directly involving employees in the initiative.
- Career development and succession plans for key positions.
- Potential management programmes.
- New approaches to the mentoring programme.
- The contribution by London-Luton Airport in the UK to the Luton Council's Training Academy or the extension of the learning programme. In this regard, it is worth mentioning the collaboration with local partners for the promotion of employment in the local environment[180], participation in different job fairs, as well as in the Prince's Trust initiative, a charitable organisation focused on promoting the employability of young people. Work has also been done in collaboration with the Department of Work and Pensions (DWP), the Passport to Employment of Luton Borough Council (LBC), and other local charitable groups to promote local employment. As of the fiscal year 2023, the goal is to continue to improve the management of training and development opportunities, as well as the implementation of new goals in the performance management, development appraisals and talent.
- In Brazil, an analysis of employees in key positions in the organisation is conducted. Likewise, the availability of Career Plans and the feedback culture are upheld as a useful tool in the attraction and development of internal talent.



[180] The impact of measures to promote employment is not documented directly from a strategic perspective, although new jobs created are documented monthly through People's Councils.

Aena promotes the attraction and retention of talent, promotion of employability and professional career development

Internal and external employment	Technical and competence training	Career development and growth	Knowledge management and leadership	Relying on talent

With concrete actions such as

Employer branding strategy, brand ambassadors, career development and succession plans, collaborations with organisations pursuing specific objectives:

Reinforce the feeling of pride and belonging in the workforce	Achieve greater talent attraction and locate the most appropriate profiles, both externally and internally	Identify the potential of the organisation, including senior career management	Offer better development opportunities	Facilitate generational respite and anticipate long-term employment needs and qualification requirements

- Career development and succession plans for key positions.
- Training/internships scholarships for master's and undergraduate degree students and signing new agreements with Universities and professional training centres throughout the territory.
- Participation in job fairs.
- Improved dissemination of job requisitions, selection processes and internal communications.
- Potential Management Programme.
- Mentoring and/or coaching programmes (see Training section).
- Evaluation of opportunities to develop new approaches to the Mentoring Programme.

Assessment of internal talent: Aena´s foundation

In Spain, the performance of Aena professionals is evaluated periodically.

Performance Management stands as a necessary tool for identifying areas for improvement of worker in the interests of development, identifying the degree of achievement of the objectives set annually and evaluating the skills and behaviours of professionals.

Performance appraisals are conducted at least semi-annually and are measured primarily through three types of objectives:

- Company goals. They link each professional with the results of the company's overall activity, fostering a shared vision of the company. They will consist of those objectives of the Strategic Plan determined by the Management Committee, based on the strategic lines, economic and market recommendations, as well as the results of the previous fiscal year.
- Team goals. These must be aligned with the business objectives, and in turn both are set by taking the Strategic Plan and the Operational Plans of the different units as a starting point.
- Personal goals: These are related to the performance of each professional. They are structured into job-specific objectives, values, and training.

The weighting of the aforementioned types of objectives is not fixed, this being determined annually by the Management Committee based on the strategic priorities of each fiscal year. The organisational level of the professional and consequently their ability to influence the achievement of the objectives also have an effect on assigned goals and their weighting.

In addition, throughout the year, the evolution of the objectives is monitored by the immediate managers in the hierarchy of the company through the use of indices and statistics (in the case of company and team objectives, this monitoring is carried out through the Operational Plans).

The results of these appraisals are linked to remuneration and allow the performance of workers to be oriented by identifying possible training actions. In this regard, it should be mentioned that 100% of Spain's workforce participates in the performance management system.

In relation to the appraisal of the performance of personnel with positions of responsibility (representing 14.4% of employees, 14.7% in 2021) in the area of human resources management, a part of their complete appraisal corresponds to their behavioural competencies and values, which are previously established by their hierarchical supervisor. These competencies and values are chosen from a catalogue that includes the performance management skills, social skills, managerial skills and people management skills.

In these cases, the fundamental part of the performance evaluation methodology is the appraisal interview, as it allows for the following, in addition to examining the results that have been achieved throughout the period from a constructive position:

- To establish 'two-way' communication between manager and employee.
- To know the priorities of the organisation, of the manager and of the person evaluated.

In 2022, more than 1,200 interviews have been conducted with employees with positions of responsibility (2.4% more/less than in 2021), totalling 100% of directors and intermediate management.

Percentage of workforce that has received a performance appraisal by region, gender and professional category (%)
(GRI 404-3)[181]

	2021						2022					
	Spain		Brazil		Total		Spain		Brazil		Total	
	Women	Men	Women	Men	**Women**	**Men**	Women	Men	Women	Men	**Women**	**Men**
Senior Management	100%	100%	-%	-%	**100%**	**100%**	100%	100%	-%	-%	**100%**	**100%**
Executives and graduates	100%	100%	100%	100%	**100%**	**100%**	100%	100%	100%	100%	**100%**	**100%**
Coordinators	100%	100%	83.33%	81.82%	**99.47%**	**99.32%**	100%	100%	100%	100%	**100%**	**100%**
Technicians	100%	100%	-%	-%	**98.52%**	**97.02%**	100%	100%	100%	100%	**100%**	**100%**
Support staff	100%	100%	5.45%	-%	**82.19%**	**79.09%**	100%	100%	87.65%	92.86%	**97.01%**	**98.21%**
Total	**100%**	**100%**	**22.68%**	**23.2%**	**97.49%**	**97.13%**	**100%**	**100%**	**91.94%**	**97.78%**	**99.68%**	**99.91%**

The Performance Management System includes the ability to conduct a 180º assessment of behavioural values or skills in order to provide employees with a more complete and objective perspective of their performance. In 2022, this option has been provided to more than 1,151 workers (15 more than the previous year).

In the United Kingdom, managers from the various areas of London-Luton Airport are periodically appraised and they carry out the professional performance review of their team members, in accordance with the provisions of the Performance Management Procedure. Performance goals are established at the department level, and their achievement results in the distribution of profits as an incentive to those with an accumulated length of service.

In 2023, a new performance assessment process is proposed, focused on its monitoring, evaluation and management, as well as the identification and

[181] No information is available for the United Kingdom. However, there are plans to implement an annual objectives review process linked to the variable remuneration systems, which will make it possible to monitor the performance of employees and the personal objectives achieved during the year. This information will also be useful for the identification and monitoring of internal talent...

development of the best talent. In this regard, all performance measures and stated objectives are linked to the corporate strategy and the LLA Way vision.

Finally, a Performance Management System is also available in Brazil, although it is only applicable to those employees in the category of Directors and Graduates.

Other tools to improve internal management

In order to facilitate the identification of the needs, risks and opportunities of workers, as well as to enable informed, objective and reliable decisions, BigData serves as an essential tool in the management of Human Resources.

Aware of this, Aena has implemented the SuccessFactors People Analytics module, which allows greater autonomy and self-service of information in addition to being part of an integrated system (SAP). Once People Analytics is implemented at Aena, progress continues to be made on the path of digitizing people processes, for which the Recruiting and Learning modules of SuccessFactors have been acquired in order to attract the best talent, especially in certain occupations, while improving the positioning of the brand image as an employer and reducing the average time in the search for the right candidate.

By exploiting the information contained in the rest of the modules of the tool (Employee Central, Performance, Recruitment, Learning), the People Analytics tool allows for the following:

- Measuring employee performance.
- Performing strategic planning of the workforce.
- Identifying gaps and shortfalls in the workforce, as well as improving retention.
- Facilitating recruitment and hiring processes
- Perform an analysis of the organisation.
- Competitive intelligence analysis.

5.3.3. Training

(GRI 3-3; 404-2)

In line with what is embodied in the new Strategic Plan of the Company for the next few years, Aena aims to guide the Organisation and the abilities of people towards the new needs, for which training becomes a key ally.

The Strategic Plan aims to develop, in the next DORA 3 period, among other things, the 'Aena Campus' – a space that will offer a comprehensive training service

In Spain, this commitment to training is in turn recognised in:

- The Collective Agreement, which includes the training and professional development of employees as a strategic tool to improve their performance, develop an appropriate level of specialisation and employability, as well as to promote professional growth and constant adaptation to technological and operational evolution.

The Collective Agreement includes the need to have a Training Plan that is aimed at individual improvement and the professional training of workers. This Plan is drawn up, developed and supervised by the Joint Training Committee

- The Training Policy and Sustainability Strategy include specific actions aimed at the training and career development of individuals.

Specifically, the objectives of the Training Policy consist of the following:

- Develop the technical, professional and human skills of workers in order to promote and ensure the correct performance of their job.
- Facilitate updating workers' knowledge based on the regulatory, technological and organisational changes that occur.
- Increase the productivity, efficacy and efficiency levels.
- Contribute to projecting an excellent image of Aena through its professionals.

With all this, Aena also responds to the training and competence requirements that, according to AESA and EASA regulations, must be met by personnel who provide services at an airport.

In turn, the implementation of the Proficiency Testing Programme (required by AESA and EASA) continues, defining new tests and aspects to be evaluated, providing a greater number of assessors (figure in charge of applying the Proficiency Testing assessments to the relevant personnel) and consolidating this process across all sites.

In Brazil, training and development actions are carried out for employees. The person responsible for monitoring, controlling and auditing the processes and policies in this area is the Training and Development Specialist, who also promotes the following training objectives:

- Empower the airport community to obtain airport access credentials.
- Develop and train employees in Brazil for retention, in line with succession plans.

For its part, in the United Kingdom, at London-Luton Airport, in accordance with its own training policy, those responsible for the different areas are responsible for proposing specific training and development actions, according to the role and specific needs of each employee. To do this, they must first perform a needs

identification review, as well as the evaluation of the effectiveness of the training.

In addition, training objectives are set and progress discussed, and learning outcomes are assessed in conjunction with employees.

Significant training actions in 2022

(GRI 404-2)

In Spain, workers participate in preparing the Training Plan by conducting annual appraisals of training needs. The goal is to be able to incorporate these needs along with mandatory and strategic training into the Training Plan proposed for years to come.

A self-study platform is also available that contains courses on subjects related to strategic axes (innovation, digital transformation and sustainability), languages, skills, and it allows employees to choose subjects that are of interest to them from an extensive training catalogue. On a monthly basis, the voluntary execution of a training action of this platform is encouraged.

In 2022, there have been 7,609 people active on this platform (1,464 more than in 2021), which has resulted in a total of 6,021 hours of study and 1,375 courses.

In addition to the above, and as examples of other milestones to highlight:

- Progress continues to be made in the development of the Aena Campus project, being able to highlight the following milestones reached during the fiscal year 2022:
- Installation of the driving simulators (SICAM).
- Advance on the drafting of the fire simulator project at Seville Airport.
- Installation of the new airport electrical simulator facilities (SILA, Simulador de Instalaciones Electricas Aeroportuarias) at Adolfo Suárez Madrid-Barajas Airport.
- Continuity of training aimed at Aena's transformation into an agile company.
- Continuity of training focused on improving the customer experience.
- Continuity of training to accredit Airport Security Officers as Security Managers and Directors.
- AVSAF (Aviation Safety): Project led by the AESA and which aims to ensure that all personnel who access the Aeronautical Operational Security Zone (ZASO, Zona Aeronáutica de Seguridad Operacional) of an airport unaccompanied (pedestrians or drivers) have the minimum necessary knowledge in the area of Operational Security. In particular, four new online courses have been developed: AVSAF-Pedestrians, AVSAF-Drivers, Driving in the Area of Manoeuvres (CAM) and Communications (COM).
- The English courses, and especially the That's English programme, facilitate the acquisition of knowledge by employees for the development of their position and the presentation of official examinations to obtain certification of their level. During the fiscal year 2022, the training offer in the English language has been expanded through several levels of online English and, as a news programme, a specific online course in aeronautical English has been developed in collaboration with the Official School of Languages for personnel who drive on the runway and whose pilot edition was rolled out during the last quarter of 2022.
- In Brazil, some training courses to highlight include those in ethics, internal policies, attention to people with special needs, Quality of Care and an update on AVSEC training for airfield operators.
- In the United Kingdom, among the top training courses conducted during the fiscal year 2022 were the following: My EthosFarm ('The LLA Way'), Bob's Business (cyber security modules for IT-based employees), Freeth Training (legal updates) as well as Anti-Bribery and Modern Slavery training modules.
- In addition to the above, in Spain, financial aid is offered to staff to carry out official studies for workers.

On a consolidated level, employees in Spain, the United Kingdom and Brazil have received an average of 67 hours of training (41[182] in 2021). In addition, €3,163,757 was allocated to training programmes (€998,283 more than the previous year).

[182] Information not available for UK in 2021.

Main training data (GRI 404-1)

		2021				2022			
		Spain	United Kingdom	Brazil	**Total**	Spain	United Kingdom	Brazil	**Total**
Investment in employee training and education programmes (€)		1,846,332	210,223	108,919	**2,165,474**	2,417,951	702,784.21	43,021.99	**3,163,757.05**
Investment in training per employee (€)		233.9	334.8	374.3	**245.8**	295.02	1,025.96	123.27	**342.77**
Employees who have received training (%)	Women	100%	-	100%	**100%**	100%	98%	100%	**99.8%**
	Men	100%	-	100%	**100%**	100%	97%	100%	**99.8%**
	Total	**100%**	**-**	**100%**	**100%**	**100%**	**97%**	**100%**	**99.8%**
Average training hours per year per employee (by gender) [183]	Women	26.7	-	32	**26.8**	57.36	47.78	31.42	**55.66**
	Men	50.2	-	36.9	**49.7**	78.98	28.76	39.18	**73.87**
Average hours of training per year per employee (by professional category)	Senior Management	69.4	-	0	**69.4**	29.77	-	-	**29.77**
	Executives and graduates	30.6	-	42.3	**30.8**	52.51	9.87	18.99	**49.56**
	Coordinators	36.4	-	35	**36.4**	61.38	10.61	32.83	**59,36**
	Technicians	50.2	-	48.8	**50.2**	78.95	9.16	44.36	**77.12**
	Support staff	20.7	-	20.3	**20.7**	105.94	48.71	35.75	**71.39**
Average training hours per year per employee	**Total**	**41.6**	**-**	**35.3**	**41.4**	**70.97**	**36.36**	**36.43**	**67.09**

[183] Average hours of training per woman = Total number of hours of training provided to female employees/Total number of female employees
Average hours of training per man = Total number of hours of training provided to male employees/Total number of male employees

Training hours by gender, professional category and region (*) (GRI 404-1)

2022

Training hours	Spain			United Kingdom			Brazil			TOTAL		
	Online training	On-site training	Total	Online training	On-site training	**Total**	Online training	On-site training	Total	**Online training**	**On-site training**	**Total**
Men	258,033.44	149,413.41	**407,446.85**	1,127	10,692.00	**11,819.00**	7,524.46	1,292.00	**8,816.46**	**266,684.90**	**161,397.41**	**428,082.31**
Women	122,021.79	52,192.94	**174,214.73**	678	12,413.00	**13,091.00**	3,445.68	451.00	**3,896.68**	**126,145.47**	**65,056.94**	**191,202.41**
Total by gender	**380,055.23**	**201,606.35**	**581,661.58**	**1,805**	**23,105.00**	**24,910.00**	**10,970.14**	**1,743.00**	**12,713.14**	**392,830.37**	**226,454.35**	**619,284.72**
Senior Management	92.00	235.50	**327.50**	-	-	**-**				**92.00**	**235.50**	**327.50**
Executives and graduates	59,244.64	50,659.25	**109,903.89**	349	944.25	**1,293.25**	543.64	64.00	**607.64**	**60,137.28**	**51,667.50**	**111,804.78**
Coordinators	48,936.07	28,036.26	**76,972.33**	62	160.75	**222.75**	1,455.24	416.00	**1,871.24**	**50,453.31**	**28,613.01**	**79,066.32**
Technicians	226,707.27	118,698.43	**345,405.70**	178	417.50	**595.50**	4,555.58	280.00	**4,835.58**	**231,440.85**	**119,395.93**	**350,836.78**
Support Staff	45,075.25	3,976.91	**49,052.16**	1,216	21,582.50	**22,798.50**	4,415.68	983.00	**5,398.68**	**50,706.93**	**26,542.41**	**77,249.34**
Total by professional category	**380,055.23**	**201,606.35**	**581,661.58**	**1,805.00**	**23,105.00**	**24,910.00**	**10,970.14**	**1,743.00**	**12,713.14**	**392,830.37**	**226,454.35**	**619,284.72**

2021[184]

Training hours	Spain			Brazil			TOTAL		
	Online training	On-site training	**Total**	Online training	On-site training	**Total**	**Online training**	**On-site training**	**Total**
Men	146,680.89	104,624.60	**251,305.49**	6,141.5	1,026	**7,167.5**	**152,822.39**	**105,650.60**	**258,472.99**
Women	49,066.44	27,884.48	**76,950.92**	2,723.5	380.5	**3,104**	**51,789.94**	**28,264.98**	**80,054.92**
Total by gender	**195,747.33**	**132,509.08**	**328,256.41**	**8,865.00**	**1,406.50**	**10,271.50**	**204,612.33**	**133,915.58**	**338,527.91**
Senior Management	12.00	821.00	**833.00**	-	-	**0**	**12.00**	**821.00**	**833.00**
Executives and graduates	30,815.35	29,462.04	**60,277.39**	1,018.50	122.50	**1,141**	**31,833.85**	**29,584.54**	**61,418.39**
Coordinators	27,748.61	16,348.17	**44,096.78**	1,411.00	163.50	**1,574.5**	**29,159.61**	**16,511.67**	**45,671.28**
Technicians	130,549.62	83,266.59	**213,816.21**	4,645.50	675.00	**5,320.5**	**135,195.12**	**83,941.59**	**219,136.71**
Support Staff	6,621.75	2,611.28	**9,233.03**	1,790.00	445.50	**2,235.5**	**8,411.75**	**3,056.78**	**11,468.53**
Total by professional category	**195,747.33**	**132,509.08**	**328,256.41**	**8,865.00**	**1,406.50**	**10,271.50**	**204,612.33**	**133,915.58**	**338,527.91**

[184] Information not available for UK in 2021.

Other development programmes[185]

PROGRAMME: 'LEADERS CREATING LEADERS' MENTORING PROGRAMME		
PROGRAMME DESCRIPTION	**DESCRIPTION OF PROGRAMME OBJECTIVES AND BUSINESS BENEFITS**	**QUANTITATIVE IMPACTS**
Development programme that is incorporated at Aena as a strategy of: Knowledge management, Cultural Transformation and Organisational Networking that generates support networks. It is a development programme in which a professional with more experience and prestige in their field accompanies another in their professional development, sharing their experience, their knowledge of the business and their strategic vision, which promotes the career development of the mentee, the knowledge of the informal culture and the enhancement of skills that are considered critical in the organisation. The Program has been evolving and expanding in its scope. It began as a Programme aimed at promoting the incorporation and career development of airport directors and has been introduced in successive editions across all areas and organisational levels of Aena.	• Efficiently manage the knowledge accumulated in the company, with the aim of promoting the dissemination of experience and know-how. • To promote the interrelationship, cooperation and mutual knowledge between people, sites and functional areas of Aena. • Develop the talent identified. • Facilitate adaptation in transitions to positions of greater responsibility. • Develop mentees' critical skills.	Accumulated turnover rate of mentees since 2014: 3.2% Degree of learning development achieved: 3.66 (scale 1 to 4 – Average assessment of mentees in each process). Overall assessment of the usefulness of each process: 3.79 (scale 1 to 4 – (Average assessment of mentees in each process). Overall programme rating: 3.84 (scale 1 to 4 – Average rating of mentees in the first 8 editions). Talent development/career: 26.7% vertical promotions and 23.3% horizontal promotions of the mentees from editions 1 to 8 (difference from the start of the process to January 2023). Development of critical skills: Percentage of processes in which work has been done specifically according to the evaluation questionnaire: Leadership: 79% – Communications 89% – Conflict Negotiation and Management: 85% – Flexibility and Change Management: 64%. Interrelationship/mutual knowledge between people, sites and functional areas of the company: percentage of pairs formed by mentor/mentee from different work centres or areas of activity: 100%
NUMBER OF PARTICIPANTS	251	

PROGRAMME: RECIPROCAL MENTORING		
PROGRAMME DESCRIPTION	**DESCRIPTION OF PROGRAMME OBJECTIVES AND BUSINESS BENEFITS**	**QUANTITATIVE IMPACTS**
The programme links managers who have recently joined the company with long-time professionals in the company. In pairs created, mentor/mentee roles are assumed simultaneously and belong to different activity areas that may be related. The person who has recently joined shares knowledge of their specific area of activity and the culture of the external organisation, while the person from Aena shares their knowledge of the airport business and Aena's culture. It is designed to hold three to five sessions (preferably in-person) on a monthly basis.	• Convey business knowledge, structure and informal culture to facilitate the integration of new recruits. • Broaden the vision of internal staff. • Promote the development of a corporate culture of collaboration and mutual support. • Promote synergies between areas of activity.	Ratio of completed processes to total initiated: 1/7 Processes in which 5 or more sessions have been carried out; 6/7 processes that, having completed less than 5 sessions, the participants consider completed as such structured process. They believe they can continue to maintain and enrich the relationship without process structure. Degree of utility perceived by participants (in questionnaire): Overall utility: 66.7%: Very useful; 11.1% Quite useful; 22.2% Not very useful. 77.8% consider it very useful for favouring synergies between areas, while 88.9% consider it very useful for learning about other business cultures and management initiatives. Number of sessions/activities that have been carried out with other sites or areas of activity other than those of the components of each pair. 33% have completed at least one session. Number of sessions/activities performed in groups of two or more pairs from the edition. No sessions have been performed.
NUMBER OF PARTICIPANTS	7 pairs (14 participants)	

[185] In the UK, as of the date of this report there is no formal programme, but several employees have done professional coaching when it has been identified. In 2023, there are plans to work on a development programme for high-potential employees through leadership and coaching development plans as needed.

PROGRAMME: COACHING		
PROGRAMME DESCRIPTION	**DESCRIPTION OF PROGRAMME OBJECTIVES AND BUSINESS BENEFITS**	**QUANTITATIVE IMPACTS**
Coaching is conducted in the company as a development strategy with a personalised methodology adapted to each participant, which aims to release and enhance the potential of behavioural competencies. It is an individual/team professional relationship, in which a coach accompanies others in a process of professional transformation. It is based on the customer's own knowledge through dialogue and through questions asked by the coach, so that the customer explores, broadens their perspective by observing reality, strengthens their creative ability and discovers new solutions as they put them into practice. This strategy has been evolving and expanding its scope. It began in 2007 and was aimed at directors through external coaches. Since 2011, internal coaches have been incorporated, using a common methodology and procedures, and the scope of the programme has been expanded to other levels of the company.	• Facilitate the involvement of coaches to contribute to the achievement of objectives and improve professional performance. • Improve the behavioural competencies of social interaction (communication and impact, conflict management, negotiation and teamwork), leadership (team and people management) and personal self-management mainly. • Improve self-confidence and self-motivation. • Promote the development of the potential to adapt to new challenges and positions of greater responsibility.	During the year 2022, the following information is obtained: 143 hours of individual coaching (corresponding to 19 processes: 10 men and 9 women), 14 of which were carried out by internal coaches. Satisfaction ratio: 7.84 on average (on a scale of 0–8). Since 2007, the accumulated data is as follows: • 2,536.5 hours of coaching accumulated in individual processes from 2007 to 2022. • Talent development: 28% of customers who have performed individual coaching processes have subsequently been promoted to positions of greater responsibility. And 20% moved to another position of the organisational structure. • Main competencies developed in the coaching processes: 77% Communication, 76% Leadership, 43% Conflict and Negotiation Management, 37% Emotional Intelligence and Management, 30% Time Organisation and Management, Stress.
NUMBER OF PARTICIPANTS	124 people have participated in individual coaching processes (2 coaching processes in teams have also been performed), since 2007.	

In 2022, in Brazil, different programmes have been carried out, which have been established as mandatory for new employees:

- General data protection regulations (LGPD) training programme (45 minutes per participant) for all Compliance employees.
- Information Security training for all employees, as well as support activities for the ICT area.

Likewise, in Brazil, employees are offered the possibility of obtaining a scholarship from the Polytechnic University of Madrid.

In relation to the United Kingdom, external training (such as undergraduate degrees, master's degrees, etc.) is also offered in accordance with certain conditions that normally apply to the payment of course fees for employees supported by the Company (such conditions are incorporated into a signed agreement). In this regard, the employee must commit to remain with the Company for a minimum of two years after completing a 2-year course of study, resulting in a total of 4 years. However, if the employee leaves the Company at any time during the total 4-year period as indicated, the employee must reimburse the Company for course fees, including any other additional costs incurred, such as exam fees.

On the other hand, at London-Luton Airport, through the LLA Way and the core training courses, employees can develop their careers.

5.4. Industrial relations

(GRI 2-30; 3-3; 407-1)

In Spain, the rights of freedom of association, union representation and collective bargaining are guaranteed within the framework of current employment regulations and the collective agreement. This commitment is reflected in the Code of Conduct and is endorsed in Aena's Human Rights Policy[186],which references, among others, the ILO Declaration on Fundamental Principles and Rights at Work.

In the UK, London-Luton Airport guarantees the aforementioned rights of workers by complying with the *Trade Union Act 2016*. In addition, a commitment to freedom of association, union representation and collective negotiation is reflected through the Airport's partnership with Unite the Union, an English union to which all employees can join. In this regard, consultations are periodically carried out with this union on collective bargaining, training, health and safety, complaints and disciplinary measures, the environment and equality, among other matters. Employees are also informed of their rights of union representation, based on the provisions of ACAS (Advisory, Conciliation and Arbitration Service). Finally, it is worth noting the adoption of a series of measures aimed at guaranteeing employment rights in this regard.

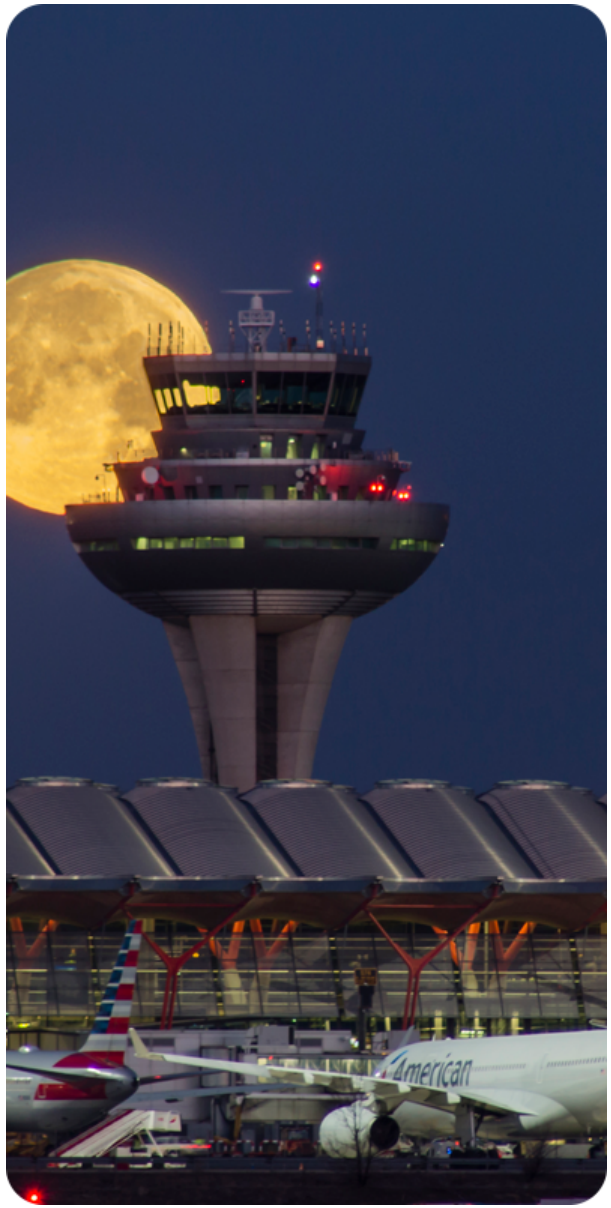
In Brazil, respect for the rights of freedom of association, union representation and collective bargaining as well as commitment to maintaining a respectful relationship with the union is reflected in the Internal Standards Manual. For its part, the Collective Agreement recognises the right of assembly as a fundamental right of the workers. This commitment is formalised and supervised by those responsible for the Compliance and Human Resources departments. In addition, any changes or modifications to the Collective Agreement must be negotiated with the applicable union.

99.87% of employees covered by the collective agreement*	**100%** 100% of employees may join a union recognised by the company, or any other union for representation purposes	**98.56%** of employees covered by the collective agreement
99.86% in 2021 (Aena S.M.E., S.A. and AIRM) 100% in 2021 (ADI)	100% in 2021	100% in 2021
Spain	**United Kingdom**	**Brazil**

Corporate commitment to the right of freedom of association and collective bargaining of workers endorsed in Aena's Human Rights Policy, which takes as a reference, among others, the Declaration of the ILO relating to fundamental principles and rights at work, and is applicable to all the companies of the group.

* Senior Management is not subject to the Collective Agreement.
**Does not include the directors of Brazil

[186] They are applicable to Aena companies in Spain, the United Kingdom and Brazil.



Collective bargaining

The 1st Collective Agreement of the Aena Group and the employment legislation in force in Spain are the framework that establishes the conditions of employment and in the employment security of workers[187].

The Collective Agreement applicable to the aforementioned companies regulates, among other things, the following aspects:

- Health and safety.
- Remuneration.
- Working hours
- Training.
- Career development.
- Work time flexibility.
- Promotion in employment.
- Equal opportunities.

The Collective Agreement is currently in the process of negotiation. Successive meetings have been held during the 2022 fiscal year in which the text of the new agreement has been prepared.

In the United Kingdom, although there is no collective bargaining agreement at London-Luton Airport, a series of actions are carried out with the Unite the Union to guarantee the right to collective bargaining. These include:

- Meet the LLA Leadership sessions organised quarterly.
- Preparation of training documents on Company policies and processes.
- Promotion of dialogue with workers through discussion with the aforementioned union on specific aspects.
- Announcement of union communications on electronic boards or the details agreement to be communicated through LLA Family Update, among other initiatives.
- Summary of agreements reached in terms of salary through the LLA Pay Review.

For its part, in Brazil, the Collective Agreement includes issues related to remuneration (overtime payment, night shift premium, social benefits, etc.) as well as related to special working hours

Both the Collective Agreement in Spain and the Collective Agreement in Brazil are available online (employees also have access to it through the intranet).

[187] Applicable to Aena S.M.E., S.A. and Aena SCAIRM S.M.E., S.A.
The Collective Agreement for Offices and Bureaus of the Community of Madrid is applicable to ADI.

5.4.1. State Trade Union Coordinator

In Spain, the State Union Coordinator (CSE, Coordinadora Sindical Estatal) is the workers' representation body made up of twelve members appointed by the unions who have obtained at least 10% of the total staff representatives and/or members of the Site Committee in the corresponding elections.

On the other hand, there are different Joint Committees that are composed of representatives of the company and members of the unions that are members of the CSE, whose function consists of developing and addressing specific aspects that affect employees as well as carrying out and ensuring the application and monitoring of the agreements adopted within the framework of the Collective Agreement, which is public in nature and therefore permanently available to the entire workforce.

The current Collective Agreement regulates a Joint Committee dedicated exclusively to the Promotion and Recruitment procedures. This, together with the rest of the joint committees provided for in said agreement, have the participation of the majority unions present in the company, enabling them to monitor the different matters according to their competences.

In 2022, various meetings of the Joint Committee have been held.

The collective agreement includes the existence of joint committees



Site committees and/or staff delegates: They guarantee the participation of workers in the management of the company.

5.4.2. Communication with employees

(GRI 2-29; 3-3)

In order to share objectives, encourage employee engagement, as well as disseminate corporate policies and standards (including those related to employment matters such as the Collective Agreement), Aena has several specific communication channels that facilitate dialogue with employees:
Specifically, in Spain:

- The employee's portal in SAP SuccessFactors (accessible from any web browser or mobile device) is focused on fostering communication and interaction between workers and facilitating access to their personal information.
- The intranet has more than 30 themed portals, among which there is one dedicated to providing relevant information on the company and human resources.
- The email, which informs employees about specific campaigns that affect all workers, stands as another means of communication with the entire workforce.
- The weekly publication of the Aena 360º magazine includes all the news about the company and the people who comprise it. The publication is open-minded and includes a mailbox to receive requests, concerns and suggestions from employees.
- Similar to the above, several airports have their own publications in which they report on their more local information.

The spirit of open communication is also maintained in physical spaces, such as those at the Company's headquarters, which are designed to promote teamwork, and to energise and enhance creativity and innovation.

In the UK, internal communication channels are available at London-Luton Airport, as well as the 'Engage Co: Lab', which collaborates, discusses and seeks effective solutions to improve communication between employees and the company, fostering a sense of pride in belonging as well as employee participation in different areas.

Meanwhile, in Brazil, Aena airports have Aena Brasil Comunica, the 'We are Connected' programme and the monthly Aena Brasil 360º magazine.



Internal communications

Intranet
SAP SuccessFactors
Internal publications – Aena 360º
Conecta2 Programme
Bienestar360
Suggestion box
State Union Coordinator
Joint committees
Dialogue with managers
Mailboxes and emails
Complaints Channel
Work groups

5.4.3. Satisfaction and motivation of Aena professionals

In Spain, Aena periodically conducts psycho-social risk assessments for identification and evaluation. Based on the results obtained, possible areas for improvement are detected and, where appropriate, corresponding action plans are implemented with a focus on ensuring the well-being of workers, promoting their satisfaction and motivation.

The Occupational Risk Prevention Service is responsible for carrying out such evaluations through anonymous surveys (some in online format) following the F-PSICO 4.0 method of the National Institute of Occupational Safety and Health (INSST, Instituto Nacional de Seguridad y Salud en el Trabajo), under the Ministry of Labour and Social Economy. Among the factors evaluated in these surveys, it assesses their workload, autonomy, psychological demands and social support and relationships.

The engagement index is calculated based on the percentages of workers classified at moderate risk level and in a situation appropriate for the psycho-social factors of 'Variety/ work content' and 'Interest in work/ reward', being updated periodically.

	2020	2021	2022
Engagement index (%) (*)	90.14	82.43	84.75
% of Workforce covered	28.51	36.78	29.56

(*) This index is calculated by taking the average of two psychosocial factors from all psychosocial evaluations that have been performed that year: Variety/Work Content (VC [Variedad/Contenido del trabajo]) and Interest in Work/Reward (ITC [Interés por el Trabajo/Compensación]).

Psycho-social risk assessments have continued to be conducted during the fiscal year 2022. These assessments, which are conducted through an anonymous survey of all site staff, address issues related to company satisfaction, the design and content of the tasks performed, the functions performed, interpersonal relationships at work, as well as other areas of the organisation (such as internal communication or leadership).

On the other hand, among the objectives of the Sustainability Strategy (2021-2030) is the establishment of a system for measuring work climate through surveys, which will be implemented in the coming years.

5.4.4. Restructurings

(GRI 402-1)

In the period analysed, there have been no restructuring of the Group's workforce and an attempt has been made to avoid, to the extent possible, burdensome measures of external flexibility.

In Spain, and in the hypothetical case that some restructuring measure is necessary, the applicable legislation and regulations provide guarantees to negotiate this matter with the representation of the workers[188].

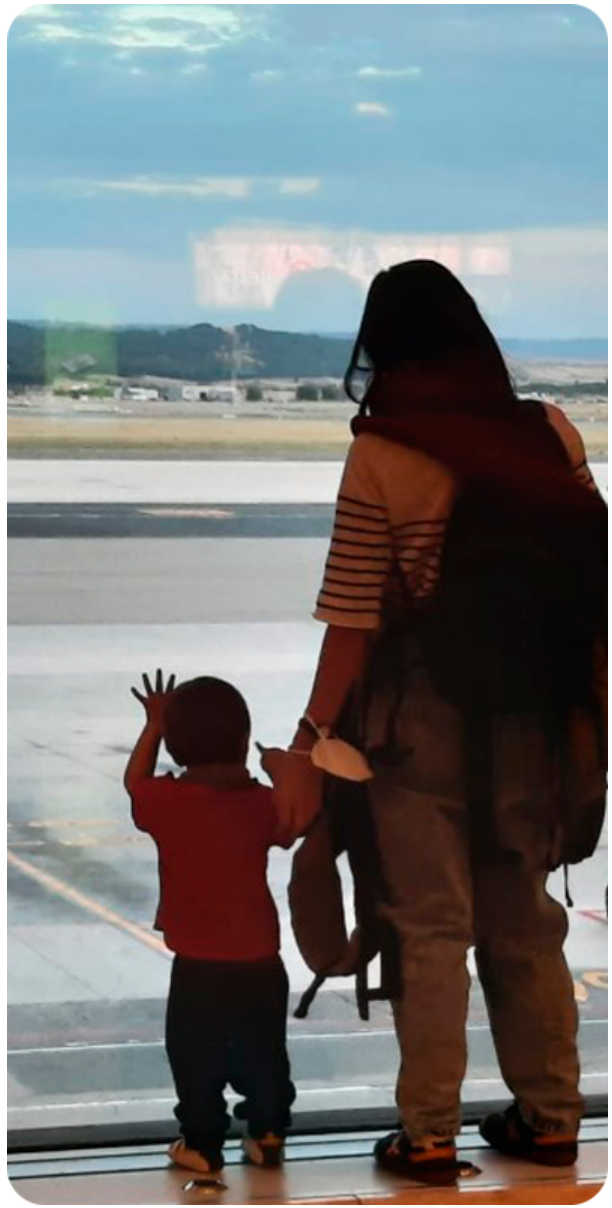
In the United Kingdom, there is a compliance system focused on the prevention of regulatory risks or irregular practices that reflects the commitment made to, among other aspects, carry out restructurings responsibly. In this regard, the legislation requires:

- Collective consultation when considering the dismissal and rehire of 20 or more employees.
- If there is a formal agreement for consultation and distribution of information to employees, conduct a health and safety consultation.
- Inquire in case of changes to the employment contract.
- Inform and consult before a TUPE transfer, 'Transfer of Undertakings (Protection of Employment)'.

Likewise, local regulations provide for the obligation to involve representatives, where appropriate, as well as the proposal of alternative measures such as the modification of working hours, the relocation of employees to other positions or the cessation of hiring new employees[189].

In Brazil, the provisions of the legal regulations in this regard are complied with. In addition, the Collective Agreement, in its tenth clause, establishes that in the event of a change in the location of the workplace, Aena must assume the expenses associated with the transportation and redeployment of both employees and their dependents.

In any case, it should be mentioned that no restructuring has been carried out in recent years in Spain, the United Kingdom or Brazil.



[188] In Spain, the notice time to be given to employees and their representatives before the application of significant operational changes is established in the Statute of Workers.
[189] All of this applies to workers with an indefinite contract.

5.5. Occupational health and safety

(GRI 3-3)

Commitment at all levels of the organisation, with:

- **Protection of physical and emotional health and safety**
- **Preventive culture**
- **Reduction of accident rate**

Integrated Quality, Environmental, Energy Efficiency and Occupational Health and Safety Management Policy

Promote the systematic integration of the management of quality, the environment, energy efficiency and occupational health and safety into Aena's strategic management.	Continuously improve the integrated management system, periodically evaluating the performance achieved, as well as stakeholder needs and expectations for continuous improvement.	Have the involvement and commitment of Senior Management to achieve the proposed objectives, using Aena's values and strategies as the main benchmark for all people in the organisation.	Ensure ongoing training and education of the organisation's personnel through training and awareness programmes of subjects on quality control, the environment and occupational health and safety.	Provide the material and human resources necessary to achieve the established objectives and goals, as well as to continuously improve the performance of Aena's processes and results.	Drive and lead the prevention of occupational risks, providing safe and healthy working conditions, eliminating hazards and minimising risks to occupational health and safety.
	Ensure the consultation and participation of all Aena personnel and their representatives, as well as having access to information on the means and measures to be adopted for the prevention of health risks.		Communicate this Policy to all personnel and companies that conduct their business at AENA, so that they are aware of their rights and responsibilities and make it available to interested parties.		Ensure compliance with the legal requirements applicable to Aena's scope of action, as well as other requirements that the organisation subscribes in terms of quality control, the environment, energy efficiency and occupational health and safety.

For which the following is available:

They cover **100%** of the workers

Continuous review and improvement to minimise and/or eradicate possible risks, incidents and fatalities

- Occupational Risk Prevention Plan
- Integrated Management System of Quality, the Environment and Occupational Health and Safety

And specific actions are carried out:

- Training.
- Monitoring and external audits on a periodic basis (every 5 years) by health and safety experts.
- Risk assessment.
- Active and two-way communication on a regular basis between the different areas involved (committees, human resources, etc.).
- Quarterly meetings of the Health and Safety committees, both State and Local in the different centres.

5.5.1. Aena's Health and Safety Model

(GRI 3-3; 403-1; 403-8)

In order to protect the health of workers and users of the facilities, Aena promotes best practices in terms of safety, health – physical and emotional – and well-being.

This commitment is formalised in the 2022-2026 Strategic Plan, which aims to develop a Comprehensive Wellbeing in the Workplace Plan, as well as in the Integrated Management Policy for quality, the environment, energy efficiency, and occupational health and safety, approved by the Board of Directors[190]. This Policy, applicable to Aena in Spain, the United Kingdom and Brazil, promotes the systematic integration of health and safety management in the ordinary management of the Group, ensuring compliance with the applicable legal requirements, as well as other requirements that have been signed in this area, such as the participation of workers and their representatives in health and safety management. It also establishes measures to raise awareness among the main stakeholders and the commitment to communicate to the staff and companies that carry out their activity at Aena, so that they are aware of their rights and responsibilities.

The Policy includes the principle of continuous improvement as well as a series of specific objectives and actions, for which the involvement and commitment of Senior Management is available, taking as reference the values and strategies of the Company.

