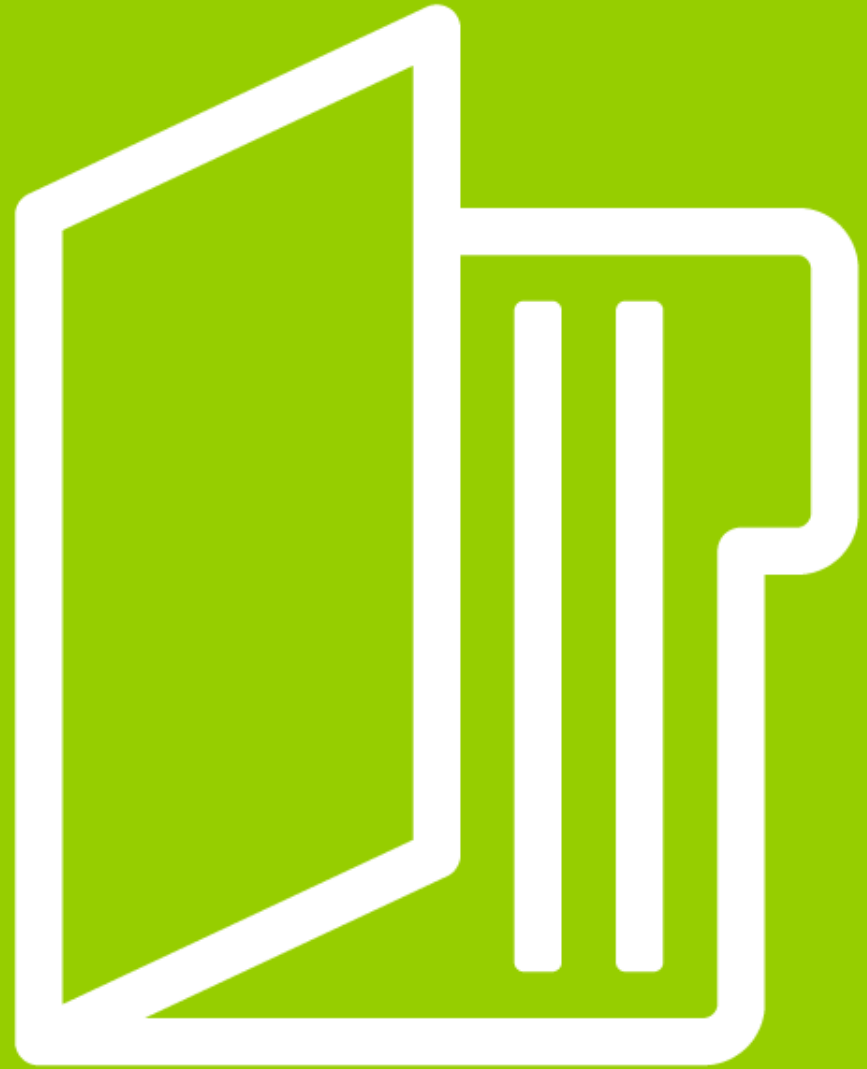


Consolidated Management Report 2023



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Introduction



Letter from the Chairman

(GRI 2-22)



Maurici Lucena Betriu - Chairman

Dear friends,

As every year, I share with all of you the main aspects of our activity throughout the year 2023, an exercise that I dare to describe as excellent, marked by the full recovery of the air transport sector and by the fulfilment, by far, of the objectives we had set.

Since the beginning of 2023, the anticipated recovery of the traffic data we recorded in 2019 has become a reality. Thus, although factors such as geopolitical instability have contributed to maintaining a context of uncertainty, we closed the year with a normalized situation in terms of connectivity and traffic volume. The projected increase estimated at the beginning of this year for the 2023 traffic forecast scenarios has been achieved and we have significantly surpassed the objectives we had set for ourselves.

