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CODE OF CONDUCT



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1. INTRODUCTION

The purpose of this Code of Conduct is to set out the principles and values of Aena S.M.E., S.A. (hereinafter “Aena” or the “Company”) with regard to ethics, integrity, legality and transparency that must guide the conduct of all individuals included within its scope of application, whether towards each other or in their relations with customers, shareholders, suppliers and, in general, all those persons and entities, both public and private, with which they deal in the pursuit of their professional activity, likewise fostering the effective compliance with the standards applicable to the entire set of activities under the principle of zero tolerance of any type of unlawful behaviour.

The Code of Conduct is therefore intended as a set of own rules which define the corporate culture, values and principles of Aena, reinforcing standards of behaviour within the Company, the organisational structure of which—comprising multiple relations and hierarchical levels—makes it necessary for there to be a series of rules and principles to be observed by all of Aena’s personnel in their professional conduct.

Although this Code does not seek to address all possible hypotheses or scenarios which can arise in our day-to-day business, it is intended to provide an accessible source of reference offering guidance and advice on how we should act in relation to matters of social importance, corporate responsibility issues, and, in general, questions of ethics, integrity and legality.

All those persons who provide their professional services within Aena should therefore make themselves familiar with this Code and adhere to its terms, both literally and in spirit, since it forms the foundation of the good governance and corporate responsibility policies of Aena, for which competence lies with the Board of Directors and the Company’s Managing Bodies, through the Compliance Monitoring and Control Body.

2. SCOPE OF APPLICATION

This Code of Conduct is binding on and applicable to the members of the Company’s Managing Bodies, its Senior Management team and, in general—without exception and irrespective of the office held, responsibility, occupation or geographical location—all employees of Aena or any other company that is wholly owned by Aena and domiciled in Spain.

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

For employees of companies in which Aena holds a stake, the references to the Aena Collective Agreement contained in this Code must be understood as made to the Workers’ Charter and applicable Collective Agreements.

All individuals to whom this Code of Conduct applies have the duty to know and comply with its contents, notwithstanding any special duties incumbent on persons who are subject to other codes specific to the activity in which they discharge their duties.



In any event, under no circumstances may the application of the Code of Conduct give rise to the infringement of any applicable legal or contractual provisions and, should such circumstance arise, the contents of the Code must be adapted to whatever is established in those legal provisions.

3. AENA'S ETHICAL PRINCIPLES

Aena undertakes to comply with and enforce the Ethical and Good Governance Principles set forth in this Code of Conduct, which shall at all times guide and govern the actions of all individuals to whom this Code applies, and which are the following:

3.1 Legality

Respect for the Law constitutes one of the fundamental principles of Aena, and therefore all individuals to whom this Code applies have the priority and inexcusable duty to observe both the laws in force and Aena's internal regulations appropriate to them in the exercise of their professional duties and responsibilities.

3.2 Integrity, honesty and trust

For Aena, integrity—meaning honesty and professional conduct—is not an option but rather an unquestionable conviction.

Therefore, all individuals to whom this Code applies must be honest and trustworthy in all work-related actions and negotiations they perform, ensuring at all times that they are not influenced by personal or third-party-related motives, considerations or interests that could lead to a possible conflict of interest or illegal or inappropriate behaviour.

3.3 Independence and transparency

Independence and transparency are inalienable values for Aena and, accordingly, all individuals to whom this Code applies shall at all times act with impartiality, maintaining independent judgement that is free of any external pressure or personal interest.

Aena does not interfere in political processes, nor does it make direct or indirect contributions to political parties, organisations and associations, to their representatives and candidates, or to professionals in the media.

3.4 Excellence and quality in satisfying our stakeholders' expectations

Aena assumes, leads and drives dedication to public service through the management of the airports in its network, with the commitment to offer the highest levels of quality to its clients and users, and to contribute to the development of domestic and international air transportation, the mobility of citizens and economic, social and territorial cohesion, guaranteeing at all times air transport that is safe, sustainable and protective of the environment and in accordance with the principles of efficacy, economy and efficiency.