These commitments are materialised in Spain through the Occupational Risk Management System, the Occupational Risk Prevention Plan and the related procedures, which have been reviewed and updated in the fiscal year 2022. As a result of this review, the Occupational Risk Prevention Plan has been modified in order to integrate it into the Integrated Management System of Quality and the Environment in accordance with ISO 45001.

With regard to the System[191] it is externally audited every 5 years, with the last audit being carried out in 2019, and includes the following aspects:

- Assessments of occupational health and safety hazards and risks in order to identify what could cause harm in the workplace.
- Prioritisation and integration of action plans with quantified objectives to address such risks.
- Integration of emergency preparedness and response actions.
- Assessment of progress in reducing/preventing health hazards/risks against objectives.
- Internal inspections in the matter.
- Procedures for the investigation of work-related injuries, illnesses, illnesses and incidents.
- Occupational health and safety training provided to employees and/or other relevant parties to raise awareness and reduce operational health and safety incidents.
- Occupational health and safety criteria introduced in procurement and contractual requirements.

For its part, the Aena Occupational Risk Prevention Plan contains organisational and preventive measures to be applied both in the operation of existing infrastructures and in the construction of new infrastructures. In addition, possible emergency situations and the activities of third parties (contractors, dealers, etc.) are also taken into account.

The prevention of occupational risks and the promotion of the health and safety of workers is a cross-divisional function that applies to all areas and all the Group's activity.

In the United Kingdom, London-Luton Airport assumes the Integrated Management Policy on Quality, the Environment, Energy Efficiency and Occupational Health and Safety and adapts it to its local context through the local[192]Health, Safety and Welfare Policy – reviewed and signed by the CEO in January 2022 – which complies with the requirements of ISO 45001:2018 and the applicable regulations[193]. This policy reflects the commitment to promoting the culture of health and safety by airport management, as well as promoting security management.

Aligned with the policy, the UK Health and Safety Management System promotes the adoption of a proactive approach to a safety culture, the establishment of open and transparent reporting practices and continuous improvement. This System, certified with ISO 45001[194],ensures effective health and safety management based on:

- Strong leadership and management.
- Identification of risks, threats and opportunities.
- Monitoring, measurement, analysis and improvement of performance.
- Compliance evaluation.
- Opportunity for ongoing improvement.
- Performance analysis and evaluation.
- Inspections.

The aforementioned Health and Safety Management System in the UK is externally audited every 3 years by the British Standards Institution (BSI) and internally twice a year. In this regard, the last audit was carried out in April 2022 with satisfactory results, reflecting the commitment to continuous improvement and the achievement of the proposed objectives.

[190] Supersedes the preceding Occupational Risk Prevention Policy in Spain..
[191] The Occupational Risk Management System is based on the applicable regulations (Act 31/1995, of 8 November, on Occupational Risk Prevention and Royal Decree 39/1997, of 17 January, which approves the Risk Prevention Services Regulation). This System includes
[192] See chapter 'Links of interest'.
[193] Health and Safety at Work Act de 1974 y Management of Safety at Work Regulations de 1999.
[194] In 2019, the Airport in the United Kingdom obtained the ISO 45001 certificate, receiving an excellent assessment from the evaluator regarding senior management's commitment to ensuring and improving the Health and Safety strategy, the resources allocated and the exemplary reporting practices.

In addition, Responsible Business Strategy 2020-2025 in the UK defines health and safety objectives that include reviewing and improving operations to address issues proactively, focusing on employees, customers and suppliers. The purpose is clear: instil an excellent culture of safety and risk management throughout the airport.

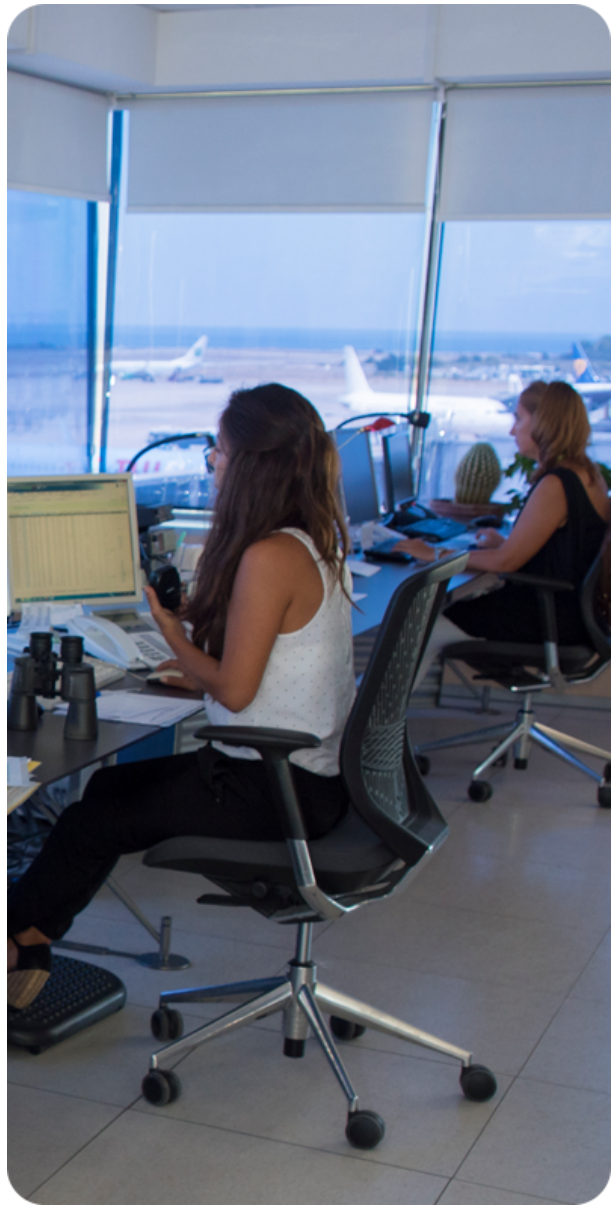
For its part, in Brazil, the commitment to the health and safety of employees is included in the Collective Agreement as well as in the aforementioned Integrated Management Policy for quality, the environment, energy efficiency and occupational health and safety.

For its implementation, the Occupational Risk Management Programme[195] and the Occupational Risk Plan establishes general provisions, scope of application, timelines, guidelines and other requirements, in compliance with applicable regulations. The Occupational Health Medical Control Programme, Hearing Conservation Programme and an ergonomic work analysis are also available. All of the above focused on the prevention of occupational accidents and diseases, through the minimisation of possible risks, the implementation of preventive practices and the continuous monitoring of the health of all employees and suppliers.

In addition, it is worth noting the campaigns developed by the Internal Accident Prevention Committee, the inspections and audits conducted by the local Occupational Health and Safety department and the development of awareness-raising campaigns.

As a result of the above, in 2022 all airports and corporate offices were maintained with acceptable exposure to risk, in accordance with the tolerance levels established by the regulations of the Ministry of Labour and Social Economy on occupational risks).

The Health and Safety Management System does not apply to non-employee workers, but covers 100% of Aena's employees in Spain, The UK and Brazil.



[195] All employees are covered by this programme.

OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT BODIES		
Spain	**Board of Directors**	Approves, promotes and deploys the Occupational Risk Prevention Policy that guarantees a safe and healthy work environment.
	General management	Highest responsible for the functioning and management of Occupational Health and Safety issues and the approval of the Health and Safety Policy.
	Management and workplaces	Responsible for establishing the appropriate means and organisation to comply with the Occupational Health and Safety Policy.
	Joint Prevention Service	In charge of overseeing the health and safety of workers in relation to occupational risks and carrying out the investigation of occupational accidents and preparing accident statistics. Support and advice in the design, implementation and monitoring of risk prevention and health protection plans and programmes.
	Risk prevention delegates	Represent workers in the field of occupational risk prevention.
	Health and Safety Committees (State Health and Safety Committee (CESS); Local Health and Safety Committees (CLSS) of the workplaces)	Joint and group participating bodies and consensus, intended for regular and periodic consultation of the actions in the company in matters of occupational risk prevention, formed by representatives of the workers and of the Company. Development, implementation and evaluation of risk prevention plans and programmes; promotion of initiatives for the effective prevention of risks and improvement proposals.
	Workers	To ensure their own safety and health at work and that of other people who may be affected by their professional activity.
United Kingdom	**Board**	Advises and assists the CEO on health and safety.
	CEO	Ultimate responsibility in terms of health and safety.
	Other senior managers, managers and supervisors	Advise and assist the CEO with regard to health and safety.
	Head of Health, Safety and Environment at the airport	Guarantees effective and direct lines of communication with all those involved in Occupational Health and Safety aspects, and with other areas of the airport.
	Workers	To ensure their own safety and health at work and that of other people who may be affected by their professional activity.
Brazil	**CEO**	Ultimate responsibility in terms of health and safety.
	Other senior managers, managers and supervisors	Advise and assist the CEO with regard to health and safety.
	Head of Health, Safety and Environment at the airport	Guarantees effective and direct lines of communication with all those involved in Occupational Health and Safety aspects, and with other areas of the airport.
	Workers	To ensure their own safety and health at work and that of other people who may be affected by their professional activity.

Identification of hazards, assessment of risks and investigation of accidents

(GRI 403-2)

Occupational risk prevention and promotion of occupational health and safety are ensured through the development of specific programmes and collaboration with different bodies.

In Spain, Aena has an Occupational Risk Management Manual that describes the processes to identify, prevent and minimise related risks, following an ongoing review process. In this regard, mechanisms are established for the identification, recording and monitoring of regulatory requirements, the analysis, identification, assessment and estimation of risks (type and severity), the adoption of preventive measures that allow for detecting potential impacts on the health of employees, as well as the establishment of urgent control measures that are necessary to minimise the possible consequences derived from them.

In addition, a Risk Assessment and Control Procedure is available, agreed by the State Health and Safety Committee and published on the intranet for consultation by all personnel, which describes the methodology to be used when risk assessments and controls are carried out, the communications to be followed and the actions to employ in the follow up and review of the measures adopted.

In 2022, 76 general assessments, 140 specific assessments and 252 occupational risk studies have been performed, and 1,283 measures have been executed, representing 15% of the total. 97% of the risks evaluated are considered tolerable, focusing the main preventive measures on the risks deemed to be important (7%) [196].

For general purposes, the Aena Joint Prevention Service (SPMA, Servicio de Prevención Mancomunado) advises and assists the company, workers, their representatives and specialised representative bodies to carry out preventive activities, in order to ensure the adequate protection of the safety and health of workers. To this end, among other tasks, it follows up on all proposed preventive measures to eliminate any hazards and minimize the risks. Likewise, any change must be communicated to the area of occupational risk prevention, which, where appropriate, will be evaluated by the SPMA, in accordance with the provisions of the Change Management Procedure[197].

Aena maintains the highest levels of security and minimises the exposure of its workers to risk by taking a proactive approach

In the UK, occupational health and safety risks are identified and managed at London-Luton Airport based on a clearly defined governance structure designed to make the implementation of the aforementioned management framework (see section above) effective.

The occupational risk assessment is carried out on an ongoing basis, both at the general level (by reviewing the documentation associated with strategic risk management and its recording and review), as well as at the local level[198]. In addition, these assessments are also conducted in the face of legislative changes and changes in processes or personnel locations. All within the framework of the Departmental Health Monitoring Programme.

As an additional measure, COSHH (Control of Substances Hazardous to Health Regulations) risk assessments are conducted for hazardous substances used, including associated emergency controls and procedures.

In Brazil, committees are also available to act as representatives of the company and employees to oversee hazard identification, risk assessment and accident investigation, which is communicated to all employees through health and safety bulletins.

In addition, a series of programmes have been implemented in line with local regulations, to identify occupational hazards and assess risks (Risk Management and Occupational Medical Control Programmes).[199]. Those situations that are likely to generate any serious accidents are evaluated in accordance with the Risk Management Programme[200]. Measures taken to eliminate occupational hazards and minimise hazards are evaluated on an ongoing basis.

Likewise, under the Risk Management Programme, assessments of possible risks that may affect the health of workers are carried out, establishing medical monitoring and prevention examinations. In addition, specific programmes such as the Hearing Conservation Plan are developed in order to avoid any problems arising from aircraft noise.

Finally, Brazil conducts health and safety risk assessments on construction and facility improvement projects.

[196] In 2021, 60 general assessments were carried out, 118 specific assessments, 144 occupational risk studies and 1,752 measures were carried out, 36% of the total, with 62% being tolerable risks and 12% important risks.
[197] In Spain, the occupational accident investigation procedure applies to occupational diseases.
[198] All area managers must ensure that their area of action, including employee activities, is subject to a risk assessment by a trained person, such as members of the Local Safety and Health team who perform local risk assessments on a monthly basis and after any major accident, injury or near miss.
In addition, the procedure establishes the involvement of workers at all levels and functions in the identification of risks to ensure continuous improvement.
[199] The identification of occupational hazards or unsafe conditions is carried out through the processing of reports by employees through the 'Safety Sheet' tool.
[200] Reportedly no accidents have occurred so far.

Communication, dialogue and participation of employees in occupational safety

(GRI 3-3; 403-4; 413-1)

The consultation and participation of workers in mater of risk prevention is carried out through:

- In Spain, representative bodies. The Health and Safety Committees (both state and local in the different sites), joint bodies and associations of participation intended for regular and periodic consultation of the company's actions on risk prevention in the scope of action at its workplace, ensuring the participation of workers in the process. These bodies consist of representatives appointed by the organisation's management and workers' representatives. Their functions include the following:
  - Identification of hazards, risk evaluation and determination of checks.
  - Accident investigation.
  - Development and review of policies and objectives in the field of Occupational Health and Safety.
  - Inquiry into any changes affecting occupational health and safety.
  - Representation in issues related to occupational health and safety.

At least every 3 months, the Health and Safety Committees meet to discuss previously agreed issues. The conclusions and agreements reached are made available to all employees through their posting on the corporate intranet. Through these Committees, and being advised by the members of the Risk Prevention Service, Management informs, debates and encourages the participation and consultation by workers, through their representatives in them, in this regard.

100% of Aena workers in Spain are represented by the corresponding health and safety committees or, for those sites with a number of workers less than 50, by the risk prevention delegates.

- Communication tools: The human resources portal on the intranet, the newsletter, informational notes, or contact email addresses for the occupational health and safety service in each geographic area contribute to active and reciprocal communication with employees, as well as to make visible the importance of meeting commitments made or to identify employee concerns regarding health and safety issues (see section 'Reporting, recording, and investigation of accidents').
- In the UK in this regard, although it does not have a workers' representative committee as such, there are sufficient mechanisms in place to ensure the establishment, the application and maintenance of the consultation and participation processes of workers at all applicable levels and functions, in the processes of development, planning, application, performance appraisal and opportunities for improvement of the occupational health and safety management system. In addition, there is an internal and external communications procedure of its own regarding its management systems and performance in health and safety, environmental and energy efficiency management:
  - Internally – communication is established through training courses and the distribution of procedures.
  - Externally – communication is carried out via the website and by organising meetings with stakeholders.
- In Brazil, the Internal Accident Prevention Committee (ICPA), composed of company and worker representatives, aims to prevent accidents and illnesses resulting from work. In addition, the communication of news regarding occupational safety is carried out through newsletters, available to all employees.

Reporting, recording and investigation of accidents

(GRI 403-2)

Reporting of incidents, accidents or potential threats related to occupational safety is carried out through various channels.

- In Spain, in person, by email addressed to the persons responsible for the matter at the site and/or to the Aena Joint Risk Prevention Service in the corresponding area, through the Employee Portal[201], or through the Risk Prevention Delegates.
  - In the event of a minor or serious workplace accident, a defined system is available and accessible to all employees so that they can notify the human resources department (SPMA through the Employee Portal or on paper). Upon recording the accident in the system (all incidents and accidents at work are recorded, whether with or without leave and including those in itinere), the investigation is carried out, identifying the causes to prevent possible future similar situations. As a result of the process, corrective and/or preventive actions are proposed. In this sense, the internal monitoring of the accidents is carried out by preparing periodic Accidents Reports that reflect the accident/incident rate that has occurred. The labour and health authorities are also informed.
  - The communication of deficiencies or improvements must be carried out through the

[201] Specific site available on the intranet for the reporting of accidents or incidents, through the Human Resources and Occupational Risk Prevention portal.

corresponding manager and/or the Aena Joint Risk Prevention Service (SPMA).



The confidentiality of the data and of the person notifying the incident is guaranteed with any of these channels.

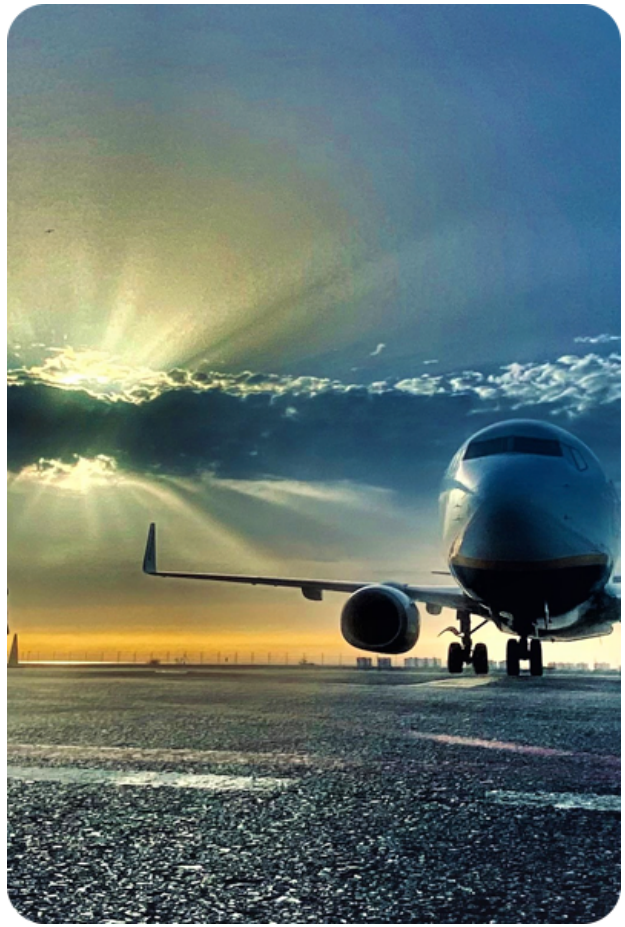
In compliance with current regulations on the matter, Aena respects the right of the worker to interrupt their activity and leave their workplace when they consider that such activity poses a serious and imminent risk to their life or health (understood as one that is likely to materialise in the immediate future and could pose a serious hazard to health). During 2022, no such situation has been recorded in Aena's workplaces in Spain.

- In the UK, at London Luton Airport, reporting of all incidents (injuries, near misses and hazards) is carried out through the platform corresponding to the management system, after which an investigation is initiated that results, for medium-high risk incidents, in the preparation of a learning report communicated to the departments and made available to employees through the corporate SharePoint program. All employees are responsible for reporting any incident to their supervisor and recording it in the incident management system as soon as reasonably possible without exposure to any additional risks.
- In Brazil, accidents are reported to the Internal Accident Prevention Committee and to other areas of the company that may be involved.

At the consolidated level, in 2022, a total of 156 accidents were recorded by workers (22 less than in 2021), 47.4% with medical leave (4.9% more than in 2021), all investigated in accordance with the corresponding procedure.

In particular, in Spain, 107 workplace accidents were reported, 8% more than in 2021, of which 56.1% were with medical leave and 44.9% without medical leave. All of them investigated their causes, finding that most of them were due to blows against moving objects and physical overexertion.

As a result, preventive actions and/or recommendations were put in place for the worker. Although the accident rate at Aena is low, it has been detected that cases of in-itinere accidents account for a significant percentage of loss, so the risk prevention service has worked on the preparation of an information campaign to improve safety in trips to or from the workplace, which took place in 2022.



Accidents (own staff) (GRI 403-9)

	Spain			United Kingdom[202]			Brazil			Consolidated Total	
	2020	2021	2022	2020	2021	2022	2020	2021	2022	2021	2022
Accidents (number)	**100**	**99**	**107**	**33**	**24**	**45**	**3**	**11**	**4**	**134**	**156**
Men	60	75	80	-	14	23	3	10	4	99	107
Women	40	24	27	-	10	22	0	1	0	35	49
With medical leave	**41**	**43**	**60**	**-**	**8**	**10**	**0**	**6**	**4**	**57**	**74**
Men	30	35	51	-	5	7	0	6	4	46	62
Women	11	8	9	-	3	3	0	0	0	11	12
Without medical leave	**59**	**56**	**47**	**-**	**16**	**35**	**3**	**5**	**0**	**77**	**82**
Men	30	40	29	-	9	16	3	4	0	53	45
Women	29	16	18	-	7	19	0	1	0	24	37
With death	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**
Men	0	0	0	0	0	0	0	0	0	0	0
Women	0	0	0	0	0	0	0	0	0	0	0
Minor accidents	**98**	**99**	**105**	**0**	**17**	**40**	**3**	**11**	**2**	**127**	**147**
Men	58	75	78	0	9	20	3	10	2	94	100
Women	40	24	27	0	8	20	0	1	0	33	47
Serious accidents[203]	**2**	**0**	**2**	**0**	**7**	**5**	**0**	**0**	**2**	**7**	**9**
Men	2	0	2	0	5	3	0	0	2	5	7
Women	0	0	0	0	2	2	0	0	0	2	2
Injury rate due to occupational accidents with major consequences[204]	**0.18**	**0.00**	**0.17**	**0**	**24.00**	**3.86**	**0**	**0.00**	**2.70**	**0.50**	**0.64**
Recordable occupational injury rate[205]	**3.66**	**3.72**	**5.03**	**0**	**27.43**	**7.72**	**0**	**12.48**	**5.40**	**4.03**	**5.30**
Death rate[206]	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**

Aena continuously identifies the hazards inherent in the workplaces and the activities carried out by all workers with access to them, taking into account the information previously provided by the Site Management to the Occupational Risk Prevention Service.

In the UK, hazards are identified during the risk assessment process. Managers are responsible for ensuring that their respective areas of responsibility, including employee activities, are subject to a risk assessment by a competent person and reviewed annually or when any change occurs, for example, an accident or change of equipment. The London-Luton Airport risk management process brings together a two-level hierarchy of recording risks. These records are owned by designated department-level managers and Risk Management Directors, Functional Directors, and the Managing Director. Records of risks are also used by the Capex Director at London-Luton Airport to help manage risks arising from specific projects. When project risks affect the operation of the airport, the Risk Management Directors of the group, Senior Directors and Functional Directors of each area are responsible for ensuring that such risks are included in the risk register of the Risk Management group or applicable function.

In Brazil, hazards with the potential for serious accidents are assessed in the risk inventory of the Risk Management Programme. Some of the measures taken or proposed to be actioned to eliminate other job hazards and minimise risks through the hierarchy of control are continuous risk monitoring, signage, redeployment of activities and training.

Aena Spain includes all of its own workers.

[202] As of 2021, accidents in the UK broken down by gender, level of severity or with/without medical leave were not reported.
[203] Any accidents that have had major consequences, not including deaths, are considered serious.
[204] Rate of occupational accident injuries with major consequences = (Number of occupational accident injuries with major consequences (not including death) / Number of hours worked * 106
[205] Recordable occupational accident injury rate = (Number of accidents with medical leave * 10^6) / (Total number of hours actually worked). Its calculation is equal to the Frequency Index.
[206] Death rate = (Number of deaths resulting from an occupational accident injury * 10^6) / Number of hours worked.

Accidents (own staff) (GRI 403-9)											
	Spain			United Kingdom[207]			Brazil[208]			Consolidated Total	
	2020	2021	2022	2020	2021	2022	2020[209]	2021	2022	2021	2022
No. of days lost	**1,620**	**896**	**2,060**	**84**	**174.7**	**84**	**0**	**54.00**	**292**	**1,124.70**	**2,435.56**
Men	1,215	674	1,840	-	160	59	0	47.00	292	881.00	2,191.08
Women	405	222	220	-	14.7	24	0	7.00	0	243.70	244.48
Rate of days lost[210]	**144.78**	**77.53**	**172.62**		**598.98**	**64.49**	**-**	**127.21**	**394.53**	**91.64**	**174.35**
Men	172.70	92.42	246.63	-	854.80	73.13	-	166.18	597.81	113.50	250.21
Women	97.49	52.05	49.18	-	140.69	50.18	-	49.41	0.00	54.02	46.90
Incidence rate of occupational accidents[211]	**5.20**	**5.51**	**7.45**	**-**	**11.92**	**14.84**	**0**	**20.91**	**12.20**	**6.51**	**8.17**
Men	5.97	7.03	10.02	-	12.05	17.33	0	30.61	18.60	8.23	10.86
Women	3.84	2.83	3.03	-	11.72	11.11	0	0.00	0.00	3.47	3.58
Frequency rate[212]	**3.66**	**3.72**	**5.03**	**23.90**	**27.43**	**7.72**	**0**	**12.48**	**5.40**	**4.64**	**5.30**
Men	4.26	4.80	6.84	-	26.71	8.66	0	17.89	8.19	5.93	7.08
Women	2.65	1.88	2.01	-	28.71	6.15	0	0.00	0.00	2.44	2.30
Severity rate[213]	**0.14**	**0.08**	**0.17**	**0.06**	**0.60**	**0.06**	**0**	**0.66**	**0.39**	**0.09**	**0.17**
Men	0.17	0.09	0.25	-	0.85	0.07	0	0.84	0.60	0.11	0.25
Women	0.10	0.05	0.05	-	0.14	0.05	0	0.00	0.00	0.05	0.05
Worked hours	**11,189,742.31**	**11,557,187.22**	**11,933,931.20**	**0**	**291,660.23**	**1,295,675.97**	**465,392.00**	**424,508.00**	**740,113.20**	**12,273,355.45**	**13,969,720.37**
Men	7,035,416.15	7,292,448.23	7,460,499.54		187,177.42	807,870.97	328,512.00	282,824.00	488,448.00	7,762,449.65	8,756,818.51
Women	4,154,326.16	4,264,738.99	4,473,431.66		104,482.81	487,805.00	136,880.00	141,684.00	251,665.20	4,510,905.80	5,212,901.86

[207] As of 2021, accidents in the UK broken down by gender, level of severity or with/without medical leave were not reported.
[208] The worked hours in Brazil have been estimated in accordance with the provisions in this regard in the Collective Agreement.
[209] In 2020, there were three accidents without medical leave in Brazil, consequently resulting in a severity index of 0 for the year.
[210] Rate of days lost = (Total number of cases of days lost by own personnel * 10^6) / Total hours worked.
[211] Incidence rate of occupational accidents = (Number of accidents with medical leave * 10^3) / Average accumulated workforce.
[212] Frequency rate = (Number of accidents with medical leave * 10^6) / (Total number of hours actually worked), where:
[213] Severity rate = (No. of working days not worked due to an occupational accident with medical leave * 10^3) / (No. of hours actually worked).

Number of occupational diseases by region reported by the private insurance company (own staff) (GRI 403-10)

	Spain			United Kingdom			Brazil			Total		
	2020	2021	2022	2020	2021	2022	2020	2021	2022	**2020**	**2021**	**2022**
Number of deaths due to occupational disease or illness	0	0	0	0	0	0	0	0	0	**0**	**0**	0
Men	0	0	0	0	0	0	0	0	0	**0**	**0**	0
Women	0	0	0	0	0	0	0	0	0	**0**	**0**	0
Number of cases of occupational diseases or illnesses	0	0	0	0	0	4	0	0	0	**0**	**0**	0
Men	0	0	0	0	0	4	0	0	0	**0**	**0**	0
Women	0	0	0	0	0	0	0	0	0	**0**	**0**	0

Aena Spain includes all of its own workers.

While the most common occupational diseases could be musculoskeletal injuries (minimised by risk assessment and associated controls) or noise-related injuries (minimised by noise assessments conducted through an established regular programme) during the fiscal year 2022, in Spain, the occupational medical specialist section of the Risk Prevention Service has not found any additional occupational illnesses, according to RD 1299/2006, of 10 November, which approves the occupational diseases table in the Social Security system and establishes criteria for reporting and recording them.

Health and safety emergency preparedness procedures

Aena facilities have emergency action protocols (see chapter 6 “Safe, quality services”), which are available to workers at each site either on the intranet or on the Employee Portal and are subject to periodic reviews.

For this purpose, the areas of occupational risk prevention collaborate with other areas (security, operations, etc.), resulting in greater involvement and commitment in this regard.

As previously indicated, in the United Kingdom, London-Luton Airport conducts COSHH (‘Control of Substances Hazardous to Health Regulations’) risk assessments, as an additional measure, for all hazardous substances used within departments, which detail the specific health hazards and controls required as well as the associated emergency procedures.

For its part, Brazil makes use of the Aerodrome Emergency Plan, keeping it updated, which also deals with the airport evacuation procedure (tested through annual assessment drills). In addition to the airport emergency plan, the Health and Safety department informs participants in the introductory health and safety training courses about the emergency meeting points for all contract employees and service providers.

Objectives and monitoring of the objectives set in terms of health and safety

Aena’s commits to reducing accident rates and developing a risk-preventive culture by establishing a series of quantitative objectives in the field of accidents, which are reviewed and updated annually according to best practices in the sector and/or the latest trends. As a sample of this, a series of goals are set in Spain according to a continuous improvement process based on historical data, taking into account data from the sector. In 2021, the following objectives were established for the year 2022:

- Number of accidents: 55.
- Incidence rate[214]: 7.71.

[214] Incidence rate of occupational accidents = (Number of accidents x 10^3)/Average accumulated workforce

The table below shows the goals established and results obtained between 2019 and 2022 with respect to the incidence rate and the number of accidents.

		2019	2020	2021	2022
Incidence rate of accidents	Target	8.35	8.35	7.71	7.71
	Results	7.24	5.27	5.58	7.54
Number of accidents	Target	60	62	60	55
	Results	56	41	43	60

Consequently, the previously proposed objectives have been achieved.

By 2023, the target set has been to maintain the same target (target being 771[215]) for the incidence rate with respect to 2022 and reduce the target number of accidents to 58.

Likewise, Brazil's targets for the 2022 financial year include the implementation of all health and safety programmes required by Brazilian legislation and compliance with corrective action plans, having reached 100% of them.

Absenteeism (own staff) (GRI 403-9)

	Spain			United Kingdom			Brazil[216]		
	2020	2021	2022	2020	2021	2022	2020	2021	2022
Number of hours lost due to absenteeism[217]	**794,813.89**	**840,999.30**	**975,787.19**	**59,413.97**	**57,130.22**	**71,347.20**	**4,335.00**	**3,572.00**	**24,320.00**
Men	458,991.84	475,488.93	549,472.90	23,884.02	39,338.15	43,616.88	2,250.00	2,445.75	15,328.00
Women	335,822.05	365,510.37	426,314.29	35,529.95	17,792.07	27,730.32	2,085.00	1,126.25	8,992.00
Absenteeism rate[218]	**7.10**	**7.28**	**8.18**	**3.84**	**4.36**	**5.51**	**-**	**0.84**	**3.29**
Men	6.52	6.52	7.37	3.57	4.66	5.40	-	0.86	3.14
Women	8.08	8.57	9.53	4.31	3.82	5.68	-	0.79	3.57

Occupational health and safety training

(GRI 403-5)

In order to ensure compliance with current regulations and make good on the commitment of the entire workforce in health and safety matters, training, communication and awareness-raising actions are regarded as being fundamental.

In Spain, the UK and Brazil, Aena ensures that every worker receives training – theoretical and practical –that is relevant and sufficient in preventive matters,from when they first start at the company and throughout the term of their contract, regardless of the modality or duration thereof, the functions they perform or any changes to the organisation or to the work teams, as well as the introduction of new technologies.

When the risk assessments of the tasks of each worker are reviewed, the health and safety training needs that adapt the training to the position they occupy are identified. The resulting courses are then mandatory in

[215] *Starting in 2023, the accident rate or incidence rate is calculated per 100,000 workers (and not per 1,000 workers as before), as indicated by the INSST.
[216] In 2020, Brazilian airports did not register absenteeism levels.
[217] Number of hours lost due to absenteeism = the number of accumulated hours of absenteeism in the year due to sick leave and similar situations, unjustified absences, justified absences that are not recoverable and absences pending justification for each scheduled hour of work.
[218] Absenteeism rate = (Total number of absenteeism hours / Total number of hours worked) x 100

nature, they are calculated for the purposes of annual variable remuneration and are imparted within the working day.

In Brazil, the hiring of a specialised company is in process for the delivery of courses in the field of occupational health and safety for certain occupations.

Worker training on occupational health and safety							
	Spain		Brazil		United Kingdom		Total
	2021	2022	2021	2022	2021	2022	2022
Training activities (number)	1.207	73	2	-	-	-	**73**
Employees (number)	7,746	5,500	70	170	-	604	**6,274**
Training hours	43,551	44,070	80	-	-	-	**44,070**

NOTE: In 2022, training hours or number of UK activities are not recorded on this specific subject.
Brazil: For its part, ANB reports that during 2022, 170 employees have received "Training in health and safety issues", within one of their training schedules. But it is not possible to discern the number of activities or hours of training in this specific subject.

5.5.2. Promoting the health and well-being of workers

(GRI 403-3; 403-6)

Aena establishes measures of risk prevention and promotion of the health of its workers with the aim of improving their conditions, as well as detecting any risk factors that may affect their health. To do this, they carry out a series of actions such as medical examinations, risk prevention programmes, dissemination of a wellbeing culture, monitoring of occupational diseases, etc.

These measures are developed by specialised technicians and submitted for consultation and participation in the State Health and Safety Committee, upon approval.

Main actions

In Spain, during 2022, Aena's work centres have been relaxing the measures imposed in response to COVID-19[219] giving rise to the development of other specific actions, among which the following are noteworthy:

- 1,304 seasonal flu vaccinations.
- 5,964 health status tests (medical recognitions).
- 360º Wellbeing project: Led by the human resources management in which the health, care and wellbeing of workers is promoted through the weekly newsletter distributed by email and from various materials available on the Aena intranet.
- Work-life balance measures and social benefits.
- Employee Services Programme (PAE [Programa de Atención al Empleado]).
- Addictive behaviours and emotional support programme.
- Management protocol in situations of personnel conflict[220].

[219] Nevertheless, workplaces have maintained protective measures implemented as a result of the pandemic, such as the delivery of FPP2 masks and sanitizing material, the performance of diagnostic tests, implementation of a remote working policy and greater flexibility in hours, etc.
[220] Its goal is to provide practical resources and tools that can help employees in the professional and personal environment. All employees have access to this material through the weekly newsletter distributed by email and on Aena's intranet.

- Adaptation of the occupational health and safety management system to the integrated management of quality, the environment and energy efficiency.
- Informational campaigns: road safety, visual fatigue at work and cardiovascular risk.

In Brazil and the UK, all workers are entitled to health insurance and have received information on the attributed benefits.

Measures to reduce stress

Aena has a procedure for identifying and evaluating psychosocial factors and risks that may represent a risk to the health and wellbeing of workers, among them is stress. It has also implemented a series of actions and resources to help improve the emotional state of employees and stress management, including:

- Awareness-raising actions, through internal newsletters and specific webinars.
- Stress support instruments, such as that offered through the Aena Employee Assistance Program (PAE [Programa de Atención al Empleado]) and the 360° Wellbeing team.
- Training about stress for employees through the new online platform (How to combat burnout, eustress yourself!).
- Ergonomic design of the workstations, which contributes to the well-being of the workers in their work environment and adaptation of the furniture to people with special needs (lumbar cushions, footrests, etc.).
- Recommendations to adapt teleworking positions to ergonomic criteria, contained in the teleworking policy, in order to reduce possible musculoskeletal injuries and improve the health and safety of people who have adhered to this work modality.
- Evaluation of psychosocial factors through anonymous surveys, following the procedure approved within the State Health and Safety Committee, as well as subsequent analysis of results and proposal of preventive measures in the various facilities.
- Identification of the sources of stress, based on nine psychosocial factors: work time, workload, autonomy, psychological demands, variety and content of work, participation and supervision, employee interest and reward, role performance and relationships and social support.

In the UK, London-Luton Airport carries out the following activities to reduce stress levels and their consequences:

- Stress risk assessments.
- Absence monitoring.
- Employee surveys, including stress/mental health issues.
- Establishment of a Mental Health first aid role.
- 'Better Conversation' training for managers and staff to improve communication about health matters in teams.
- Employee Assistance Programme.
- Wellbeing Action Plans.
- Wellbeing programme delivered through events/ webinars/ lunches and learning sessions on a variety of topics, including stress and mental health.

In this regard, an analysis has been carried out in Brazil to identify and avoid possible work overload and stress situations and specific training has been given.

Specific work-life balance and well-being measures

(GRI 3-3; 401-2; 401-3)

In Spain, Aena's Sustainability Strategy 2021-2030, through the 'People Management' action line, includes objectives aimed at promoting the work-life balance of workers, improving satisfaction and motivation through the work wellbeing programme, and the balancing of personal and work life. For this purpose, the following actions are carried out:

- Development of a flexible remuneration programme.
- Establishment of an integration and coordination plan, providing well-being and prevention resources for employees.
- Implementation of the Teleworking and Digital Disconnection policies.

In the UK, London-Luton Airport complies with the Flexible Working Regulations and the Employment Rights Act 1996 in this regard. Among others, such commitment is reflected through the Flexible Working Policy and enacted through the establishment of measures such as:

- Limitation on holiday transfers, ensuring that employees enjoy the assigned number of holidays during the corresponding period (includes 5 days in addition to what is required by regulations).
- Maternity, paternity or adoption leave.
- Emergency parental leave of up to 5 days, exceeding what is legally required.
- Employment Assistance Programme (EAP) support in a wide variety of situations, including those relating to gender-based violence.
- Private health insurance for the whole family.
- Integration and coordination plan, providing well-being and prevention resources for employees.
- Assistance programme available to all employees and their families: confidential service that includes personal advice and legal assistance if necessary.

In addition, it is worth mentioning the additional measures available to support employees at the airport in the United Kingdom:

- Healthcare (BUPA).
- Mental health first aid.
- Wellbeing Strategy Planning Group, which develops a wellbeing programme based on the needs/risks detected among employees (from surveys, stress risk

assessments, absence data, occupational health references and current external impacts).
- Webinars focused on mental health.

On the other hand, the work-life balance measures in Brazil are provided for in the Collective Agreement, with the following to highlight, among others:

- Flexibility in the workday (for those employees whose workday is not on shift).
- Maternity leave.
- Reduction in working hours for pregnant women.
- Benefits such as medical and dental insurance, life insurance, etc.



	Workday	Balance of family life and leaves	Paternity and maternity	Gender-based violence	Employee aid
Spain	• Flexi-time: ◦Flexible schedule of clock-in and -out times. ◦Two hours of daily flexibility for working people with children with disabilities. • Shortened workday during summer (3 months). Possibility of service changes for staff between shifts. • Teleworking policy that allows employees to work remotely. • Digital Disconnection policy that promotes respect for employees' working hours and leisure time. • Workdays defined and set in the short and long term. • Schedule control.	• Reduction of working hours for the care of children under twelve years of age, and sick and/or disabled family members. • Leave of absence to care for children or family members. • Paid leave for private matters (own matters). • Seniority leave (after 20 years of service, one additional day for every 5 years). • Paid leave on 24 and 31 December.	• Rest in the event of childbirth, adoption or foster care. • Possibility of distribution of the rest period per birth of child.	• Possibility of a reduction in working hours with a proportional decrease in salary or in the rearrangement of work time. • Suspension of the employment contract for those cases of job abandonment by the worker as a result of being a victim of gender-based violence.	• Flexible compensation (restaurant tickets). • Medical insurance. • Life and accident insurance. • Medical examinations. • Financial aid for studies, health, disability, camps, nurseries, reimbursable advances. • Aena's Employee Services Programme (PAE [Programa de Atención al Empleado]). A set of counselling, facilitation and emotional support services for events that take place in the life of employees, offering services and advice in all aspects derived from certain situations (legal, fiscal, social, administrative, etc.). • Pension Plan contributions.

	 Workday	 Balance of family life and leaves	 Paternity and maternity	 Gender-based violence	 Employee aid
UNITED KINGDOM	• Possibility of requesting flexible work, which may include part-time work, working from home or with modified start and end times.	• Annual holidays that include 5 days above the minimum established by the government.	• Paid maternity, paternity or adoption leave. • Paid parental leave of up to 5 days, plus compliance with the parental leave required by the government.		• Benefits include private health insurance for the whole family. • Integration and coordination plan, providing well-being and prevention resources for employees. • Assistance programme available to all employees and their families: confidential service that includes personal advice and legal assistance if necessary.
BRAZIL	• Work-life balance measures provided for in the Collective Agreement. They highlight: maternity leave, paternity leave, leave to accompany children, etc.				

Main data 2022[221]

The return-to-work rate of employees who took parental leave in 2022 amounted to 79.7% (82% in 2021).

Parental leave (GRI 401-3)														
	2021							2022						
	Spain		United Kingdom		Brazil		TOTAL	Spain		United Kingdom		Brazil		TOTAL
	M	F	M	F	M	F		M	F	M	F	M	F	
Number of employees who have returned to work after parental leave	**141**	**38**	**15**	**18**	**8**	**4**	**224**	**136**	**41**	**11**	**10**	**6**	**3**	**207**
Maternity	0	36	0	18	0	4	**58**	0	41	0	10	0	3	**54**
Paternity	141	0	15	0	8	0	**164**	136	0	11	0	6	0	**153**
Adoption/ foster care	0	2	0	0	0	0	**2**	0	0	0	0	0	0	**0**
Parental leave	0	0	0	0	0	0	**0**	0	0	0	0	0	0	**0**
Number of employees who have returned to work after completing parental leave and remain employed 12 months later	**112**	**23**	**14**	**23**	**8**	**4**	**184**	**117**	**28**	**11**	**1**	**6**	**2**	**165**
Maternity	0	22	-	23	-	4	**49**	0	28	0	1	0	2	**31**
Paternity	112	0	14	-	8	-	**134**	117	0	11	0	6	0	**134**
Adoption/ foster care	0	1	-	-	-	-	**1**	0	0	0	0	0	0	**0**
Parental leave	0	0	-	-	-	-	**0**	0	0	0	0	0	0	**0**

[221] In accordance with current legislation and applicable internal regulations, all Aena workers have the right to paternity/maternity leave.