After a few challenging years, more than 314.1 million passengers have transited through the airports of the Aena Group (Aena SME, SA., London Luton Airport, and Northeast Brazil Airport Group), 16.0% more than in 2022 and 2.3% more than in 2019 (the year before the outbreak of the pandemic). These figures have allowed us to achieve an unprecedented record in our operations.

This rapid recovery has been possible thanks to the effort, professionalism, and dedication of the Aena teams, who have once again demonstrated their operational excellence and have enabled us to meet this high demand with high standards of safety, quality, and sustainability, hallmarks of our company.

Commercial and real estate activities have also contributed significantly to the company's excellent results in 2023. Sales and commercial revenue figures have surpassed the 2019 reference, since the beginning of the year, thanks to the success achieved in re-tendering and new contracts.

I cannot fail to mention the extraordinary progress of the Company in the international arena, demonstrating Aena's intention to establish itself as a globally recognized airport operator. Internationally, we have completed the construction of airports in Northeast Brazil and acquired control and begun managing the Eleven Airport Block in Brazil (BOAB), with Congonhas at the forefront, thanks to which we now manage 20% of the country's air traffic.

Thanks to all these milestones, as a result of this journey, the economic and financial performance of our Company has shown substantial improvement, with an EBITDA of 3,022,610 thousand euros (2,078.9 thousand euros in 2022) and net income of 1,630,814 (901,499 thousand euros in 2022), which will provide us with the necessary stability to establish future growth as well as the recovery of an attractive dividend for our shareholders. These good results are accompanied by outstanding levels of quality, compliance with planned investments, and significant progress in our sustainability actions.

As evidence of this, in June 2023, Aena formalized a sustainable syndicated credit line ("Sustainability-Linked RCF") for an amount of 2,000 million euros, reinforcing our commitment to the environment, social responsibility, and good corporate governance. Additionally, we have managed to maintain the highest rating awarded by the Carbon Disclosure Project (CDP) in terms of climate change and present our emissions reduction targets to the Science Based Target initiative (SBTi), thus validating our climate action route towards a Net Zero Emission target by 2040. We ended the year by achieving another major milestone, the inclusion of Aena, for the first time, in the prestigious Dow Jones Sustainability World Index and maintaining our commitment to Principles of the Global Compact.

Looking ahead to the future, we are already looking beyond our regulatory horizon for the next three years and have begun actively working to lay the foundations for the third DORA 2027-2031. All of this, focusing on sustainability, decarbonization, and the fight against climate change as key cross-cutting elements within the Company. To project our future, it is necessary to drive our commitment to ESG aspects and continuously improve our benchmark indices.

The company's success is a reflection of the professionalism of all the people who are part of Aena, an admirable company for its performance. A committed and diverse team that have made our company an undisputed leader among airport organizations worldwide in terms of traffic, profitability, and service quality.

Finally, I want to mention that our activity would not be possible without the trust placed by clients, tenants, airlines, or shareholders, among others, who accompany us in our innovative commitment and participate in our achievements.

Overview of the document

This Consolidated Management Report 2023 relating to the activity of the Aena Group¹ (hereinafter 'Aena' or 'the Company') has been designed to inform Aena's stakeholders of its performance in economic, social and environmental matters throughout 2023, also complying with the reporting requirements of Act 11/2018, of 28 December, on the disclosure of Non-Financial Information and Diversity, with the preparation of the Non-Financial Information Statement (NFIS).

Through this document, the Aena Group 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 and integrated with a Non-Financial Information Statement, the Corporate Governance Report and the Annual Report on Remuneration for the fiscal year 2023. Moreover, the Company's website² 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 - Economic and financial information' of this Consolidated Management Report, the development of which analyses in detail 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. Meanwhile, the economic results of the business areas are analysed by segment in Chapter 3 of the aforementioned Block. For these analytical purposes and with the aim of offering a better understanding of the results of the Group's management of the airports it operates in Spain, the traffic data, as well as the economic information of 'Aena Sociedad Concesionaria del Aeropuerto Internacional de la Región de Murcia S.M.E., S.A.' (SCAIRM) are integrated within the network's data when presenting the evolution of the aeronautical, commercial and real estate services activity in the Consolidated Management Report.