Accordingly, all individuals to whom this Code applies must exercise the proper diligence when performing their duties, offering a service that is safe and secure, of high quality and



aimed at satisfying the expectations of our stakeholders, as the main way of achieving excellent returns in a manner that brings about sustainable growth for the Company in the short, medium and long-term, with a commitment to investing the necessary time, efforts and resources for this purpose.

3.5 Respect for Aena's image and reputation

Aena considers respect for the image and reputation of the Group as one of its most valuable assets which contributes to the perception of a company with integrity and respect for its stakeholders.

All individuals to whom this Code applies must exercise the utmost care and due diligence in preserving the image and reputation of the Company in all their professional activities, including public interventions.

In performing their duties, all individuals to whom this Code applies shall act with loyalty, avoiding detraction or criticisms, or collaborating in actions or omissions that might directly or indirectly compromise the image of Aena or harm the reputation of the organisation.

4. GENERAL GUIDELINES OF CONDUCT

In their relations with customers, partners, suppliers, airport users and, in general, with all those persons and entities, both public and private, with whom they have dealings in the course of their professional activities, all individuals to whom this Code applies must apply the values, standards and ethical principles contained in this document, and in particular the following guidelines for action:

PEOPLE-RELATED CONDUCT

4.1 Compliance with human and collective rights

Aena is committed to the human rights and political freedoms recognised in the domestic and international legislation, and in particular to the principles set forth in the Universal Declaration of Human Rights.

Therefore, all individuals to whom this Code applies must respect the rights to freedom of association and collective bargaining, as well as the activities legally carried out by the organisations in representation of employees, in accordance with the duties and competencies legally attributed to them, with whom a relationship based on mutual respect shall be maintained in order to promote an open, transparent and constructive dialogue that will make it possible to consolidate the objectives of social and industrial stability.

4.2 Respect for people

Aena rejects any form of physical, psychological, or emotional abuse or abuse of authority, as well as any other conduct that may violate a person's individual rights. In this respect, intimidation, lack of respect and consideration or any type of physical or verbal aggression are unacceptable and shall not be permitted or tolerated in the workplace.



All individuals to whom this Code applies, and those in management roles or who have personnel under their charge in particular, must ensure that the previously described situations do not occur and must at all times foster relations based on respect, equity and reciprocal collaboration in order to create a respectful and positive work environment for the personal and professional development of all employees.

4.3 Non-discrimination and equal opportunity

Aena undertakes to provide the same opportunities of access to work and professional promotions, rejecting any type of discrimination by reason of race, nationality, social origin, gender, marital status, sexual orientation, religion, political ideology, disability or any other personal, physical or social condition.

In this respect, all individuals to whom this Code applies who take part in any way in recruitment, selection and/or professional promotion processes shall make decisions based on the principles of objectivity, responsibility and transparency, without allowing themselves to be influenced by factors that may alter the objectivity of their judgement, in order to identify the people who best fit the profile, qualifications and needs of the position to be filled.

In addition, Aena shall make any adaptations to job positions or the work environment that are objectively necessary to ensure that disabled workers can progress professionally on a level playing field with the rest of the employees.

WORK-RELATED CONDUCT

4.4 Professionalism, responsibility and cooperation in the workplace

All individuals to whom this Code of Conduct applies must at all times maintain behave with integrity, professionalism and responsibility in their decisions and actions, in addition to carrying out their work using both their technical skills and the appropriate prudence and care, to achieve the best performance of the duties assigned to them in accordance with the highest levels of quality, the law and the regulations and procedures established internally by Aena.

Likewise, all individuals to whom this Code applies must promote a working environment of cooperation and teamwork, and must at all times act in a spirit of collaboration and make available to the organisation the knowledge or resources that may facilitate the achievement of Aena's objectives and interests.