Number of employees who have returned to work after the end of parental leave and are still employed 12 months later (2022) *							
	Spain		United Kingdom		Brazil		TOTAL
	M	F	M	F	M	F	
Maternity	0	21	0	21	0	4	**46**
Paternity	110	0	13	0	8	0	**131**
Adoption/ foster care	0	1	0	0	0	0	**1**
Parental leave	0	0	0	0	0	0	**0**
Total	**110**	**22**	**13**	**21**	**8**	**4**	**178**

*In Spain, as of 12/31/22, there are three employees on Leave of Absence.
Information reported for the first time in fiscal year 2022.

Return to work rate									
	Number of employees who have returned to work			Number of employees who are due to return to work			Return to work rate*		
	M	F	**Total**	M	F	**Total**	M	F	**Total**
Maternity	0	31	31	0	54	54	-	57.4%	57%
Paternity	134	0	134	153	0	153	87.6%	-	88%
Adoption/ foster care	0	0	0	0	0	0	-	-	0%
Parental leave	0	0	0	0	0	0	-	-	0%
Total	**134**	**31**	**165**	**153**	**54**	**207**	**87.6%**	**57.4%**	**79.7%**

(*) Return to work rate: (Total number of employees who returned to work after parental leave / Total number of employees who must return to work after parental leave) x 100.

5.5.3. Commitment to companies (external/concurrent)

(GRI 403-7)

As an entity subject to public law, in Spain, Aena undertakes to establish the requirements and coordination mechanisms for the Prevention of Occupational Risks between Aena and all those companies that carry out some type of activity in the facilities managed by the Company, in order to improve the actions on the prevention of occupational risks and comply with the obligations established in Article 24 of Act 31 of 1995, of Occupational Risk Prevention, and its subsequent development by Royal Decree 171 of 2004, and other concordant legislation. This commitment to the protection of contracted third parties is reflected in the Integrated Policy on Quality, the Environment, Energy Efficiency and Occupational Health and Safety.

For this purpose, the Company has a Business Activities Coordination (CAE) system with third parties[222] in operation in all work centers, through which the risks of companies that work in Aena facilities (external companies) are communicated. / concurrent) and coordination between all of them is encouraged. Specifically, the companies that carry out their activity at Aena sites have the duty to fill out and/or update declarations of own risks and risks to third parties, to subsequently inform them to both their workers and to those of Aena. This information is reflected in a risk map[223] which is made available to the companies along with the corresponding manual and the link to the Aena CAE website. During fiscal year 2022, the continuous improvement of the website has been extended to facilitate as much as possible the coordination process of external companies, with notable efforts made in the work carried out to record any accidents that the workers of all external companies may have suffered at the facilities of Aena. This will result in greater efficiency when designing and maintaining spaces where the safety of everyone who accesses the facilities comes first. The coordination of business activities thus becomes the mechanism that is used to comprehensively enhance the care given to the health of all workers (both at the airport and in society), taking into account the large number of people who carry out their work activity at Aena's centres.

Protecting the health of its workers, suppliers, external staff and passengers are priorities for Aena

In addition, there is a Procedure for the Coordination of Business Activities that establishes requirements and coordination mechanisms in matters of Occupational Risk Prevention between Aena and all those companies that carry out some type of activity in their facilities. The purpose of the procedure is to improve the actions carried out in this area and to ensure compliance with the obligations established in Article 24 of Act 31 of 1995, on the Prevention of Occupational Risks, and its subsequent development through Royal Decree 171 of 2004, and other concordant legislation. This objective is achieved through the exchange of information related to risks to third parties generated by the activity of the companies concurrently working at the Aena site.

Additionally, periodic meetings have continued to be held with the concurrent companies by virtue of the type of activity they carry out or the areas in which they operate.

Finally, contracts with external suppliers include clauses detailing the lines of action in matters of health and safety.

In the UK, London-Luton Airport conducts pre-contracting assessments of suppliers in which information about suppliers is requested, evaluated and qualified in health and safety matters. Once the contract is executed, suppliers are subject to the Airport's health and safety policy. Likewise, the Health and Safety department monitors the performance of the suppliers in this regard, for their continuous improvement.

In addition, there is ongoing collaboration with suppliers to reduce the risks to which they may be exposed. In addition, tools are available to share any relevant communication with suppliers. Finally, meetings are organised with the stakeholders to assess the impact of potential risks that, if any, may be transferred internally to the governing bodies.

In Brazil, service providers undergo an initial assessment of compliance with Brazilian health and safety legislation. They are also subject to the Third-Party Health and Safety Procedure, which delineates the conduct of contractors, with the aim of eliminating or reducing risks in the workplace, establishing accident reporting channels and encouraging mitigation actions. In addition, all accidents of third parties at work must be reported and properly investigated.

Finally, Brazil recommends health and safety measures for some activities carried out by business partners, such as for construction activities or those considered high risk, which is also included in the Third-Party Health and Safety and Procedure.

[222] The relationship between Aena and external companies may be the result of a direct link, derived from a contractual relationship between the parties (work contracts, leases, transfer of facilities, etc.) or an indirect link (when the external company carries out all or part of its business activity in Aena's facilities).
[223] Access the link to the website for Business Activities Coordination with third parties – Occupational risk prevention. See chapter 'Links of interest'.

6. Safe, quality services (GRI 2-22; 3-3)

Operational Safety

Certified and approved programmes and management systems at the highest level of the Company.

Specific objectives.

Periodic internal and external reviews and audits.

Emergency plans.

Communication and training.

Corrective actions.

Commitment to operational security extendable to third parties.

+90 internal supervisions and 30 external operational safety audits

+8,500 employees trained in operational safety in 2022

Cybersecurity or information security

Information Security Management System certified to ISO 27001:2013.

Strategic Information Security Plan 2022-2026, reviewed by the Board of Directors and senior management.

Awareness training and actions.

Procedure for reporting incidents.

Contingency plans and incident response procedures.

0 Information security breaches or other cybersecurity incidents

Health safety

Aena has received the 'Best Airport Group COVID-19 Excellence' award at the 'World Airport Awards' from the prestigious consultancy Skytra

The airports of Reus, Pamplona, International Region of Murcia, Seve Ballesteros-Santander, El Hierro and Barcelona-El Prat Josep Tarradellas have received the 'Best Hygiene Measures' award in Europe during the fiscal year 2022, also granted by ACI, for the health measures implemented during the previous fiscal year against COVID-19

London-Luton Airport has received the certification from ACI (ACI Health Accreditation).

Excellent management

Company Strategic Plan.

Strategic Airport Maintenance Plan of Aena.

Responsible Business Strategy 2020-2025.

Quality of Services Plan (PQS).

Airport Exploration Plan (PEA) of ANB.

Aena's Integrated Quality and Environmental Management System.

Aena's Integrated Quality and Environmental Management System, implemented and certified in Spain in accordance with ISO 9001 and ISO 14001

Airport security

Focused on:

Communication and collaboration between all the agencies and groups involved.

Surveillance of vulnerable areas of the airport.

Control of the movement of persons and vehicles at the accesses to restricted security areas.

Inspection of persons and property.

Preparation and update of measures of the Programme.

More than 3,929 employees trained in airport security

Commitment to SDGs



Introduction

Aena is a company focused on the prevention of eventualities and contingencies that may affect the normal development of its activities, trying to alleviate potential existing risks.

Given their nature, the Company considers it essential to carry out a continuous evaluation of all its processes in matters of safety and risks, adapting them where appropriate and providing the necessary human resources, mechanisms and materials. This ensures the highest levels of airport, operational, health and information security.

Health and Safety Assurance at Aena (GRI 3-3)[224]



AIRPORT SECURITY

In vigilance against illegal acts, "a combination of measures and human and physical resources are used for protecting civil aviation against acts of illegal interference".



OPERATIONAL SAFETY

The minimisation of the risks of accidents and serious incidents occurring in aircraft (prevention).



HEALTH SAFETY

Focused on the application of health measures that contribute to avoiding the possibility of contagion as much as possible, and reducing the exposure of all users, as well as guaranteeing their safety at all times.



CYBERSECURITY OR INFORMATION SECURITY

Covers a series of safety measures to prevent and detect the unauthorised use of computer systems.

[224] Applicable to all services offered at Aena airports in Spain, UK and Brazil

6.1. Operational safety

(GRI 3-3)

6.1.1. Management framework

(GRI 2-23)

Aena addresses operational safety at its airport facilities by adopting an attitude focused on risk prevention, with a commitment to complying with legal and regulatory requirements that are applicable[225] in this regard, taking into account the good practices established across the Company and in the sector, while providing the necessary resources to place operational safety – including crisis situations – as one of the main responsibilities of all the directors and staff of the airport in general.

Commitment to guaranteeing the highest levels of Operational Safety from senior management, to reduce risks to a minimal and reasonably achievable level[226]. Enshrined in the following:

Security management is a formal, explicit and systematic activity of risk prevention, where crisis management is guided within the framework of a fair culture, always seeking to identify systemic deficiencies

Operational Safety Policy
Approved by the Director of Operations, Security and Services and the Executive Director and Managing Director of Airports, who sign their agreement with it



Addresses operational safety at airport grounds and buildings, adopting a preventive attitude, with the commitment to comply with legal requirements and applicable regulations on the matter, take into account good practices, provide the necessary resources and make operational safety, including crisis situations, one of the main responsibilities of all directors and airport personnel in general.



Application of a culture of fairness as a tool to improve safety notifications and influence the improvement of the system's performance as opposed to the search for individual responsibilities, except in cases of wilful misconduct or serious negligence.

It has led to the implementation of **Operational Safety Management Systems (OSMS)**, a tool used at Aena to ensure that the appropriate levels of operational safety are achieved and maintained and which are adapted to each airport in the network. Includes the organic structure, lines of responsibility, policies and procedures:

[225] Operational Safety is a priority at airports around the world. There are national and international regulations on the subject, as well as sectoral guidelines:
a. ICAO: in Annex 14 – Volume I 'Aerodrome Design and Operations', in Doc. 9774 'Aerodrome Certification Manual' and in Doc. 9859 'Operational Safety Management Manual'; sets down the requirement for airports to establish an Operational Safety Management System (OSMS) that ensures that operations are carried out in a controlled manner and that there are continuous improvement procedures for safety levels.
b. Spanish Aviation Safety and Security Agency (AESA): responsible for developing the Operational Safety regulation in relation to the requirements that must be met by the OSMS of Spanish airports and their own continuous improvement procedures.
c. EU Regulation No. 139/2014 (applicable to Aena airports in Spain and the United Kingdom), which establishes the administrative requirements and procedures relating to aerodromes, in accordance with Regulation (EC) No. 1139/2018 of the European Parliament and the Council, which establishes in its part ADR.OR.D.005 the need to include, as part of the management system, a description of the operator's philosophy and principles with regard to operational safety, referred to as the Safety Policy, which must be signed by the manager.
d. In Brazil, the requirements of Annex 19 of the ICAO are included in the Regulations determined by ANAC (RBAC 153).

[226] All Aena airports in Spain, the United Kingdom and Brazil have an operational security policy and the corresponding Operational Safety Management Systems (OSMS), procedures, programmes, etc., adapted to their circumstances.

Identifying the organisation's weaknesses, classifying its risk level and taking measures to reduce it – hazard identification, risk analysis and risk mitigation. As well as identification of opportunities for improvement

Analysing and monitoring the operation of the airport globally

Establishing indicators to monitor the safety conditions of airport activity to anticipate possible problems and their solutions

Analysing accidents and incidents to define measures that minimize their consequences

Creating a culture of safety through the dissemination of its results and conclusions (mechanisms for sharing and disseminating information between the different sites and the agents involved)

Improving the airport's overall safety through an operational safety programme with clear objectives

Operational Safety Programme,
To achieve the principle of continuous improvement of the System at each airport

With specific objectives and goals, measured through indexes and indicators (adapted to each airport), which are evaluated and analysed periodically.
Includes actions and resources necessary in the area of Operational Safety for the achievement of objectives, as well as the deadlines in which they must be reached.

These indicators are related to weather, maintenance, the environment, vehicles/drivers or incidents, among others

6.1.2. Objectives in the scope of Operational Safety

Aena establishes operational safety objectives for each of its airports, ensuring the correct compliance with the established security levels. It also incorporates potential improvements based on the Company's experience, lessons learned and from a detailed analysis of them to verify their effectiveness.

In Spain, some of the main goals include the modification and adaptation of infrastructures, the establishment of more efficient processes for the identification of risks and the improvement of the operational safety culture through the promotion of notifications and the implementation of the principles of fair culture.. At the cross-divisional level, the creation of an independent unit of supervision of the operational safety management compliance processes (Compliance Monitoring) is highlighted.

In the UK, London-Luton Airport sets objectives in this area to ensure accident prevention, paying special attention to training, adding value from lessons learned, organising meetings and workshops, or reinforcing the programme of tours and visits for employees. For measurement and monitoring, internal objectives are set.

As far as Brazil is concerned, airports are focused on implementing as many measures as necessary to improve and maintain an acceptable level of operational safety, including actions resulting from hazard identification and risk management. In addition, the aim is

to reinforce the coordination between the various activities, as well as conducting training courses and disseminating information.

Aena seeks continuous improvement of its operations and ensures an excellent level of operational safety.

6.1.3. Main actions focused on improving operational safety in 2022

In line with the improvements implemented during 2021 in terms of operational safety, in 2022 the Company has focused on:

- The consolidation of a procedure for notifying the state and conditions of surface of the runways (GRF, Global Reporting Format), in order to detect the state of the surface paving in the event of adverse weather conditions, both at Spanish airports, in the United Kingdom and in those of Brazil.
- Specifically in the UK, training of employees and airport staff on the subject, taking as reference previous initiatives and shared learning. It also highlights the continuity of the Skills Retention Programme for personnel on leave of absence and the reduction in the number of accidents.



6.1.4. General aeronautical audits, checks and drills of Operational Safety

(GRI 3-3; 416-1)

In order to establish a continuous improvement process, which in turn serves as a tool for the evaluation of the OSMS, the following control mechanisms are carried out:

- **Internal inspections** at all airports in the Aena network, including the Air Base platforms open to Civil Traffic, with the aim of verifying regulatory compliance and the proper implementation, suitability and efficacy of the systems, as well as avoiding any non-conformities from being detected in external inspections. In the fiscal year 2022, a total of 49 internal inspections have been carried out in Spain (50 in 2021, in Spain), 41 in the United Kingdom and 2 in Brazil[227].
- **External audits** to ensure the correct implementation of the OSMS at each airport.
  - In Spain, these are performed by the Spanish aviation safety and security agency (AESA). In general, the airports in the network receive an average of 25 visits from auditors annually, having a greater presence in the three large airports (Adolfo Suárez Madrid-Barajas Airport, Barcelona-El Prat Josep Tarradellas Airport and Palma de Mallorca Airport) as well as those of Group I.
  - In the UK, the Civil Aviation Authority (CAA) and the British Standards Institution conduct these audits twice a year.
  - In Brazil, the Agência Nacional de Aviação Civil (ANAC) carries out external audits on this matter. In 2022, they only conducted one audit while at the end of 2021, 4 airports were in process of certification.
- **Drills.** In 2022, 20 general aeronautical drills (28 in 2021) were carried out at Spanish airports in the Aena network[228]. Likewise, and following the scheme established by the CAA, drills are also carried out in the United Kingdom on a regular basis. Specifically, 3 drills have been conducted during 2022[229]. In Brazil, Operations Management is responsible for organising these activities, resulting in 25 drills having been conducted during 2022 (none in 2021).

Operational safety

83% of airports according to EU Regulation 139/2014 and 17% according to Royal Decree 862/2009.[230]



[227] Information not available for UK and Brasil in 2022.
[228] Airports of Vigo, Pamplona, Tenerife Norte-Ciudad de La Laguna, Málaga-Costa del Sol, Valladolid, AIR Murcia, Santiago-Rosalía de Castro, Jerez, Almería, Burgos, León, Madrid-Cuatro Vientos, Badajoz, Bilbao, Seville, El Hierro, La Gomera, César Manrique-Lanzarote, Girona-Costa Brava and Barcelona-El Prat Josep Tarradellas. Referring to La Palma, it was deferred for 2023.
[229] Information not available for UK in 2021.
[230] The air bases open to civil traffic and the joint airport of Zaragoza are not certified or verified, as the requirement does not apply to them.

	2020				2021				2022			
	Spain	United Kingdom	Brazil	**Total**	Spain	United Kingdom	Brazil	**Total**	Spain	United Kingdom	Brazil	**Total**
Internal inspections (number)	49	19	-	68	66	36	6	108	49	41	2	92
External audits (number)	24	2	-	26	29	7	12	48	28	1	1	30

6.1.5. Other mechanisms to maintain excellent levels of Operational Safety

(GRI 2-25)

Emergency Plan

In all the Company's Airports and Heliports – in Spain, the United Kingdom and Brazil[231]- there is an Emergency Plan (self-protection)[232] that provides guidelines on the response to any emergencies related to the operation of aircraft, as well as to those that may occur in the buildings and facilities of the airport. These plans, whose maximum responsibility lies with the Plan Director, establish the designated emergency teams at each airport, as well as their coordination with the teams of the higher-level Civil Protection plans (local/autonomous), which are external to the airport and in which the airport plan is integrated[233].

The plans include those situations that are likely to causing an emergency and identifies the key departments in terms of continuity of service, containing the procedures for coordinating actions to give an effective response. Thus, the possible risks (natural, technological or anthropogenic hazards, etc) are evaluated and mitigating measures are associated to them.

Specifically, the emergency plans of Spanish airports reflect the mechanisms that alert emergency teams, as well as the information channels for passengers or other users of the airport facility. When an emergency plan is activated, users who are part of the emergency teams are alerted during the actual activation of the Plan. All other users are informed by means of alarm systems/ loudspeakers/ alarm and evacuation equipment (AEE), in the event of emergencies in buildings, and by means of the corresponding NOTAMs (Notice to Airmen) in case of aircraft emergencies.

These plans are active documents. Thus, for example, in Spain, corrective action plans are executed derived from the analysis of both emergency drills, real situations, as well as the results of internal and external inspections. In general, they are distributed to all bodies, both internal and external, that are involved or affected by the plan[234].

The emergency response is integrated in the operational safety culture implemented at airports

In order to strengthen the level of security, airports develop a drill programme in compliance with current regulations that allow all groups involved in the Emergency Plan to periodically test aspects related to the Emergency Plan (see previous section).

[231] Aena's Airports in Brazil have the Airport Emergency Response System (AERS), which is updated and structured in accordance with the regulations that apply to them. They include the user alert, and communication mechanism and system. In this regard, the airports have, for example, emergency telephones to guarantee immediate communication of possible incidents to agents, such as the fire service or the operations control centre, among others.
In Brazil, they also have Procedures for the Removal of Inoperative Aircraft and Unblocking of Runways, procedures for mitigating negative psychological effects derived from an aviation accident, firefighting plans and contingency plans for public health emergencies. All of them are reviewed in the event of a drill exercise, of an emergency that requires the activation of the Emergency Response System, of a significant change in the operational characteristics of the aerodrome or in the event of a transmissible disease at a regional, national and/ or international level.
[232]Updated and structured in accordance with European sectoral regulations (Regulation 139/2014), with Royal Decree 862/2009 – in the case of verified Spanish airports–, the technical instructions of AESA, the standards and recommendations of the International Civil Aviation Organisation (ICAO) and the National Civil Protection regulations.
In the United Kingdom, they have 'Emergency Orders' that define the types of emergency, general procedures, actions by area, etc. This document is available to all stakeholders through the specific communication platform.
[233] The need to plan the response to emergencies derives from both the requirements established at the sectoral level (airport certification/verification) and Civil Protection regulations (Basic Self-Protection Standard). Taking this into account, Aena has an operating instruction that sets the minimum criteria that airports must meet in relation to emergency plans.
[234] With the exception of those cases in which they contain information related to security procedures, as their dissemination is restricted.

In the UK, the Emergency Plan is managed by the technical services in charge of air operations, with the collaboration of the Health and Safety team. In addition, all events and related data are recorded in the corresponding tool for proper management, and an application is available for the reporting of third-party eventualities. In addition, a contact email address for Security is available for users, in case of failures related to operational security.

In relation to requests for product recalls by suppliers, these are immediately disseminated through a security alert to the responsible areas and managed through the Risk Governance Process. Finally, the Health and Safety team is also responsible for conducting an ongoing review of potential regulatory changes to ensure proper implementation.

Aena airports in Brazil have an Aerodrome Emergency Plan (PLEM), as part of the Airport Emergency Response System (SREA)[235]. Its objective is to establish the basic procedures for action and coordination in the event of possible emergencies[236]. The preparation, coordination and future update of the Plan rests with the Management of Operations, Safety, Services and Maintenance, while its approval is the responsibility of the Airport Management, in accordance with current legislation.

In the event of a nuclear accident or serious radiological emergency, anywhere in the National Territory, specialised equipment (Radiological Control and Decontamination) must be activated by the II COMAR (Brazilian Air Regional Command), even if it has not yet been necessary to request its support.

Investigation, handling of accidents and incidents, and corrective actions

Airports belonging to the Aena network in Spain have a procedure for the analysis and reporting of accidents/incidents that occur in the airside area of the airport or those that affects Operational Safety. This procedure facilitates the establishment of measures to prevent them from happening again and thus take into account the experiences and lessons learned. When an accident/incident occurs, all the data related to the event must be communicated to the control department that has been established for this purpose[237].

Airports follow a best practice model for reporting and investigating accidents, with the aim of learning from mistakes and establishing new learning opportunities

Considering the logic of each airport, each one identifies possible hazards that may affect operational safety, analyses potential risks and implements the corresponding mitigation measures. By using an Operational Safety Communication Procedure, a system is installed that allows for internal and external communications, queries and complaints in this area, and provides a specific internal communication channel.

In Spain, lessons learned are disseminated within the framework of Operational Safety workshops or through Operational Safety Bulletins and the development or improvement of specific procedures, if applicable.

As far as the UK is concerned, various actions have been carried out aimed at promoting a proactive and learning methodology with regard to accidents and incidents that have occurred, in order to achieve continuous improvement in their performance and facilitate the implementation of corrective actions.

In turn, Aena airports in Brazil investigate operational safety incidents in order to correct them and prevent them from happening in the future.

[235] Accidents resulting from the use of hazardous materials in the airport area is considered as an emergency, with the following types of materials or materials similar to them considered hazardous:
(a) combustibles, lubricants and flammable, corrosive, toxic or poisonous products that may affect the health and safety of persons or cause damage to property in general;
b) Weapons, ammunition, war products in general; and
c) Radioactive, corrosive, toxic, bacteriological and other similar products.

[236] Incidents covered by the scope of the PLEM include aeronautical emergencies, medical emergencies, unlawful interference and crowd control emergencies, fire in the Airport Terminal or other airport infrastructure facilities, wildfire/vegetation emergencies, natural disaster emergences, lighting and power outage failures, pavement failures in airfields and manoeuvre grounds, and emergencies involving hazardous materials. Information of the latter emergency type is compiled by the Service Executive, Airport Emergency Response Manager, TWR/Radio, SESCINC, COE, Airport Manager, AVSEC Officer, PAPH, Head of the Cargo Terminal or the manager of the Air Operator, and the person directly responsible for the cargo.

[237] In this regard, the Company has a 24-hour network management centre for operational incidents, CGRH24, which continuously monitors the operational status of the entire Airport Network, coordinated with SYSRED (ENAIRE) and the incidents affecting flight operations, in addition to generating the corresponding monitoring reports. In the case of the airport in the United Kingdom, all accidents, incidents and corrective actions are reported through their own system, following their specific accident and incident management procedure, similar to that followed in the case of occupational health and safety accidents. Aena's Airports in Brazil have the Airport Emergency Response System (AERS), which is updated and structured in accordance with the regulations that apply to them. They include the user alert, and communication mechanism and system. In this regard, the airports have, for example, emergency telephones to guarantee immediate communication of possible incidents to agents, such as the fire service or the operations control centre, among others.

Indicators of total number of airport incidents			
	Spain	United Kingdom	Brazil
2020	631	141	20*
2021	718	96	16
2022	1,311	148	6

*Runway incursions and excursions are considered.

Indicators of equipment accidents (ACI TYPE D)			
	Spain	United Kingdom	Brazil
2020	315	60	-
2021	372	26	14
2022	680	52	12

Indicators of motion incident (ACI TYPE B)			
	Spain	United Kingdom	Brazil
2020	116	0	2[238]
2021	134	0	4
2022	250	0	0

Ensuring third-party operational safety

OSMS is the framework of reference in Spain and Brazil to ensure the operational safety of third parties who perform their activity in the airport facilities. This System sets forth, but is not limited to:

- Communication mechanisms between the Company and third parties to address any aspects related to operational safety.

[238] Both incidents were minor.

- Mechanisms for cataloguing third parties based on their potential impact on operational safety and induced risks.
- Mechanisms of control and supervision of compliance with the different requirements and aspects of operational safety, and which are also detailed in the specifications and contracts with third parties through specific clauses.

Such requirements include, but are not limited to:

- Have a person in charge of Operational Safety.
- Ensure the knowledge and application of regulations in the matter and provide the airport with the necessary information regarding its activity.
- Maintain continuous collaboration with the Contract Manager, as well as communicate accidents/ incidents.

Likewise, in Spain, there is an Apron Safety Regulation, operating instructions and specific procedures that include the safety mechanisms to be applied by all agents participating in the operation.

In Brazil, operational safety requirements apply to continuous service providers and suppliers with whom contracts are signed for operations in the airside area of the airport. Contracts and agreements include the necessary requirements that third parties must meet in terms of training and competencies, according to their activity[239].

In addition, the contracts require the establishment of operational safety indicators, with objectives related to the control of the operational safety of third parties being included in the OSMS.

In Spain and Brazil, there are also specific procedures and instructions that include the safety mechanisms to be applied by all participating agents in the course of operations. Likewise, the monitoring of the performance of third parties in the matter is carried out within the framework of the SMS.

Finally, Brazil has a reporting mechanism aimed at the Operational Safety Manager and applicable to air operations, so that they are adequately and timely addressed and corrective and/or preventive measures are duly implemented to mitigate related risks.

In the United Kingdom, London-Luton Airport establishes the requirements to be met by third parties both in the bidding documentation and in the contracts signed with them, with these also including the potential risks. In addition, contracts and the Contractors Code of Practice include training for suppliers in operational safety matters, mechanisms for monitoring compliance with the aforementioned requirements, related objectives and goals, channels for communication and reporting of safety management and a description of the clauses. Finally, publications related to Operational Safety are prepared, which are made available to suppliers through the Management Portal, and they must provide information related to Operational Safety and collaborate with the airport in all these aspects.

Staff training

Aena's airports in Spain have a training procedure for personnel in the area of Operational Safety, which ensures that airport workers have the appropriate training to perform the tasks and functions entrusted. These procedures identify the training needs by category, occupation and requirements associated with the position (content, duration, etc.), proposing different training itineraries.

In this same line, in Brazil, various training actions (on the OSMS, aeronautical accident prevention, dangerous goods transportation, etc.) are carried out to ensure that employees working on activities directly or indirectly related to operational safety are properly trained and qualified.

In addition to the above, in the United Kingdom, at London-Luton Airport, employees have participated in the Safety differently training (tours and visits), which promotes a proactive methodology focused on learning from opportunities (prevention).

2022				
	Spain	United Kingdom	Brazil	**Total**
Nº of employees	8,221	604	273	**8,553**
2021				
	Spain	United Kingdom	Brazil	**Total**
Nº of employees	2,372	-	155	**2,527**

Innovation

With regard to the innovative aspects that lead to progress in the operational safety of airports, the following lines of work stand out:

- In Spain:
  - An app supported by mobile devices created for the collection and communication of data and able to relay messages related to the surface condition of runways that are exposed to the elements of winter weather conditions (water, snow, ice).
  - Analysis of the different devices that the industry is generating for the identification and location of Foreign Object Debris (FOD). Both mobile devices in vehicles and fixed devices located in the runway environment are being analysed.
  - Analysing the use of drones for the calibration of visual aid systems
  - Installation of 13 Driving Simulators in the Aircraft Movement Area (SICAM, Simuladores de Conducción en el Área de Movimiento) at

[239] Similar ones in Spain and Brazil.

many other airports for the familiarisation and verification of the skills of drivers in the Aeronautical Zone of Operational Safety.
    - Avian RADAR tests for the detection of birds in flight in the surrounding airport environment that may affect operations.
- In Brazil, a RELPREV System is available to prepare reports on potential situations of operational safety risk, which are used to assist in the analysis of the facts, as well as in the definition of the mitigating actions taken.
- This RELPREV system is available online and via QR codes.

6.2. Airport security

(GRI 3-3)

The Company's actions are aimed at maintaining the highest level of security in airport facilities.

To this end, Aena implements different surveillance systems that complement the implementation of specific measures to prevent acts of unlawful interference and ensure best practices in this area.

The safety and protection of passengers, of the general public, crew members, aircraft, ground personnel and airports and facilities in general is a priority that Aena guarantees, beyond the minimum established by the corresponding authority.

6.2.1. Airport Security Objectives in 2022

With regard to Aena's general objectives regarding airport safety, in order to guarantee operations with the highest levels of security in people and assets, there are the following:

- **Security Equipment:** supply of inspection equipment, as well as access control systems and CCTV in accordance with the regulations and needs of the airports[240].
- **Analysis and monitoring of the Private Security service.** In addition, private security companies in the UK are subject to both CAA and internal inspections.
- **Quality Control:** verifications and tests covering the application of security procedures, the preparation of reports and the monitoring of corrective action plans.
- **Training:** development of courses aimed at airport security managers, both Spanish and UK.
- **Regulations**: participation with the AESA, in the case of Spanish airports, or with the ANAC in the case of Brazil, in different working groups and in the permanent commissions of the national safety committee. As a result, for example in Brazil, they have collaborated in the preparation of the Manual of the civil aviation security management system against acts of illegal interference, which will serve as a guide for other airports in Brazil.

In addition, in the UK, forward-looking goals have been set for the improvement of the CAA score in its assessments.

In Brazil, the main objectives pursued by airports in matters of airport security are to technically support the progress of deliveries agreed with the concession authority, as well as to provide and manage the resources for AVSEC's operations at airports.

6.2.2. Main actions focused on improving airport security in 2022

As regards the main airport security actions carried out during fiscal year 2022 across the Spanish network, the following can be cited:

- Tender of a new Framework Agreement for the supply and installation of automated explosive detection systems for cabin baggage screening (EDSCB) and automated systems for security filters.
- Tender for new private security files appropriate to the operational reality as a result of the COVID-19 pandemic.
- Collaboration with the new AESA VS certification programme.
- Implementation of the Drone Threat Protocol.
- Collaboration in the development of cybersecurity regulations in the AVSEC environment.

At the Airport in the United Kingdom, internal inspections have continued to be developed to ensure a better response to those of the CAA.

For its part, at Aena airports in Brazil, bids have been prepared for the acquisition of security equipment, CCTV cameras, electronic acces control equipment,BCBP and electronic doors.

[240] At London Luton Airport, according to the Department for Transport (DfT), which certifies the equipment that can be installed at airports in the United Kingdom.

FACTORS ON WHICH AIRPORT SECURITY DEPENDS						
Airports subject to national and international reference regulations (contains guidelines for the structural design of airport infrastructures with the aim of defending against and preventing acts of illicit interference)	**SPAIN**	**ICAO:** Annex 17 to the Chicago Convention of 1944: establishes the general rules and recommendations on security for air transport.	**ECAC:** European Civil Aviation Conference (ECAC): Document 30, which establishes safety recommendations for air transport at the European level.	**COMMUNITY:** Regulation (EC) No. 300/2008: Establishes common civil aviation security rules, which are mandatory in all States belonging to the European Union. Implementing Regulation (EU) 2015/1998: establishes detailed measures for the implementation of the common basic standards, thus developing Regulation 300/2008.	**NATIONAL:** Act 21/2003, of 7 July, on Aviation Security: establishes the legal regime for aeronautical inspections and obligations regarding aviation security, including the adoption of the National Security Programme (NSP) for Civil Aviation. Royal Decree 550/2006. Designates the Competent Authority, responsible for coordinating and monitoring the National Security Program for civil aviation. It also determines the organisation and functions of the National Security Committee.	**National Civil Aviation Security Programme (PNS [Programa Nacional de Seguridad)** It establishes the organisation, methods and procedures necessary to ensure the protection and safeguarding of passengers, crews, the public, ground personnel, aircraft, airports and their facilities, against acts of illicit interference.
	UK				National Civil Aviation Security Programme. Single Consolidated Direction 2/2021.	
	BRAZIL		**ANAC**: Brazilian Civil Aviation Regulation No 107- Civil aviation security in the event of acts of illicit interference - Aerodrome operator. This regulation applies to the operator of the public civil aerodrome, shared or not, whose responsibilities related to the security of civil aviation against acts of illegal interference (AVSEC) are provided for in Article 8 of the National Civil Aviation Safety Program against Acts of Illicit Interference (PNAVSEC).		**NATIONAL:** Decree No. 7,168, of 5 May 2010 - National Civil Aviation Security Programme against Acts of Illicit Interference (PNAVSEC).	

FACTORS ON WHICH AIRPORT SECURITY DEPENDS						
Qualified staff	SPAIN	State Security Forces, Civil Guard and National Police Corps.	Autonomous and/or Local Security forces and bodies.	Private Security Personnel, hired by Aena	Security personnel of the airport itself.	Aena coordinates and collaborates with all groups involved in security to ensure its effectiveness and efficacy..
	UK	Security Services and Counter-terrorism Police of the United Kingdom, Department of Transport, Centre for the Protection of National Infrastructure (CPNI).	Counter terrorism police.	Regional and Airport Police. Civil Aviation Authority (inspection).	Airport Security Department.	
	BRAZIL	Federal Police, AVSEC Security Sector of ANB and its security subcontractors.		AVSEC Security Sector of ANB and its security subcontractors.	AVSEC Security Sector of ANB and its security subcontractors.	
Existence of technical resources	SPAIN	Perimeter security.	Integrated access control and CCTV systems.	Inspection equipment for people and screening machines for baggage, packages or bags.	Procedures (employee inspection, accreditation of individuals, vehicle authorisation, etc.).	
	UK	CCTV System.	Access Control System, vehicle access regime and ANPR.	Security systems to control access of people, transported objects, vehicles and cargo (screening).	Airport safety plan, inspection of employees, CAA certified training, general awareness-raising, vehicle access control, security management systems (SeMS).	
	BRAZIL	Perimeter security and protection infrastructure, including CCTV, security barriers, surveillance and ground personnel.		Civil Aviation Protection Agents, Gates and Security Guards, access control systems and systems for the inspection of persons and belongings including detection equipment.		

Airport Security is maintained by Aena through the implementation of various measures:

- Communication and collaboration on behalf of all the agencies and groups involved.
- Surveillance of potentially vulnerable areas of the airport.
- Control of the movement of persons and vehicles at the accesses to restricted security areas.
- Inspection of persons and property.
- Creation and update of the measures of the Airport Security Programme [241].

The National Security Programme, in the event of an act of unlawful interference (AUI), contains the specific measures to be applied. Thus, among the most representative AUIs, such as threats of aircraft hijacking or bomb threats, the airport is required to have the necessary resources to perform the proper management (also included in the airport's Emergency Plan).

In Brazil, the measures implemented at Aena airports to mitigate possible cases of unlawful interference consist of the implementation of the Contingency Plan for the orderly management of the crisis and the restoration of normality, as well as informing all stakeholders. Likewise, it continues to participate actively in the Brazilian Aviation Safety Group (BASeT), with the following objectives:

- Defining an agenda of national actions and projects against Acts of Unlawful Interference under Civil Aviation Security (AVSEC), in accordance with the Global Aviation Security Plan (GASeP), instituted by the International Civil Aviation Organization (ICAO), for the planning and guiding within the civil aviation sector.
- Furthering collaboration, producing technical material and developing joint AVSEC projects between the Brazilian National Civil Aviation Agency (ANAC)[242], its regulators and other interested parties.

[241] Aena has at its disposal, in its Security Management System, specific procedures and measures—created in collaboration with the competent authorities—to facilitate compliance with the applicable regulations and maintain the highest levels of Airport Security. These procedures are not made public in order to safeguard the information.
[242] ANAC - National Civil Aviation Agency is a federal regulatory agency whose responsibility is to regulate and supervise the activity of civil aviation in Brazil.

- Enabling the collection and exchange of information, data and indicators by the agents of the sector, in order to provide a better analysis, diagnosis and definition of goals for the AVSEC system.

6.2.3. Excellent Airport Security levels[243]

Airport Security training

Aena carries out training and awareness activities in matters of airport security, aimed at employees who require access to airports. In 2022, more than 3,929 employees have received training in the subject matter:

Number of employees trained	2021	2022
Spain	1,584	2,790
United Kingdom	37	604
Brazil	94	786
Total	**1,716**	**3,929**

It should also be mentioned that, in the United Kingdom, at London-Luton Airport, all security operation personnel must obtain level 1 of training in Aviation Security (AVSEC), while supervisors must obtain level 2 of AVSEC and management roles must receive AVSEC ASM training (Aviation Security Managers). [244].

In Brazil, the 'AVSEC Basic' and 'AVSEC Aerodrome Operator' courses have been launched according to ANAC guidelines.

Airport security audits, inspections and drills

(GRI 416-1)

In compliance with current regulations, airports in the Aena network undergo a process of internal inspections and airport security audits annually by the European Commission and AESA, – in the case of Spanish airports; CAA and external providers, in the case of the UK Airport, and ANAC in the case of Brazil.

- Spain: in 2022, 35 external audits were carried out by AESA (37 in 2021) y 27 internal chacks (35 in 2021).
- United Kingdom: annually, the CAA conducts unannounced visits to airport facilities to audit certain required aspects of the SCD. They also conduct audits every 4 years unannounced on-site covering all aspects of SCD. In addition, the CAA and third-party vendors conduct covert evaluations and testing. Internally, Internal Compliance personnel conduct weekly audits of security activity and processes, including third parties. Security camera recordings (CCTVs) are also reviewed daily and operational performance assessments are performed.
- Brazil: AVSEC audits are carried out, which consist of a detailed evaluation of all the aspects provided for in the PNAVSEC and in the ANAC regulations in order to determine the degree of compliance with current regulations. On the other hand, the ANAC conducts external audits on a periodic basis on the facilities. In 2022, 4 internal inspections (7 less than the previous year) and 2 external audits were carried out by the ANAC (2 less than in 2021), and for both types of reviews, higher compliance levels have been reached than those of the previous year.

With regard to conducting drills, the airports of the Spanish network comply with the applicable regulations to ensure that the personnel have the appropriate training in the event of an emergency[245]. In this regard, 2 Airport Security drills have been carried out during the fiscal year 2022 in Spain.[246].

Likewise, in the United Kingdom, drills on airport security are carried out periodically, following the provisions established by CAA as an alternative to compliance.
In Brazil, in 2022, 8 drills have been carried out. (2 in 2021).

Airport security RE 2017/458
100% of Aena's international airports with Schengen border (the border security force complies with this RE on behalf of London Luton Airport)

Airport security (RE 300/2008, 2015/1998 and PNS)
100% of Aena's airports in Spain (London Luton airport with RE 300/2008 and SCD 2/2019)

[243] Regarding the management of detected risks and the handling of accidents and incidents in matters of Airport Safety, is restricted due to the participation of State Security Forces, as well as the Air Force.
[244] Such trainings are provided by qualified trainers who have a CIN number based on regulations in the United Kingdom.
[245] The drills for acts of illegal interference that are recorded in the National Security Program for Civil Aviation are regulated by security instruction SA-19, which records those aspects that do not depend on the airport manager and that need to be reported.
[246] Information not available for Spain in 2021.

6.2.4. Ensuring airport security for third parties

In Spain, compliance with airport security regulations is ensured by all those operating in airports through the inclusion of a specific clause in all the specifications of works and supplies, whether or not they have a direct impact on security, by which the contractor undertakes to adopt a series of measures that ensure their understanding and compliance with current regulations on the subject, and to have an Airport Security officer. Such clauses also include possible penalties in the event of a violation or non-compliance.

In the UK, London-Luton Airport performs an initial assessment of all goods and services based on the requirements of SCD 1/2022 prior to the Critical Part (CP) phase. Also, all contractors providing airport security goods and services must be approved by CAA. The requirements in this matter are also established in the contracts[247], and the suppliers are subject to the same objectives (see section 6.2.1. 'Airport Security Objectives in 2022') and reviews (see section 'Airport security audits, inspections and drills'). To verify continued compliance with established guidelines, contractors are also subject to internal audits.

In Brazil, criteria for airport safety pre-screening are expected to be established in 2023. However, at present and in accordance with ANAC standards, the clauses of contracts with third parties establish certain certification requirements, reliable availability of contingency plans, as well as the obligation to carry out the AVSEC–PIAVSEC Training Programme. Contracts also define KPIs to monitor supplier performance in this area, in order to comply with regulations and established service levels.



[247] Clause 10 of the Charges & Conditions of Use document.

6.3. Cybersecurity or information security

(GRI 3-3)

In Spain, Aena has an Information Security Management System (ISMS) certified according to ISO 27001:2017[248] and audited during the fiscal year 2022, which allows for the effective protection of assets and information, capable of guaranteeing information security and avoiding the occurrence of possible related incidents and the potential threat of cyberattacks. The ISMS is part of the overall management system, and is based on an enterprise risk approach established to create, implement, operate, monitor, review, maintain and improve information security.

Furthermore, the Information Security Policy, which is available on the Organisation's website and intranet together with the rest of the regulatory framework, establishes the guidelines to be followed in accordance with the UNE-ISO/IEC 27001 standard, which establishes an internationally recognised security framework. This security framework is supported in a set of security processes, standards, procedures and tools implemented for security assets through which the ISMS is developed. The purpose of this Policy is to ensure the efficient and dynamic protection of information through a preventive, detective and reactive approach[249].