With regard to non-financial information, 'Block B - Sustainability Report' is developed in accordance with the regulations applicable to the NFIS. In this section, the most relevant topics are developed in relation to sustainable governance, environment, human rights and social issues, value chain, quality and safety of services, and innovation.

Structure of the Consolidated Management Report 2023

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.

Additionally, other documents are included such as the Greenhouse Gas Emissions Inventory Verification Report and the corresponding inventory, the Annual Corporate Governance Report, or the Annual Remuneration 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 section 'Index of contents Act 11/2018'), includes a brief mention of such issues, as well as a reference to the chapter in which they are developed.

The following are introduced as appendices:

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

Level of review by external auditors

(GRI 2-5)

The content of the Consolidated Management Report 2023 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.

¹ 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 Bloque de Once Aeroportos de Brasil ('BOAB') in Brazil.

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

³ Other information: "Consolidated Management Report" in the "Audit Report", under "Audit Report and Consolidated Annual Accounts".

- 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 2023.⁴
- Deloitte, S.L. has issued a verification report with a limited level of assurance on the contents on 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 'Index of contents Act 11/2018' and 'Table: Index of contents GRI' in Block B of the Consolidated Management Report.⁵
- Deloitte, S.L. has issued a limited assurance verification report on the greenhouse gas emissions indicators of Aena SME, SA and SCAIRM, a review conducted in accordance with ISO 14064-3 standard.

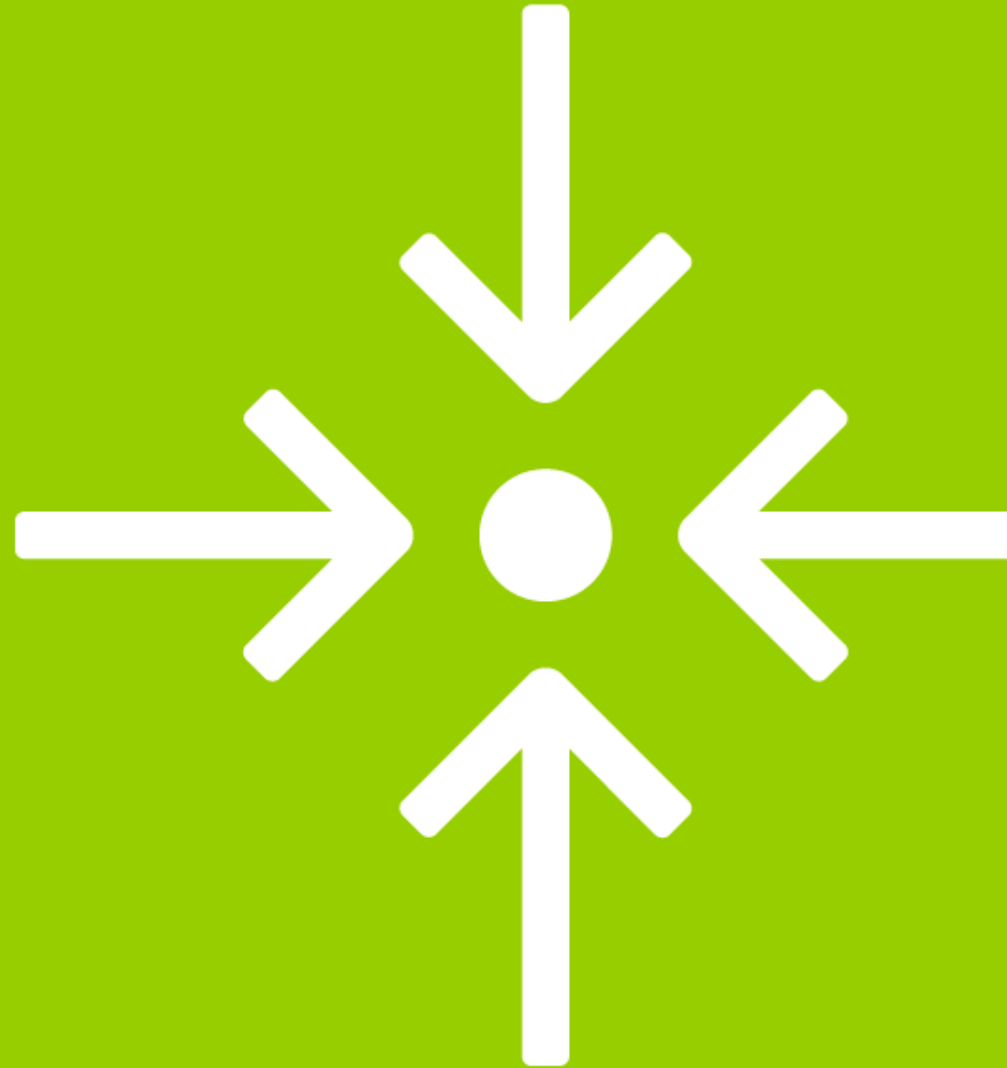
As a sample of Aena's commitment to the regular rotation of external auditors, and in compliance with Article 52 of its Corporate Bylaws, the account auditors will be appointed by the Annual General Meeting before the end of the fiscal year to be audited, for a certain initial period of time, which may 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 Annual General 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.