Aena also considers that integrity and responsible conduct in the workplace is incompatible with the use of illegal drugs or the abuse of alcohol and, therefore, the performance of work under the effect of these substances shall be penalised in accordance with the provisions of section 8 of this Code.

4.5 Work/life balance



All individuals to whom this Code applies must promote a working environment and climate compatible with the personal and family life of the workers, collaborating with the people in their teams to achieve the best possible work-life balance.

4.6 Responsible use of resources

Aena considers it essential that its resources be used with due care and rigour by all individuals to whom this Code applies and, therefore, it provides them with the suitable resources and means they need to pursue their professional activities.

Consequently, all individuals to whom this Code applies shall undertake:

- a. To be respectful and careful in the use of the installations, IT equipment, furniture, work tools and other items made available by Aena, which must only be used for professional purposes and never for personal benefit.
- b. To use the resources and means made available to them responsibly, in a manner that does not infringe the rights and interests of Aena and respects at all times the policies established by Aena to regulate their use.
- c. To avoid any practice that impairs the value of Aena, in particular superfluous activities and expenses.

4.7 Healthy and safe workplace

Guaranteeing a safe and risk-free working environment in all its facilities is a priority for Aena. It is the goal of Aena to bring about constant improvement of working conditions and safety in all its facilities.

Therefore, all individuals to whom this Code applies must strictly comply with the legal provisions on operational safety, as well as with the internal rules and instructions that complement them and any others that, at a local level, may be established by the airport management or by the competent body where they carry out their activity, in order to ensure the protection of civil aviation against any act of unlawful interference.

Furthermore, all individuals to whom this Code applies must at all times observe the preventive measures applicable to health and safety in the workplace, using the resources established by Aena and in strict compliance with the rules regarding occupational risk prevention.

CONDUCT RELATED TO THE ENVIRONMENT, STAKEHOLDERS AND IMAGE OF AENA

4.8 Environmental protection and sustainable development

As a leader in the provision of airport services under a framework of safety, quality and efficiency, Aena pursues its activity with an active and responsible commitment to preserving the environment. Accordingly, it respects the requirements laid down in the



applicable legislation on pollution prevention and environmental protection, while advocating for the sustainable development of air transport.

In this sense, since care for the environment is a basic principle for Aena, Aena shall endeavour to disseminate its environmental policies and promote among its employees, contractors, suppliers and collaborating companies respect for the environment and the adoption of good environmental practices.

Moreover, all individuals to whom this Code of Conduct applies must at all times act within the scope of their remit, with full compliance with both environmental legislation and internal policies or regulations on environmental matters, in order to reduce as much as possible the environmental impact of our activity at all the airports within the Aena network, and contribute to the sustainable development of our Company.

4.9 Relationship with clients, suppliers and partner companies

Aena regards its clients, suppliers and partner companies as indispensable to achieve its objectives of growth and improvement in the quality of its services and, therefore, considers it a priority to establish with all of them relationships based on respect, transparency and trust in order to obtain mutual benefits for all.

All individuals to whom this Code applies, in particular those who intervene directly or indirectly in the selection or contracting of clients, suppliers and collaborating companies, must avoid any kind of interference that could affect their impartiality or objectivity, and must act in such a way in these contracting processes as to avoid any conflict between their personal interests and those of Aena.

In particular, all individuals to whom this Code applies must ensure the proper functioning and continuous improvement of the customer service systems, seeking the creation of a collaborative framework that allows their needs to be anticipated and facilitates the meeting of mutual objectives, avoiding any discriminatory treatment towards customers.

4.10 Relationship with investors and shareholders

Aena's relationships with its investors and shareholders must be based on transparency, trust and sustainable reciprocal benefits. In this respect, Aena's stated intention is to create value for its investors and shareholders on a continuous and sustainable basis, while providing them with channels of communication and consultation that allow them to obtain suitable, accurate, useful and complete information on the Company.

In this sense, Aena's main official channel of communication with its investors and shareholders is the corporate website (www.aena.es), which is permanently updated and through which Aena channels all the information that may be of interest to investors and shareholders, favouring the immediacy of its posting and the possibility of subsequent access, for the purpose of making transparency the principal value that shapes Aena's relations with the general public.