At the Airport in the UK, a number of policies (covering topics such as user access, responsible use of technology, information security, VPN and passwords) are available and can be accessed via the local intranet (LLA Hub). In addition, work continues to be done on the development of a local Cybersecurity Policy. NIS regulations have been implemented for critical airport operating Likewise, the ICFR standards are implemented for systems that may influence financial information and financial management. The installed cybersecurity monitoring systems are as follows:

- Palo Alto Next Gen Firewalls
- Cortex AV and detection and response application that natively integrates data from the network.
- A cloud to stop sophisticated attacks, Proofpoint email security.
- CASB: cloud access security agent software that is installed between cloud service users and cloud applications, monitoring all activity and enforcing security policies, with a threat detection system in place, and cybersecurity training carried out for all personnel.

Finally, independent vendors perform network penetration testing twice a year, with vulnerabilities identified and rectified based on the risk profile.

In Brazil, the commitment to cybersecurity is embodied in the Information Security Policy, updated in 2022 and deployed through security standards and procedures. During the aforementioned fiscal year, the EDR–CrowdStrike solution has been implemented, with additional identification protection that is in the process of implementation.

6.3.1. Management and commitment model

The Board of Directors of Aena – which is made up of professionals with experience in the field such as Ms Irene Cano Piquero[250], is the body responsible for approving the updating of the Information Security Policy[251].

In addition, there is the Information Security Governance Body, which consists of 3 committees with diverse functions in terms of information security, which allows for a global view in 3 clearly differentiated plans:

- Strategic or Corporate: Ensures compliance with the interests of the Aena Management Body and ensures continuous improvement and development of the principles and policies of security. Defines the organisation's information security strategy.
- Tactical: Defines the tactical aspects of information security by transposing the directives of the Strategic Security Committee.
- Technical-Operational: with more operational functions, whose role is to address the issues at a more technical level.

Finally, a governance cybersecurity structure has been created, consisting of the creation of the Cybersecurity Division, with the hiring of a Chief Information Security Officer (CISO), and the appointment of a person in charge of GRC (Government, Risk and Compliance) and Security Architecture, providing the function with more internal and external resources.

[248] London Luton Airport is in the process of implementing the ISO 27001 planned for 2023 or 2024, and moving forward to comply with the new NIS Information Security Directive. In Spain, the expected renewal date is may of 2025.
[249] The scope of this Policy includes managers, directors and, in general, all Aena employees, without exception and whatever their position, responsibility, occupation or geographic location, contracted companies, collaborating companies and customers and, more generally, any person who has access to the information and/or systems of the organisation (hereinafter, 'Users' or 'User') as well as all physical infrastructures (buildings, airports, etc.).
[250] Independent Director and Managing Director of Meta Spain and Portugal since 2012 (see Chapter 1).
[251] In both the UK and Brazil, they have their own Information Security Policy, which complies with the standards established by ISO 27001, is supervised by the Director of the Financial Office and the Board respectively, and is accessible to all employees via the intranet.

In addition, Aena is currently governed by the Information Security Strategic Plan 2022-2026, which is overseen by the Audit Committee and defines actions in the following processes to achieve the target level of security:

- Information Security Governance.
- Internal Safety Regulations.
- Information Security Awareness.
- Asset Management.
- Vulnerability Management.
- Security Incident Management.
- Monitoring Management.
- Management of Users.
- Security Operations.
- Communications Security Architecture.
- Information Systems Architecture.
- Security in Application Development.
- Security in Relations with Suppliers.
- Security in Cloud Environments.
- Safety Regulatory Compliance.
- Resilience.
- Safety in Industrial Environments.
- Cryptography Security.
- Physical Security.

Bodies responsible for the implementation and operation of the Cybersecurity Plan:

- The Cybersecurity Plan is reviewed in detail by the Board of Directors and senior management[252].
- The Management Committee and the Information Technology Management[253] are responsible for promoting and supporting the establishment of technical, organisational and control measures that guarantee the integrity, availability, confidentiality, authenticity and traceability of computer assets. This is done in order to avoid their possible alteration, destruction, theft, copy, counterfeiting and other existing threats, whether or not these are accidental. They are also responsible for the training and awareness actions that are necessary to guarantee the success of the aforementioned measures.
- At the operational and management level, Aena has the role of the CISO and the Information Security Manager (ISM). In this regard, the CISO is the highest responsible body for the supervision of cybersecurity at Aena.
- At the UK Airport, this responsibility rests with the IT Manager, who has 20 years of experience in the subject matter and reports directly to the local CFO. Additionally, the figure of Cybersecurity Manager has been appointed during 2022. In view of 2023, a cyber monitoring system will be established and will be available every day of the year, in order to obtain system certification according to ISO27001 & Cyber-Essentials Plus in 2023/24.
- In Brazil, the highest body of responsibility for cybersecurity oversight lies with the CISO, which is a member of ANPPD (National Association of Data Privacy Professionals) and the CSO. Their work is supported by the Information Security Committee.

6.3.2. Measures to ensure the effectiveness of the Cybersecurity Plan[254]

Aena develops different measures with the objective of ensuring the achievement of the objectives of the Plan and the transformation processes, operating models and ICT services by all those involved, based on the following:

Training

In Spain, an awareness and training plan has been designed to facilitate the development of new skills, both at the management and technological levels, that accompany all the people involved (functional and technical) in the transition to a new operating model and in the responsible use of the new technological tools. In the last year, it is worth noting the participation of 6,247 employees[255] in mandatory course of cybersecurity awareness and information security regulations, as well as holding 17 awareness-raising[256] talks on the same subject in periodic airport reviews. In addition, periodic awareness-raising activities are conducted by posting information in the corporate Newsletter or sending monthly emails illustrating existing information security risks.

In the United Kingdom, all people incorporated into the workforce are summoned to take courses on the subject and it is expected that all employees will complete these

[252] At the Board level, the independent director Leticia Ortiz is responsible for these matters; she also has experience in the matter.
[253] Specifically, the Head of the Cybersecurity Division
[254] Framed in the 2022 Security Plan, ANB is in the process of acquiring the SIEM tool, which allows for recovery and normalisation in case of events; applications (such as firewalls, proxies, intrusion prevention systems (IPS) and antivirus, etc.) that facilitate rapid identification and response to possible events; as well as the Identity Management tool, which will ensure that access is consolidated in a single location.
During 2022, no external audits were performed, nor were cyberattacks simulated.
[255] Information not available for Spain in 2021.
[256] Information not available for Spain in 2021.

on an annual basis. The Bobs Business Security Training platform has also been started. In particular, the courses that are given are:

- Introduction to cybersecurity.
- *Keep it clear.*
- *Phishing Fears.*
- *Mastering Malware.*

A total of 161 users[257] have completed cybersecurity training in 2022.

In Brazil, 100% of employees[258] were trained in information security, General Data Protection Legislation, and information systems performance and processes. Cybersecurity-related courses are mandatory and as such, their completion is part of the performance appraisals of employees.

In addition, awareness-raising actions are carried out on a weekly basis in the matter for all employees.

Provision of a procedure for employees to follow in the event of an incident

As established in the Information Security Policy, the Company has an action procedure aimed at employees (internal or external) and companies (contracted or collaborating) in the event that any cybersecurity event or incident occurs, consisting of communicating it to the support centres or CSIRT (Computer Security Incident Response Team). It also indicates how to proceed in the event of detecting any phishing, smishing, malware, etc. during the aforementioned awareness-raising talks in the periodic reviews of airports.

Employees at London-Luton Airport in the United Kingdom should contact the IT Service Desk to report such incidents, where it will be investigated if the situation requires it.

Failure to comply with established security standards may result in appropriate disciplinary action[259] and, where appropriate, legal liability of those responsible.

In addition, policies are in place to cover user access, VPN policies, etc.

In Brazil, employees who detect a cyberattack must report it to ICT through official channels (phone, chatbot or email).

Contingency plans and incident response procedures

In Spain, Aena has different business continuity and disaster recovery plans, with the latter being tested and updated at least annually. It also an ICT Security Incident Response Centre (ICTSC), which provides information security incident management services, monitoring of corporate systems, review of the security rules and controls implemented in the systems that manage security and contact points with the entities of interest 24x7x365.

Similarly, it includes both continuous improvement measures in the area of contingency and/or incident response, as well as new necessary measures to counter the emergence of new risks detected in the aforementioned Strategic Information Security Plan 2022-26, as with the previous Plan.

In the UK, London-Luton Airport tests local disaster recovery and back-up plans for critical systems on an annual basis and is currently working on formalising a cybersecurity incident response procedure.

In Brazil, Aena airports have documents reviewed annually that include the actions to be carried out in the event of IT or cybersecurity incidents:

- IT Business Continuity Plan (PCN).
- Disaster Recovery and Contingency Plan for Critical Computing Services (DRP)

External verification and vulnerability analysis

The ICT and Cybersecurity Department carries out periodic audits of compliance, hacking (IT and OT), applications and penetration tests (Pentesting), in order to check the security of ICT infrastructure and information security management systems (ISMS), as well as to assess the level of maturity in the security systems in Spain.

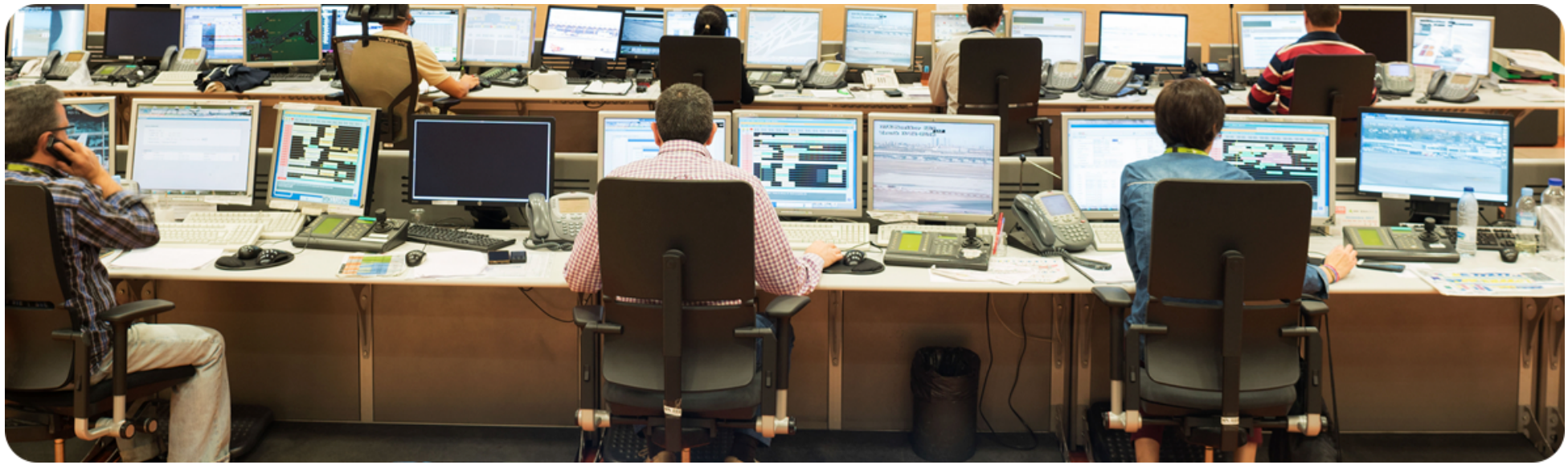
In parallel, Red Team engagement reviews and exercises (both internal and external) are conducted, simulating targeted Hacking-Ethics attacks using different hybrid methods with the goal of compromising the infrastructure so that any identified weaknesses can be corrected.

In the UK, an independent external company conducts two penetration tests per year on internal and external IT infrastructure as well as websites, after which corrective actions are proposed and taken. In this way, the aim is to achieve ISO 27001 by 2023 or 2024.

Aena airports in Brazil are currently in the process of a Vulnerability Analysis, to identify and correct risk points, with the aim of ensuring the security of technological environments.

[257] Information not available for UK in 2021.
[258] Information not available for Brazil in 2021.
[259] Described in the Aena Code of Conduct as well as in the HR Manual in the UK.

Cybersecurity breaches								
	Spain		United Kingdom		Brazil		**Total**	
	2021	2022	2021	2022	2021	2022	**2021**	**2022**
Information security breaches or other cybersecurity incidents (number)	0	0	0	0	0	0	**0**	**0**
Data breaches (number)	0	0	0	0	0	0	**0**	**0**
Employees/customers affected by such violations (number)	0	0	0	0	0	0	**0**	**0**
Cybersecurity breach/violation fines	0	0	0	0	0	0	**0**	**0**



6.4 Health safety

(GRI 3-3; 416-1)

As points of entry into a country, airports carry out health control procedures for passengers, baggage, goods and animals.

For this purpose, taking as a reference the applicable regulations and the relevant documentation, at airports there are brochures, posters, etc. related to the sanitary controls carried out on goods, baggage of passengers and companion animals, as well as public health events of international importance, such as the COVID-19 pandemic.

In this regard, in 2022, the Aena airport network in Spain has continued to adapt the measures implemented in the previous year, to ensure Health Safety in the epidemiological situation at present and to the requirements set by the health authorities, communicating the latter together with updated information through the information channels (website, signage, etc.) and maintaining the priority of minimising the possibility of contagion.

In particular, the Health Controls were maintained until they were removed in October, adapting them to the regulations in force at all times during the de-escalation process and following the guidelines set by the health authority.

Similarly, other measures have continued, such as the installation of barriers in certain areas of the airport, the reinforcement of cleaning and disinfection services, the monitoring of social distancing in areas where people may concentrate, the delivery of certifying documentation and the incorporation of COVID-19 diagnostic testing clinics at airports. The implementation of these measures has continued to be reinforced with signage and notices over the loudspeaker, enabling a specific website for each airport, etc.

Regarding the measures implemented in the aircraft and at the destination airport, these are mostly defined by each airline and the destination country itself, respectively. However, Aena has continued to offer cautionary recommendations on its website.

This effort has continued to be recognised internationally:

- Aena has received the 'Best Airport Group COVID-19 Excellence' award at the 'World Airport Awards' of the prestigious Skytrax consultancy.
- The airports of Reus, Pamplona, International Airport of the Region of Murcia, Seve Ballesteros-Santander, El Hierro and Barcelona-El Prat Josep Tarradellas have received the 'Best Hygiene Measures' award in Europe during the fiscal year 2022, also granted by ACI, for the health measures implemented during the previous year against COVID-19.

In the UK, London-Luton Airport has received certification from ACI (ACI Health Accreditation) in recognition of their COVID-19 measures.

Likewise, actions and measures such as the requirement for masks, hand-washing hygiene and social distancing have been introduced at Aena airports in Brazil, advising passengers to come to the airport only in the absence of respiratory symptoms.



6.5. Dedication to service

Aena's search for excellence implicitly involves delivering all services with the highest level of quality and excellence in collaboration with all of its value chain. Aena focuses on the customer, adapting, improving and personalising the commercial offer and the services provided to passengers, airlines and other users of airport facilities in general, as well as enhancing the Company's innovation and digital transformation towards the Smart Airport model.

Customer orientation is part of Aena's Strategic Plan 2022-2026



Airports
Increasing and adapting the capacity of airports.





Services
Compliance with high levels of quality of service.





Innovation
Development of innovative digital solutions and technologies.



Passengers

Together with accessibility services, which represent a segment on the rise, facilitation and passenger experience services are also included, as well as the assessment of their perceptions.





Airlines

Ground handling and other handling services, pursuant to Royal Decree 1161/1999, of 2 July, which governs the provision of airport ground handling services





All users

In general, all airport users: maintenance services, and planning and management services, which includes establishing common rules to ensure uniform provision of the service.



AIRPORT SERVICES, MAINTENANCE AND QUALITY RESPONSIBILITIES

Maintenance of facilities with maximum efficiency, enhancing best practices.

Service planning and management, with common rules for the different airports.

Ground handling, with common rules for the different airports.

Passenger facilitation and experience: measurement of perceptions and tracking of passenger expectations.

Accessibility: coordination and guidelines to serve persons with reduced mobility uniformly in all airports.

6.6. Quality management

(GRI 3-3)

To comply with the highest levels of service quality in an outstanding manner, and to ensure the satisfaction and the best possible customer service for all users are framed as Aena's main objectives in this area, being set out as such in the Company's main planning instruments:

- The Strategic Plan 2022-2026 of Aena.
- The Strategic Plan and the Responsible Business Strategy 2020-2025 at London-Luton Airport in the United Kingdom.
- El Plan de Calidad de Servicios (PQS)[260] y el Plan de Exploración Aeroportuaria (PEA) en Brasil.

The definition of these instruments takes into account current regulations and reference frameworks for decision-making (management systems, corporate policies and procedures), in addition to the mechanisms for communications with all users.

As a result, Aena defines the various actions that are intended to be carried out annually to improve the facilities and their maintenance, as well as to achieve continuous optimisation of the processes. In turn, this results in the obtaining of awards and recognitions, being able to highlight the inclusion of Adolfo Suárez Madrid-Barajas Airport in Skytrax's list of the 'World's Top 20 Airports for 2022'.

ACTIONS

→ **Strategic Plan 2022-2026**

Maintain the leadership position in operational efficiency, achieving the required levels of safety and quality.

→ **Aena's Strategic Airport Maintenance Plan**

Includes a specific line focused on the use of common tools that allow a preventive maintenance plan to be carried out and quality to be improved.

→ **Responsible Business Strategy 2020 of the London-Luton Airport**

Includes a strategic line aimed at 'Delivering an excellent customer experience' with seven specific objectives.

→ **Quality of Service Plan (PQS)**

→ **Airport Exploration Plan (PEA) of ANB**

These plans inform all the actions, responsibilities, plans and procedures that define ANB's strategy to comply with the requirements of the Concession Contract and the Service Quality agreement



Current regulations (internal and external).
Management systems.
Corporate procedures.



Measures and situations for the improvement and maintenance of the facilities (training, services for people with functional diversity, technological improvements)



Satisfaction surveys
Complaints and grievances
Activity figures

[260] In 2022, ANAC approved the Service Quality Plans in Brazil for the Airports in Recife, Maceió, João Pessoa and Aracaju.

6.6.1 Main applicable regulations and measures developed to improve the quality of the services

(GRI 2-23)

Airport Regulation Document 2022-2026 (DORA II)

At Spanish airports, the Airport Regulation Document 2022-2026[261] (DORA II) endorses and guarantees the best service to passengers and companions, as well as to airlines. Likewise, this document establishes the conditions and airport charges that airports in the Aena network must comply with for the next 4 years in terms of quality, the environment, capacity and investments. Among the strategic objectives that guide Aena's performance in the 2022–2026 period, the following stands out:

- The recovery of traffic and the efficient management of the airport network in terms of safety and quality.
- Environmental sustainability as the backbone of the actions.

For this purpose, goals and objectives are established in the Quality Plans for each airport, both qualitative and quantitative, as well as the actions carried out and those planned for the airport in question.

Objectives of a qualitative nature include:

- Efficient management of the airport network in terms of safety and quality.
- Environmental sustainability as the backbone of the actions.
- Innovation as an essential piece for efficiency and quality in the provision of the service.

In the case of Aena airports in Spain, quantitatively and as an example, 17 quality indicators have been established that measure aspects such as:

- Passenger satisfaction with cleanliness (lavatories and the terminal), orientation and information, safety and comfort.
- The overall satisfaction of passengers with the service of assistance to people with reduced mobility (PRM).
- Waiting times at security controls and the checking-in of baggage.
- The response times to claims.
- The availability of facilities in the terminal and in the airside.

Six environmental sustainability indicators have also been included, whose goals cover the reduction of CO2 emissions, resource efficiency, waste recycling, etc

Verification of the fulfilment of these objectives is carried out through a report issued by AESA[262]. The degree of compliance with these results in the establishment of bonuses or penalties in the charges that support the services provided by Aena.

Likewise, the Board of Directors approves budgets annually that contain the prescribed actions in matters of quality control – both those required by regulations (the DORA or the concession contracts) and those that have been detected as necessary to improve the quality of the services.

At London-Luton Airport in the United Kingdom, the customer experience is a fundamental pillar in the Responsible Business Strategy 2020-2025. In addition, The LLA Way has been developed, which defines the expected behaviours of both own and third-party employees in terms of quality.

At Aena airports in Brazil, the Quality of Service Plans (PQS) contain information, responsibilities, procedures and the minimum requirements from teams dedicated to the care of passengers that directly or indirectly influence the quality of the services provided to airport users.

To analyse the performance of quality management, a series of indicators are available, which are systematically monitored, evaluating the services offered to users. Based on these, actions are planned and implemented for the continuous improvement of their operation. The Service Quality Indicators (SQIs) include the following aspects:

- Direct services;
- Availability of equipment;
- Airside facilities;
- Passenger satisfaction survey.

For the measurement and monitoring of the Service Quality Indicators, Administrative Instructions have been prepared that serve as the basis and guidance for the teams directly and indirectly involved in the areas that may influence the Quality of the Services provided at Aena airports in Brazil.

Specific quality goals include reduced waiting times in the security queue between 5 and 15 minutes, improved comfort terms and noise levels, quality Wi-Fi network, etc.

[261] Second Airport Regulation Document (DORA 2021–2026), approved by the Council of Ministers. It stems from Act 18/2014, of 15 October, approving urgent measures for growth, competitiveness and efficiency.
[262] AESA is expected to publish the corresponding 2022 monitoring report in April 2023. This document includes the degree of achievement of the objectives that have been set, both in terms of the quality and in the investments and capacity.

Integrated Quality, Environmental and Energy Efficiency Management Policy

The principles of the Integrated Quality, Environment, Energy Efficiency and Health and Safety Management Policy applicable to Aena airports in Spain, the United Kingdom and Brazil include promoting the systematic integration of quality management and periodically evaluating the performance of the management system and the needs and expectations of stakeholders in order to define priority lines of action aimed at the continuous improvement of the system. This policy is approved at the highest level of the Organisation and also includes the involvement and commitment of senior management to achieve the proposed objectives, using Aena's values and strategies as the main benchmark for all people in the Company.

Aena´s Integrated Quality and Environmental Management System

Aena's Integrated Quality and Environmental Management System, implemented and certified in Spain in accordance with the international standards ISO 9001 and ISO 14001[263],represent the internal reference framework for developing and providing the services at the airports managed by Aena, both in Spain and Brazil.

On the other hand, London-Luton Airport quality standards in the UK are designed with best practices in mind. In this regard, the Airport has been certified by the Airport Service Quality programme of the Airport Council International (ACI), reaching Level 1, and is currently in the process of applying for Level 2.

Collaborations with third parties

Quality is a key element in bid selection criteria, including certain specific contractual conditions in the contract specifications to ensure this attribute in the contracted product or service[264].

In Spain, such selection criteria may include aspects such as the Service Level Agreement (SLA) criteria, according to which, those that provide commitments intended to reach certain levels of service are likely to score higher.

This approach has led to some collaboration agreements being established with some suppliers. These are projects that take the form of partnerships in which Aena and the collaborating companies explore and develop tools to satisfy the demands that have been detected, but for which a clear response has not been identified on the market.

During 2022, the requirement for training in airport culture has begun to be introduced in the specifications, in order to disseminate a culture of excellence in the passenger experience. This training must be promoted among all personnel assigned to the service and who, therefore, are part of the airport community.

In the UK, quality is also a key element in the selection criteria for tenders made. During 2022, some modifications to the bidding requirements for commercial partners have been proposed to ensure the best quality of the services offered.

In this same line, in Brazil, the Service Level Agreements (SLAs) require passenger satisfaction surveys to be conducted on by third parties on a monthly basis. These are defined and audited by the ANAC.

Training to improve the quality of services

2022

	Spain	United Kingdom	Brazil	**Total**
Customer experience training* (number of employees)	5,604	679	209	**6,492**
Training in Environmental Awareness (number of employees)	1,514	-	238	**1,752**
Training in the Quality and Environmental Management System (number of employees)	149	-	238	**387**

2021

	Spain	United Kingdom*	Brazil	**Total**
Customer experience training* (number of employees)	164	-	160	**324**
Training in Environmental Awareness (number of employees)	782	-	60	**842**
Training in the Quality and Environmental Management System (number of employees)	43	-	-	**43**

*Information not available for UK in 2021

Taken together, the established mechanisms promote innovation among suppliers, as well as ensuring a quick and effective response to customer and user demands.

[263] Aena airports in Brazil anticipate ISO certification in 2023. In the United Kingdom, the London-Luton Airport is certified in accordance with ISO 14001, 45001 and 50001 regarding environmental management, occupational safety and energy.
[264] See Chapter 4.

Finally, it should be mentioned that, based on the above, collaboration agreements are established with some suppliers for the development of tools that improve satisfaction and the demands that have been identified.

Training

Training actions aimed at Aena employees include specific training courses on quality matters. During the year 2022, in Spain, the course 'Introduction to the Passenger Experience' has begun, focused on understanding and internalising passenger emotions in order to participate in the improvement of their experience and, therefore, in the quality of the services.

In the United Kingdom, London-Luton Airport has the aforementioned 'LLA Way', through which, among other things, employees who carry out their activity in areas related to customer treatment, have the possibility of receiving training that enables them to this end.

At Aena airports in Brazil, the Training Coordinator has worked on identifying training needs as well as managing, evaluating and monitoring training results to ensure proper qualification of staff.

As a result of all of the above, in 2022 6,492 employees have received training in customer experience (324 in 2021), while 1,752 employees have received training in environmental awareness (842 in 2021) and 387 employees have received training on the System of Quality and Environmental Management (43 in 2021).

6.6.2. Infrastructure accessible to everyone

Aena develops different measures to ensure the universal accessibility of its facilities. The Company pays special attention to meeting the requirements of persons with special needs, integrating them into daily airport activity and eliminating possible barriers that may hinder mobility, communication and understanding.

Mobility and passenger assistance

Airports offer high-quality, personalised and free services for persons with reduced mobility (PRM)[265]. This assistance service is provided throughout the airport's facilities (departures, arrivals and connections), as well as in the different processing points (check-in, security checks, boarding and disembarkation, baggage collection, transfers to the terminal, placement in the assigned seat of the aircraft, etc.).

In 2022, and despite the fact that the authorities have lifted the measures imposed as a result of COVID-19, some hygienic and sanitary standards and requirements have been maintained, now remaining as part of the normal operations. The information messages to passengers have also continued to be reinforced in order to raise awareness of the need to request assistance sufficiently in advance, in order to guarantee the availability of resources necessary to offer the best service and to promote the organisation of the resources available for their delivery. In this regard, it is important that the passenger makes the request for the service at least 48 hours before the flight and specifies their needs, as well as making sure that they arrive at the airport with the indicated advance notice on the day of their trip (generally 2 and a half hours before the flight)[266] in order to ensure that the assistance is provided with adequate quality and hygiene levels and within the established timeframes, in compliance with Regulation CE 1107/2006, which indicates the need to care for people with reduced mobility.

In 2022, in Spain, the conditions of this service have continued to be served and improved. Proof of this is the introduction of the service at 12 airports (including the largest airports, Adolfo Suárez Madrid-Barajas, Josep Tarradellas Barcelona el Prat and Palma de Mallorca) and the awarding of a new service contract at 5 airports (including Valencia and Bilbao).

In this regard, the successful bidders are required to comply with very precise requirements regarding the assistance offered, the necessary technical and human resources available, response times, staff training and the attention and treatment. Significant awareness efforts have been made in the UK, including among the annual training of airport staff on these aspects.

Aena seeks continuous improvement of its service and quality levels. To do this, it carries out a detailed monitoring of the care provided.

During 2022, work was advanced in the development of a "Terminal Guide" app that facilitates the guidance service through airports, allowing to locate the accessible option, which provides exclusively routes without barriers and the choice of use of elevators and/or escalators and/or mechanical ramps, thus avoiding conventional stairs.

[265] The Assistance Service for Persons with Reduced Mobility should be requested only when it is necessary, since requesting it when it is unnecessary may have an impact on the quality offered to people who really need it.
[266] In the case of Spanish airports, the most appropriate way to request assistance for PRM is through the airline or travel agent when making the reservation or purchasing the tickets. However, it is also possible to do so through the Aena website, through the Aena Information and Service Desk (91 321 1000), through the mailbox enabled for this purpose (sinbarreras@aena.es) or through the Aena mobile device app. To ensure that the assistance is provided at adequate quality levels, and within the established time frames, it is very important to specify the passenger's limitations, make the request at least 48 hours prior to the flight, and ensure that on the day of the trip the passenger arrives at the airport and notifies their arrival at least two and a half hours in advance. In the UK, bookings can be made as explained on their website. In Brazil, the service can be requested through the private link enabled for each of the six airports. See chapter 'Links of interest'.
At the London-Luton Airport in the UK, the best way to request the service is through the Airline or travel agency. Those users who request the service 36 hours in advance to receive assistance will also be required to arrive at the airport at least two hours in advance.

Also, actions have been carried out to improve the experience of passengers with disabilities while traveling to the airport. For example, toilets adapted to the needs of ostomy passengers are available at several of the Spanish airports.

The surveys that are conducted periodically with passengers at the Spanish airports of Aena indicate that the PRM Service – also known as 'Without Barriers' – is the best rated, with a score of 4.93 out of a maximum of 5.

Other projects that are being developed are alternatives designed to free up some of the strain on the Without Barriers Service, achieving autonomy for passengers who need specific assistance (location, languages, waits or long distances): autonomous wheelchairs, lending of wheelchairs and NaviLens aids (analogous QR code signals installed by airport areas to provide information in any language of the specific site where it is located, through an app installed on the mobile phone).

In addition, throughout 2022, work has continued to provide the best service to people with Autism Spectrum Disorder (ASD) through measures such as the creation of low sensory stimulation rooms, which allow them to move away from the busy airport environment while waiting for their flights[267].

Some airports in the Spanish network already have a consolidated service, such as Lanzarote-César Manrique or Málaga-Costa del Sol. Likewise, the collaboration with entities such as CERMI and the Spanish Confederation of Autism[268] has been maintained, in order to jointly analyse and evaluate the accessibility needs in public services, transport and tourism of this group. In particular, together with the Spanish Confederation of Autism, support tools have been developed by providing them with information prior to their trip, so that they can anticipate and know the needs they may experience as they pass through the airports. This collaboration has materialised in social scripts, a checklist and an explanatory video. In this regard, training materials have also been developed in order to provide the different groups working at the airport with simple recommendations when interacting with the passengers with ASD.

A pilot project has also been developed, in collaboration with INECO, for the dissemination of the 'TEAcompaño' [Take me with you] app, specially designed for this group. This app shows the different stages of the journey in language that is understandable and adapted for children with ASD, helping them to anticipate and remember the main milestones and stages of the journey.

In the United Kingdom, passengers with hidden disabilities are provided with a sunflower lanyard[269] upon request, as identification, and may require additional assistance or support when passing through the terminal. Pre-airport facility visits are also arranged for families with travel difficulties.

In addition to the aforementioned collaborations, Spain maintains a relationship with other third parties to comply with the commitment of continuous improvement and universal accessibility in air transport. In particular, it works closely with social organisations to undertake new projects in the airport facilities or in the face of any initiative focused on improving accessibility. For example, FASOCIDE for projects related to deafblindness, Ostomy Associations, ONCE, etc. In this regard, these types of collaborations and regular meetings are also held in the UK, such as Alzheimer's Society, Hertfordshire Age UK, Action on Hearing Loss, Security Industry Association (SIA), Colostomy UK, Autism Bedfordshire, the Disability Resource Centre, the charitable funding organisation for diabetes research JDRF, and the Guide for the Blind.

London-Luton Airport has continued to hold meetings at the accessibility forum, facilitating access to help and support for the local community and users who need special help[270]

During 2022, several information and awareness-raising initiatives have also been carried out in Spain with employees (seminars, participation in pilot projects and studies (NaviLens, TEAcompaño, etc.). Noteworthy, for example, are the training and awareness-raising sessions held for all groups at the Alicante-Elche Airport, focused on improving the experience of the group with deafblindness. It is intended to hold these sessions more frequently in future.

[267] This measure has also been implemented in the UK.
[268] Completed in March 2022.
[269] They can request it in advance of their arrival at the Airport. London-Luton Airport also donates to local organisations sunflower ribbons associated with people with hidden disabilities in order to contribute to the distribution and free assistance of service users.
[270] In 2022, the UK Airport held two meetings with this working group and, with feedback provided by customers with disabilities and forum members, can ensure that an accessible environment is provided so that most passengers can travel independently. In addition, during the fiscal year 2022, the UK Airport was present at the 2nd Airport Accessibility Conference at the British-Irish Expo, and training and disability awareness actions have begun to be developed.

	2021				2022			
	Spain	United Kingdom	Brazil	Total	Spain	United Kingdom	Brazil	Total
PRM requests (number)	719,241	25,232	5,470	749,943	1,714,398	92,543	19,923	1,826,864

Finally, Aena airports in Brazil have accessibility measures aimed at facilitating the stay of passengers with special difficulties, such as bathrooms, touch floors, handrails, elevators and wheelchairs on offer at the facilities. Additional accessibility measures are also implemented in renewal projects and accompanied by a specific consultation for compliance.

Communications

Aena makes available to users a line of information and service via chat (accessible through the computer, tablet or Smartphone) for passengers with hearing and/or speech disabilities, which allows them to contact the Information and Telephone Service directly. In addition, some Spanish airports, as well as London-Luton Airport in the UK, have magnetic induction loops or hearing loops[271].

Likewise, the Aena maps application[272] offers the possibility of selecting the PRM configuration for indoor guiding by accessible routes at the airport sites, preferably using the elevator as a connector between floors and always avoiding conventional stairs. In this line, it is worth mentioning the initiative that is being carried out with Google to create 360° maps of the airport facilities, so that users can become remotely familiar with the design of the airport, as well as with the location of the facilities prior to their arrival on the day of their flight.

Understanding

At all airports in the Aena network, the signage is updated to ensure its understanding by all groups, incorporating icons for hearing, mobility, elderly people, etc.

Specifically, during 2022 at London-Luton Airport in the UK, there has been an improvement in accessibility and signage in commercial areas. The accessible store design at the point of sale has also been incorporated as part of the bidding process.

In 2022, new versions of both the Aena public website and the corresponding mobile application were launched, both adapted to the possible accessibility needs.

Website accessibility

In fiscal year 2022, new versions of both the Aena public website and the mobile app have continued to be launched, focused on its improvement. Also, as previously indicated, the Aena Maps app (compatible with different mobile operating systems) offers the ability to select the PRM setting for guidance on accessible routes in the airport facilities.

At London-Luton Airport in the UK, all website pages have been developed using HTML 5 and CSS language, to improve visualisation.

6.6.3. Top recognitions received in 2022 for the quality of services

- ACI's 'The Voice of the Customer' award to 33 airports in the Aena network in Spain for their work during 2021.
- Awarded 'Best Airport Group COVID-19 Excellence' at the Skytrax World Airport Awards.
- At UK Airport, ACI CX accreditation (Level 1) has been obtained and nominations have been received to be finalists in the UK Customer Experience Awards.
- Recife Airport named the second best airport in the world for passenger experience based on the AirHelp Score 2022.

[271] This technology allows users with hearing aids, cochlear implants and other ear prosthetics with a micro coil to receive the specific information they require through a clean transmission of sound from the source to the hearing aid. In the UK, there are about 130 magnetic induction loops around the terminal building, as well as some portable magnetic induction loops to be able to take to a customer if needed.
[272] Implemented in the 7 Spanish airports with the highest volume of passengers, although it will be implemented progressively to the rest of the airports in the network.

6.7 Communication and satisfaction evaluation of customers

6.7.1. Evaluation of customer satisfaction

To continuously monitor the opinions and expectations of its customers, both passengers and airlines and concession companies, and to evaluate the quality of the services it provides, Aena has the best tools available. These include Airport Service Quality (ASQ[273]),surveys, Happy or Not devices and work groups.

The results obtained form the basis for the implementation of proposals and action plans, in line with Aena's commitment to continuous improvement as well as the management of maximum efficiency, dialogue with stakeholders and the best customer experience.

In this sense and as an example, the measurement and monitoring of performance in terms of commercial quality through passenger surveys in the VIP Lounges has resulted in the achievement of a score of 92% in positive ratings on the customer satisfaction scale, which is higher than the target pursued in this year (80%).

Specifically, in relation to quality indicators, during 2022 the following results were obtained in the ASQ surveys answered by the users.

Quality assessment (out of 5)						
	2021			2022[274]		
	Quality of service to passengers Reference value: 4.06	Quality of commercial premises	Quality of food and beverage premises	Quality of service to passengers Reference value: 4.12	Quality of commercial premises	Quality of food and beverage premises
Spain[275]	4.12	3.5	3.43	4.08	3.63	3.49
United Kingdom[276]	4.17	3.81	3.71	3.96	3.59	3.69
Brazil	n/a	3.49	3.51	-	-	-
Objective for Next Year	4			4	-	-

[273] ASQ is a programme of studies on passenger satisfaction directed by the ACI (Airport Council International), in which 386 airports from 95 countries participate, through which each airport has the opportunity to study the satisfaction of its passengers throughout the current year, also comparing their results with those of other airports in their vicinity.
[274] In Brazil, the aggregate data is not available. Each airport carries out its own quality evaluations, obtaining the corresponding results.
[275] In Spain, the 34 busiest airports in the network in Spain participate in these surveys.
[276] Results of ASQ surveys conducted in the third and fourth quarters. The Airport plans to set objectives in the next year.

		 Passenger satisfaction and perception	 Satisfaction and perception of airlines: airport marketing	 Relationship with concession companies: commercial marketing
	EXPECTATIONS IDENTIFIED	Competitive prices in food and beverage. Staff efficiency. Minimum waiting time (invoicing, security control, etc.). Discounts on services. Comfortable facilities. Recharging points for electronic devices. Good Wi-Fi connectivity. Absence of supervening costs. Cleaning. Friendliness of the staff. Sufficient personal distancing, fewer queues.	Premium offer. Efficient and coordinated work procedures. Quality of service appropriate for the price. Active collaboration. Operational information and information on analysis of potential markets. Incentives and discounts. Operational priorities (special services to customers). Help with passenger mobility (wayfinding).	Clear, achievable and stable contractual requirements. Transparency. Equal treatment. Procedural agility.
MAIN TOOLS USED TO GET TO KNOW USER EXPECTATIONS	**SPANISH AIRPORT NETWORK**	ASQ Surveys Instant Feedback devices (currently, Happy or Not), which conduct surveys on bathroom cleanliness, the courteousness of the security staff and baggage claim time in 33 airports of the network. These opinion collection devices are also available in the car parks and in 18 airports where the VIP Lounge Services are offered, managed on their own. Complaints, suggestions and compliments tracking and management Monitoring and management of passenger queries. EMMA surveys. Monitoring of process indicators. DORA indicators. Monitoring and management of interactions in social media networks.	Working groups/expert sessions. Analysis of the satisfaction and quality perception of airlines. Surveys to companies. Direct contact/meetings. Attendance at specialised forums and conferences. Indicators associated with company processes. Committee of users and joint monitoring committees.	Regular follow-up meetings. Brand conferences (professional meetings where we explain the airport's overall offering). Exchange of periodic surveys and statistics. Mystery shopper and compilation of opinions in VIP lounges. Aena Business Portal. Advertising, promotion and revitalisation of Commercial Areas. Loyalty Club (more than 1.8 million customers in 2022). Workgroups for information exchange and service improvement. Analysis of the results of the service provided (commercial attributes of the ASQ surveys and monitoring of the complaints, suggestions and compliments management). Business service surveys.

MAIN TOOLS USED TO GET TO KNOW USER EXPECTATIONS	**LONDON LUTON AIRPORT**	Meeting on the transformation of the customer experience. Accessibility Forum for inquiries from PRM users and charitable organisations. ASQ surveys during the last two quarters of 2021. Collection of real-time customer feedback (FeedbackNow) at various points (security control, check-in, lavatories, immigration and baggage claim). Mystery Shop Programme is back in the CX strategy, (to be implemented in the second quarter of 2022). Quality walkarounds.	Airport operators' committee.	
	NORTHEAST BRAZIL AIRPORTS	PSP surveys (passenger satisfaction surveys). Passenger Quality Assurance and Satisfaction Survey, in addition to the communication channels described above. Controls and monitoring of service quality indicators. Additional surveys.	Airport operators' committee. Establishment of consultations with airlines and definition of service level agreements (SLA).	Regular follow-up meetings. Exchange of periodic surveys and statistics. Working Groups for the exchange of information and service improvement. Analysis of results of the service provided – in accordance with the commercial requirements of the ANAC surveys. Business service surveys. Daily inspections and follow-up of the levels of Service Level Agreement (SLA) and its Key Performance Indicators (KPIs) for contracts related to the management and quality control of third parties and subcontractors.

6.7.2. Customer rights and obligations

(GRI 2-29)

Aena informs all its customers and suppliers of their rights and obligations, both before the signing of the contract and during the execution thereof, through different tools:

- The Aena website[277] serves to inform about the rights of passengers, including those regarding information, claims and compensation, non-discrimination, indemnity, etc. Specifically, it includes information about passengers' right in dealing with airlines (in case of delays, cancellations or denial of boarding, baggage issues, etc.), as well as disability or PRM rights and accident liabilities.
- In the UK, London-Luton Airport has several information points specifically aimed at reporting on these aspects, either in person or via digital media.
- In Brazil, airports have different communication channels to inform about passengers' rights and obligations, including airport information counters and screens, as well as the Customer Service desk.

6.7.3. Complaints mechanisms

(GRI 2-25; 2-26; 2-29; 3-3; 416-2; 417-1; 417-2; 417-3)

Complaints and claims management

Complaints or grievances related to Aena services are communicated to the Company through various tools:

- The Telematics Services Portal, accessible from the website, contains a specific section for submitting complaints, suggestions and compliments[278].

[277] See chapter 'Links of interest'.
[278] See section '2.1.4. Environmental queries' in the case of inquiries relating to environmental matters.