⁴Appendix of Section F of the Annual Corporate Governance Report of Aena S.M.E., S.A. of 31 December 2023.

⁵Independent Verification Report' in Section 'B. Non-Financial Information Statement'.

**2023: Reactivation
and new challenges**





Signing of agreement with 'Saving the Amazon' to create Aena Forest.

Creation of the alliance for using green hydrogen in aviation



Changes to the corporate structure to adapt to the Strategic Plan.

On 27 February, the Board of Directors approved the awarding of the tender for the renovation of the food and beverage offer at Adolfo Suárez Madrid-Barajas Airport.



Adolfo Suárez Madrid-Barajas Airport chosen by users as the tenth Best Airport in the World at the Skytrax World Airport Awards 2023.

ACI awards 7 airports in the network: Palma de Mallorca Airport, Alicante-Elche Airport, Asturias Airport, Región de Murcia International Airport, Reus Airport, Pamplona Airport and El Hierro Airport. Valencia Airport turns 90 years old.

Aena signs the concession contract for the 11 airports in Brazil, including Congonhas-São Paulo.



Aena makes €133.6 million in the first quarter of 2023 and commercial sales improve by more than 12% compared to pre-pandemic activity.

The winning ideas from the fourth edition of the Awards have been chosen.

F.G.L. Granada-Jaén Airport completes the reform and extension of the terminal building.

The Alliance for Sustainable Air Transport is launched, bringing together business, academia and the third sector to address the challenge of environmental, economic and social sustainability in aviation.

Aena creates a badge to identify people with invisible disabilities.

Aena, awarded by the Autonomous University of Madrid, for its contribution to the training and learning of its students.



Aena holds its fourth internal innovation awards.

Following the approval by the Annual General Meeting of the proposed distribution of the net profit of Aena S.M.E., S.A. for the fiscal year 2022, the proposed dividend of €712.5 million was paid on 4 May 2023 (no dividends were distributed in the six-month period ended 30 June 2022).

On 30 May 2023, the Board of Directors of Aena approved the award of the management of duty-free shops at 23 airports, corresponding to the following lots: Andalusia-Mediterranean, Canary Islands, Balearic Islands and North Airports.

New Airport Carbon Accreditation strategy with 19 airports at level 4+ by 2026 and level 5 by 2030.