4.11 Relationship with the public authorities



Aena's relations with the public authorities shall be guided by institutional respect, transparency and compliance with any decisions issued by them.

In addition, all individuals to whom this Code applies must at all times maintain an attitude of cooperation and transparency with any public authorities or supervisory body in the event of any request, inspection or monitoring they may carry out at our organisation. In this respect, any judicial or administrative communications from any public authorities must be forwarded to and managed by the person with responsibility for the matter in question, who shall reply to them within the mandatory time limit.

All information submitted to the courts or administrative authorities at their request must be truthful, appropriate, useful and consistent.

4.12 Corruption and bribery of members of public or private entities. Gifts, commissions or credit facilities

Aena firmly and rigorously rejects any form of corruption, bribery or extortion, and is opposed to the influencing of people outside Aena to obtain any kind of benefit or advantage through practices that infringe the law or the principles and rules of conduct contained in this Code.

In this respect, the receipt and delivery, promise or offer of any kind of payment, commission or gift to any public authorities or officials or members of private entities is prohibited where, due to its frequency, characteristics or circumstances, it may be interpreted by an objective observer as having been made with the intention of affecting the impartial judgement of the recipient. However, the following are exempted from this prohibition:

- a. Objects of little value used for advertising purposes.
- b. Occasional invitations or hospitality not exceeding the modest limits considered reasonable in customary, social and courtesy practices. The non-acceptance or giving of gifts for an individual amount of greater than one-hundred euros is established.

Any travel and entertainment expenses that Aena may incur for third parties, must be duly authorised, consistent and reasonable and under no circumstances classifiable as excessive or extravagant. In these cases and to the extent possible, the travel policy applicable to Aena's staff shall apply. These expenses shall always be paid to the provider of the service and must in all cases be supported by the presentation of the relevant receipt.

In addition, all individuals to whom this Code applies shall reject and report to the Compliance Monitoring and Control Body any offer by any third party, from the public or private sector, of payments, commissions, remuneration or gifts of any kind, except for those previously mentioned in sections a) and b).

Should anyone individual to whom this Code applies have any doubts on whether an action is prohibited or not, or on how to act when faced with a certain situation, they must



consult the Compliance Monitoring and Control Body through the Compliance Department.

No individuals to whom this Code applies may, themselves or through a nominee, receive loans or any type of credit facility from clients, suppliers, intermediaries or counterparties, unless they are at arm's length and under market conditions.

The restrictions provided for in this section extend to close relatives¹, and to legal entities over which those to whom the restrictions apply or their close relatives exercise control or significant influence; both from the point of view of the individuals to whom this Code applies (i.e. the prohibition on accepting gifts extends to the close relatives of a Director) and from that of third parties (i.e. the prohibition on giving gifts to a public official also extends to their close relatives).

4.13 Political or organisation membership activities

The making of donations or contributions to a political party, federation, coalition or electoral group is expressly forbidden when charged using Company resources.

Relationships with, membership of or cooperation with political parties or with other types of entities, institutions or associations with public purposes that go beyond those of Aena, as well as any contributions or services to them, must be pursued in a manner that clearly shows their personal nature and avoids any involvement on the part of Aena, during free time and without using any of Aena's resources (including Aena's computers, e-mail and telephones).

In addition, before accepting any public office, all individuals to whom this Code applies must inform the People and Organisation Department of such circumstance so that it may determine the existence of any incompatibilities with or restrictions on the office in question. Moreover, all individuals to whom this Code applies must also comply with whatever is established for the purpose in the legislation on incompatibilities.

4.14 Corporate image and reputation

Aena considers its corporate image and reputation as one of its most valuable assets to preserve the trust of its shareholders, clients, employees, suppliers, authorities and society at large. Therefore, all individuals to whom this Code applies must use Aena's corporate image and reputation correctly and properly.