- Complaint sheets, primarily available at airport information points, as well as VIP lounges and car parks.
- In the UK, London-Luton Airport makes available to users a specific website (Feedback-form London Luton Airport) through which they can process claims on an online form.
- The Ovidoria Channel at Aena airports in Brazil is enabled to receive proposals for improvements related to the airport services offered, functioning as a bridge between the user and the technical unit. In addition, the email ouvidoria@aenabrasil.com.br[279], and QR codes are available in the boarding lounges[280].

To do this:

- Spanish airports have a Procedure for the Management of Complaints and Claims, and a Department for Passenger Facilitation and Experience to guarantee their correct processing. Likewise, the management of claims is supervised internally by review by managers at each airport and at a centralised level, prior to AESA audits that carry out the relevant assessments within the framework of monitoring compliance with the DORA.
- In the United Kingdom, London-Luton Airport does not have a procedure as such, although the receipt and processing of complaints and claims is systematised.
- In Brazil, once the claim has been recorded, an analysis of the claim is carried out (minimum content necessary for the processing of the incident and the competence of the body). Subsequently, the message is sent to the technical unit, which must respond within the established time. With this:
  - It is analysed and verified as to whether it has responded adequately to the request and, if so, sends the response to the user;
  - If the response does not adequately address what was requested or partially addresses it, the Technical Managers and Airport Management are requested to clarify or supplement the response.
  - The information is then transferred to the user.

In Spain, in 2022, the total number of complaints and claims received amounted to 12,920, 218.5% more than the previous year. This increase is due both to the 103.1% increase in traffic at the network's airports, and to passengers' increased use of the Aena Parking Single Portal for complaints. Meanwhile, at London Luton Airport in the United Kingdom, the total number of complaints and claims amounted to 5,488 (2,761 more than in 2021) and, at Aena's airports in Brazil, 192 (230 fewer than in the previous year).

Aena's objective in Spain is to answer initial claims regarding its airport management in less than five days (four business days for practical purposes)[281]. In this regard, 99.6% of claims have been addressed and responded to within this timeframe. In the UK, complaints are usually addressed within the first 24 to 48 hours of receipt, although they do not have an official procedure that establishes the maximum response time to them. In Brazil, the maximum deadline for responding to complaints received is 10 days (which has been met in the 2022 fiscal year).

Likewise, the corresponding financial compensation is made. As a sample of this, in 2022 the financial compensation derived from equity claims in Spain, the United Kingdom and Brazil amounted to a total of €57,787.70 euros[282] (12,693.5 € in 2021).

The Company also tracks complaints and claims received on social media profiles (Twitter and Facebook, as well as Instagram in the case of London-Luton Airport and ANB, and LinkedIn in the case of ANB). Through these channels, in 2022, Spanish airports have collected a total of 3,435 complaints (2,155 in 2021), while in the United Kingdom 5,747 notices have been received (1,861 in 2021) and in Brazil 498 complaints[283]. However, it should be noted that, in Spain, complaints received through social networks and mailboxes are generally addressed, since they are not included in the Complaints and Claims Management Procedure[284].

[279] In Brazil, the Management System also addresses the relationship with the airport users, with the aim of providing information to citizens about the Ombudsman and their relationship with consumers, suppliers, employees, the community and users. ANB is obligated to maintain a physical and electronic service system for users and an ombudsman to investigate complaints, claims, requests for information, suggestions and compliments in relation to the execution of the Concession Contract. And, in addition, the Airport Exploration Plan (PEA) establishes the obligation to implement a 'recording and processing system for claims related to the provision of the service'.
[280] In Brazil, the Customer's Ouvidoria Channel has as one of its main attributes, the analysis and sending of complaints related to the provision of services at the airports where the Company operates. In addition, it is the responsibility of the Customer's Ouvidoria to prepare statistics indicative of the service and the nature of the claims, in order to inform the ANAC and other interested parties to promote the improvement of the services offered to users.
[281] In the UK, they do not currently have a complaint and claim management procedure, although they try to respond to all requests and complaints in less than five business days, with this being managed through their insurance companies. They currently use Dynamics 365 to manage communications with their customers, allowing them to record and generate the corresponding reports for their monitoring.
[282] The amount includes possible expenses incurred from expert and/or legal counsel services. This includes both civil liability claims for personal injuries and for property damages greater than €9,000. The resolution of personal injuries does not occur until the claimant has been medically discharged. In cases that wind up in court, the resolution does not occur until a final ruling is issued.
[283] Information not recorded in 2021.
[284] Those affected are encouraged to process them through official channels.

Likewise, the Company makes opinion-gathering tools available to airlines, handling agents, commercial activity concession companies or real estate customers in the Lounges, based on the Happy or Not[285] platform and in which the user comments are analysed in order to make improvement measures jointly with the management companies of the Lounges[286]. At each airport level, improvement measures are taken in the management of our VIP Lounges, based on the continuous feedback provided by the aforementioned feedback collection platform.

Preventive and corrective actions are proposed and adopted locally.

Improvement actions are promoted in VIP lounges based on survey results.



[285] In the UK, London-Luton Airport has replaced Happy or Not devices with FeedbackNow to measure customer satisfaction in real time.
[286] In Brazil, this measure will be implemented in May 2023.

Main data on complaints and claims												
	Spain[287]			Uniited Kingdom			Brazil			Total		
Indicator	**2020**	**2021**	**2022**	**2020**	**2021**	**2022**	**2020**	**2021**	**2022**	**2020**	**2021**	**2022**
Transport agreement	496	587	1,129	66	-		7	3	0	**569**	**590**	**1,129**
Handling	110	248	349	336	255	717	-	-	0	**446**	**503**	**1,066**
Information systems	183	251	663	-	-		14	1	6	**197**	**252**	**669**
Facilities	280	319	554	-	35	96	71	150	63	**351**	**504**	**713**
Security services	709	1,035	2,000	237	147	354	49	52	29	**995**	**1,234**	**2,396**
Supplementary services	427	587	944	-	1,984	1,801	-	-	9	**427**	**2,571**	**2,755**
Access points	11	36	31	-	51	94	-	3	0	**11**	**90**	**125**
Damage and theft	102	138	271	66	28	136	3	-	1	**171**	**166**	**408**
Miscellaneous	90	163	151	-	48	124	171	198	75	**261**	**409**	**337**
Commercial and food and beverage services	62	123	216	347	90	1,725	5	12	8	**414**	**225**	**1,951**
Car parks	575	569	6,612	630	89	441	2	3	1	**1,207**	**661**	**7,054**
Total	**3,045**	**4,056**	**12,920**	**1,682**	**2,727**	**5,488**	**322**	**422**	**192**	**5,409**	**7,205**	**18,603**

Other specific indicators

In 2022, and as in the previous fiscal year, Aena has not been aware of any cases of breaches of regulations or voluntary codes related to:

- Impacts on health and safety from categories of products and services in any of the companies of the Group.
- Information and labelling that is provided to users about the service, in any of the companies of the Group.
- Marketing communications, in any of the companies of the Group.

In relation to breaches of regulations or voluntary codes related to the health and safety impacts of the services, there has been 2 received in Brazil. Specifically, these 2 cases correspond to non-compliance with regulations that result in fines or penalties, non-compliance with regulations that result in a warning or non-compliance with a voluntary code.

[287] In Spain, the observed increase in the number of claims with respect to the previous fiscal year is due to the tendency of passenger to use the Single Portal as well as to the recovery of traffic.

7. Innovation (GRI 2-22; 3-3)

Main advances in innovation in 2022

Approval of the Strategic Innovation Plan.
Digital identity systems.
Aena as operator of drones.
AenaVentures.
Pilot Projects.
Horizon 2020.

Strategic Innovation Plan

3 programmes:
From passenger to customer.
Efficient use of resources.
Beyond the airport.

Includes more than **80** projects for the 2021-2026 period.

Innovation ecosystem

"Aena Ventures"
Working in alliance with partners.

254 proposals from 33 countries, of which 5 were accelerated

Training

786 employees with more than 8,965.5 hours of training in innovation

Investment

In R&D&I projects during the fiscal year 2022 has exceeded €27 million

Committment to SDGs

3 GOOD HEALTH AND WELL-BEING
7 AFFORDABLE AND CLEAN ENERGY
9 INDUSTRY, INNOVATION AND INFRASTRUCTURE
11 SUSTAINABLE CITIES AND COMMUNITIES
13 CLIMATE ACTION
16 PEACE, JUSTICE AND STRONG INSTITUTIONS
17 PARTNERSHIPS FOR THE GOALS

7.1. Innovation management at Aena

(GRI 3-3)



7.1.1. Strategic Innovation Plan

Aena continues to make a firm commitment to innovation, implementing and publicising its Strategic Innovation and Digital Transformation Plan, approved at the end of 2021, characterised by being transversal to the entire Company. Aena's vision is to be a benchmark in the use of technology to optimise customer experience, increase operational efficiency and develop business around sustainable mobility.

The Plan establishes the organisation's qualitative and quantitative objectives in this area, making innovation a fundamental pillar of airport management.

The Plan is underpinned with three programmes:

- From passenger to customer.
- Efficient use of resources.
- Beyond the airport.

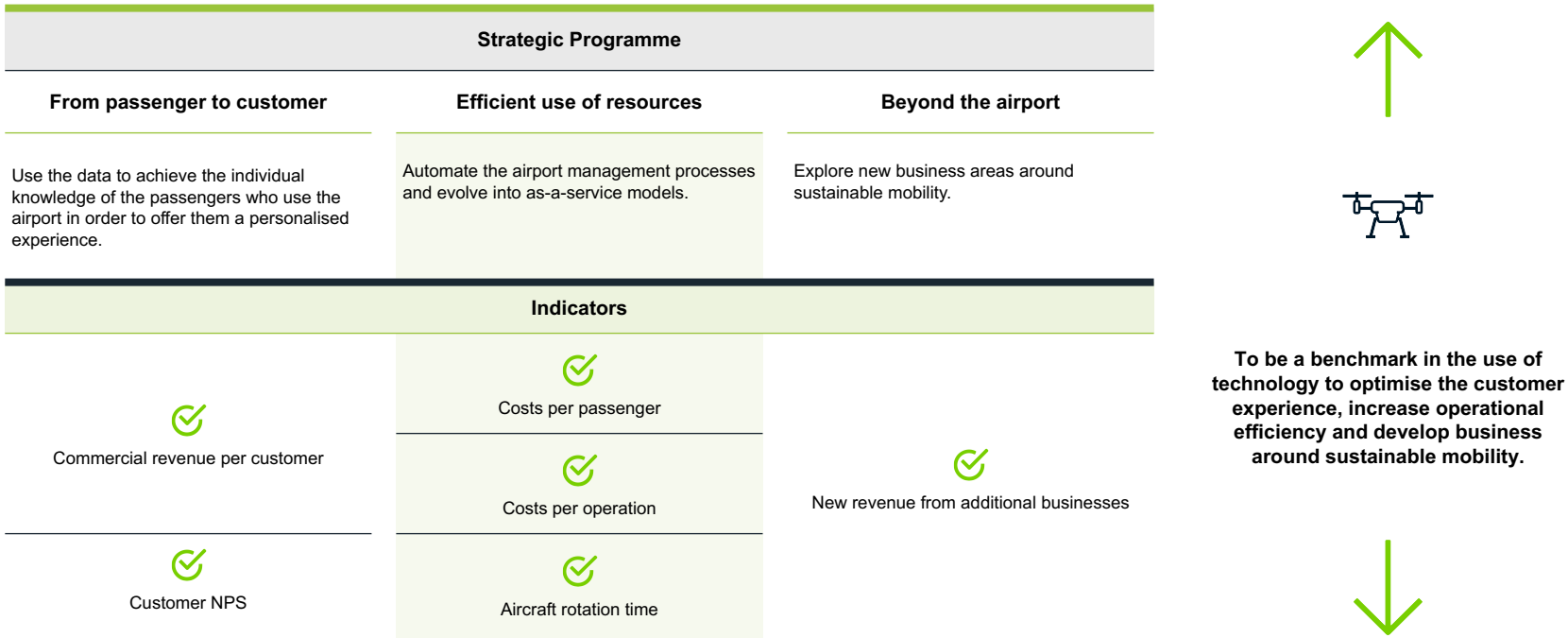
Each programme develops a series of lines of action that allow for validating technology, analysing results and estimating impacts on subsequent deployments.

Innovation at Aena is open, dynamic and cross-divisional, and it seeks to have the participation of all the actors involved (users, customers, suppliers, partners, entrepreneurs, universities, research centres), learning from them, working together in the search for solutions to new challenges and existing problems, sharing risks in pilot projects and drawing inspiration from the best of them.

To achieve this, Aena has different tools that help promote innovation. Internally, the Innova Awards for the channelling of internal talent and collaboration agreements for pilot projects, while there is the Aena Ventures programme for external collaboration.

Aena's Strategic Innovation Plan strengthens Aena's commitment to Innovation





7.1.2. Innovation ecosystem

To promote the development of advances and proposals, Aena works in alliance with different partners (employees, suppliers, startups, city councils or universities, etc.). As proof of this, the Company offers the possibility of carrying out concept tests in our airports on new technologies and processes, in order to find innovative solutions and alternatives for the airport business. In this regard, in 2020 the call for startups (SU) of the "Aena Ventures[288]" programme was held, which received 254 proposals from 33 countries. Of these, 5 were selected to participate in the programme that was developed in 2021, where they were accelerated, adapting their proposals to deploy a proof of concept with real customers, allowing the viability of the initiatives and their future implementation in Aena Airports to be analysed.

Of the 5 startups accelerated, 4 of them have been given the green light in 2022 to implement their solution on a larger scale in Aena airports.

In the future, Aena is committed to continuing this open innovation programme with the aim of attracting new ideas from agile and innovative companies.

Internally, the INNOVA awards enable the detection and sharing of good ideas and practices within the network. The fourth edition of the awards was held in 2022, in which employees of Aena from Spain, the United Kingdom and Brazil participated, and the call for proposals were the following: good practice, sustainable idea, innovative idea, idea to increase revenue and idea for passenger assistance.. A total of 153 entries were received from central services and 23 airports.

[288] See chapter "Links of interest".

Training

As one of the main levers of innovation and cultural change, Aena has launched training activities in 2022 to enable employees to acquire the necessary skills to integrate innovation as a driving force for the company. To this end, different levels of training in innovation, digitalisation and agile project management procedures have been implemented, including postgraduate master's degrees, seminars and internal technical training courses.

Training in new cross-cutting working methods as well as new technologies have been the areas where special attention has been paid to foster innovation in the company.

Training in specific areas of innovation in 2022 totalled 786 employees with more than 19,641 hours of training.

Work and collaboration with specialised companies

The investment made in R&D&I projects during the year 2022 exceeded €27 million (€14.8 million in 2021).

Aena has initiated collaboration with 19 companies[289] in the field of private innovation, and 10 project proposals have been submitted to national and international R&D&I grant calls in different consortiums.

7.2. Developments in 2022

In 2022, the main objective in terms of innovation was to implement the Strategic Innovation Plan, whose scope encompasses the 2021-2026 period.
The main advances made in innovation during 2021 include the following:

- **Implementation of the Strategic Innovation and Digital Transformation Plan**. This is a cross-divisional plan for the organisation, which includes the main technologies to work on over the next five years with the focus placed on the digitalisation of passengers and infrastructures, seeking new opportunities in the airport business environment.
  The Plan includes more than 80 projects for the 2021–2025 period.
- **Digital identity systems**. In June 2022, the latest biometrics pilot was completed, encompassing all steps of the airport process using biometrics: check-in (at home or at the airport), baggage check-in, security screening access and boarding access. This project was awarded at the 2022 ACI World Technology Innovation Awards as the "Best Innovation in Airport Passenger Related Processes". In addition, in 2022, four airlines have signed the Collaboration Agreement to use the biometric systems that will be deployed during 2023 in some of Aena's airports.
- **Aena as operator of Drones.** In 2021 Aena registered as a drone operator, and in 2022 the first drones were acquired, employees were trained as drone pilots, and the first three use cases were carried out in-house with Aena personnel and equipment. The objective is to analyse the capabilities of Remotely Piloted Aircraft Systems (RPAS) in airport management, operation and maintenance activities. This project will continue in 2023, looking for new use cases to test and validating the employability of this new work tool.
- **AenaVentures.** In 2022, the implementation of 3 of the initiatives accelerated in Aena Ventures during 2021 has begun. The initiatives to be deployed at A.S. Madrid Barajas and J.T Barcelona El Prat airports are:
  - AIRBOT: Chatbot for communicating with passengers in three languages that allows for the use of AI to improve passenger assistance.
  - MEEP: Mobility platform, with door-to-gate usability for different modes of transport.
  - ChinaSpain: Initiative to improve the Chinese passengers' experience at the airports in the Aena network.

  A new Aena Ventures call for startups is scheduled to open in 2023.
- **Pilot Projects**. Demonstrative projects that are measurable and produce tangible short-term results are carried out through collaboration agreements with different technological partners. This allows us to attract external innovation and provides mutual benefits, for example:
  - Sound projects to know in real time the state of the infrastructure.
  - Platform/terminal video analysis: video analysis techniques have been used to detect events around the aircraft during rotation, with the aim of improving planning and safety in the aircraft environment.
- **Horizon 2020**: In 2022, Aena continued participating as a partner in the following projects:
  - TRANSIT (Travel Information Management for Seamless Intermodal Transport): research project funded by SESAR 2020.
  - IMHOTEP: its goal is to develop a concept of operations and a set of data analysis methods, predictive models and decision support tools that allow for information sharing.
  - ASPRID: aims to address the problem of protecting airport operations against (careless or malicious) drone intrusion from an operational point of view.
  - AVIATOR: Provides a better understanding of the particulate and primary gases emitted as well as the evolution of pollutants in the exhaust plume.

[289] The 2021 NFIS included information on projects underway during the year (45 collaboration projects with 50 companies in 2021). However, this report includes information on collaborations initiated in 2022.

- SESAR 3: Aena has become a founding member of SESAR 3 within the framework of the new European Union R&D&I project (*Horizon Europe*).
- Eurocontrol InnoHub: Aena has participated in EUROCONTROL Innovation Hub projects with objectives to improve the punctuality of operations.



7.3. Future outlook

Aena seeks to strengthen innovation and digital transformation as a lever of change and competitive advantage that enables the Company to achieve its objectives.

Digitising the passenger relationship and infrastructure management will improve the service provided to our customers and will enable the company to be more resource efficient.

Continuing to validate technologies with short- and medium-term implementation perspectives and participating in the large transnational innovation projects will allow the organisation to be prepared for the new changes in the sector and to deploy R&D&I, giving them a practical and real application in the production of the organisation.



About this report

(GRI 2-2; 2-5; 2-14)

Committment to SDGs



Reporting principles

This 2022 Consolidated Management Report meets the reporting requirements of Act 11/2018, of 28 December, on Non-Financial Information and Diversity. It presents the information necessary to understand the risks, business model, policies, strategy, evolution, results and situation of Aena, as well as the impact of its activity on environmental and social issues related to staff, the respect for Human Rights and combating corruption and bribery

The Non-Financial Information Statement (NFIS) is part of Aena's Consolidated Management report for the fiscal year 2022. The NFIS is subject to the same criteria for approval, submission and publication as the other reports that make up the Consolidated Management Report, as well as verification by an independent provider of these services.

The scope of the information in the document, which is maintained with respect to the previous fiscal year, includes the companies owned by Aena by more than 50% – as they are presented in the Annual Accounts by virtue of the control criterion – and includes the available data of the following in a consolidated manner:

- The companies in Spain: Aena S.M.E., S.A., Aena Desarrollo Internacional S.M.E. (ADI), S.A.; Aena Sociedad Concesionaria del Aeropuerto Internacional de la Región de Murcia S.M.E. (AIRM or also SCAIRM);
- The subsidiaries in[290]:
  - United Kingdom;
  - Brazil[291].

When the reported indicators refer to a specific part of the Group, this is explicitly specified, as well as, where appropriate, when the information is not available (see comments in the GRI table).

The rest of the investee companies that are not fully consolidated within the Group have not been included in the non-financial performance indicators referred to in this document.

This report has been prepared in accordance with the following recommendations, regulations and standards:

- Act 11/2018, of December 28, on non-financial information and diversity, which transposes Directive 2014/95/UE into the Spanish legal system. To comply with this Law, selected GRI standards have been used.
- Act 5/2021, of April 12, which amends the consolidated text of the Corporate Enterprises Act and introduces a new requirement regarding the mechanisms and procedures that the company uses to promote the involvement of workers in the management of the company, in terms of information, consultation and participation.
- In accordance with the GRI Universal Standards 2021 for the preparation of Global Reporting Initiative (GRI) Sustainability Reports[292].
- Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on establishing a framework to facilitate sustainable investment which, in its first delegated act, establishes the obligation to disclose information on how and to what extent the company's activities are associated with economic activities that are considered environmentally sustainable in relation to climate change mitigation and adaptation objectives.
- Moreover, other reporting frameworks have been taken as a reference, such as the international integrated reporting framework of the IIRC (International Integrated Reporting Council), SASB (Sustainability Accounting Standards Board) relating to the industries of Professional and Commercial Services, Logistics and Air Freight Transportation Services, Airlines and Real Estate Services, the Principles of the United Nations Global Compact, the United Nations Guiding Principles on Business and Human Rights, the United Nations Sustainable Development Goals, the 2017 /C125/01 EU Guidelines on the presentation of non-financial reports (Methodology for the presentation of non-financial information), as well as the recommendations from TCFD (Task Force on Climate-Related Financial Disclosures), CDP (Carbon Disclosure Project), the CNMV and ESG Rating agencies.

The table with the contents of Act 11/2018 (section "Act 11/2018 Contents Index") and the table with the GRI indicators (section "GRI Content Index"), whose contents have been verified by an independent third party, as well

[290] Through its subsidiary Aena Desarrollo Internacional (ADI), Aena is present in Brazil through the company Aeroportos do Nordeste do Brasil (ANB) and, in the United Kingdom through the indirect shareholding in the management of the London-Luton Airport.
[291] In August 2022, Aena, through its subsidiary Aena Desarrollo Internacional S.M.E., S.A., was awarded the concession for the operation and maintenance of 11 airports in Brazil (collectively known as the Block of Eleven Airports in Brazil, or "BOAB"), among which Congonhas-Sao Paulo stands out. The signing of the contract is expected to take place in March 2023, and it is estimated that the concession contract will enter into force ("Efficiency Data") in April 2023, so that the start of operations at the airports will take place in the second semester of 2023. Consequently, it is not taken into consideration in fiscal year 2022 for the purposes of reporting non-financial information.
[292] In this report, the new universal standards (GRI 1, 2, 3) have been incorporated and all the GRI topic-specific standards have been followed in their most updated version.

as the table with the SASB indicators (section "Sustainability Accounting Standards Board (SASB) Content Index"), indicate the exact location of the information –either the page(s) of the report, the reference to the table of non-financial indicators and/or the URL of the external reference – or the reasons for its omission.

The report provides data from previous years in order to reflect the Company's sustainability performance over the last few years and to enable its assessment, including external references to help its readability.

For more information, further details on the Company's performance in matters related to ESG aspects are available in different sections on the corporate website. Furthermore, for any questions or concerns about this report, the Corporate Responsibility department can be contacted on: rc@aena.es

Control over the information

With regard to the internal control of information, Aena is working on the progressive development and implementation of an Internal Control System for Non-Financial Information (SCIINF) as a measure to reinforce its reliability and confidence. In this respect, a series of procedures have been drawn up, followed by an analysis of the traceability of the information. The aim is to identify potential risks and implement controls to help mitigate them.

REPORTING PRINCIPLES USED

Quality of the report	Definition of contents
• Accuracy	• Inclusion of stakeholders
• Balance	• Sustainability context
• Clarity	• Materiality
• Comparability	• Completeness
• Reliability	
• Timeliness	

Reporting principles included in GRI 1: 'Foundation 2021'

PHASES FOR PREPARING THE REPORT AND GROUPS INVOLVED

01	02	03	04	05
				
Consultation of stakeholder groups and materiality analysis	Preparation of drafts	Review and consolidation	Formulation of the non-financial information statement	Presentation and approval by the General Shareholders' Meeting
INTERNAL AGENTS EXTERNAL AGENTS	**ALL UNITS**	**ALL UNITS MANAGEMENT**	**BOARD OF DIRECTORS**	**GENERAL SHAREHOLDERS ' MEETING**

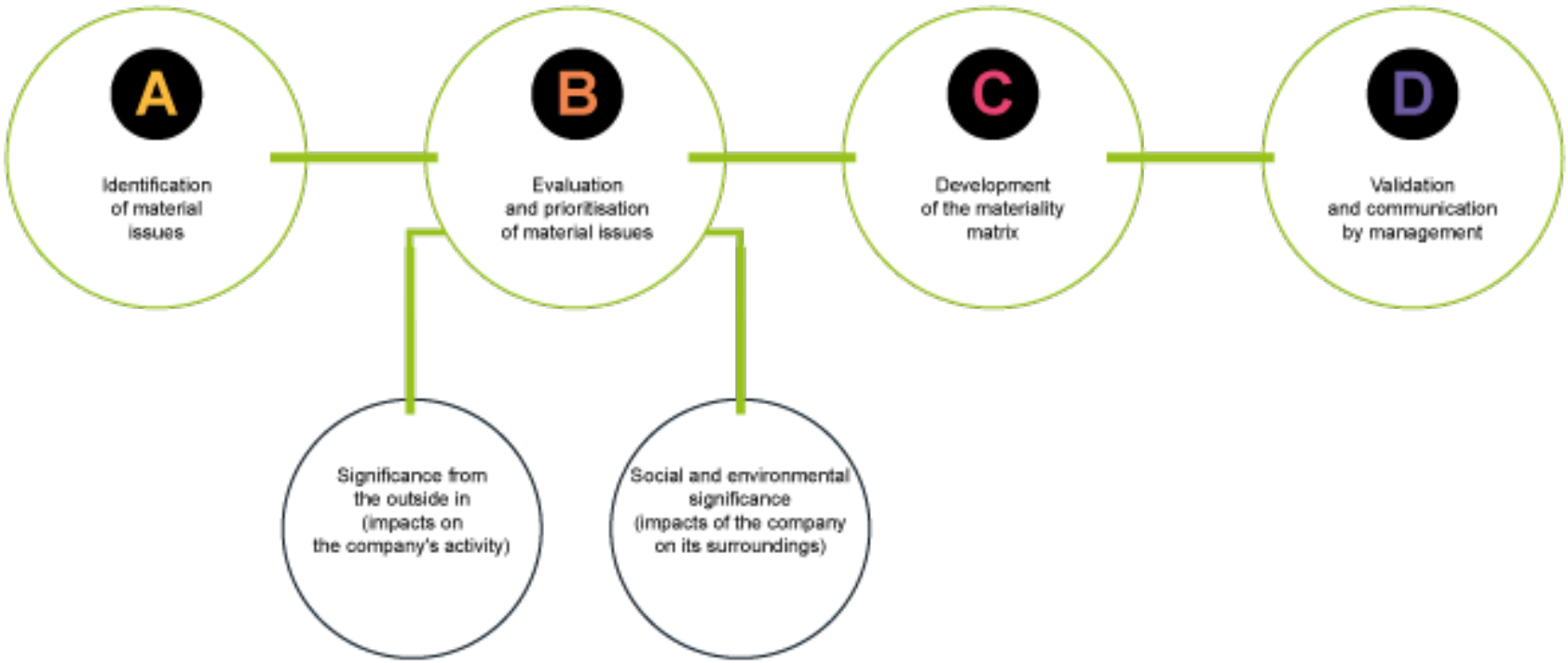
Materiality

(GRI 2-14; 3-1; 3-2; 3-3)

In 2022, a review and update of the material issues identified in previous fiscal years was carried out, incorporating new aspects or elements into the process to be followed for the materiality analysis and taking into account the medium and long-term priorities and lines of action of the new Strategic Plan 2022-2026 and the Sustainability Strategy, as well as the main lines and trends of the year. In line with best practices in this area, Aena has consolidated the application of the dual materiality approach in order to identify and understand:

- How non-financial issues affect the Company's situation and results (financial significance or inward impacts).
- The impact the company has on the environment and in society (environmental and social significance or outward impacts).

Process of reviewing and updating the materility analysis:



A. Identification of potentially material issues throughout Aena's value chain. Main sources of information considered[293]:

- Public sources and international and sectoral benchmark organisations to identify the main trends and challenges affecting the sector (CNMV, European Parliament, ACI and CEOE, World Economic Forum, APD, Edelman Trust Barometer, Air Transport Action Group, etc.).
- Main trends and aspects evaluated by investors and ESG rating agencies in financial and extra-financial matters (Sustainalytics, DJSI, Vigeo Eiris, MSCI, ISS Oekom, etc.), including applicable legislation, as well as the most relevant non-financial reporting standards (GRI, SASB, Global Compact and the United Nations Sustainable Development Goals).
- Internally, the results of analyses conducted in previous periods have been considered in terms of the perception of the relevance of the different trends and the identification of the main risks. Internal reference information has also been taken into account (Strategic Plan 2022-2026, Sustainability Strategy, Risk Management and Control System[294], Aena reputational study[295], etc).
- Results of the analysis of the Company's presence on social networks and analysis of complaints received through Twitter and Facebook in 2022.

As a conclusion of the analysis of these information sources, the list of relevant topics has been updated to the 2022 context. Thus, 35 material issues have been identified, grouped into 16 topics, the latter being reflected in the materiality matrix itself.

B. Evaluation and prioritisation of material issues from a perspective of double materiality, including those aspects with the capacity to impact the growth of the Company (financial significance) and, in turn, relevant to the stakeholders, which may be affected by the impact of the activity of the company (environmental and social significance).

- Financial significance analysis (Y-axis): each material aspect has been internally evaluated and assessed for its ability to impact the Company, integrating the economic and risk perspective and taking into account, where appropriate, the results of the valuation of specialised ESG agencies (Sustainalytics and Vigeo). Those aspects included in the Strategic Plan 2022-2026 have been modulated by the corresponding overweight factor in order to faithfully reflect their relevance in the analysis.
- Analysis of environmental and social significance (X-axis): the results of the reputational study conducted by Aena through interviews with the main stakeholders (suppliers, customers, regulators, etc.) have been taken into account, obtaining information on both the perception and the importance for each of them of the different material issues identified. In addition, the valuation of ESG agencies and/or analysts (DJSI and FTSE) and the results of the social media reports and complaints and claims received have also been taken into account, where applicable. Finally, the main inputs and trends of 2022 have been considered by applying the corresponding correction factor to those aspects that may have been significantly affected by them.
- To calculate the overall value of each of the material topics, averages are obtained from the scores assigned to each criterion considered.

C. Preparation of the materiality matrix: based on the valuations obtained in the previous point.

D. Validation by management within the framework of the process for preparing the Non-Financial Information Statement and its dissemination.

Following this process, a series of critical issues have been identified, aligned with the main ESG trends and the main lines of the Company's new Strategic Plan, as well as the Sustainability Strategy, which focus, among others, on promoting sustainability and economic profitability, guaranteeing the safety, quality and accessibility of services, placing sustainability as a key factor through decarbonisation, the fight against climate change, the reduction of negative environmental impacts and the amplification of positive ones (employment, talent, social contribution, etc.). All of this under the supervision of Governing Bodies responsible for the good performance of the Company and continuous monitoring of the challenges and risks it faces.

[293] The analysis of some of these sources allows for a sector-based approach to be incorporated in the evaluation of the materiality.
[294] See chapter "2022: a year of hope"
[295] "The reputation of Aena among key stakeholders" Study, based on the RepTrak Model, whereby a correlation with the material issues identified by Aena is applied to the rational dimensions and attributes of the model, reflecting the relevant information for the different sources used.


Financial significance (short/medium/long term)
105
100
95
90
85
80
75
70
65
60
60
65
70
75
80
85
90
95
100
105
Environmental and social significance (short/medium/long term)
Decarbonisation and the fight against climate change
Risk management and control
Ensure everyone's health and safety
Sustainability and economic profitability
Restrictions arising from the regulatory framework
Service quality and accessibility and responsible services
Good governance and ethical culture
Cybersecurity and data protection
Environmental footprint and use of resources (circular economy)
Transparency, reporting and communication with stakeholders
Responsible value chain management
Internationalisation
Our people
Research, innovation, design and digital transformation
Human rights
Community impact and contribution: creation of shared value, contribution to social and economic development and impact measurement

Material issue	Why is it material?	Impact (Internal/External)	Strategy/measures implemented and metrics (Block B: Non-financial information statement)
Decarbonisation and the fight against climate change	Meeting the most ambitious objectives of the Paris Agreement and limiting the increase in temperature to 1.5°C, requires that the business sector contribute to decarbonisation by proposing and developing climate change adaptation and mitigation measures, to effectively reduce CO2 emissions. In this regard, Aena's commitment is to be at the forefront of the sector's decarbonisation process, positioning itself as a driving force for other players in the aviation sector to accelerate their decarbonisation.	I & E	Chap. 1, Section "1.4.3. Features of the Sustainability Strategy" Chap. 2, Section "2.2. Aena and the climate emergency"
Good governance and ethical culture	The Governing Bodies are responsible for the proper performance of the organisations, for implementing an ethical culture that is applicable and extendable to all members of the Organisations, and for fully integrating ESG aspects in the activity. Therefore, it is essential for them to have the required tools to regulate aspects such as the composition of the Board, the profile of the Directors, the Committees, the remuneration or its evaluation, and to ensure the establishment of a solid culture of compliance and sustainability. Aena has strengthened the governance and reporting mechanisms to account for its progress in this area, thus ensuring the regular monitoring of initiatives and the fulfilment of objectives.	I & E	Chap. 1, Sections "1.1.2. Governing bodies" and "1.2. Culture and corporate ethics"
Environmental footprint and use of resources (circular economy)	A key aspect is reducing the impacts that any activity generates on the natural environment (atmospheric pollution, use of water resources generation of waste, noise, etc.) is a top priority that requires re-adapting the business models and business management to ensure the sustainable coexistence of their activity with the care of the environment. In this regard, Aena's Sustainability Strategy focuses both on its own operations and on the other players in the airport ecosystem, maximising collaboration with third parties.	I & E	Chap. 1, Section "1.4.3. Features of the Sustainability Strategy" Chap. 2, Sections "2.2.5. Efficiency in the use of energy and use of renewable energy", "2.3. Pollution" "2.4. Sustainable use of resources" and "2.6. Waste management and circular economy in airport facilities"
Ensure everyone's health and safety	As basic infrastructures for transportation, ensuring the safety and health of all users is a priority. In this regard, it is important to adopt a preventive attitude regarding possible risk situations is important, as is continuously evaluating the possible contingencies that may affect the normal development of activities. There must be sufficient mechanisms, measures and human and material resources to ensure the safety of both employees and passengers, and in general, all airport users.	I & E	Chap. 5, Section "5.5. Occupational health and safety" Chap. 6, Sections "6.1. Operational Safety" "6.2. Airport Security" and "6.4. Health safety"
Human rights	The new trends and guidelines place special focus on the social aspect and protection of human rights and disadvantaged groups. Companies must ensure respect for human rights in the development of their activities, establishing the appropriate mechanisms to ensure their protection in all the communities in which they operate. It is therefore a priority to make further progress in implementing the right mechanisms to identify, prevent, mitigate and account for the impact on human rights. In this regard, Aena is moving towards a proactive human rights risk, impact and opportunity management strategy, ensuring a permanent dialogue with all players involved.	I & E	Chap. 1, Section "1.4.3. Features of the Sustainability Strategy" Chap. 3, Section "3.3. Human Rights"
Our people	Organisations must adapt to an increasingly changing and demanding workforce, and adjust their people management models to encourage the recruitment and retention of the best talent, the promotion of diversity and equal opportunities, the implementation of sufficient and effective well-being and work-life balance measures, or the promotion of a corporate culture based on corporate values. The social and economic relevance of the activities carried out by Aena requires the best talent, and relies on teams that are motivated and committed to a shared project, built with the contributions of all and supported by the vocation of public service. Aena's goal is to put people and communities at the heart of the Company.	I & E	Chap. 5, Sections "Introduction" "5.1. Stable and quality employment " "5.2. Diversity and inclusion"; "5.3. Promotion and development of talent, skills and knowledge" and "5.4. Industrial relations"

Research, innovation, design and digital transformation	The management of airports is directly related to the use of cutting-edge technologies and the development of specific solutions for all the challenges that Aena faces when carrying out its activity, both in terms of internal management and in areas related to customers and shareholders. In order to ensure the continuous improvement of their business activities and face present and future challenges, it is essential for organisations to integrate innovation, co-create internal and external innovation poles, and move forward in the implementation of new technologies that guarantee the improvement of services.	I & E	Chap. 7 “Innovation”
Community impact and contribution: creation of shared value, contribution to social and economic development and measurement of impact	Large infrastructures are designed to improve people’s lives. Their optimal management involves considering, in addition to operational factors, the implications for sustainable development and the expectations of external groups, as well as promoting synergies and alliances that multiply the positive impacts of operations and contribute to building the trust that stakeholders place in the Company, generating added value to the company based on co-responsibility.	I & E	Chap. 3, Sections “3.1. Commitments to sustainable development and society” and “3.2. Impact of the activity on society and the environment”
Transparency, reporting and communication with stakeholders	Aena conceives transparency as an essential pillar of the trust that all stakeholders place in the Organisation. To achieve this, it makes various communication channels available to them that are treated with the utmost seriousness and are open to dialogue.	I & E	Chap. “Introduction”, Sections “3. “Relationship and dialogue with stakeholders” and “4. Communication and transparency”
Sustainability and economic profitability	The Company’s future depends on obtaining sufficient profitability thresholds to meet its operational needs and satisfy the interests of all its owners. This is compatible with ensuring that sustainability is fully integrated into the business model, guaranteeing the creation of shared value in the environment in which it operates and in society as a whole. Ensuring a sustainable business model, capable of handling the current changing environment and new challenges, which enables sufficient profitability thresholds to be obtained and guarantees the best ESG performance, is essential in order to satisfy the interests of investors and other stakeholders.	I & E	Chap. “2022: A year of hope” Section “1. The aviation sector as an economic and social driver” Chap. 1, Section “1.5. Sustainable financing. Taxonomy”
Cybersecurity and data protection	The increasing digitisation of processes exposes the company to emerging cybersecurity risks that may jeopardise the security of systems, databases with sensitive information or lead to data protection breaches. Strengthening computer security mechanisms and protocols is essential for companies such as Aena, for which the comprehensive protection of all (employees, external companies, general users, etc.) takes precedence.	I & E	Chap. 1, Section “1.2.11. Data protection” Chap. 6, “6.3. Cybersecurity or information security”
Service quality and responsible services	Responding to consumer demands and meeting their expectations is especially necessary. Aena’s search for excellence implicitly involves delivering all services with the highest level of quality, excellence and innovation. The Company focuses on customers and users, so that their journey through airports is a positive experience, where the highest quality and safety requirements are combined and met, with the most advanced means and technologies to detect and anticipate new needs. Likewise, facilitating the accessibility of any group becomes a strategic aspect of the Organisation.	I & E	Chap. 6, Section “6.6. Quality management”
Responsible value chain management	The quality of the services offered depends to a large extent on the relationship and behaviour of the organisations’ value chain. To achieve common goals, it is key to extend the ESG values and ethical commitments to supply chains. In this regard, Aena is committed to a sustainable value chain, with the aim of improving the environment by collaborating with suppliers, tenants, transport agents and the community. In this way, the Company promotes sustainable mobility to and from the airport, as well as proactive collaboration with the supply chain and the community, to promote sustainability throughout the value chain.	I & E	Chap. 4 “Social management in the value chain”

Risk management and control	In today's complex and uncertain environment, having robust systems and mechanisms in place to identify and address new challenges and sources of risk becomes even more relevant. Getting ahead of emerging risks and those related to ESG becomes especially important in ensuring the proper performance of the organisations.	I & E	Chap. "2022: A year of hope" Section "3. Risks and their management"
Restrictions arising from the regulatory framework	Aena, as a state trading company configured as a public limited company, may be exposed to certain limitations due to its legal status (for example, in the hiring of personnel, in bidding processes, or organisational development), which could represent a competitive disadvantage compared to other private listed companies, hindering its capacity to respond to new challenges and opportunities. In this regard, Aena is firmly committed to complying with the growing number of regulations concerning its activities and characteristics, complying optimally with the mandates received from its shareholders and other stakeholders.	I & E	Chap. 1, Section "1.2. Culture and corporate ethics"
Internationalisation	Aena maintains a clear vocation to expanding its model of operational excellence to airports located outside Spain, thus diversifying risks and making the most of the opportunities of its management capacities, assuming its responsibilities as an active and relevant member of the different communities.	I & E	Chap. "2022: A year of hope"

Relationships and dialogue with stakeholders

(GRI 2-25; 2-29; 3-3; 413-1; 413-2)

Aena recognises the importance of stakeholder management as a key element in achieving social interest and developing a responsible and sustainable business model.

Aena builds relationships with its stakeholders on the basis of transparency, dialogue, the generation of trust and creation of shared value

Understanding the expectations of stakeholders is critical, and is an essential element for setting goals, creating long-term value and contributing to the Sustainable Development Goals.

Aena's Stakeholder Relations Policy establishes the principles and guidelines on which to project the Company's values and promote a framework of relations based on transparency, dialogue, the generation of trust and the creation of shared value. These principles allow it:

- To encourage the involvement of Stakeholders in the Company's business project, through a strategy of strong involvement with the communities in which it operates and the creation of shared sustainable value for all of them.
- To respond to the legitimate interests of all Stakeholders in line with those of the Company.
- To build long-lasting, stable and robust relationships based on co-responsibility, respect, ethics and integrity.
- To promote recognition of Aena's commitment to diversity in a broad sense and, in particular, in all matters relating to the professional development of its members.
- To recognise the importance of managing relations with Stakeholders as a key element in achieving social interest and developing a responsible and sustainable business model.
- To contribute, in this way, to preserving corporate reputation in the different countries and businesses in which the Company operates.