In this sense, all individuals to whom this Code applies must exercise particular caution in any public intervention, when intervening before the media, participating in professional conferences or seminars, or in any other act that may be publicly disseminated, provided that they appear as Aena personnel.

¹ For the purposes of this Code, close relatives are those who could influence or be influenced by individuals to whom this restriction applies in their decisions related to the Company. They include: a) spouse or spousal equivalent; b) ascendants, descendants and siblings and respective spouses or spousal equivalents; c) ascendants, descendants and siblings of the spouse or spousal equivalent; and d) dependents or the dependents of the spouse or spousal equivalent.



Likewise, all individuals to whom this Code applies shall pay due attention to the use made of Aena's name by clients, suppliers and external partners, ensuring that such use is correct and suited to the corporate image and identity.

4.15 Conflicts of interest and incompatibilities

Despite the impossibility of identifying and responding to each of the personal conflicts of interest that may arise in practice within our organisation, a conflict of interest will be generally considered to exist in those situations in which the personal interest of any individuals to whom this Code applies or a natural or legal person associated with them, whether directly or indirectly, differs from the interest of Aena or any of its subsidiaries or affiliates.

Faced with a situation of potential conflict of interest, all individuals to whom this Code applies must always act, in the fulfilment of their responsibilities, with loyalty, honesty and in defence of the interests of Aena. They must abstain from giving priority to their personal interests at the expense of those of Aena and from intervening or influencing the taking of decisions affected by such conflicts of interest.

Furthermore, all individuals to whom this Code applies must inform the Compliance Monitoring and Control Body in writing of any possible conflict of interest in which they may be involved, and may not under any circumstances perform transactions or activities that pose or may pose a conflict of interest without the prior written authorisation of the Compliance Monitoring and Control Body.

All individuals to whom this Code applies who wish to engage in a second activity, whether public or private, must comply with the provisions of the regulations on incompatibilities.

4.16 Projects of a social nature and sponsorships

In order to comply with Aena's commitment to transparency, any collaboration, sponsorship or patronage arrangement pursued by Aena, in addition to being properly recorded in its books of account, and to having secured any express internal and external authorisations that may be required, may only be pursued with organisations or institutions that are not linked to any political party and whose purpose is not political and that have the appropriate organisational structure to guarantee the proper administration of the resources contributed by Aena.

Such collaborations, sponsorships or patronage must always be aimed at strengthening the good reputation and image of our brand and our commitment to society, and under no circumstances may they be used as a subterfuge to conduct practices or make covert payments contrary to this Code of Conduct.

Moreover, Aena must, as far as possible, effectively monitor any collaboration or sponsorship entered into in order to know the correct use of the Company's resources.

INFORMATION-RELATED CONDUCT

4.17 Confidentiality and authenticity of information



Aena considers that it is essential to respect the confidentiality of any information that is the property of Aena and considered reserved and confidential, to which any individuals to whom this Code applies may have access by reason of their office.

In this respect, all individuals to whom this Code applies must observe the duty of professional secrecy with respect to any non-public information of which they become aware as a result of their professional activity, whether it originates with or refers to Aena, its employees or any other third party. In particular, all individuals to whom this Code applies undertake

- a. To use the information or data exclusively for the purpose of carrying out their professional activity at Aena, and to disclose it only to those other professionals at Aena who need to know it for the same purpose.
- b. To strictly observe the duty of permanent confidentiality of any information learned in the course of their work at Aena, even after their professional relationship with Aena has ended.
- c. Not to use the confidential or reserved information of Aena for their own benefit or that of a third party.

All individuals to whom this Code applies shall uphold the truthfulness of the information as a basic principle in all their actions. Therefore, they must truthfully convey all the information they have to disclose, both internally and externally, and in no case must they knowingly provide incorrect or inaccurate information that could mislead the recipient and negatively impact the image or reputation of Aena.