Aena's relationship with its Stakeholders is based on the following principles:

- A responsible action that builds relationships based on ethics, integrity, sustainable development, respect for human rights and the communities affected by the Company's different activities.
- Compliance with the laws that are in force in Aena's relationships with third parties, respecting the principles of legality, efficiency, transparency and ethical behaviour with Stakeholders, and full submission to Aena's Policy against corruption and fraud.
- The protection of the rights and interests of Stakeholders, using clear, direct and effective communication channels to receive the appropriate information, guaranteeing they receive equal treatment with regard to information, participation and the exercising of their rights.
- Cooperation and transparency in relations with competent authorities, regulatory bodies and administrations.
- Focusing on achieving consensus, especially with the local communities and indigenous peoples of the countries where the company operates, taking into account their needs, points of view and expectations.
- Continuous improvement, ensuring it provides the most efficient response to requirements at all times.

In the relationship and dialogue with its stakeholders, Aena has various tools aimed at establishing the necessary guidelines for segmenting, identifying and prioritising groups, in addition to effective communication mechanisms that facilitate fluid communication and dialogue with these groups.

To carry out this segmentation, identify stakeholders and guarantee the communication, monitoring and review of relations with them, Aena has an Integrated Management System (IMS) through which the different units and centres analyse possible changes that may exist in the needs and expectations of stakeholders, evaluating the degree of satisfaction with the aim of improving the services provided.

To reinforce this system, Aena designs and implements different training and awareness-raising actions aimed at employees, especially in the areas directly involved.

The Company's commitment to its stakeholders is formalised through the Stakeholder Relations Policy, the Code of Conduct and the Sustainability Policy.

The stakeholder participation process in the Company comprises a series of active and two-way communication tools and mechanisms, which facilitate dialogue, collaboration and continuous accountability, while helping to evaluate and permanently reinforce Aena's commitment.

Each Unit / airport, locally, analyses the following information:



Annual review

Stakeholders with whom it acts	→	Needs and expectations	→	Applicable requirements	→	Follow-up, communication and review mechanisms



Of all Aena's stakeholders, the most relevant in relation to its activity are passengers and airlines. In both cases, Aena regularly conducts an analysis of their needs and expectations (Stakeholder Matrix), from which a specific segmentation by customer is carried out.

In the case of passengers, EMMA surveys (Survey of the characteristics and reasons for Air Mobility) are carried out, which, among other aspects, provide information on the reasons for the journey and the means of transport used to reach the airport, as well as other passenger characterisation data. These studies are supplemented by the programme of Airport Service Quality (ASQ) surveys by Airports Council International (ACI), to measure the degree of customer satisfaction. These surveys measure the feedback of passengers regarding a wide range of service parameters, and monitor the customer's experience within the airport from the time of their arrival until the moment they pass the boarding gate.

Through a comparative analysis with other airports, ASQ allows airports to understand their position relative to their competitors. The programme also makes it easier for airports to make decisions to prioritise investments related to the improvement of airport services and infrastructures. At Aena's Spanish airports, 33 centres use this type of survey.

Each month the airports analyse the results they have obtained; and on a quarterly basis, ACI issues the results reports and comparisons with other airports of similar characteristics.

These tools are supplemented by others aimed at specifically finding out the passenger's opinion about the services provided, for example, through Happy or Not devices or specific surveys carried out by the Passenger, User and Customer Service Agents Association (AAPUC [Agentes de Atención al Pasajero, Usuarios y Clientes]).

The airports that have these Happy or Not devices are able to obtain real-time results relating to their users' opinions, enabling more agile decision-making and allowing them to adapt the services according to the passengers' priorities.

For airlines, Aena has designed its own methodology and conducts annual Airline Company Surveys (ECA [Encuestas a Compañías Aéreas]) that allow us to obtain information about their level of satisfaction, regarding the main elements related to the provision of services related to operations, security, services, commercial, communication systems, environment, infrastructures, etc.

The obtained results are analysed both at the general and individual level by each centre, proposing good practices/relevant improvement actions that are shared among the airports that make up the Aena network.

In addition to the main stakeholders mentioned above, social entities play a strategic stakeholder role, and Aena considers it key to care for and strengthen its relationship with them, particularly through initiatives to improve accessibility and infrastructures. For example, in the fiscal year 2022, work has continued with CERMI and the Spanish Confederation of Autism in the analysis of the accessibility requirements of public services, transport and tourism for this group, as well as in the development of tools that allow them to prepare for their journey through the airport. Moreover, it is worth mentioning the holding of regular meetings in the United Kingdom with associations such as Alzheimer's Society, Action on Hearing Loss and Autism Bedfordshire, among others (see section "6.6.2. Accessible infrastructures for all").

Communication from Aena with its stakeholders

(GRI 2-29; 413-1; 413-2)

SM | Alliances | Web | Press | Diálogue | NFIS and other reports | Appointments and Remuneration Committee | Board of Directors

Major Stakeholders	Communication tools	Expectations
PASSENGERS (Low cost, seniors, business, family, leisure, etc.)	Complaints, suggestions and compliments tracking and management Regular analysis of ASQ surveys EMMA surveys Monitoring of process indicators DORA indicators "HappyorNot" devices	No supervening costs Good quality/price ratio Excellence in service Commercial and food and beverage offer Efficiency, attention and friendliness of staff
AIRLINES (Budget and traditional)	Surveys to companies Direct contact/meetings Indicators associated with company processes Attendance at specialised forums and conferences User committee Work groups	Efficient and coordinated work procedures Quality of service Active collaboration Operational information and information on analysis of potential markets
EMPLOYEES AND OTHER UNITS	Suggestion box/Intranet Training Surveys HR Management process indicators Performance management system Regulatory Compliance System Meetings with union representatives Internal satisfaction surveys Internal meetings Internal and external audits	Recognition Professional development Transparency and ethics Ease of providing ideas

Common Objectives

Major Stakeholders	Communication tools	Expectations
PUBLIC ADMINISTRATION, REGULATORY BODIES AND OTHER BODIES (ENAIRE, AEMET)	Public noise information and consultations Regulatory Compliance System Specialised committees Internal and external audits Evaluation of compliance with legal requirements Meetings/contacts Work groups Inspections	Interministerial Commission for Defence and Development meetings Site-specific meetings/committees
MINISTRY OF DEFENCE, SECURITY FORCES AND BODIES, CIVIL PROTECTION AND OTHER EMERGENCY SERVICES	Specialised committee (emergency, National Security, simulations, etc) Meetings AESA and internal audit committees Interministerial Commission for Defence and Development	Interministerial Commission for Defence and Development meetings Site-specific meetings/committees
SOCIETY, LOCAL COMMUNITIES / NEARBY COMPANIES / NGOs, ASSOCIATIONS	Commissions and committees Public information Complaints, suggestions and compliments tracking and management Meetings Work groups Intersectoral committees	Commissions and Committees Public information Complaints, suggestions and compliments tracking and management Meetings Work groups Intersectoral committees
INVESTORS AND SHAREHOLDERS	Meetings General Meeting Public information Communications to the CNMV Contact Channels for Relations with Investors	Participation in meetings and conferences Regulatory public information Publication of results and activity data Monitoring of the Climate Action Plan Business model consultations Consultations on social and corporate governance issues

Common Objectives

Major Stakeholders	Communication tools	Expectations
COMMUNICATION MEDIA	Meetings Complaints, suggestions and compliments tracking and management Follow-up of news in the media	Meetings of the Board of Directors General Shareholders' Meeting Publication of results Internal Control over Financial Reporting System (ICFR) Risk Management System Internal and external audits
SUPPLIERS, SERVICE PARTNERS AND OTHER TENANTS, CARGO COMPANIES, TOUR OPERATORS	Direct contacts and meetings with contractors, leaseholders, handling agents, user committees, complaints, suggestions and compliments management Indicators Follow-ups and Analysis Work groups Analysis of results of the service rendered VIP Room surveys, parking and commercial services, companies Forums and conferences	Meetings with contractors, user committees Contractor follow-up/service provided Work groups Complaints, suggestions and compliments tracking and management DORA, technical specifications, process-related indicators Company and operator surveys Direct contact/meetings Attendance at specialised forums and conferences Direct contact/meetings Cargo facilitation committees
GENERAL AVIATION	User committee Direct contact/meetings Work groups	User Committee Direct contact/meetings Work groups

Common objectives

Communication and transparency

(GRI 3-3; 413-1)

For Aena, transparency is an essential factor of credibility, trust and reputation of unquestionable value for the Organisation and its stakeholders, and contributes to stimulating and reinforcing its Sustainability Policy. Ensuring the right of citizens to know public information is part of its culture.

This commitment to transparency contributes to fostering dialogue, collaboration and accountability, while helping to continuously evaluate and reinforce its commitment to citizens.

To ensure effective two-way communication, the Company makes a series of communication channels available to all its stakeholders. These include the Company's website[296], and the different portals comprising it, and social networks.

In line with its improvement efforts, in 2022, Aena's public website has continued to renovate its websites. The new site offers clear and structured information about the company, including content such as the company profile, environmental sustainability strategy and actions, Aena's commitment to society and its environment, the company's occupations and skills development and press resources for professionals. In this way, all Aena website portals have adapted their structure and content to different user profiles in order to improve interaction and access to the information of interest.

- The passengers and airports section of the website offers the possibility to find out and book everything passengers/companions need for their trip in a quick and easy way: flight information, parking reservations, airport services (transportation, shops, restaurants, companies, check-in, airport maps, etc.), formalities (check-in, customs, controls, etc.) and the possibility to book VIP services: lounges, fast lane and meet & assist.
- The Aena marketplaces; Travel, Food & Fly and Shop & Fly have also been integrated. These services allow passengers to discover and plan the best experiences and events, order food and pick it up at the gate and shop in the shops and have the items ready for them on arrival to the airport.
- The website of shareholders and investors, the Company's main official communications channel, provides clear, transparent and permanently updated information to all Aena shareholders, investors and to the markets in general. The portal provides access to the content on: (i) Aena's share performance (including information relating to the share price, dividends and share capital); (ii) economic-financial information (in particular financial and operational publications, credit rating, average supplier payment period, as well as other relevant financial information); (iii) other general information; and (iv) corporate governance information.
- The airlines website presents the potential routes, incentives, rates and operational and commercial aspects that may interest airlines when expanding or consolidating their business model.
- Through the Telematic Services Portal, citizens can process their requests, suggest improvements or report any dissatisfaction.

This information is updated on a regular basis, guaranteeing transparency and information on the activities performed[297] functions, organisational structure, economic and financial information, etc.

In terms of digital accessibility, Aena works to ensure that the contents of its website are validated with Double A certification, according to the recommendations given by the Web Accessibility Initiative (WAI), an international working group belonging to the World Wide Web Consortium (W3C) that ensures that no group suffers any kind of discrimination that may cause social fractures in the virtual world. In this sense, the techniques used on Aena's site meet the WAI recommendations, for both XHML marking and CSS, with the exception of PDF documents, subtitling and the audio-description of all videos and the multimedia player used.

In 2022, Aena was one of the top ten companies on the Ibex-35 having the greatest impact on social networks, according to the Ibex-35 Panepsilon Icarus Analytics Panel.

[296] The websites of Aena in Spain and in the UK (London-Luton Airport) and Brazil (ANB) can be consulted. See section "Links of interest".
[297] In Spain, Act 19/2013 on transparency, access to public information and good governance is complied with in this way.

Corporate website and intranet

Using the online services portal, available on the Company's website, stakeholders can make suggestions for improvements or report any reason for dissatisfaction online. This information is essential for the continuous improvement of the Company's performance.

For its part, the intranet is configured as the main tool and documentation repository for all Aena employees.

Aena's website includes all information for general users, as well as details concerning the business and its progress. It also responds to different stakeholders such as shareholders or airlines, among others, with specific sections where more specific information can be found.

Some specific sections and/or portals[298]

→ Shareholders and investors, with detailed information on the company's financial development and sustainable corporate governance.

→ Corporate with the sections on Transparency, Working at Aena, Press and Corporate Responsibility and Environmental Sustainability, which contain the data and management mechanisms regarding Aena's ESG performance.

→ Contracting of suppliers and companies.

→ Passenger portal.

→ Airline portal.

→ Employment portal, with details of the recruitment processes.

→ Online services portal for the electronic processing of any suggestion for improvement, complaint or claim by stakeholders.

38M
visits to
www.aena.es

54
publications
52 weekly y two special,
(8M and BOAB awarding))

More than
200
pages published

More than
210
publications on environmental and social sustainability

Specific information campaigns

Throughout 2022, Aena has organised various specific campaigns to promote initiatives related to topics or areas such as the 2nd Equality Plan; internal initiatives for intra-entrepreneurship; energy efficiency; compliance or international expansion, among others.
Moreover, at the end of the year and on the occasion of the presentation of the new EP 2022-2026, a campaign was carried out to disseminate its main aspects among the workforce.

[298] See links to these sections in the "Appendix - Links of interest" included in this document.

Social Media[299]

The Company makes an ever-increasing effort to promote its presence on digital media and social networks, by offering periodic information about its activities and sharing actions, proposals and initiatives relating to innovation and sustainable development with stakeholders.

Aena has corporate accounts on Twitter, Instagram, Facebook, LinkedIn and YouTube. They transmit real-time information on the status of airports and the services they offer; they also respond to questions, complaints, claims and suggestions made by users.

In addition, the Enjoy Aena accounts on Instagram, Facebook and LinkedIn publish information about Aena's commercial services, and those of Aena Ventures on Twitter and LinkedIn disseminate content about the Company's start-up accelerator.

Among the major airport managers, Aena has been the first by volume of own publications on Twitter during the months of January, June, October, November and December of this year, according to an online monitoring report prepared by Deloitte.

Over

654k

interactions with network users

Over

252k

Social media followers

	**@aena** **@EnjoyAena**
	**@aena** **@enjoyaena**
	**aena**
	**@aena**
	**aena**

[299] See links to these sections in the "Appendix - Links of interest" included in this document.

Act 11/2018 Content Index

The 2022 Consolidated Management Report of Aena includes the Company's most relevant financial and non-financial information in a single document. This facilitates its understanding, avoids possible repetitions and, at the same time, improves and extends the level of disclosure and transparency.

In accordance with the structure of the Aena 2022 Consolidated Management Report, presented below are the contents required by Act 11/2018, of 28 December, which modifies the Code of Commerce, the consolidated text of the Corporate Enterprises Act approved by the Royal Legislative Decree 1/2010, of 2 July, and Act 22/2015, of 20 July, on Auditing, regarding non-financial and diversity information. It has also taken into account the provisions of Law 5/2021, of 12 April, which amends the consolidated text of the aforementioned Corporate Enterprises Act, which introduces a new requirement regarding the mechanisms and procedures that the company uses to promote the involvement of workers in the management of the company, in terms of information, consultation and participation.

To facilitate the traceability of the information, the sections of Aena's Consolidated Management Report 2022 where these contents can be found are specified in the table:

Subjects of Act 11/2018	Information included in Aena's Consolidated Management Report 2022		
Business model description	**Location (page, section)[300]**	**Framework used**	**Omissions**
Business environment.	In general terms, throughout 2022, Aena has been pleased to see how the effects of the pandemic caused by COVID-19 have been progressively lessening, and consequently recovering much of its traffic levels with respect to 2019. However, the Company has also been affected by other factors that have undoubtedly marked the course of the year. Among them, the evolution of macroeconomic conditions, the conflict in Ukraine and the rise in fuel prices are aspects or events that, although they have not had a significant impact on air traffic behaviour so far, have determined its evolution to some extent and may also have more significant consequences in the near future. In light of this new, more encouraging scenario, Aena has been ready to define its new roadmap in the Strategic Plan 2022-2026, which will shape the coming five years. This Plan follows a continuation of the previous one, paying special attention to sustainability as a transversal axis thereof, and other strategic enabling factors. These include innovation, social impact and people management. The second Airport Regulation Document 2022-2026 (DORA II) emanating from Act 18/2014, of 15 October, also acquires special relevance at a strategic level, as it is an indispensable part for the recovery of this sector, with the following being considered as strategic axes: excellence in the service provided to passengers and their companions, as well as the airline companies; sustainability; innovation; and efficient management of the network. The following sections can be consulted for more information: Chap. '2022: A year of hope,' Subsection 'Aena and its Value Chain' (p. 13 and 14). Chap. '2022: A year of hope,' Section '1.1. 2022: Beyond recovery' (p. 15). Chap. 'About this Report' (p. 269).	**GRI 2-2** **GRI 2-6**	

[300] The page numbers indicate the beginning of the section in which the information corresponding to each requirement of Act 11/2018 is found, or the location of the table in which the information is presented. In addition, the text in green refers to information contained in the chapters 'Introduction' and '2022: A year of hope' of the document.

Organisation and structure.	Chap. 1, Section '1.1.1. Structure of the property' (p. 3). Chap. 1, Section '1.1.2. Governing bodies' (p. 5), Infographics '2022 General Shareholders' Meeting' (p. 7) and 'A Board of Directors that is diverse and balanced in skills, origins, experiences, age and gender (as of 31 December 2022)' (p. 10). Chap. 1, Section '1.1.2. Governance bodies,' Subsections 'Leadership and Independence' (p. 9), 'Aena's selection, appointment, re-election and succession plan' (p. 11), 'Committees supporting the Board' (p. 13) and 'Executive Management Committee' (p. 15). Chap. 1, Section '1.4.2. Sustainability Governance' (p. 43). Chap. 'About this report' (p. 269).	**GRI 2-1** **GRI 2-9** **GRI 2-10** **GRI 2-11** **GRI 2-13** **GRI 2-14**	
Markets where it operates.	The Company manages 46 airports and two heliports in Spain and participates directly and indirectly in the management of another 23 airports: one in Europe (London-Luton Airport, of which it owns 51% of the capital) and 22 in America (six in Brazil, 12 in Mexico, two in Colombia and two in Jamaica). In March 2019, Aena Internacional acquired 100% of the management of six airports in the Northeast of Brazil (Aeroporto de Juazeiro do Norte-Orlando Bezerra de Menezes, Aeroporto Internacional Recife/Guararapes-Gilberto Freyre, Aeroporto de Joao Pessoa-Presidente Castro Pinto, Aeroporto de Campina Grande-Presidente Joao Suassuna, Aeroporto de Aracaju-Santa Maria, Aeroporto de Maceió-Zumbi dos Palmares). In 2022, Aena Internacional was awarded the concession in the management and maintenance of 11 airports in Brazil at an auction held on 18 August. With this concession, Aena becomes the manager of a network of 17 airports in Brazil with a presence in nine states and over 40 million passengers. In addition, Aena Desarrollo Internacional provides consultancy services to the Cuban airports company, Cuba-Ecasa. As detailed in 'Note 5. Financial information by segments' of the Consolidated Annual Accounts, the Group conducts its business activities centred on the following segments: Airports, Real estate services, International and SCAIRM. The following sections can be consulted for more information: Chap. 'Introduction,' Infographic 'Aena in 2022' (p. 6). Chap. '2022: A Year of Hope,' Section 'Aena and its Value Chain' (p. 13 and 14).	**GRI 2-1** **GRI 2-6**	

Objectives and strategies.	Among the main tools that will guide Aena's activity in the coming years to respond to the new challenges associated with the aviation sector are the following: • The Strategic Plan 2022-2026 is focused on consolidating recovery, enhancing innovation and being an international benchmark in sustainability. Specifically, its goals are to: – Develop the core business by maintaining leadership in the safety and efficiency of aeronautical activity and appreciable revenue growth from commercial activities. – Grow through diversification by expanding international activity and developing Airport Cities, as well as other adjacent businesses. – All supported by sustainability as a cross-divisional factor in Aena's growth, as well as innovation, technology and digitisation, customer orientation and culture and talent as key enablers. • The DORA II 2022–2026 includes these strategic pillars, on the basis of which Aena will perform its activity during the next five-year period: – The recovery of air traffic. – Excellence in service and commitment to safety. – Environmental sustainability. – Enhancing competitiveness through innovation and digitisation. – Efficiency in management. – Due to its importance as a matter of general interest, the Aena airport network will continue to ensure the accessibility and mobility of citizens, workers and goods and services, as well as territorial cohesion. • The Sustainability Strategy 2021-2030 lays the groundwork to meet the big challenges and mega trends of ESG. In line with the Sustainable Development Goals of the United Nations 2030 Agenda, it is based on 5 strategic programmes, which in turn are developed into 16 lines of action, and are deployed in projects and actions. The five strategic programmes are: – Carbon neutrality – Sustainable aviation – Responsible use of resources – Community and sustainable value chain – Social commitment In the short and medium term, the effects that macroeconomic conditions, conflict in Ukraine or the increase in the price of fuels have on the company's strategy and objectives cannot be ignored. Aena acts quickly to adapt to the current situation, and collaborates with other agencies, airlines and companies that carry out activities at the network's airports to implement common actions. The following sections can be consulted for more information: Chap. 'Introduction', Section 'Letter from the Chairman' (p. 5). Chap. '2022: A year of hope', Section '1.2. The new Strategic Plan 2022-2026' (p. 16). Chap. 1, Section '1.1.2. Governing bodies,' Infographic 'ESG issues present on the Board agenda during 2022' (p. 13). Chap. 1, Section '1.1.2. Governing bodies,' Subsections "Committees supporting the Board" (p. 13) and 'Executive Management Committee' (p. 15). Chap. 1, Section '1.4. Sustainability: Aena´s management pillar' (p. 41). Chap. 2 (p. 62), Section '2.1. Sustainable environmental management model,' Subsection 'Environmental governance' (p. 63). Chap. 2 (p. 62), Section '2.2.2. Supervision and monitoring of the Climate Action Plan' (p. 82). Chap. 3 (p. 130). Chap. 4 (p. 153). Chap. 5 (p. 169). Chap. 6 (p. 230). Chap. 7 (p. 263).	**GRI 2-12** **GRI 2-13** **GRI 2-22**

Factors and trends that may affect its future evolution.	Aena's activity is subject to risks and impacts in the macroeconomic and political context; concentration and competition; sustainability and climate change; public-private organisation and regulation; digital innovation and transformation; cybersecurity; third-party dependence; operational and physical security; regulatory framework; fiscal compliance and transparency; stakeholder involvement; and planning and execution of investments. The following sections can be consulted for more information: Chap. '2022: A year of hope', Section '2. Context of the Sector', Table 'The main short, medium and long-term trends and risks that may arise from the context in which Aena operates' (p. 20). Chap. '2022: A year of hope', Section '3. Risks and their management' (p. 24).	**GRI 2-12**	
Description of the policies the Group applies	**Location (page, section)**	**Framework used**	**Omissions**
Due diligence procedures applied to the identification, evaluation, prevention and mitigation of risks.	Aena has a risk management and control model based on the integrated corporate risk management framework of COSO III (Committee of Sponsoring Organisations of the Treadway Commission), aimed at guaranteeing the achievement of the Company's objectives in a predictable way in a globalised competitive environment and a complex context. The following sections can be consulted for more information: Chap. '2022: A year of hope', Section '3.1. Structure, control and risk management' (p. 24). Chap. 1, Sections '1.2.1. Regulatory Compliance System' (p. 20), '1.2.4. Prevention of fraud, corruption and bribery' (p. 26) and '1.4.2. Sustainability Governance' (p. 43).	**GRI 3-3**	
Significant impacts, and verification and control. Measures taken.	In 2022, the Risk Map was updated. For this review of the Risk Map, both internal sources have been taken into account (e.g., Strategic Plan), as well as external sources (best practices of competitors). Thus, following the appropriate review, this map is made up of 16 risks, classified into: strategic, operational, financial, technological, legal and compliance, information and social, environmental and governance risks. In 2022, a review and update of the material issues identified in previous fiscal years was carried out, incorporating new aspects or elements into the process to be followed for the materiality analysis and taking into account the priorities and lines of action of the new Strategic Plan 2022-2026. The following sections can be consulted for more information: Chap. '2022: A year of hope', Sections '3. Risks and their management' (p. 24) and '3.2. Risks in 2022' (p. 28). Chap. 'About this report,' Section 'Materiality' (p. 272).	**GRI 3-3**	
Results of the policies	**Location (page, section)**	**Framework used**	**Omissions**
Key indicators of relevant non-financial results that allow the monitoring and evaluation of progress and favour comparability between companies and sectors.	Chap. 1 (p. 2). Chap. 1, Section '1.1.2. Governing Bodies,' Subsection 'General Shareholders' Meeting', Infographic '2022 General Shareholders' Meeting' (p. 7). Chap. 1, Section '1.1.2. Governing Bodies,' Subsection 'Committees supporting the Board' (p. 13). Chap. 2 (p. 62). Chap. 3 (p. 130). Chap. 4 (p. 153). Chap. 5 (p. 169). Chap. 6 (p. 230). Chap. 7 (p. 263). Chap. 'About this report' (p. 269), Sections 'Materiality' (p. 272) and 'GRI and SASB Content Index' (p. 302).	**GRI 2-14** **GRI 3-3**	

Main related risks linked to the activities of the group	Location (page, section)	Framework used	Omissions
Commercial relationships, products or services that may have negative effects.	Aena's activity is subject to different types of risks, which are classified as strategic, operational, financial, technological, legal and compliance, information and social, environmental and good governance. The following sections can be consulted for more information: Chap. '2022: A year of hope', Subsection 'Aena and its Value Chain' (p. 13 and 14). Chap. '2022: A year of hope', Section '3.2. Risks in 2022' (p. 28). Chap. 2, Section '2.3.1. Air pollution', Subsection 'Air pollution indicators' (p. 103). Chap. 2, Section '2.3.3. Noise' (p. 104). Chap. 3, Section '3.2.2. Impact on local populations and on the territory', Subsection 'Operations with significant negative impacts' (p. 140). Chap. 4, Section '4.3.2. Contract execution processes', Subsection 'Negative impacts in the supply chain' (p. 168).	**GRI 2-6 GRI 2-12 GRI 3-3 GRI 305-7**	
How the group manages these risks.	Aena has a risk management and control model based on the integrated corporate risk management framework of COSO III (Committee of Sponsoring Organisations of the Treadway Commission), aimed at guaranteeing the achievement of the Company's objectives in a predictable way in a globalised competitive environment and a complex context. The following sections can be consulted for more information: Chap. '2022: A year of hope', Section '3.1. Structure, control and risk management' (p. 24). Chap. 1, Section '1.2.1. Regulatory Compliance System' (p. 20). Chap. 2, Sections '2.1.3. Management of environmental risks and impacts' (p. 68) and '2.2.3. Risks and opportunities related to climate change' (p. 83). Chap. 3, Section '3.3.2. Human rights due diligence procedure', Subsection 'Identification and evaluation of risks in Aena and subsidiaries, risk prevention and mitigation measures' (p. 147).	**GRI 2-12 GRI 2-23 GRI 3-3**	
Procedures used to detect them and evaluate them.	Aena's risk management system develops the principles defined in the risk management and control policy, and incorporates the responsibilities and procedures to identify and evaluate risks according to an evaluation methodology so as to prioritise them according to their criticality, based on their impact and probability of occurrence. The following sections can be consulted for more information: Chap. '2022: A year of hope', Section '3.1. Structure, control and risk management' (p. 24). Chap. 1, Section '1.2.1. Regulatory Compliance System' (p. 20). Chap. 2, Sections '2.1.3. Management of environmental risks and impacts' (p. 68) and '2.2.3. Risks and opportunities related to climate change' (p. 83). Chap. 3, Section '3.3.2. Human rights due diligence procedure', Subsection 'Identification and evaluation of risks in Aena and subsidiaries, risk prevention and mitigation measures' (p. 147).	**GRI 2-12 GRI 2-23 GRI 3-3**	

Information on the impacts that have been detected and their breakdown, particularly the main short-, medium- and long-term risks.		In 2022, the Risk Map was updated. For this review of the Risk Map, both internal sources have been taken into account (e.g., Strategic Plan), as well as external sources (best practices of competitors). Thus, following the appropriate review, this map is made up of 16 risks, classified into: strategic, operational, financial, technological, legal and compliance, information and social, environmental and governance risks. The following sections can be consulted for more information: Chap. '2022: A year of hope', Section '2. Context of the sector', Table 'The main short, medium and long-term trends and risks that could result from the context in which Aena operates' (p. 20). Chap. '2022: A year of hope', Section '3.2. Risks in 2022' (p. 28). Chap. 2, Sections '2.1.3. Management of environmental risks and impacts' (p. 68) and '2.2.3. Risks and opportunities related to climate change' (p. 83). Chap. 3, Section '3.3.2. Human rights due diligence procedure', Subsection 'Identification and evaluation of risks in Aena and subsidiaries, risk prevention and mitigation measures' (p. 147).	**GRI 3-1 GRI 3-2 GRI 3-3 GRI 201-2**	
Information on environmental issues		**Location (page, section)**	**Framework used**	**Omissions**
Current and foreseeable effects of the company's activities on the environment.		Chap. 2, Sections '2.1.3. Management of environmental risks and impacts' (p. 68) and '2.2.3. Risks and opportunities related to climate change' (p. 83).	**GRI 3-3 GRI 201-2**	
Current and foreseeable effects of the company's activities on health and safety.		Chap. 6, Infographic 'Health and Safety Assurance at Aena' (p. 231).	**GRI 3-3**	
Environmental evaluation or certification procedures.		Chap. 2, Section '2.1.2. 'Environmental certifications' (p. 67).	**GRI 3-3**	
Resources dedicated to the prevention of environmental risks.		Chap. 2, Section '2.1.3. Management of environmental risks and impacts', Table 'Some indicators related to environmental management and resources used for improving environmental management and the prevention of environmental risks' (p. 70).	**GRI 3-3**	
Principle of precaution.		Chap. 2, Sections '2.1. Sustainable environmental management model' (p. 63) and '2.5.2. Protected spaces' (p. 119).	**GRI 3-3**	
Quantity of environmental risk provisions and guarantees.		Chap. 2, Section '2.1.3. Management of environmental risks and impacts', Table 'Some indicators related to environmental management and resources used for improving environmental management and the prevention of environmental risks' (p. 70).	**GRI 3-3**	
Pollution	Measures to prevent, reduce or remedy carbon emissions that seriously affect the environment	Chap. 2, Sections '2.2.1. Climate Action Plan' (p. 76), '2.2.4. Metrics. Carbon footprint' (p. 86), '2.2.5. Efficiency in the use of energy and use of renewable energy" (p. 91) and "2.2.6. Renewable energies' (p. 94).	**GRI 3-3 GRI 305-5**	
	Any form of air pollution specific to an activity, including noise and light pollution.	Chap. 2, Section '2.3.1. Air pollution' (p. 101) and Subsection 'Air pollution indicators' (p. 103), Section '2.3.2. Light pollution' (p. 104), Section '2.3.3. Noise' (p. 104), Subsection 'Measurement, reduction and control' (p. 106).	**GRI 3-3 GRI 305-7 GRI A07**	

Circular economy, and prevention and waste management	Prevention, recycling, reuse, recovery and elimination of waste.	Chap. 2, Sections '2.6. Waste management and circular economy in airport facilities' (p. 122), '2.6.1. Waste management and circular economy model' (p. 122), '2.6.3. Initiatives for the reduction, reuse, recycling of waste and the correct treatment of hazardous waste' (p. 127) and '2.6.5. Waste Indicators' (p. 129), Table 'Generated waste, waste not intended for disposal, and waste for disposal' (p. 129).	**GRI 3-3 GRI 306-2 GRI 306-3 GRI 306-4 GRI 306-5**	
	Actions to combat food waste.	-		Not applicable. Not material.
Sustainable use of resources	Water consumption and water supply in accordance with local restrictions.	Chap. 2, Section '2.4.2. Initiatives for responsible water consumption', Subsection 'Water consumption indicators', Tables 'Water Extraction/ Consumption' and 'Water-stressed regions' (p. 115).	**GRI 303-2 GRI 303-3 GRI 303-5**	
	Consumption of raw materials and measures adopted to improve the efficiency of their use.	-	-	Not applicable. Not material. As a company providing airport services, the consumption of raw materials is not relevant in the Aena value chain.

Climate change	Direct and indirect energy consumption.	Chap. 2, Section '2.2.6. Renewable energies,' Table 'Renewable Energy Facilities at Aena' (p. 94), Infographic 'Energy Intensity' (p. 98) and Subsection 'Energy consumption within the organisation' (p. 99).	**GRI 302-1** **GRI 302-3**	
	Measures taken to improve energy efficiency.	Chap. 2, Sections '2.2.5. Efficiency in energy use and renewable use', Infographic 'Energy efficiency in 2022' (p. 92) and '2.2.6. Renewable energies', Subsection 'Main energy consumption indicators' (p. 97).	**GRI 3-3** **GRI 302-4**	
	Use of renewable energies.	Chap. 2, Section '2.2.6. Renewable energies' (p. 94).	**GRI 3-3**	
	Important elements of greenhouse gas emissions generated as a result of the company's activities and the use of the goods and services it produces.	Chap. 2, Section '2.2.1. Climate Action Plan' (p. 76), Table 'Evolution and progress of established decarbonisation targets' (p. 81). Chap. 2, Section '2.2.4. Metrics. Carbon footprint' (p. 86). Chap. 2, Section '2.2.6. Renewable energies', Subsection 'Reduction of emissions through renewable energy facilities and energy efficiency measures' (p. 95).	**GRI 3-3** **GRI 305-1** **GRI 305-2** **GRI 305-3** **GRI 305-4** **GRI 305-5**	
	Measures taken to adapt to the consequences of climate change.	Chap. 2, Sections '2.2.1. Climate Action Plan' (p. 76) and '2.2.3. Risks and opportunities related to climate change' (p. 83).	**GRI 3-3** **GRI 201-2**	
	Voluntary reduction targets in the medium and long term to reduce greenhouse gas emissions and the means implemented to this end.	Chap. 2, Section '2.2.1. Climate Action Plan' (p. 76), Subsection 'Specific decarbonisation targets' (p. 77) and Table 'Evolution and progress of established decarbonisation targets' (p. 81). Chap. 2, Section '2.2.4. Metrics. Carbon footprint' (p. 86). Chap. 2, Section '2.2.6. Renewable energies', Subsection 'Reduction of emissions through renewable energy facilities and energy efficiency measures' (p. 95).	**GRI 3-3** **GRI 305-5**	
	Taxonomy of sustainable finances – EU Regulation 2020/852 of the European Parliament – Delegated Taxonomy Acts of the EU	Chap. 1, Section '1.5. Sustainable financing. Taxonomy' (p. 50).	Company Criteria	
Protecting biodiversity	Measures to preserve or restore biodiversity.	Chap. 2, Sections '2.5. Protecting biodiversity' (p. 118). '2.5.1. Biodiversity management and protection model' (p. 118), '2.5.2. Protected spaces' (p. 119) and '2.5.3. Studies on the fauna of the environment and control services' (p. 120).	**GRI 3-3** **GRI 304-1** **GRI 304-3**	
	Impacts caused by activities or operations in protected areas.	Chap. 2, Section '2.5.3. Studies on the fauna of the environment and control services' (p. 120).	**GRI 304-2**	

Information on staff and social issues		Location (page, section)	Framework used	Omissions
Employment	Total number and distribution of employees by gender, age, country and professional classification.	Chap. 5, Section '5.1.1. Main details about the workforce', Table 'Total number and distribution of employees by gender, age, region and professional category (as of 31 December)' (p. 173).	**GRI 2-7**	
	Total number and distribution of employment contract types.	Chap. 5, Section '5.1.1. Main details about the workforce', Table 'Total number and distribution of employment contract types by gender and region (as of 31 December)' (p. 172).	**GRI 2-7**	
	Annual average of open-ended contracts, temporary contracts and part-time contracts by gender, age and professional category.	Chap. 5, Section '5.1.1. Main details about the workforce', Table 'Annual average of contracts according to their type by gender, age, and professional category (consolidated)' (p. 174).	**GRI 2-7**	
	Number of dismissals by gender, age and professional category.	Chap. 5, Section '5.1.1. Main details about the workforce,' Subsection 'Dismissals' (p. 177).	**GRI 401-1**	
	Average remuneration and its evolution broken down by gender, age and professional categories or equal value	Chap. 5, Section '5.1.2. Remuneration model', Table 'Average remuneration and its evolution broken down by gender, age and professional categories or equal value' (p. 181).	**GRI 405-2**	
	Wage gap.	Chap. 5, Section '5.1.2. Remuneration model', Table 'Pay gap' (p. 182).	**GRI 405-2**	
	The remuneration of equal or average jobs in the company.	Chap. 5, Section '5.1.2. Remuneration model' (p. 179), Table 'Average remuneration and its evolution broken down by gender, age and professional categories or equal value' (p. 181).	**GRI 3-3** **GRI 405-2**	
	The average remuneration of directors and executives, including variable remuneration, allowances, compensation, payment to long-term savings systems and any other compensation broken down by gender.	Chap. 1, Section '1.1.2. Governing Bodies', Subsection 'Remuneration of the Board and Senior Management' (p. 16), Table 'Remuneration received by Directors and Senior Management' (p. 17). Chap. 5, Section '5.1.2. Remuneration model', Table 'Average remuneration and its evolution broken down by gender, age and professional categories or equal value' (p. 181). Chap. 5, Section '5.1.2. Remuneration model', Subsection 'Annual total compensation ratio' (p. 182).	**GRI 2-19** **GRI 2-20** **GRI 2-21** **GRI 405-2**	
	Implementation of right to disconnect policies for employees.	Chap. 5, Section '5.1.3. Organisation of work time and disconnection' (p. 183). Chap. 5, Section '5.5.2. Promoting the health and well-being of workers', Subsection 'Specific work-life balance and well-being measures' (p. 223).	**GRI 3-3**	
	Employees with disabilities	Chap. 5, Section '5.2.2. Universal accessibility to employment of persons with disabilities', Table 'Employees with disabilities' (p. 192).	**GRI 405-1**	

Organisation of work.	Organisation of working time	Chap. 5, Section '5.1.3. Organisation of work time and disconnection' (p. 183). Chap. 5, Section '5.5.2. Promoting the health and well-being of workers', Subsection 'Specific work-life balance and well-being measures' (p. 223).	**GRI 3-3**	
	Number of absentee hours.	Chap. 5, Section '5.5.1. Aena's Health and Safety Model', Table 'Absenteeism (own staff)' (p. 221).	**GRI 403-9**	
	Measures designed to facilitate the enjoyment of work-life balance and encourage joint responsibility of these measures by both parents.	Chap. 5, Section '5.5.2. Promoting the health and well-being of workers', Subsection 'Specific work-life balance and well-being measures' (p. 223).	**GRI 3-3** **GRI 401-2** **GRI 401-3**	
Health and safety.	Health and safety conditions in the workplace.	Chap. 5, Section '5.5. Occupational health and safety' (p. 211). Chap. 5, Section '5.5.1. Aena's Health and Safety Model' (p. 212) and Subsections 'Identification of hazards, assessment of risks and investigation of accidents' (p. 215), 'Communication, dialogue and participation of employees in occupational safety' (p. 216), 'Reporting, recording and investigation of accidents' (p. 216) and 'Occupational health and safety training' (p. 221). Chap. 5, Section '5.5.2. Promoting the health and well-being of workers' (p. 222) and '5.5.3. Commitment to companies (external/ concurrent)' (p. 229).	**GRI 3-3** **GRI 403-1** **GRI 403-2** **GRI 403-3** **GRI 403-4** **GRI 403-5** **GRI 403-6** **GRI 403-7** **GRI 403-8**	
	Occupational accidents, in particular their frequency and severity.	Chap. 5, Section '5.5.1. Aena's Health and Safety Model', Tables 'Accidents (own staff)' (p. 218 and 219).	**GRI 403-9**	
	Occupational diseases; broken down by gender.	Chap. 5, Section '5.5.1. Aena's Health and Safety Model', Table 'Number of occupational diseases by region reported by the private insurance company (own staff)' (p. 220).	**GRI 403-10**	

Industrial relations	Organisation of social dialogue, including procedures for informing and consulting with staff, and negotiating with them.	Chap. 3, Section '3.3.2. Human rights due diligence procedure' (p. 145), Subsection 'Identification and evaluation of risks in Aena and subsidiaries, risk prevention and mitigation measures' (p. 147). Chap. 5, Section '5.4. Industrial relations' (p. 206). Chap. 5, Section '5.5.1. Aena's Health and Safety Model', Subsection 'Communication, dialogue and participation of employees in occupational safety' (p. 216).	**GRI 3-3**	
	Mechanisms and procedures that the company has in place to promote the involvement of workers in the management of the company, in terms of information, consultation and participation.	Chap. 5, Section '5.4. Industrial relations' (p. 206). Chap. 5, Section '5.5. Occupational health and safety', Subsection 'Communication, dialogue and participation of employees in occupational safety' (p. 216).	**GRI 3-3**	
	Percentage of employees covered by collective agreements by country.	Chap. 5, Section '5.4. Industrial relations' (p. 206).	**GRI 2-30**	
	The balance of collective agreements, particularly in the field of health and safety at work.	Chap. 5, Section '5.5. Occupational health and safety', Subsection 'Communication, dialogue and participation of employees in occupational safety' (p. 216).	**GRI 403-4**	
Training	Policies implemented in the field of training.	Chap. 5, Section '5.3.3. Training' (p. 200) and Subsection 'Significant training actions in 2022' (p. 201).	**GRI 3-3** **GRI 404-2**	
	Total amount of training hours by professional categories.	Chap. 5, Section '5.3.3. Training,' Tables 'Main training data' (p. 202) and 'Training hours by gender, professional category and region' (p. 203)	**GRI 404-1**	
Universal accessibility for people with disabilities		Chap. 5, Sections '5.2.2. Universal accessibility to employment for people with disabilities' (p. 192) and '5.2.3. Accessibility of the services' (p. 193).	**GRI 3-3**	