4.18 Personal data protection

All individuals to whom this Code applies are bound to respect the privacy of all persons, employees, customers, and any other persons, with regard to personal or family life, whose data they may have access to in the course of performing Aena-related activity, and must safeguard any personal data that is stored and exchanged during their professional activity in Aena.

4.19 Financial and non-financial information

All of Aena's accounting, financial and non-financial information shall be prepared with reliability and accuracy, ensuring at all times that any economic information that Aena may present to its shareholders and investors, the securities markets or any public authorities or public or private supervisory body, is true and complete.

In this regard, all individuals to whom this Code applies responsible for preparing the financial information of Aena must ensure that all the information reflects all of the transactions, events, rights and obligations affecting Aena, and that these have been recorded, classified and valued at the right time and in accordance with the applicable legislation, thus making sure that this information offers a true image of the equity, the financial situation, the profit and loss and cash flows of Aena.



Likewise, persons responsible for preparing financial information must comply with all of the internal and external control procedures established by Aena in order to guarantee that all transactions receive the correct accounting treatment and are properly reflected in the financial information published by Aena.

The Audit Committee shall supervise the financial and non-financial reporting process and the effectiveness of any internal controls, internal and external audits, and risk management systems.

4.20 Information and Communication Technology

When using Aena's IT and technology systems, all individuals to whom this Code applies must take maximum security measures and strictly comply with any rules of use and policies established for the purpose by Aena, such as the Information Systems Security Policy, the Information Classification Policy, the Internet Access Policy, the Data Network Access Policy, IT Asset Use Policy, the Corporate E-Mail Use Policy, the Smart Mobile Device Use Policy, the regulations issued by the Spanish Directorate of Information and Communication Technologies (DTIC) on the use of tools and resources for microcomputing network servers, and the Procedure for Managing Users of Aena Software. All of the above is available to all individuals to whom this Code applies on the corporate intranet, in the DTIC document manager.

CONDUCT RELATED TO LEGAL OBLIGATIONS

4.21 Respect for legality and for Aena's ethical principles

All individuals to whom this Code applies must comply with the general provisions that apply to them in the course of discharging their professional duties and responsibilities (laws, regulations, circulars from regulatory and supervisory bodies), as well as with any internal Aena regulations that apply to the activity conducted by each individual person. To this end, any doubts as to the regulations that apply or to the legality of a given action should be submitted to the Corporate General Secretary of Aena or the People and Organisation Department in the case of a labour-related doubt.

In addition, all individuals to whom this Code applies must engage in professional conduct that is upright, impartial, honest and in accordance with Aena's ethical principles, and must refrain from engaging in situations, activities or interests that are illegal or immoral and/or in any way incompatible with the duties entrusted to them in our organisation.

All individuals to whom this Code applies who become involved, whether as alleged liable parties, witnesses or in another capacity, in a process involving a criminal or civil court, employment tribunal or judicial review, which is directly or indirectly related to their professional activities at Aena, must inform the Corporate General Secretary as soon as possible, which, in the event of referring to a breach of regulations, will also inform the Compliance Department for the purposes of its report to the Compliance Monitoring and Control Body.



4.22 Tax obligations

Aena expressly prohibits any practice that entails evading the payment of tax to the detriment of the Tax Agency, the Social Security System or any other administrative agency of the local or regional authorities. Therefore, all individuals to whom this Code applies must avoid such practices at all times.

4.23 Intellectual and industrial property rights

All individuals to whom this Code applies must respect Aena's intellectual property rights and right of use with regard to any courses, projects, software and IT systems, equipment, manuals, know-how, processes and, in general, any project or work developed or created by Aena, whether as a result of its professional activity or that of a third party.

All individuals to whom this Code applies must also respect the intellectual and industrial property rights held by third parties unrelated to Aena and, in particular, any type of information or physical or electronic documentation belonging to a third party that has been obtained (e.g. through the holding of a previous post) may be incorporated, utilised or employed without the due consent of its owner.

Furthermore, all individuals to whom this Code applies shall refrain from using the image, name or trademarks of Aena for personal reasons or purposes unrelated to the Company. They may only be used for the proper pursuit of their professional activity at Aena.