Equality	Measures taken to promote equal treatment and opportunities between women and men.	Chap. 5, Section '5.2.1. Gender diversity' (p. 187).	**GRI 3-3**	
	Equality plans (Chapter III of Organic Act 3/2007, of 22 March, for the effective equality of women and men).	Chap. 5, Section '5.2.1. Gender diversity' (p. 187).	**GRI 3-3**	
	Measures taken to promote employment.	Chap. 5, Sections 'Introduction' (p. 170) and '5.2.6. Generational diversity, age management and the promotion of the integration of young people in the workplace' (p. 194).	**GRI 3-3**	
	Protocols against sexual and gender-based harassment, integration and universal accessibility for people with disabilities.	Chap. 5, Section '5.2. Diversity and inclusion' (p. 184). Chap. 5, Section '5.2.1. Gender diversity', Subsection 'Cases of discrimination and corrective actions' (p. 188). Chap. 5, Sections '5.2.2. Universal accessibility to employment for people with disabilities' (p. 192) and '5.2.3. Accessibility of the services' (p. 193).	**GRI 3-3**	
	The policy against all types of discrimination and, where applicable, management of diversity.	Chap. 5, Section '5.2. Diversity and inclusion' (p. 184).	**GRI 3-3**	

Information on the respect for Human Rights	**Location (page, section)**	**Framework used**	**Omissions**
Application of due diligence procedures in the field of Human Rights.	Chap. 3, Section '3.3.1. Formal commitment to Human Rights' (p. 142). Chap. 3, Section '3.3.2. Human rights due diligence procedure', Subsection 'Complaints mechanisms: reporting human rights violations' (p. 152).	**GRI 2-23** **GRI 2-26** **GRI 3-3**	
Prevention of risks related to human rights violations and, where appropriate, measures to mitigate, manage and redress possible abuses committed.	Chap. 1, Section '1.2. Culture and corporate ethics' (p. 18). Chap. 3, Sections '3.3.1. Formal commitment to Human Rights' (p. 142) and '3.3.2. Human rights due diligence procedure' (p. 145).	**GRI 2-23** **GRI 3-3**	
Complaints about cases of violation of human rights.	Chap. 1, Section '1.2.10. Complaints Channel' (p. 32). Chap. 3, Section '3.3.2. Human rights due diligence procedure', Subsection 'Complaints mechanisms: reporting human rights violations' (p. 152). Chap. 5, Section '5.2.1. Gender diversity', Subsection 'Cases of discrimination and corrective actions' (p. 188).	**GRI 3-3** **GRI 406-1**	
Promotion of 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.	Chap. 3, Sections '3.3.1. Formal commitment to Human Rights' (p. 142) and '3.3.2. Human rights due diligence procedure' (p. 145), Subsection 'Identification and evaluation of risks in Aena and subsidiaries, risk prevention and mitigation measures' (p. 147).	**GRI 2-23** **GRI 407-1**	

The elimination of discrimination in employment and the workplace.	Chap. 1, Section '1.2.10. Complaints Channel' (p. 32). Chap. 5, Section '5.2. Diversity and inclusion' (p. 184). Chap. 5, Section '5.2.1. Gender diversity', Subsection 'Cases of discrimination and corrective actions' (p. 188).	**GRI 3-3** **GRI 406-1**	
The elimination of forced labour.	Chap. 3, Section '3.3.2. Human rights due diligence procedure' (p. 145), Subsection 'Identification and evaluation of risks in Aena and subsidiaries, risk prevention and mitigation measures' (p. 147).	**GRI 409-1**	
The effective abolition of child labour.	Chap. 3, Section '3.3.2. Human rights due diligence procedure' (p. 145), Subsection 'Identification and evaluation of risks in Aena and subsidiaries, risk prevention and mitigation measures' (p. 147).	**GRI 408-1**	
Information on combatting corruption and bribery	**Location (page, section)**	**Framework used**	**Omissions**
Measures taken to prevent corruption and bribery.	Chap. 1, Sections '1.2. Culture and corporate ethics' (p. 18), '1.2.1. Regulatory Compliance System' (p. 20), '1.2.2. Code of Conduct' (p. 24), '1.2.3 Regulatory Compliance Policy' (p. 25), '1.2.4. Prevention of fraud, corruption and bribery' (p. 26), '1.2.5. Procedure for Related Transactions' (p. 29), '1.2.6. Conflicts of interest' (p. 29). Chap. 1, Section '1.2.4. Prevention of fraud, corruption and bribery', Table 'Nature of the cases of confirmed corruption incidents' (p. 27).	**GRI 2-15** **GRI 2-23** **GRI 2-26** **GRI 3-3** **GRI 205-1** **GRI 205-2** **GRI 205-3**	
Measures to combat money laundering.	Chap. 1, Sections '1.2. Culture and corporate ethics' (p. 18), and '1.2.7. Specific measures to combat money laundering' (p. 30).	**GRI 3-3**	
Contributions to foundations and non-profit organisations	Chap. 3, Section '3.1.1. Social action: Contributions to foundations and non-profit organisations' (p. 134).	**GRI 203-1** **GRI 413-1**	
Information about society	**Location (page, section)**	**Framework used**	**Omissions**

Commitments from the company on sustainable development.	The impact of the company's activity on employment and local development, local populations and on the territory.	Chap. 2, Sections '2.1.3. Management of environmental risks and impacts' (p. 68), '2.5.2. Protected spaces' (p. 119) and '2.3. Pollution' (p. 101). Chap. 2, Section '2.3.3. Noise', Subsection 'Sound Insulation Plans' (p. 108). Chap. 3, Sections '3.1. Commitments to sustainable development and society' (p. 131), '3.2. Impact of the activity on society and the environment' (p. 138), '3.2.1. Creating social value' (p. 138) and '3.2.2. Impact on the local populations and territory', Subsection 'Operations with significant negative impacts' (p. 140). Chap. 5, Section '5.5. Occupational health and safety' (p. 211). Chap. 5, Section '5.5.1. Aena's Health and Safety Model', Subsection 'Communication, dialogue and participation of employees in occupational safety' (p. 216). Chap. 'About this report,' Sections 'Relationships and dialogue with stakeholders' (p. 278) and 'Communication and transparency' (p. 284).	**GRI 3-3** **GRI 201-1** **GRI 203-1** **GRI 203-2** **GRI 413-1** **GRI 413-2**	
	The relationships maintained with actors from local communities and modalities of dialogue with them.	Chap. 1, Section '1.1.2. Governing bodies', Subsections 'General Shareholders' Meeting' (p. 6) and 'Communication with shareholders' (p. 8). Chap. 2, Section '2.1.4. Environmental inquiries' (p. 71). Chap. 2, Section '2.3.3. Noise', Subsection 'Communications' (p. 108). Chap. 3, Section '3.1. Commitments to sustainable development and society' (p. 131). Chap. 3, Section '3.2.2. Impact on the local populations and territory', Subsection 'Operations with significant negative impacts' (p. 140). Chap. 4, Section '4.2.1. General aspects', Subsection 'Transparency and dialogue' (p. 159). Chap. 5, Section '5.4.2. Communications with employees' (p. 209). Chap. 6, Sections '6.7.2. Customer rights and obligations' (p. 259) and '6.7.3. Complaints mechanisms' (p. 259). Chap. 'About this report,' Sections 'Relationships and dialogue with stakeholders' (p. 278).	**GRI 2-29** **GRI 413-1** **GRI 413-2**	
	Association or sponsorship actions.	Chap. 2, Section '2.1.6. Environmental endorsements, partnerships and recognitions' (p. 75). Chap. 3, Sections '3.1. Commitments to sustainable development and society' (p. 131) and '3.2. Impact of the activity on society and the environment' (p. 138). Chap. 3, Section '3.2.1. Creating social value', Table "Generation of resources in the community (social cash flow)" (p. 138).	**GRI 2-28** **GRI 201-1** **GRI 413-1**	
Subcontracting and suppliers.	The inclusion of social issues, gender equality and environmental issues in the purchasing policy.	Chap. 4, Section '4.2. Sustainable value chain management' (p. 158). Chap. 4, Section '4.3.1. Inclusion of social and environmental issues in bidding procedures' (p. 163).	**GRI 3-3** **GRI 308-1** **GRI 414-1**	
	Consideration in relations with suppliers and subcontractors of their social and environmental responsibility.	Chap. 4, Section '4.3. The acquisition and purchasing process' (p. 162). Chap. 4, Section '4.3.2. Contract execution processes' (p. 164), Subsection 'Negative impacts in the supply chain' (p. 168).	**GRI 3-3** **GRI 308-2** **GRI 414-2**	
	Supervision and audit systems, and their results.	Chap. 6, Section '6.1.4. General aeronautical audits, checks and drills of Operational Safety' (p. 235).	**GRI 3-3**	

Consumers.	Measures for the health and safety of consumers	Chap. 6, Sections '6.1. Operational Safety' (p. 232), '6.1.4. General aeronautical audits, checks and drills of Operational Safety' (p. 235), '6.2. Airport Security' (p. 240), '6.3. Cybersecurity or information security' (p. 245) and '6.4 Health safety' (p. 249). Chap. 6, Section '6.2.3. Excellent Airport Security levels,' Subsection 'Airport security audits, inspections and drills' (p. 243).	**GRI 3-3** **GRI 416-1**	
	Systems for claims and complaints received, and their resolution.	Chap. 6, Section '6.7.3. Complaints mechanisms' (p. 259).	**GRI 3-3** **GRI 416-2**	
Tax information	Profits obtained, country by country.	Chap. 1, Section '1.3.1. Tax contributions', Table 'Tax indicators' (p. 40).	**GRI 207-4**	
	Taxes paid on profits	Chap. 1, Section '1.3.1. Tax contributions', Table 'Tax indicators' (p. 40).	**GRI 207-4**	
	Public grants received	Chap. 1, Sections '1.1.1. Structure of the property' (p. 3) and '1.3.1. Tax contributions', Table 'Tax indicators' (p. 40).	**GRI 201-4**	This information is available in the Annual Accounts (see Section 24).

GRI Content Index

Aena has reported in accordance with the GRI Standards for the period January 1 to December 31 of 2022.

GRI Contents	Description	Global Compact	SDGs	Location/Content	Page[301]	Comments/Omissions
GRI 1: Foundation 2021 **GRI 2: General Disclosures 2021**						
1. The organization and its reporting practices						
2-1	Organizational details			Legal name: Aena S.M.E., S.A. Head Office: C/ Peonias, 12. 28042 Madrid, Spain. Chap. 'Introduction', Infographic 'Aena in 2022.' Chap. 1, Sections '1.1.1. Structure of the property' and '1.2. Culture and corporate ethics'.	6, 3, 18	
2-2	Entities included in the organization's sustainability reporting			Chap. 'About this report.'	269	
2-3	Reporting period, frequency and contact point			Fiscal year 2022 (from 1 January to 31 December), as the Consolidated Annual Accounts. Annual reporting frequency. Date of publication: 27 February 2023 Contact point: rc@aena.es	-	
2-4	Restatements of information			-	-	See GRI 201-1 and 207-4.
2-5	External assurance			Chap. 'Introduction,' Section 'Level of review by external auditors.' Chap. 'About this report.'	8, 269	The Audit Committee's functions include presenting the proposals for the selection, appointment, re-election and replacement of account auditors to the Board of Directors for submission to the General Shareholders' Meeting, ensuring and preserving the independence of the external auditor while exercising their functions, supervising their work, etc. In addition, a relationship is maintained with external auditors and verifiers that is strictly focused on the effective performance of their services within a suitable framework of independence. The external verification of this report is reflected in the 'Independent verification report of the Consolidated Non-Financial Information Statement of Aena S.M.E., S.A. and subsidiaries for the fiscal year 2022'.

[301] Page numbers indicate the beginning of the section or section in which the information corresponding to each content is found, or the location of the table through which the information is presented. Also, green text refers to information contained in the 'Introduction' and '2022: A year of hope' chapters of the document.

2. Activities and workers						
2-6	Activities, value chain and other business relationships	7	8	Chap. 'Introduction', Infographic 'Aena in 2022'. Chap. '2022: A year of hope', Infographic 'Aena and its Value Chain.' Chap. '2022: A year of hope', Section '1.1. 2022: Beyond recovery'. Chap. 3, Section '3.2.2. Impact on the local populations and territory', Subsection 'Operations with significant negative impacts'. Chap. 4, Sections '4.1.1. Description of the supply chain' and '4.3.2. Contract execution processes', Subsection 'Negative impacts in the supply chain'.	6, 13, 14, 15, 140, 155, 168	
2-7	Employees	3, 4, 5, 6	5, 8, 10	Chap. 5, Section '5.1.1. Main details about the workforce', Tables 'Total number and distribution of employment contract modalities by gender and region (as of 31 December),' 'Total number and distribution of employees by gender, age, region and professional category (as of 31 December)' and 'Annual average of contracts according to their type by gender, age, and professional category (consolidated)'	172, 173, 174	In Spain, employee data has been collected through SAP. In the UK, this information is obtained through personnel files, ADP workforce data and Goodshape reports. Finally, in Brazil, the third-party vendor that manages this information facilitates it by using standard software.
2-8	Workers who are not employees	3, 4, 5, 6	5, 8, 10	Chap. 4, Section '4.1.1. Description of the supply chain'.	155	In Spain, data relating to non-employee workers has been obtained through the use of a specific supplier programme. This information is not available in the UK and has been obtained in Brazil using standard tools.
3. Governance						
2-9	Governance structure and composition		16	Chap. 1, Section '1.1.2. Governing Bodies', Subsections 'Committees supporting the Board' and 'Executive Management Committee,' and Table 'A Board of Directors that is diverse and balanced in skills, origins, experiences, age and gender (as of 31 December 2022).' Chap. 1, Section '1.4.2. Sustainability Governance'. Chap. 2, Section '2.1. Sustainable environmental management model', Subsection 'Environmental governance' and Section '2.2.2. Supervision and monitoring of the Climate Action Plan'.	5, 10, 13, 15, 43, 63, 82	
2-10	Nomination and selection of the highest governance body		5, 16	Chap. 1, Section '1.1.2. Governing Bodies', Infographic '2022 General Shareholders' Meeting' and Subsection 'Selection, appointment, re-election and succession plan of Aena'.	7, 11	
2-11	Chair of the highest governance body			Chap. 1, Section '1.1.2. Governing Bodies', Subsections 'Leadership and independence' and 'Executive Management Committee.' Chap. 1, Section '1.2.6. Conflicts of interest'.	9, 15, 29	

2-12	Role of the highest governance body in overseeing the management of impacts		8	Chap. '2022: A year of hope', Section '2. Context of the sector', Table 'The main short, medium and long-term trends and risks that could result from the context in which Aena operates'. Chap. '2022: A year of hope', Sections '3.1. Structure, control and risk management' and '3.2. Risks in 2022'. Chap. 1, Section '1.1.2. Governing Bodies', Infographic 'ESG issues appearing on the Board's agenda during 2022' and Subsections 'Committees supporting the Board' and 'Executive Management Committee'. Chap. 1, Section '1.4.2. Sustainability Governance'. Chap. 2, Section '2.1. Sustainable environmental management model', Subsection 'Environmental governance'. Chap. 2, Section '2.2.2. Supervision and monitoring of the Climate Action Plan'.	20, 24, 28, 13, 15, 43, 63, 82	
2-13	Delegation of responsibility for managing impacts			Chap. 1, Section '1.1.2. Governing Bodies', Subsection 'Executive Management Committee'. Chap. 1, Section '1.4.2. Sustainability Governance'. Chap. 2, Section '2.1. Sustainable environmental management model', Subsection 'Environmental governance'. Chap. 2, Section '2.2.2. Supervision and monitoring of the Climate Action Plan'.	15, 43, 63, 82	
2-14	Role of the highest governance body in sustainability reporting			Chap. 1, Section '1.1.2. Governing Bodies', Subsection 'General Shareholders' Meeting', Infographic '2022 General Shareholders' Meeting'. Chap. 1, Section '1.1.2. Governing Bodies', Subsection 'Committees supporting the Board'. Chap. 'About this report,' Section 'Materiality.'	7, 13, 269, 272	
2-15	Conflicts of interest	10	16	Chap. 1, Sections '1.2.5. Procedure for Related Transactions' and '1.2.6. Conflicts of interest'.	29	
2-16	Communication of critical concerns	1, 2, 10	16	Chap. 1, Section '1.1.2. Governing Bodies', Subsection 'General Shareholders' Meeting', Infographic '2022 General Shareholders' Meeting'. Chap. 1, Section '1.2.10. Complaints Channel'.	7, 32	
2-17	Collective knowledge of the highest governance body			Chap. 1, Section '1.1.2. Governing Bodies', Subsection 'Training (The Board of Directors)'.	12	
2-18	Evaluation of the performance of the highest governance body			Chap. 1, Section '1.1.2. Governing Bodies', Subsection 'Evaluation of the Board (The Board of Directors)'.	12	
2-19	Remuneration policies	1, 6	5	Chap. 1, Section '1.1.2. Governing Bodies', Subsection 'Remuneration of the Board and Senior Management'. Chap. 1, Section '1.4.3. Features of the Sustainability Strategy'. Chap. 2, Section '2.2.2. Supervision and monitoring of the Climate Action Plan'.	16, 45, 82	
2-20	Process to determine remuneration	1, 6	5, 15	Chap. 1, Section '1.1.2. Governing Bodies', Subsection 'General Shareholders' Meeting', Infographic '2022 General Shareholders' Meeting'. Chap. 1, Section '1.1.2. Governing Bodies', Subsection 'Remuneration of the Board and Senior Management'. Chap. 5, Section '5.1.2. Remuneration model'.	7, 16, 179	

2-21	Annual total compensation ratio			Chap. 5, Section '5.1.2. Remuneration model', Subsection 'Annual total compensation ratio'.	182	
4. Strategy, policies and practices						
2-22	Statement on sustainable development strategy			Chap. 'Introduction', Section 'Letter from the Chairman'. Chap. '2022: A year of hope,' Section '1.2. The new Strategic Plan 2022-2026.' Chap. 1, Sections '1.4. Sustainability: Aena's management pillar' and '1.4.2. Sustainability Governance'. Chap. 2 'Commitment to the environment'. Chap. 3 'Commitment to society and human rights'. Chap. 4 'Responsible value chain management'. Chap. 5 'Staff and social issues'. Chap. 6 'Safe, quality services'. Chap. 7 'Innovation'	5, 16, 41, 43, 62, 130, 153, 169, 230, 263	
2-23	Policy commitments	1 a 10		Chap. 1, Section '1.2. Culture and corporate ethics', Table 'Internal documents that make up the Aena Action Framework'. Chap. 1, Sections '1.2.1. Regulatory Compliance System' and '1.2.7. Specific measures to combat money laundering'. Chap. 2, Section '2.1.1. Natural capital management model'. Chap. 3, Sections '3.1. Commitments to sustainable development and society' and '3.3.1. Formal commitment to Human Rights'. Chap. 5, Section 'Introduction'. Chap. 6, Sections '6.1.1. Management framework' and '6.6.1 Main applicable regulations and measures developed to improve the quality of the services.' Chap. 'Links of Interest'.	19, 20, 30, 65, 131, 142, 170, 232, 252, 325	
2-24	Embedding policy commitments	1 a 10		Chap. '2022: A year of hope', Section '3.1. Structure, control and risk management' and Subsection 'Aena's Risk Management and Control Policy'. Chap. 1, Section '1.2. Culture and corporate ethics', Table 'Internal documents that make up the Aena Action Framework'. Chap. 3, Section '3.3.1. Formal commitment to Human Rights'.	24, 26, 19, 142	
2-25	Processes to remediate negative impacts	1, 7, 10	16	Chap. 2, Section '2.1.4. Environmental inquiries'. Chap. 3, Section '3.3.2. Human rights due diligence procedure'. Chap. 6, Sections '6.1.5. Other mechanisms to maintain excellent levels of Operational Safety' and '6.7.3. Complaints mechanisms'. Chap. 'About this report,' Section 'Relationship and dialogue with stakeholders'.	71, 145, 236, 259, 278	

2-26	Mechanisms for seeking advice and raising concerns	1, 2, 10	16	Chap. 1, Sections '1.2.2. Code of Conduct', '1.2.3. Regulatory Compliance Policy', '1.2.4. Prevention of fraud, corruption and bribery', '1.2.7. Specific measures to combat money laundering' and '1.2.10. Complaints Channel'. Chap. 1, Section '1.3. Fiscal transparency', Subsection 'Risk management and control'. Chap. 3, Section '3.3.2. Human rights due diligence procedure', Subsection 'Complaints mechanisms: reporting human rights violations'. Chap. 4, Section '4.3.2. Contract execution processes', Subsection 'Negative impacts in the supply chain'. Chap. 5, Section '5.2.1. Gender diversity', Subsection 'Cases of discrimination and corrective actions'. Chap. 6, Section '6.7.3. Complaints mechanisms'.	24, 25, 26, 30, 32, 39, 152, 168, 188, 259	
2-27	Compliance with laws and regulations	1 a 10		-	-	In 2022, Aena has not received any fines or penalties for non-compliance with applicable legislation and regulations that may be considered significant due to their possible impact at the operational, economic or reputational level.
2-28	Membership associations		17	Chap. 2, Section '2.1.6. Environmental endorsements, partnerships and recognitions.' Chap. 3, Sections '3.1. Commitments to sustainable development and society' and '3.2. Impact of the activity on society and the environment'.	75, 131, 138	A more detailed list of associations and organisations can be found on the Aena website. See: www.aena.es/en/corporative/transparency/agreements.html
5. Stakeholder engagement						
2-29	Approach to stakeholder engagement			Chap. 1, Section '1.1.2. Governing Bodies', Subsections 'General Shareholders' Meeting' and 'Communication with shareholders'. Chap. 2, Section '2.1.4. Environmental inquiries'. Chap. 2, Section '2.3.3. Noise', Subsection 'Communications'. Chap. 3, Sections '3.1. Commitments to sustainable development and society' and '3.2.2. Impact on local populations and on the territory'. Chap. 4, Section '4.2.1. General aspects', Subsection 'Transparency and dialogue'. Chap. 5, Section '5.4.2. Communication with employees'. Chap. 6, Sections '6.7.2. Customer rights and obligations' and '6.7.3. Complaints mechanisms'. Chap. 'About this report,' Section 'Relationships and dialogue with stakeholders' and Subsection 'Communication from Aena with its stakeholders.'	6, 8, 71, 108, 131, 140, 159, 209, 259, 278, 281	
2-30	Collective bargaining agreements	1, 3, 4, 6	8	Chap. 5, Section '5.4. Industrial relations'.	206	
GRI 3: Material Topics 2021						

3-1	Process to determine material topics			Chap. '2022: A year of hope', Section '2. Context of the sector', Table 'The main short, medium and long-term trends and risks that could result from the context in which Aena operates'. Chap. '2022: A year of hope', Section '3.2. Risks in 2022'. Chap. 'About this report,' Section 'Materiality.'	20, 28, 272	
3-2	List of material topics			Chap. '2022: A year of hope', Section '2. Context of the sector', Table 'The main short, medium and long-term trends and risks that could result from the context in which Aena operates'. Chap. '2022: A year of hope', Section '3.2. Risks in 2022'. Chap. 'About this report,' Section 'Materiality.'	20, 28, 272	
Material Issue: Good governance and ethical culture						
3-3	Management of material topics	10	16	Chap. 1 'Sustainable Governance Model'. Chap. 1, Sections '1.1.2. Governing Bodies', '1.2. Culture and corporate ethics', '1.2.1. Regulatory Compliance System', '1.2.4. Prevention of fraud, corruption and bribery', '1.2.7. Specific measures to combat money laundering' and '1.4.2. Sustainability Governance.' Chap. 'About this report,' Section 'Materiality.'	2, 5, 18, 20, 26, 30, 43, 272	
201-4	Financial assistance received from government	10	16	Chap. 1, Section '1.1.1. Structure of the property.'	3	See Section 24 in the Annual Accounts.
205-1	Operations assessed for risks related to corruption	10	16	Chap. 1, Section '1.2.4. Prevention of fraud, corruption and bribery'.	26	
205-2	Communication and training about anti-corruption policies and procedures	10	16	Chap. 1, Section '1.2.4. Prevention of fraud, corruption and bribery'.	26	
205-3	Confirmed incidents of corruption and actions taken	10	16	Chap. 1, Section '1.2.4. Prevention of fraud, corruption and bribery,' Table 'Nature of the confirmed corruption cases.'	27	

206-1	Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	10	16	Chap. 1, Section '1.2.9. Unfair competition'.	31	On 20 February 2020, the Commercial Court summoned Aena to address the lawsuit filed by Ryanair DAC in which it seeks the declaration of nullity of a penalty imposed by Aena on Ryanair, amounting to €9,000, an immaterial amount for the Organisation, the declaration of nullity of the contractual clause establishing the penalty and the refund of the amount imposed. The declaration of nullity of the clause in question is based on the fact that it had been imposed through abuse of a dominant position. The trial will be held on 1 March 2023. Aena has consistently argued that the basis of the Claimant's claim is not a question of abuse of a dominant position, but rather opposition to the imposition of the corresponding penalty and, therefore, a contractual issue. Aena considers that the civil courts should have jurisdiction to hear this matter and will make this clear at the appropriate procedural moment.
207-1	Approach to tax		16	Chap. 1, Section '1.3. Fiscal transparency', Subsection 'Fiscal approach'.	39	
207-2	Tax governance, control, and risk management	10	16	Chap. 1, Section '1.3. Fiscal transparency', Subsections 'Tax governance' and 'Risk management and control'.	39	
207-3	Stakeholder engagement and management of concerns related to tax		16	Chap. 1, Section '1.3. Fiscal transparency', Subsection 'Participation of stakeholders and management of tax concerns'.	39	
207-4	Country-by-country reporting		16	Chap. 1, Section '1.3.1. Tax contributions', table 'Tax indicators'.	40	See note (1) at the end of this GRI table. The information relating to 2021 has been restated in accordance with note 2.1.1. of the Annual Accounts, relating to "Changes in accounting policies".
415-1	Political contributions	10	16	Chap. 1, Section '1.2.8. European Transparency and Lobbying Registry'.	30	
Material Issue: Decarbonisation and the fight against climate change						
3-3	Management of material topics	7, 8, 9	3, 7, 8, 12, 13, 14, 15	Chap. 1, Section '1.4.3. Features of the Sustainability Strategy'. Chap. 2 'Commitment to the environment'. Chap. 2, Sections '2.2. Aena and the climate emergency', '2.2.1. Climate Action Plan', '2.2.3. Risks and opportunities related to climate change' and '2.2.4. Metrics. Carbon footprint'. Chap. 2, Section '2.2.1. Climate Action Plan', Subsection 'Specific decarbonisation objectives'. Chap. 2, Section '2.2.5. Efficiency in the use of energy and renewable energy', Infographic 'Energy efficiency in 2022'. Chap. 'About this report,' Section 'Materiality.'	45, 62, 76, 77, 83, 86, 92, 272	

201-2	Financial implications and other risks and opportunities due to climate change	7, 8, 9	13	Chap. 2, Sections '2.2.1. Climate Action Plan' and '2.2.3. Risks and opportunities related to climate change'.	76, 83	
302-1	Energy consumption within the organization	7, 8, 9	7, 8, 12, 13	Chap. 2, Section '2.2.6. Renewable energies,' Table 'Renewable Energy Facilities at Aena' and Subsection 'Energy consumption within the organisation'.	94, 99	
302-2	Energy consumption outside of the organization	7, 8, 9	7, 8, 12, 13	-	-	**Not applicable:** The disclosure of information related to this content is not applicable, since Aena offers services that do not involve external energy consumption.
302-3	Energy intensity	7, 8, 9	7, 8, 12, 13	Chap. 2, Section '2.2.6. Renewable energies,' Infographic 'Energy intensity'.	98	
302-4	Reduction of energy consumption	7, 8, 9	7, 8, 12, 13	Chap. 2, Section '2.2.6. Renewable energy', Subsection 'Main energy consumption indicators'.	97	
302-5	Reductions in energy requirements of products and services	7, 8, 9	7, 8, 12, 13	-	-	**Not applicable:** The disclosure of information related to this content is not applicable, since Aena offers services that do not involve external energy consumption of the end user.
305-1	Direct (Scope 1) GHG emissions	7, 8, 9	3,12,13,14, 15	Chap. 2, Section '2.2.4. Metrics. Carbon footprint', Tables 'Carbon footprint' and 'Direct GHG Emissions (Scope 1)'.	86, 87, 88	
305-2	Energy indirect (Scope 2) GHG emissions	7, 8, 9	3,12,13,14, 15	Chap. 2, Section '2.2.4. Metrics. Carbon footprint', Tables 'Carbon footprint' and 'Indirect GHG Emissions (Scope 2)'.	86, 87, 89	
305-3	Other indirect (Scope 3) GHG emissions	7, 8, 9	3,12,13,14, 15	Chap. 2, Section '2.2.4. Metrics. Carbon Footprint,' Table 'Carbon Footprint.'	86, 87	**Information unavailable**: in the United Kingdom and Brazil there are plans to unify calculation methodologies for future years.
305-4	GHG emissions intensity	7, 8, 9	13, 14, 15	Chap. 2, Section '2.2.4. Metrics. Carbon footprint', Tables 'Intensity of GHG emissions kgCO2e/ATU (Scopes 1 and 2)' and 'Intensity of GHG emissions kgCO2e/ATU (Scope 3)'.	86	
305-5	Reduction of GHG emissions	7, 8, 9	13, 14, 15	Chap. 2, Section '2.2.1. Climate Action Plan', Table 'Evolution and progress of established decarbonisation targets'. Chap. 2, Section '2.2.4. Metrics. Carbon footprint', Table 'Evolution of GHG emissions (equivalent tonnes of CO2).' Chap. 2, Section '2.2.6. Renewable energy', Subsection 'Reducing emissions through renewable energy facilities and energy efficiency'.	76, 81, 86, 95	**Information unavailable**: In the United Kingdom, no measures have been developed to date for the implementation of renewables in self-consumption, although it is part of its planning for 2026. In Brazil, the implementation of self-consumption renewables is planned after the completion of the works during which photovoltaic plants will be installed.
305-6	Emissions of ozone-depleting substances (ODS)	7, 8, 9	3,12,13,14, 15	-	-	**Not applicable:** The disclosure of information related to this content is not applicable, since the Aena Group does not significantly emit ozone depleting substances (ODS).
305-7	Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions	7, 8, 9	13, 14, 15	Chap. 2, Section '2.3.1. Air pollution', Subsection 'Air pollution indicators'.	103	
Material Issue: Environmental footprint and use of resources (circular economy)						

3-3	Management of material topics	7, 8, 9	6, 11, 12, 13, 14, 15	Chap. 1, Sections '1.4.2. Sustainability Governance' and '1.4.3. Features of the Sustainability Strategy'. Chap. 2 'Commitment to the environment'. Chap. 2, Sections '2.1. Sustainable environmental management model', '2.1.2. 'Environmental certifications', '2.1.3. Management of environmental risks and impacts', '2.2. Aena and the climate emergency', '2.2.1. Climate Action Plan', '2.2.3. Risks and opportunities related to climate change', '2.2.4. Metrics. Carbon footprint', '2.2.5. Efficiency in the use of energy and use of renewable energy', '2.2.6. Renewable energies', '2.3. Pollution', '2.3.2. Light pollution', '2.3.3. Noise', '2.4. Sustainable use of resources: water', '2.5. Protecting biodiversity', '2.5.2. Protected spaces' and '2.6. Waste management and circular economy in airport facilities'. Chap. 2, Section '2.1.3. Environmental risk and impact management', Table 'Some indicators related to environmental management and resources used for improving environmental management and the prevention of environmental risks'. Chap. 2, Section '2.2.1. Climate Action Plan', Subsection 'Specific decarbonisation targets'. Chap. 2, Section '2.2.5. Efficiency in the use of energy and renewable energy', Infographic 'Energy efficiency in 2022'. Chap. 'About this report,' Section 'Materiality.'	43, 45, 62, 63, 67, 68, 70, 76, 77, 83, 86, 91, 92, 94, 101, 104, 111, 118, 119, 122, 272	
303-1	Interactions with water as a shared resource	7, 8, 9	6, 14	Chap. 2, Section '2.4.1. Water management'.	111	
303-2	Management of water discharge-related impacts	7, 8, 9	6, 14	Chap. 2, Section '2.4.2. Initiatives for responsible water consumption', Subsection 'Water consumption indicators'.	115	
303-3	Water withdrawal	7, 8, 9	6, 14	Chap. 2, Section '2.4.2. Initiatives for responsible water consumption', Subsection 'Water consumption indicators', Table 'Water Extraction/Consumption'.	115	
303-4	Water discharge	7, 8, 9	6, 14	Chap. 2, Section '2.4.2. Initiatives for responsible water consumption', Subsection 'Water consumption indicators', Tables 'Wastewater discharges by destination – thousands of m3' and 'Wastewater discharges by water type – thousands of m3'.	116	**Information unavailable**: in the case of London Luton Airport in the United Kingdom and Aena's airports in Brazil, this categorisation is not currently available, but work is underway to make this information available in future reports.
303-5	Water consumption	7, 8, 9	6, 14	Chap. 2, Section '2.4.2. Initiatives for responsible water consumption', Subsection 'Water consumption indicators', Tables 'Water Extraction/Consumption' and 'Water stress regions'.	115	
304-1	Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	7, 8, 9	15	Chap. 2, Sections '2.5.1. Biodiversity management and protection model' and '2.5.2. Protected spaces'.	118, 119	See note (2) at the end of this GRI table.

304-2	Significant impacts of activities, products and services on biodiversity	7, 8, 9	15	Chap. 2, Section '2.5.3. Studies on the fauna of the environment and control services'.	120	
304-3	Habitats protected or restored	7, 8, 9	15	Chap. 2, Sections '2.5.2. Protected spaces' and '2.5.3. Studies on the fauna of the environment and control services'.	119, 120	Spain is one of the countries with the greatest biological diversity in the European Union and the airports of the Spanish network are distributed throughout its geography. As a reflection of this, the diversity and typology of the ecosystems found in them is very varied and depends, in any case, on the characteristics of the areas in which each airport is located. Consequently, 24 of the 46 airports in the network contain some protected natural area (see note (2) below the GRI table). In this regard, it should be noted that the actions of the airports and the companies that carry out their work there are carried out in strict compliance with the legislation in force. As a result, any possible action that may affect these areas must obtain the corresponding environmental resolution or permit, and no actions that alter these areas may be carried out without the application of the corresponding protective measures determined by these resolutions. These areas are perfectly delimited by those responsible for each airport in order to delimit any action carried out on them to ensure that their natural values are maintained. Both London Luton Airport in the United Kingdom and the Aena airports in Brazil are not located in protected areas.
304-4	IUCN Red List species and national conservation list species with habitats in areas affected by operations	7, 8, 9	15	Chap. 2, Sections '2.5.2. Protected spaces' and '2.5.3. Studies on the fauna of the environment and control services'.	119, 120	
306-1	Waste generation and significant waste-related impacts	7, 8, 9	11, 12	Chap. 2, Section '2.6.1. Waste management and circular economy model'.	122	
306-2	Management of significant waste-related impacts	7, 8, 9	11, 12, 13, 15	Chap. 2, Sections '2.6.1. Waste management and circular economy model', '2.6.3. Initiatives for the reduction, reuse, recycling of waste and the correct treatment of hazardous waste' and '2.6.4. Initiatives with third parties in terms of waste reduction, reuse and recycling'.	122, 127, 128	
306-3	Waste generated	7, 8, 9	11, 12	Chap. 2, Section '2.6.5. Waste Indicators', Tables 'Waste generated, Waste not intended for disposal, and Waste for disposal'.	129	
306-4	Waste diverted from disposal	7, 8, 9	11, 12	Chap. 2, Section '2.6.5. Waste Indicators', Tables 'Waste generated, Waste not intended for disposal, and Waste for disposal'.	129	**Information unavailable**: there is currently no breakdown of the type of waste recovery carried out by third parties, although work is underway to make this information available in future reports.

306-5	Waste directed to disposal	7, 8, 9	11, 12	Chap. 2, Section '2.6.5. Waste Indicators', Tables 'Waste generated, Waste not intended for disposal, and Waste for disposal'.	129	
Material Issue: Research, innovation, design and digital transformation						
3-3	Management of material topics	9	4, 9, 12	Chap. 7 'Innovation' Chap. 7, Section '7.1. Innovation management at Aena'. Chap. 'About this report,' Section 'Materiality.'	263, 264, 272	
Material Issue: Community impact and contribution, creation of shared value, contribution to social and economic development and measurement of impact						
3-3	Management of material topics	1, 2	5, 8, 9, 11, 16, 17	Chap. 3 'Commitment to society and human rights'. Chap. 3, Sections '3.1. Commitments to sustainable development and society' and '3.2. Impact of the activity on society and the environment'. Chap. 'About this report,' Section 'Materiality.'	130, 131, 138, 272	
A07	Exposure to noise		11	Chap. 2, Section '2.3.3. Noise,' Subsection 'Measurement, reduction and control'.	106	**Information unavailable**: No noise insulation actions have been carried out in Brazil to date. Short-term objectives include the establishment of noise commissions with stakeholders and in the medium/long term to carry out noise mitigation measures with the community.
201-1	Direct economic value generated and distributed		5, 8, 9	Chap. 3, Section '3.2.1. Social value creation', Tables 'Generation of resources in the community (Social cash flow)' and 'Social impact indicators'.	138, 139	The information relating to 2021 has been restated in accordance with note 2.1.1. of the Annual Accounts, relating to "Changes in accounting policies".
203-2	Significant indirect economic impacts		16	Chap. 2, Section '2.3.3. Noise', Subsection 'Sound Insulation Plans'. Chap. 3, Sections '3.2.1 Creating social value' and '3.2.2. Impact on local populations and on the territory'.	108, 138, 140	
413-1	Operations with local community engagement, impact assessments, and development programs		8,17	Chap. 2, Sections '2.1.3. Management of environmental risks and impacts' and '2.5.2. Protected spaces'. Chap. 3, Sections '3.1. Commitments to sustainable development and society', '3.1.1. Social action: Contributions to foundations and non-profit organisations' and '3.2. Impact of the activity on society and the environment'. Chap. 5, Section '5.5.1. Aena's Health and Safety Model', Subsection 'Communication, dialogue and participation of employees in occupational safety'. Chap. 'About this report,' Section 'Relationships and dialogue with stakeholders' and Subsection 'Communication from Aena with its stakeholders.' Chap. 'About this report,' Section 'Communication and transparency.'	68, 119, 131, 134, 138, 216, 278, 281, 284	

413-2	Operations with significant actual and potential negative impacts on local communities	1, 2	11	Chap. 3, Section '3.2.2. Impact on local populations and territory', Subsection 'Operations with significant negative impacts'. Chap. 'About this report,' Section 'Relationships and dialogue with stakeholders' and Subsection 'Communication from Aena with its stakeholders.'	140, 278, 281	
Material Issue: Transparency, reporting and communication with stakeholders						
3-3	Management of material topics		16, 17	Chap. 'About this report,' Sections 'Materiality,' 'Relationship and dialogue with stakeholders' and 'Communication and transparency'.	272, 278, 284	
Material Issue: Human Rights						
3-3	Management of material topics	1, 2, 3, 4, 5	8	Chap. 3 'Commitment to society and human rights', Section '3.3.1. Formal commitment to Human Rights', Section '3.3.2. Human rights due diligence procedure', Subsection 'Identification and evaluation of risks at Aena and subsidiary companies, and prevention and mitigation measures'. Chap. 'About this report,' Section 'Materiality.'	130, 142, 145, 147, 272	
407-1	Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	3	8	Chap. 3, Section '3.3.2. Human rights due diligence procedure', Subsection 'Identification and evaluation of risks at Aena and subsidiary companies, and prevention and mitigation measures'. Chap. 4, Section '4.3.2. Contract execution processes', Subsection 'Negative impacts in the supply chain'. Chap. 5, Section '5.4. Industrial relations'.	147, 168, 206	
408-1	Operations and suppliers at significant risk for incidents of child labor	2, 5	8	Chap. 3, Section '3.3.2. Human rights due diligence procedure', Subsection 'Identification and evaluation of risks at Aena and subsidiary companies, and prevention and mitigation measures'.	147	
409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labor	2, 4	8	Chap. 3, Section '3.3.2. Human rights due diligence procedure', Subsection 'Identification and evaluation of risks at Aena and subsidiary companies, and prevention and mitigation measures'.	147	
410-1	Security personnel trained in human rights policies or procedures	2, 4	8			**Not applicable**: The training of security personnel is not an activity that Aena seeks to undertake, although the contracting specifications for service providers in airports include a clause on 'Airport Diversity and Culture', which contains sections to ensure equal treatment of users. In addition, its compliance with applicable regulations is duly monitored.
411-1	Incidents of violations involving rights of indigenous people	1, 2, 4	8	Chap. 3, Section '3.3.2. Human rights due diligence procedure', Subsection 'Complaints mechanisms: reporting human rights violations'.	152	As of the date of this report, there are no reports of any cases of violation of the rights of indigenous peoples.
Material Issue: Our people						

3-3	Management of material topics	3, 6	3, 4, 5, 8, 10, 16	Chap. 5 'Staff and social issues'. Chap. 5, Sections 'Introduction', '5.1. Stable and quality employment', '5.1.2. Remuneration model,' '5.1.3. Organisation of work time and disconnection', '5.2. Diversity and inclusion', '5.2.1. Gender diversity', '5.2.2. Universal accessibility to employment for people with disabilities' '5.2.3. Accessibility of the services', '5.2.6. Generational diversity, age management and the promotion of the integration of young people in the workplace,' '5.3. Promotion and development of talent, skills and knowledge', '5.3.3. Training,' '5.4. Industrial relations' and '5.4.2. Communications with employees'. Chap. 5, Section '5.2.1. Gender diversity', Subsection 'Cases of discrimination and corrective actions'. Chap. 'About this report,' Section 'Materiality.'	169, 170, 172, 179, 183, 184, 187, 188, 192, 193, 194, 197, 200, 206, 209, 272	
202-1	Ratios of standard entry level wage by gender compared to local minimum wage		16	Chap. 5, Section '5.1.2. Remuneration model', Subsection 'Comparison with interprofessional minimum wage'.	182	
401-1	New employee hires and employee turnover	6	5, 8, 10	Chap. 5, Section '5.1.1. Main details about the workforce,' Subsections 'Recruitments,' 'Dismissals,' and 'Turnover rate.'	175, 177, 178	
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	6	3, 5, 8	Chap. 5, Section '5.1.2. Remuneration model'. Chap. 5, Section '5.5.2. Promoting the health and well-being of workers', Subsection 'Specific work-life balance and well-being measures'.	179, 223	Benefits for regular full-time employee are similar to those for part-time employees.
401-3	Parental leave	6	5, 8	Chap. 5, Section '5.5.2. Promoting the health and well-being of workers', Subsection 'Specific work-life balance and well-being measures'. Chap. 5, Section '5.5.2. Promoting the health and well-being of workers', Table 'Parental permission'.	223, 227	
402-1	Minimum notice periods regarding operational changes	3	3, 8	Chap. 5, Section '5.4.4. Restructuring'.	210	
404-1	Average hours of training per year per employee		4, 5, 8, 10	Chap. 5, Section '5.3.3. Training,' Tables 'Main Training Data' and 'Training hours by gender, professional category and region'.	202, 203	
404-2	Programs for upgrading employee skills and transition assistance programs		8	Chap. 5, Section '5.3.2. Attraction, development and talent'. Chap. 5, Section '5.3.3. Training' and Subsection 'Significant training actions in 2022'.	197, 200, 201	
404-3	Percentage of employees receiving regular performance and career development reviews		8	Chap. 5, Section '5.3.2. Attraction, development and talent', Table 'Percentage of the workforce that has received a performance appraisal by gender and professional category (%)'.	199	**Information unavailable**: In the UK, there is no formal approach to performance management. However, it is expected to be developed in the following exercises.

405-1	Diversity of governance bodies and employees	6	5, 8, 10	Chap. 1, Section '1.1.2. Governing bodies', Table 'A Board of Directors that is diverse and balanced in skills, origins, experiences, age and gender (as of 31 December 2022)'. Chap. 5, Section '5.2.1. Gender diversity', Table 'Percentage of workforce by gender, age and professional category (as of 31 December)'. Chap. 5, Section '5.2.2. Universal accessibility to employment of persons with disabilities', Table 'Employees with disabilities'.	10, 189, 192	**Confidentiality constraints**: In the UK, disability is considered a protected characteristic under the Equal Opportunity Act 2010 (covering all local employees). Information may only be available from those workers who voluntarily provide such information.
405-2	Ratio of basic salary and remuneration of women to men	6	5, 8, 10	Chap. 1, Section '1.1.2. Governance bodies', Subsection 'Remuneration of the Board and Senior Management', Table 'Remuneration received by Managers and Directors'. Chap. 5, Section '5.1.2. 'Remuneration model', Table 'Average remuneration and its evolution broken down by gender, age and professional categories or equal value'. Chap. 5, Section '5.1.2. Remuneration model,' Table 'Pay gap.'	17, 181, 182	
406-1	Incidents of discrimination and corrective actions taken	6	5, 8, 10	Chap. 1, Section '1.2.10. Complaints Channel'. Chap. 3, Section '3.3.2. Human rights due diligence procedure', Subsection 'Complaints mechanisms: reporting human rights violations'. Chap. 5, Section '5.2.1. Gender diversity', Subsection 'Cases of discrimination and corrective actions'.	32, 152, 188	
Material Issue: Sustainability and economic profitability						
3-3	Management of material topics		8, 9, 16	Chap. '2022: A year of hope', sections '1. The aviation sector as an economic and social stimulator' and '1.3. Towards the recovery of air transportation Chap. 1, Section '1.5. Sustainable financing. Taxonomy'. Chap. 'About this report,' Section 'Materiality.'	12, 18, 50, 272	
203-1	Infrastructure investments and services supported		8, 9, 16	Chap. 2, Section '2.3.3. Noise', Subsection 'Sound Insulation Plans'. Chap. 3, Sections '3.1.1. Social action: Contributions to foundations and non-profit organisations', '3.2.1 Creating social value' and '3.2.2. Impact on local populations and on the territory'.	108, 134, 138, 140	
Material Issue: Cybersecurity and data protection						
3-3	Management of material topics		16	Chap. 1, Section '1.2.11. Data Protection'. Chap. 6 'Safe, quality services'. Chap. 6, Section '6.3. Cybersecurity or information security'. Chap. 'About this report,' Section 'Materiality.'	35, 230, 245, 272	
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	1	16	Chap. 1, Section '1.2.11. Data Protection,' Table 'Data protection indicators'.	38	
Material Issue: Ensure everyone's health and safety						

3-3	Management of material topics	3	3, 8, 16	Chap. 5 'Staff and social issues'. Chap. 5, Section '5.5. Occupational health and safety'. Chap. 5, Section '5.5.1. Aena's Health and Safety model', Subsection 'Communication, dialogue and participation of employees in occupational safety'. Chap. 5, Section '5.5.2. Promoting the health and well-being of workers', Subsection 'Specific work-life balance and well-being measures'. Chap. 6 'Safe, quality services'. Chap. 6, Infographic 'Safety and health guarantee at Aena'. Chap. 6, Sections '6.1. Operational Safety', '6.1.4. General aeronautical audits, checks and drills of Operational Safety', '6.2. Airport Security' and '6.4. Health safety'. Chap. 'About this report,' Section 'Materiality.'	169, 211, 212, 216, 223, 230, 231, 232, 235, 240, 249, 272	
403-1	Occupational health and safety management system	3	3, 8	Chap. 5, Section '5.5.1. Aena's Health and Safety Model'.	212	
403-2	Hazard identification, risk assessment, and incident investigation	3	3, 8	Chap. 5, Section '5.5.1. Aena's Health and Safety Model', Subsections 'Identification of hazards, assessment of risks and investigation of accidents' and 'Reporting, recording and investigation of accidents'.	215, 216	
403-3	Occupational health services	3	3, 8	Chap. 5, Section '5.5.2. Promoting the health and well-being of workers'.	222	
403-4	Worker participation, consultation, and communication on occupational health and safety	3	3, 8	Chap. 5, Section '5.5.1. Aena's Health and Safety Model', Subsection 'Communication, dialogue and participation of employees in occupational safety'.	216	
403-5	Worker training on occupational health and safety	3	3, 8	Chap. 5, Section '5.5.1. Aena's Health and Safety Model', Subsection 'Occupational health and safety training'.	221	**Information unavailable**: the hours of training or the number of activities in the United Kingdom on this specific subject are not recorded. In Brazil, during 2022, 170 employees received "Training in health and safety issues" as part of one of their training programmes. However, the number of training activities or hours of training in this specific subject is not recorded.
403-6	Promotion of worker health	3	3, 8	Chap. 5, Section '5.5.2. Promoting the health and well-being of workers'.	222	
403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships		3, 8	Chap. 5, Section '5.5.3. Commitment to companies (external/ concurrent).'	229	
403-8	Workers covered by an occupational health and safety management system		3, 8	Chap. 5, Section '5.5.1. Aena's Health and Safety Model'.	212	
403-9	Work-related injuries		3, 8	Chap. 5, Section '5.5.1. Aena's Health and Safety Model', Tables 'Accident rates (own staff)' and 'Absenteeism (own staff)'.	218, 219, 221	**Information unavailable**: Throughout 2022, Aena has implemented a platform for third parties to voluntarily provide this information. Based on this, it is planned to report this information in future fiscal years.

403-10	Work-related ill health		3, 8	Chap. 5, Section '5.5.1. Aena's Health and Safety Model', Table 'Number of occupational diseases by region reported by the insurance company (own staff)'.	220	**Information unavailable**: Throughout 2022, Aena has implemented a platform for third parties to voluntarily provide this information. Based on this, it is planned to report this information in future fiscal years.
416-2	Incidents of non-compliance concerning the health and safety impacts of products and services		3, 16	Chap. 6, Section '6.7.3. Complaints mechanisms'.	259	
Material Issue: Service quality and responsible services						
3-3	Management of material topics		3, 12, 16	Chap. 6 'Safe, quality services'. Chap. 6, Sections '6.6. Quality management' and '6.7.3. Complaints mechanisms'. Chap. 'About this report,' Section 'Materiality.'	230, 251, 259, 272	
416-1	Assessment of the health and safety impacts of product and service categories		3, 16	Chap. 6, Section '6.1.4. General aeronautical audits, checks and drills of Operational Safety'. Chap. 6, Section '6.2.3. Excellent Airport Security Levels,' Subsection 'Airport security audits, inspections and drills'. Chap. 6, Section '6.4 Health safety.'	235, 243, 249	
417-1	Requirements for product and service information and labeling		12	Chap. 6, Section '6.7.3. Complaint mechanisms'.	259	
417-2	Incidents of non-compliance concerning product and service information and labeling		12, 16	Chap. 6, Section '6.7.3. Complaint mechanisms'.	259	
417-3	Incidents of non-compliance concerning marketing communications		12, 16	Chap. 6, Section '6.7.3. Complaint mechanisms'.	259	
Material Issue: Responsible value chain management						
3-3	Management of material topics	2, 7, 8, 9	5, 8, 11, 12, 13, 15, 16	Chap. 4 'Responsible value chain management'. Chap. 4, Sections '4.1 Criteria applicable to contracting at Aena', '4.2. Sustainable value chain management', '4.3. The acquisition and purchasing process' and '4.3.2. Contract execution processes'. Chap. 4, Section '4.1.2. Main procurement milestones in 2022,' Subsection 'Training.' Chap. 'About this report,' Section 'Materiality.'	153, 154, 157, 158, 162, 164, 272	
204-1	Proportion of spending on local suppliers		16	Chap. 4, Section '4.1.1. Description of the supply chain'.	155	**Information unavailable**: London-Luton Airport in the United Kingdom has not recorded construction and services, materials and equipment files to date, according to said classification. However, this information is expected to be provided in future years.

308-1	New suppliers that were screened using environmental criteria	7, 8, 9	11, 12, 13, 15	Chap. 4, Section '4.3.1. Inclusion of social and environmental issues in bidding procedures.'	163	**Information unavailable**: at Aena's airports in Brazil in 2022, no supplier has been selected based on these criteria. However, 100% of suppliers are subject to compliance with environmental or social clauses.
308-2	Negative environmental impacts in the supply chain and actions taken		5, 8, 12, 16	Chap. 4, Section '4.3.2. Contract execution processes', Subsection 'Negative impacts in the supply chain'.	168	
414-1	New suppliers that were screened using social criteria	2	5, 8, 16	Chap. 4, Section '4.3.1. Inclusion of social and environmental issues in bidding procedures'.	163	**Information unavailable**: at Aena's airports in Brazil in 2022, no supplier has been selected based on these criteria. However, 100% of suppliers are subject to compliance with environmental or social clauses.
414-2	Negative social impacts in the supply chain and actions taken	2	5, 8, 16	Chap. 4, Section '4.3.2. Contract execution processes', Subsection 'Negative impacts in the supply chain'.	168	
Material Issue: Risk management and control						
3-3	Management of material topics	1 a 10		Chap. '2022: A year of hope', Sections '2. Context of the sector' '3. Risks and their management' and '3.2. Risks in 2022'. Chap. 2, Sections '2.1.3. Management of environmental risks and impacts' and '2.2.3. Risks and opportunities related to climate change'. Chap. 5, Section 'Introduction,' Subsection 'Personnel management risks.' Chap. 'About this report,' Section 'Materiality."	19, 24, 28, 68, 83, 170, 272	
Material Issue: Restrictions arising from the regulatory framework						
3-3	Management of material topics	1 a 10	16	Chap. 1 'Sustainable Governance Model'. Chap. 1, Sections '1.2. Culture and corporate ethics' and '1.2.1. Regulatory Compliance System'. Chap. 'About this report,' Section 'Materiality.'	2, 18, 20, 272	
Material Issue: Internationalisation						
3-3	Management of material topics		17	Chap. '2022: A year of hope', Sections '1. The aviation sector as an economic and social stimulator' and '2. Context of the sector'. Chap. 'About this report,' Section 'Materiality.'	12, 19, 272	

(1)

Tax indicators (GRI 207-4)

Tax jurisdictions in which Aena has holdings	Year-end staff	Revenues		Profit before tax	Tangible assets other than cash and cash equivalents	Corporate income tax	
		Third-party sales	Intra-group transactions			Paid	Cumulative over profit
2022							
SPAIN (Aena, S.M.E., S.A., Aena Sociedad Concesionaria del AIRM, S.M.E., S.A. and ADI, S.M.E., S.A.)	8,196	3,696.4	11.3	1,110.9	12,057.6	165.1	236.8
UNITED KINGDOM (London Luton Airport Operations Ltd)	685	266.6	-	16.2	0.5	8.9	6.3
BRAZIL (Aeroportos do Nordeste do Brasil, S.A.)	349	207.5	-	59.2	207.7	2.2	20.2
2021							
SPAIN (Aena, S.M.E., S.A., Aena Sociedad Concesionaria del AIRM, S.M.E., S.A. and ADI, S.M.E., S.A.)	7,892	2,254.9	8.6	-566	12,322.3	-	-182.4
UNITED KINGDOM (London Luton Airport Operations Ltd)	628	105.3	-	-63.7	0.7	0.3	-3.4
BRAZIL (Aeroportos do Nordeste do Brasil, S.A.)	291	58.1	-	-92.7	226.6	0.6	-31.5

(2)

Surface area of the facilities (GRI 304-1)

	ENP	ZEPA	LIC	HIC	IBA	RAMSAR	R BIOSF	ZEPIM
Surface area (ha)	213.21	167.62	318.63	737.81	1,567.65	5.75	1,059.46	2.96

Sustainability Accounting Standards Board (SASB) Content Index[302]

The Sustainability Accounting Standard Board (SASB) is a US-based non-profit organisation, whose objective consists in helping companies around the world identify, manage and report on the sustainability issues that are relevant to investors.

In order to deepen its commitment to transparency to all stakeholders, Aena expands its sustainability reporting framework by adopting SASB's reporting standard, in an attempt to quantify its value creation and its impacts on the environment.

The heterogeneity of the activities framed in the Aena business model requires that, in addition to reporting the indicators of the sector to which it belongs (Professional and commercial services), it discloses those corresponding to the Air Freight & Logistics and Real Estate sectors that complement the set of activities carried out by the Company. Likewise, only the indicators of the SASB framework that are material in nature and/or apply to Aena have been selected, taking into account its ordinary activity as a result of their analysis and their relationship with Aena's activity.

These indicators are detailed below:

		Topics			
Professional and commercial services sector	**Indicator No.**	**Description**	**Location**	**Page**	**Omissions or comments**
Information security	SV-PS-230a.1	Approach to identifying and managing information security risks	Chap. 1, Section '1.2.11. Data Protection'. Chap. 6, Section '6.3.2. Measures to ensure the effectiveness of the Cybersecurity plan'.	35, 245	
	SV-PS-230a.2	Policies and practices related to the capture, use and retention of customer data	Chap. 1, Section '1.2.11. Data Protection'.	35	
	SV-PS-230a.3	(1) Information security breaches detected (2) Percentage that has involved confidential customer data (3) Number of customers affected	Chap. 1, Section '1.2.11. Data Protection', Table 'Data Protection Indicators'. Chap. 6, Section '6.3.2. Measures to ensure the effectiveness of the Cybersecurity plan', Table 'Cybersecurity breaches'.	38, 248	

[302] The page numbers indicate the beginning of the section in which the information corresponding to each SASB content is found, or the location of the table in which the information is presented. In addition, the blue page numbering is relative to the chapters 'Overview of the document' and '2022: A year of hope'.

Employees: Diversity and commitment	SV-PS-330a.1	Percentage of gender representation and racial/ ethnic group for (1) senior management and (2) other employees	Chap. 1, Section '1.1.2. Governing Bodies', Table 'A Board of Directors that is diverse and balanced in skills, origins, experiences, age and gender (as of 31 December 2022)'. Chap. 5, Section '5.1.1. Main details about the workforce'. Chap. 5, Section '5.2.1. Gender diversity', Subsection 'Gender diversity in the company's organisational structures' and Table 'Percentages of workforce by gender, age and professional category (as of 31 December)'.	10, 172, 188, 189	No information is available on the racial/ethnic group of senior management and other employees.
	SV-PS-330a.2	Voluntary and involuntary turnover rate	Chap. 5, Section '5.1.1. Main details about the workforce', Subsection 'Turnover rate'.	178	
Professional integrity	SV-PS-510a.1	Approach to ensuring professional integrity	Chap. 1, Section '1.2. Culture and corporate ethics'.	18	
	SV-PS-510a.2	Monetary losses as a result of legal processes associated with professional integrity	Chap. 1, Section '1.2.4. Prevention of fraud, corruption and bribery", Table "Nature of the confirmed corruption cases'.	27	
Air freight logistics and services	**Indicator No.**	**Description**	**Location**	**Page**	**Omissions or comments**
Greenhouse gas emissions	TR-AF-110a.1	Scope 1 gross emissions	Chap. 2, Section '2.2.4. Metrics. Carbon footprint', and Tables 'Carbon footprint' and "Direct GHG emissions (Scope 1)'.	86, 87, 88	
	TR-AF-110a.2	Short- and long-term strategies to manage scope 1 emissions; emission reduction targets and performance against targets.	Chap. 2, Section '2.2.1. Climate action plan', Subsection 'Specific decarbonisation targets' & Table 'Evolution and progress of established decarbonisation targets'.	76, 77, 81	
Air quality	TR-AF-120a.1	Atmospheric emissions of NOx, SOx and PM10	Chap. 2, Section '2.3.1 Air pollution' and Table 'Nitrogen oxides (NOx), sulphur oxides (SOx) and other significant air emissions'.	103	
Employee health and safety	TR-AF-320a.1	(1) Total recordable incident rate and (2) mortality rate for a) direct employees and b) contract employees	Chap. 5, Section '5.5.1. Aena's Health and Safety Model', Table 'Accidents (own staff)'.	218	
Management of safety and accidents	TR-AF-540a.1	Description of implementation and performance of the safety management system	Chap. 6, Section '6.1. Operational safety'.	232	
Real Estate	**Indicator No.**	**Description**	**Location**	**Page**	**Omissions or comments**

Energy management	IF-RE-130a.2	Total energy consumed in the property portfolio	Chap. 2, Section '2.2.6. Renewable energies,' Subsection 'Main energy consumption indicators."	97	
	IF-RE-130a.5	Description of how the considerations related to energy management in buildings are integrated into the analysis of real estate investments and in the operational strategy	Chap. 2, Section '2.2.5.Efficiency in the use of energy and use of renewable energy'.	91	
Water management	IF-RE-140a.2	(1) Total water extracted by area of the portfolio that has data coverage and (2) percentage in regions with high or extremely high initial water stress, by real estate subsector	Chap. 2, Section '2.4.2. Initiatives for responsible water consumption', Subsection 'Water consumption indicators', Table 'Water Extraction/ Consumption'.	115	
	IF-RE-140a.4	Description of the risks associated with water management and strategies and practices to mitigate those risks	Chap. 2, Section '2.4. Sustainable use of resources: water'.	111	See also Strategic Plan for Water Management, available at https://www.aena.es/en/corporative/environment-sustainability/strategy/water/water-management.html
Sustainability services	IF-RS-410a.3	Analysis of the method for measuring, incentivising and improving the effects of lessees on sustainability	Chap. 2, Section '2.1.5. Sustainability and value chain'. Chap. 4, Section '4.3.1. Inclusion of social and environmental issues in bidding procedures.'	72, 163	
Adaptation to climate change	IF-RE-450a.1	Description of the analysis of climate change risk exposure, degree of systematic risk exposure and risk mitigation strategies	Chap. 2, Section '2.2.3. Risks and opportunities related to climate change'.	83	

Annex I: Taxonomy 2021

CapEx Table

Eligible economic activities according to Taxonomy	Codes	Absolute CapEx	Activity CapEx			Total CapEx of the eligible activity	Proportion of CapEx eligible under Taxonomy	Mitigation of climate change	Adaptation to climate change	Category: activity facilitator	Category: activity transition
			AENA, AIRM, ADI (Spain)	Aena Brazil	London-Luton Airport						
Electricity generation using solar photovoltaic technology	4.1		3,182,450	-	-	3,182,450	0.38%	Eligible	Eligible	N/A	N/A
Transmission and distribution of electricity	4.9		523,281	-	75.330,69	598,611	0.07%	Eligible	Eligible	N/A	N/A
Construction, extension and operation of water collection and treatment systems	5.3		1,002,136	252	104.798,55	1,107,187	0.13%	Eligible	Eligible	N/A	N/A
Transport by motorbikes, passenger cars and light commercial vehicles	6.5	845,363,000.00	454,860	-	-	454,860	0.05%	Eligible	Eligible	N/A	Can be transitional (If an economic activity in this category does not meet the criterion of a substantial contribution specified in point (a) of its specific section, that activity is a transitional activity).
Construction of new buildings	7.1		2,354,806	-	-	2,354,806	0.28%	Eligible	Eligible	N/A	N/A
Renovation of existing buildings	7.2		209,686,968.00	910,803	2,163,090	212,760,861	25.17%	Eligible	Eligible	N/A	N/A
Installation, maintenance and repair of energy-efficient equipment	7.3		31,750,084	87,023	270,906	32,108,013	3.80%	Eligible	Eligible	If it were to meet the technical criteria	N/A
Installation, maintenance and repair of charging stations for electric vehicles in buildings (and in parking spaces attached to buildings).	7.4		1,754,181.35	-	-	1,754,181	0.21%	Eligible	Eligible	If it were to meet the technical criteria	N/A
Installation, maintenance and repair of instruments and devices to measure, regulate and control energy efficiency of buildings.	7.5		476,893	29,924	45,263	552,079	0,07%	Eligible	Eligible	If it were to meet the technical criteria	N/A
CapEx of eligible activities according to Taxonomy			254,873,048.26								
% of eligible CapEx according to Taxonomy			30.1%								
% of CapEx ineligible under Taxonomy			70%								

OpEx Table

Eligible economic activities according to Taxonomy	Codes	Absolute OpEx	Activity OpEx			Total OpEx of the eligible activity	Proportion of OpEx eligible under Taxonomy	Mitigation of climate change	Adaptation to climate change	Category: activity facilitator	Category: activity transition
			Spain	Brazil	United Kingdom						
Conservation forestry	1.4		120,384.85	0.00	0.00	120,384.85	0.01%	Eligible	Eligible	N/A	N/A
Electricity generation using solar photovoltaic technology	4,1		68.68	0.00	0.00	68.68	0.00%	Eligible	Eligible	N/A	N/A
Electricity generation from wind energy	4.3		14,874.68	0.00	0.00	14,874.68	0.00%	Eligible	Eligible	N/A	N/A
Transmission and distribution of electricity	4.9		1,780,018.63	0.00	0.00	1,780,018.63	0.20%	Eligible	Eligible	N/A	N/A
Construction, extension and operation of water collection and treatment systems	5.3		1,065,307.41	38,882.06	40,848.22	1,145,037.69	0.13%	Eligible	Eligible	N/A	N/A
Collection and transport of non-hazardous waste in source-segregated fractions	5.5		530.20	0.00	0.00	530.20	0.00%	Eligible	Eligible	N/A	N/A
Urban and suburban transport, road passenger transport	6.3	876,517,000.00	0.00	0.00	218,268.96	218,268.96	0.02%	Eligible	Eligible	N/A	Can be transitional (If an economic activity in this category does not meet the criterion of a substantial contribution specified in paragraph (a) of its specific section, that activity is a transitional activity)
Transport by motorbikes, passenger cars and light commercial vehicles	6.5		271,692.53	0.00	0.00	271,692.53	0.03%	Eligible	Eligible	N/A	Can be transitional (If an economic activity in this category does not meet the criterion of a substantial contribution specified in paragraph (a) of its specific section, that activity is a transitional activity)
Renovation of existing buildings	7.2		4,699,247.55	6,338.82	0.00	4,705,586.37	0.54%	Eligible	Eligible	N/A	N/A
Installation, maintenance and repair of energy efficient equipment.	7.3		10,379,971.95	608,248.01	0.00	10,988,219.96	1.25%	Eligible	Eligible	If it were to meet the technical criteria	N/A
Installation, maintenance and repair of instruments and devices for measuring, regulating and controlling the energy performance of buildings	7.5		1,053.44	0.00	0.00	1,053.44	0.00%	Eligible	Eligible	If it were to meet the technical criteria	N/A
OpEx of eligible activities according to Taxonomy			19,245,736.00								
% of eligible OpEx according to Taxonomy			2.20%								
% of OpEx ineligible under Taxonomy			97.80%								

Links of interest

(GRI 2-23)

Overview of the document	
Aena's website	www.aena.es/en/
Aena's Consolidated Annual Accounts 2022	www.aena.es/en/shareholders-and-investors/financial-and-economical-information/financial-and-operational-publications.html
Shareholders and investors portal	www.aena.es/en/shareholders-and-investors.html
Social Sustainability section of the Aena website	www.aena.es/en/corporative/cr/responsible-business/responsible-business-aena.html
Environmental section of the Aena website	www.aena.es/en/corporative/environment-sustainability/environment-office.html
Contracting and companies	www.aena.es/en/commercialbusinesses/commercial-businesses.html
General information for users and airlines in general	www.aena.es/en/passengers/passengers.html
Employment portal	empleo.aena.es/empleo/SessSrv?accion=seleccionar&leng=EN&SEDE=0
Aena's Twitter	twitter.com/aena
Aena's Facebook	www.facebook.com/aena.es/
Aena's Instagram	www.instagram.com/aena.es/?hl=en
Aena's Linkedin	www.linkedin.com/company/aena/mycompany/
Aena's Youtube channel	www.youtube.com/@AenaTV/featured
Enjoy Aena Facebook	es-es.facebook.com/EnjoyAena/
Enjoy Aena Instagram	www.instagram.com/enjoyaena/?hl=en

Chapter 1: Sustainable Governance Model	
Significant Shares and Treasury Stock of the website of the National Securities Market Commission – CNMV Portal	www.cnmv.es/Portal/Consultas/DerechosVoto/PS_AC_INI.aspx?nif=A86212420&lang=en
Company Bylaws	www.aena.es/en/shareholders-and-investors/general-information/company-bylaws.html
Regulations of the General Shareholders' Meeting	www.aena.es/es/accionistas-e-inversores/gobierno-corporativo/reglamentos-junta-general-accionistas.html
Regulations of the Board of Directors	www.aena.es/en/shareholders-and-investors/corporate-governance/regulations-governing-board-directors.html
Corporate policies	www.aena.es/en/shareholders-and-investors/corporate-governance/corporate-policies.html
Information on the 2022 General Shareholders' Meeting	www.aena.es/es/accionistas-e-inversores/gobierno-corporativo/junta-general-de-accionistas.html
ANB Code of Conduct / Anti-Corruption and Fraud Policy	www.aenabrasil.com.br/pt/corporativo/Compliance.html
Information on Board committees	www.aena.es/en/shareholders-and-investors/corporate-governance/board-committees.html
Activities reports of Board committees	www.aena.es/en/shareholders-and-investors/corporate-governance/reports/other-reports.html
Composition of the Board of Directors and their CVs	www.aena.es/en/shareholders-and-investors/corporate-governance/board-of-directors.html

Composition of the Executive Management Committee and their CVs	www.aena.es/en/corporative/about-aena/executive-management-committee.html
Annual Report on Remuneration	www.aena.es/en/shareholders-and-investors/corporate-governance/reports/directors-remuneration.html
Corporate Governance Report	www.aena.es/en/shareholders-and-investors/corporate-governance/reports/corporate-gobernance-reports.html
Aena's Non-financial Information Statement 2021	www.aena.es/en/corporative/cr/sustainability-assessment/non-financial-information-statement.html
Airport Regulation Document (DORA) 2022-2026	www.mitma.gob.es/recursos_mfom/dora_2022-2026.pdf
Aena's Complaints Channel	serviciostelematicos.aena.es/en/online-services/available-services/citizens/complaints-channel.html
ANB Ethics Channel	aloetica.com.br//otrs/canal-de-etica.pl?CustomerID=aenabrasil;Language=en
Aena's website privacy policy	www.aena.es/en/privacy-policy.html
Privacy policy for personnel of collaborating companies of Aena	www.aena.es/es/nota-adicional/politica-privacidad-personal-empresas-colaboradoras
Privacy Policy for customers of London-Luton Airport	travel.london-luton.co.uk/terms-conditions/privacy-policy/
London-Luton Airport Privacy Statement	www.london-luton.co.uk/privacy-notice
London-Luton Airport cookies Policy	www.london-luton.co.uk/cookies-policy
Policy for the disclosure to third parties of London-Luton Airport	www.london-luton.co.uk/terms-conditions
Information on Related Transactions	www.aena.es/en/shareholders-and-investors/general-information/related-party-transactions.html
Aena Tax Strategy	www.aena.es/en/shareholders-and-investors/financial-and-economical-information/tax-transparency/fiscal-strategy.html
Sustainability Strategy 2021-2030	www.aena.es/en/corporative/environment-sustainability/sustainability/sustainability-strategy.html
Strategic Plan 2022-2026	www.aena.es/en/shareholders-and-investors/general-information/companys-strategic-plan.html
Responsible Business Strategy of London-Luton Airport	www.london-luton.co.uk/corporate/sustainability/responsible-business-strategy
Question 13 of the FAQ's of February 2, 2022 of the EC in reference to article 8 of the European taxonomy (see chapter "Links of interest").	eur-lex.europa.eu/legal-content/FR/TXT/?uri=uriserv%3AOJ.C_.2022.385.01.0001.01.ENG&toc=OJ%3AC%3A2022%3A385%3AFULL.
Chapter 2: Commitment to the environment	
Office of Environmental Care	www.aena.es/en/corporative/environment-sustainability/environment-office.html
Interactive noise maps of Aena	www.aena.es/en/corporative/environment-sustainability/noise/interactive-noise-maps.html
The Telematic Services portal	serviciostelematicos.aena.es/en/online-services/online-services.html
London-Luton Airport interactive noise map (TraVis)	travisltn.topsonic.aero/
Noise inquiries and complaints policy / London-Luton Airport noise inquiries and complaints procedure	www.london-luton.co.uk/corporate/community/noise/making-a-noise-complaint
London-Luton Airport *Feedback-form*	www.london-luton.co.uk/contact-us
ANB's complaints channel Canal de Ouvidoria	ouvidoria.aenabrasil.com.br/
Aena Climate Action Plan 2021-2030: path to zero emissions	www.aena.es/en/corporative/environment-sustainability/climate-change/climate-action-plan.html
Carbon Reduction Plan for London Luton Airport	www.london-luton.co.uk/CMSPages/GetFile.aspx?guid=af6067e9-0fd6-438d-ac28-8a1c1423d8e6

DEFRA	www.gov.uk/government/publications/greenhouse-gas-reporting-conversion-factors-2022
Reports from the surveillance network at Adolfo Suárez Madrid-Barajas Airport	www.aena.es/en/redair---stations-map.html
Air quality surveillance network consultation portal at Adolfo Suárez Madrid-Barajas Airport, Barcelona-El Prat Josep Tarradellas Airport, Palma de Mallorca Airport, Alicante-Elche Airport and Málaga-Costa del Sol Airport	www.aena.es/en/corporative/environment-sustainability/air-quality.html
IDAE table of calorific values of the main energy sources	www.idae.es/uploads/documentos/documentos_PCI_Combustibles_Carburantes_final_valores_Update_2014_0830376a.xlsx
Environmental Impact Assessment (EIA) projects	www.aena.es/en/corporative/environment-sustainability/environmental-assessment/environmental-impact-assessment-eia-of-projects.html

Chapter 3: Commitment to society and human rights	
Collaboration agreements signed by Aena	www.aena.es/en/corporative/transparency/agreements.html
Environmental Master Plans	www.aena.es/en/corporative/environment-sustainability/environmental-assessment/strategic-environmental-assessment-sea-of-plans.html
Local community projects at London-Luton Airport	www.london-luton.co.uk/corporate/community/community-trust-fund
Information about the Adolfo Suárez Madrid-Barajas *Airport City*	desarrollo-logistico.aena.es/en/logistic-development.html
Modern Slavery Act at London-Luton Airport	www.london-luton.co.uk/corporate/modern-slavery-statement

Chapter 4: Responsible value chain management	
Aena corporate contracting portal	www.aena.es/en/corporative/aena-international/contracting/procurement-rule.html
Landing page for Aena Suppliers and Aena Companies	contratacion.aena.es/contratacion/principal?portal=errorCSRF
Landing page for Aena Companies	empresas.aena.es/empresas-home/
Information about contracting on the Aena website	empresas.aena.es/empresas-contratacion/
Murcia International Airport contracting portal	www.aeropuerto-de-murcia.es/Contratacion/index
London-Luton Airport 'In tend' electronic contracting portal	in-tendhost.co.uk/llaol/aspx/Home
Public Sector Procurement platform	contrataciondelestado.es

Chapter 5: Staff and social issues	
Aena Collective Agreement	www.boe.es/boe/dias/2011/12/20/pdfs/BOE-A-2011-19846.pdf
Average remuneration and pay gap at London-Luton Airport	gender-pay-gap.service.gov.uk/Employer/MZGnz73O www.london-luton.co.uk/corporate/lla-publications/gender-pay-gap-report

Minimum pay and living wage set by the UK Government	www.gov.uk/government/publications/minimum-wage-rates-for-2022
Madrid Community Business Premises Agreement (ADI)	www.bocm.es/boletin/CM_Orden_BOCM/2019/10/26/BOCM-20191026-2.PDF
London-Luton Airport Health and Safety Policy	www.london-luton.co.uk/corporate/health-safety-matters
Coordination of Business Activities with third parties – Occupational risk prevention	www.aena.es/en/corporative/about-aena/businesses/occupational-risk-prevention.html
Royal Decree Act 8/2019, of 8 March, on urgent measures of social protection and the fight against job insecurity in the working day	www.boe.es/buscar/doc.php?id=BOE-A-2019-3481

Chapter 6: Safe, quality services	
London-Luton Airport accessibility forum	www.london-luton.co.uk/special-assistance-landing/llaaf-organisations
PRM Service Spain	www.aena.es/pmr/inicio?lang=en
Special assistance for persons with reduced mobility – London-Luton Airport	www.london-luton.co.uk/special-assistance-landing/getting-the-special-assistance-you-need
Special assistance for persons with reduced mobility – Recife Guararapes – Gilberto Freyre International Airport	www.aenabrasil.com.br/pt/aeroportos/aeroporto-internacional-do-recife-guararapes-gilberto-freyre/Assistencia-especial--.html
Special assistance for persons with reduced mobility – Maceió – Zumbi dos Palmares International Airport	www.aenabrasil.com.br/pt/aeroportos/aeroporto-internacional-de-maceio-zumbi-dos-palmares/Assistencia-especial.html
Special assistance for persons with reduced mobility – Joao Pessoa – Presidente Castro Pinto International Airport	www.aenabrasil.com.br/pt/aeroportos/aeroporto-internacional-de-joao-pessoa-presidente-castro-pinto/Assistencia-especial-.html
Special assistance for persons with reduced mobility – Aracaju – Santa María Airport	www.aenabrasil.com.br/pt/aeroportos/aeroporto-internacional-santa-maria-aracaju/Assistencia-especial-.html
Special assistance for persons with reduced mobility – Juazeiro do Norte – Orlando Bezerra de Menezes Airport	www.aenabrasil.com.br/pt/aeroportos/aeroporto-de-juazeiro-do-norte-orlando-bezerra-de-menezes/Assistencia-especial.html
Special assistance for persons with reduced mobility – Campina Grande – Presidente Joao Suassuna Airport	www.aenabrasil.com.br/pt/aeroportos/aeroporto-de-campina-grande-presidente-joao-suassuna/Assistencia-especial.html
Passenger rights	www.aena.es/en/passengers/travellers/incidents-on-your-trip.html

Chapter 7: Innovation	
Aena Ventures	aenaventures.com/es/

AENA S.M.E., S.A. and Subsidiaries

Independent Limited Assurance Report on the Consolidated Non-Financial Information Statement for the year ended 31 December 2022

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Translation of a report originally issued in Spanish. In the event of a discrepancy, the Spanish-language version prevails.

INDEPENDENT LIMITED ASSURANCE REPORT ON THE SUSTAINABILITY REPORT - CONSOLIDATED NON-FINANCIAL INFORMATION STATEMENT OF AENA S.M.E, S.A. AND SUBSIDIARIES FOR 2022

To the Shareholders of AENA S.M.E., S.A.,

In accordance with Article 49 of the Spanish Commercial Code, we have performed the verification, with a scope of limited assurance, of the attached Sustainability Report - Consolidated Non-Financial Information Statement for the year ended 31 December 2022 of AENA S.M.E., S.A. (the Parent) and its subsidiaries (the Group), which forms part of the Group's consolidated directors' report.

The content of the Sustainability Report - Consolidated Non-Financial Information Statement includes information additional to that required by current Spanish corporate legislation relating to non-financial reporting and by the Global Reporting Initiative Standards (GRI standards) that was not the subject matter of our verification. In this regard, our work was limited solely to verification of the information identified in the "GRI Context Index" and "Act 11/2018 Content Index" tables included in the attached Sustainability Report - Consolidated Non-Financial Information Statement.

Responsibilities of the Directors

The preparation and content of the Sustainability Report - Consolidated Non-Financial Information Statement included in the Group's consolidated directors' report are the responsibility of the Parent's directors. The Sustainability Report - Consolidated Non-Financial Information Statement was prepared in accordance with the content specified in current Spanish corporate legislation and with the criteria of the selected Global Reporting Initiative Sustainability Reporting Standards (GRI standards), as well as other criteria described as indicated for each matter in the "Act 11/2018 Content Index" table and in accordance with the GRI standards as indicated for each matter in the "GRI Context Index" table in the Sustainability Report - Consolidated Non-Financial Information Statement.

These responsibilities of the Board of Directors also include the design, implementation and maintenance of such internal control as is determined to be necessary to enable the Sustainability Report - Consolidated Non-Financial Information Statement to be free from material misstatement, whether due to fraud or error.

The Parent's directors are also responsible for defining, implementing, adapting and maintaining the management systems from which the information necessary for the preparation of the Sustainability Report - Consolidated Non-Financial Information Statement is obtained.

Our Independence and Quality Control

We have complied with the independence and other ethical requirements of the Code of Ethics for Professional Accountants (including international standards on independence) issued by the International Ethics Standards Board for Accountants (IESBA), which is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

Our firm applies current international quality standards and, accordingly, maintains a system of quality including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

Our engagement team consisted of professionals who are experts in reviews of non-financial information and, specifically, in information about economic, social and environmental performance.

Our Responsibility

Our responsibility is to express our conclusions in an independent limited assurance report based on the work performed. We conducted our review in accordance with the requirements established in International Standard on Assurance Engagements (ISAE) 3000 Revised, Assurance Engagements other than Audits or Reviews of Historical Financial Information ("ISAE 3000 Revised"), currently in force, issued by the International Auditing and Assurance Standards Board (IAASB) of the International Federation of Accountants (IFAC), and with the guidelines published by the Spanish Institute of Certified Public Accountants on attestation engagements regarding non-financial information statements.

The procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement and, consequently, the level of assurance obtained is substantially lower.

Our work consisted of making inquiries of management and the various units of the Group that participated in the preparation of the Sustainability Report - Consolidated Non-Financial Information Statement, reviewing the processes used to compile and validate the information presented in the Sustainability Report - Consolidated Non-Financial Information Statement, and carrying out the following analytical procedures and sample-based review tests:

- Meetings held with Group personnel to ascertain the business model, policies and management approaches applied, and the main risks relating to these matters, and to obtain the information required for the external review.

- Analysis of the scope, relevance and completeness of the contents included in the Sustainability Report - Consolidated Non-Financial Information Statement for 2022 based on the materiality analysis performed by the Group and described in section "Materiality" thereof, taking into account the contents required under current Spanish corporate legislation.
- Analysis of the processes used to compile and validate the data presented in the Sustainability Report - Consolidated Non-Financial Information Statement for 2022.
- Review of the information relating to risks and the policies and management approaches applied in relation to the material matters presented in the Sustainability Report - Consolidated Non-Financial Information Statement for 2022.
- Verification, by means of sample-based tests, of the information relating to the contents included in the Sustainability Report - Consolidated Non-Financial Information Statement for 2022 and the appropriate compilation thereof based on the data furnished by the information sources.
- Obtainment of a representation letter from the directors and management.

Emphasis of Matter

Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment establishes the obligation to disclose information on how and to what extent an undertaking's activities are associated with aligned economic activities in relation to the climate change mitigation and climate change adaptation objectives for the first time for 2022, in addition to the information referring to eligible activities required in 2021. Accordingly, the Sustainability Report - Consolidated Non-Financial Information Statement does not include comparative information on alignment. Also, since the information referring to eligible activities in 2021 was not required with the same level of detail as in 2022, the information disclosed in relation to eligibility in the Sustainability Report - Consolidated Non-Financial Information Statement is not strictly comparable either. In addition, it should be noted that the Parent's directors have included information on the criteria which, in their opinion, best enable them to comply with the aforementioned obligations and which are defined in section 1.5 "Sustainable Financing. Taxonomy" of the Sustainability Report - Consolidated Non-Financial Information Statement. Our conclusion is not modified in respect of this matter.

Conclusion

Based on the procedures performed in our verification and the evidence obtained, nothing has come to our attention that causes us to believe that:

a) The non-financial information identified in the "GRI Context Index" table included in the Sustainability Report - Consolidated Non-Financial Information Statement for the year ended 31 December 2022 was not prepared, in all material respects, in accordance with the GRI standards.

b) The Sustainability Report - Consolidated Non-Financial Information Statement of AENA S.M.E., S.A. and subsidiaries for the year ended 31 December 2022 was not prepared, in all material respects, in accordance with the content specified in current Spanish corporate legislation and with the criteria of the selected GRI standards, as well as other criteria described as indicated for each matter in the "Act 11/2018 Content Index" table in the Sustainability Report - Consolidated Non-Financial Information Statement.

Use and Distribution

This report has been prepared in response to the requirement established in corporate legislation in force in Spain and, therefore, it might not be appropriate for other purposes or jurisdictions.

DELOITTE, S.L.



Ana Sánchez Palacios

27 February 2023