5. ACCEPTANCE OF THE CODE OF CONDUCT

All individuals to whom this Code applies, as well as any individuals who join or become part of Aena in any form, are expressly affected by the entire contents of this Code and, in particular, by the ethical principles and rules of conduct set out in its provisions.

6. COMPLIANCE MONITORING AND CONTROL BODY AND COMPLIANCE DEPARTMENT

The Compliance Monitoring and Control Body is in charge of overseeing, controlling and evaluating the correct operation of the General Regulatory Compliance System, and has, among others, the obligation to promote knowledge of and compliance with the Code of Conduct, interpret it and provide guidance in decision-making in case of doubt, as well as to make proposals for its improvement when it deems appropriate. The Compliance Monitoring and Control Body performs part of its duties through the Compliance Department, which it oversees.

The Compliance Monitoring and Control Body may be reached by e-mail at the following address: organocumplimiento@aena.es.

7. BREACHES AND DUTY TO REPORT



In accordance with the provisions of this Code, respect for the law constitutes one of Aena's fundamental principles and, accordingly, we endeavour to attain the highest levels of compliance and integrity in pursuing our activity, assuming as a management objective the achievement of a high degree of awareness on the part of Aena's workers of the importance of acting at all times with the utmost respect for the law and minimising as far as possible the risk of unethical practices or regulatory breaches occurring in our organisation.

In this respect, all individuals to whom this Code applies must perform their professional duties according to and with respect for the internal policies and regulations established by Aena to prevent any unlawful and/or criminal conduct in our organisation, and in accordance with the provisions of the Criminal Code, which must be read, understood and always borne in mind in the discharge of the duties assigned to each individual.

In this respect, in order to prevent or, where applicable, detect any irregular conduct that may occur at any of the hierarchical levels of Aena, all individuals to whom this Code applies must inform on, report and collaborate in the investigation of possible risks to or breaches of the Code of Conduct or any other internal regulation or protocol of action established in Aena, and/or of any action that may be considered unlawful or criminal of which they have knowledge or suspicion, through the communication channels of the Internal Reporting System.

Aena guarantees absolute confidentiality and anonymity in the processing of reports and expressly and rigorously prohibits the adoption of any kind of retaliation or negative consequence for an employee as a result of having made a report.

The Whistleblower Channel can be accessed via the following link:

<https://juno.aena.es/portal/cande/paginas/canal.aspx>

8. PENALTIES FOR BREACHES

Any breach of the Code of Conduct, any other internal regulations or policy and/or legal or contractual provision in the discharge of the professional duties assigned to each person shall be deemed to be a labour breach subject to penalties, in which case the procedure provided for in Aena's Collective Agreement and in other applicable regulations shall be followed.

The penalties applicable to the disciplinary misconduct referred to above shall be classified by Aena as minor, serious or very serious, depending on the specific circumstances of the case and in accordance with the disciplinary rules established in Aena's Collective Agreement and, where appropriate, any other applicable regulations.

Furthermore, in the case of breaches attributable (i) to the members of the Board of Directors, the provisions of the Regulations of the Board of Directors and the applicable legislation shall apply for these purposes, (ii) to employees who work for Aena under a senior management contract, the provisions of the contracts regulating their relationship with Aena, as well as of any legislation applicable to them, shall apply for these purposes.



9. TERM AND UPDATE OF THE CODE OF CONDUCT

This Code of Conduct was approved by the Board of Directors of Aena at its meeting of 30 June 2015, and was last updated at its meeting of 30 May 2023.

Any amendments made to the Code of Conduct shall be approved by the Board of Directors, following a proposal and report from the Compliance Monitoring and Control Body, and shall apply from the day following that of their notification by electronic means to all individuals to whom this Code applies.

10. REPEALING PROVISION

This Code of Conduct repeals and supersedes the Aena Code of Conduct for Managers and Structural Personnel, dated 27 November 2008.