Certification in 2023 of level 3 (Optimization) in the ACI EU Airport Carbon Accreditation program at the 4 main airports in the network, AS Madrid Barajas, JT Barcelona-El Prat, Málaga-Costa del Sol, and Palma de Mallorca.



Aena Ventures opens its second call for start-ups worldwide. Aena awards the duty-free shops at 23 airports and relaunches the tender for Madrid (MAD) and Catalonia (CAT).

Launch of the 5th edition of the Innova Awards. Recognition by the Ministry of Transport, Mobility and Urban Agenda of Aena's work as a benchmark entity in the logistics sector.

Aena completes the final stage for the start of the BOAB concession.

Aena, host of the ACI Europe/World 2023 Annual General Assembly, Conference and Exhibition.

Aena launches the 'Aena with Research' programme.

Aena renews the 't for transparent' seal granted by the Haz Foundation.

Recognition of the quality of the corporate information issued in IBEX 35. AECA Awards for Business Transparency 2023. Recognition for its progress in sustainability, remaining in the FTSE4Good

On June 1, 2023, the Fitch rating agency confirms the long-term credit rating assigned to Aena "A-" with a stable and short-term outlook "F2"



The management of duty-free shops at the airports in Catalonia and Madrid has been awarded.

Aena Ventures receives more than 500 proposals.

Aena has been recognised in the ranking of companies for Equality.

Aena, included in the Financial Times 'Europe's Climate Leaders 2023' ranking.

The Board of Directors, at its meeting held on 25 July 2023, approves Aena's charge proposal applicable as of 1 March 2024.



Aena renews the certification of its airports in the Airport Carbon Accreditation programme.



Aena 360° reaches number 700.

75th anniversary of Bilbao Airport.

Licences for ground handling services assigned to airlines.

London-Luton Airport achieves ACA Level 4.



Start of operations at BOAB airports.

Aena makes its inaugural bond issuance

Aena starts the process for the Rent a Car tender at 38 airports in the network.

Launch of 'Aena with society'

Submission to SBTi of short and long-term decarbonization targets based on the 1.5°C scenario, for validation.



Aena records an EBITDA of €2,113 million in the first 9 months of the year.

Start of operations continue at BOAB airports.

The private security service for Spain's airports has been awarded.

Aena Ventures holds its welcome week in which the 5 selected start-ups present their projects.

20 years of the International Cooperation programme, a pioneer in the European airport sector.

Aena launches the Equality survey.



Aena enters the Dow Jones Sustainability World Index for the first time

The Board of Directors of Aena approved the initiation of the process for the renewal of the self-drive vehicle rental service at 38 airports in the network, compared to the current 34. The available spaces will exceed 21,500, and the licenses will increase from the current 170 to 218. The publication of this tender is scheduled for early January 2024. The new contracts will have a duration of between 5 and 7 years. This is one of the largest self-drive car rental tenders in the world, with an estimated business volume of 10 billion euros during the contract period.

Business Model

(GRI 2-1; 2-6)

Aena S.M.E., S.A. is a state-owned company that manages 46 airports and 2 heliports in Spain, a leader in the management of airport services thanks to its experience, capacity and professional team.

It offers its customers (passengers, airlines, handling agents and users in general) a comprehensive service that includes a commercial offer, with guarantees of full accessibility and a service for people with reduced mobility that is internationally recognised for its excellence.

Through its subsidiary Aena Desarrollo Internacional S.M.E., S.A. (hereinafter, 'Aena Internacional') it also participates in the management of 34 airports in different countries in Europe and America (United Kingdom, Brazil, Mexico, Jamaica and Colombia).

This Consolidated Management Report 2023 relates to the activity of the Aena Group (hereinafter, 'Aena' or 'the Company'), made up of Aena S.M.E, S.A., Sociedad Concesionaria del Aeropuerto Internacional de la Región de Murcia (SCAIRM), Aena International (ADI) in Spain, London-Luton Airport Group companies in the United Kingdom, as well as Sociedad Concesionaria Aeroportos do Nordeste do Brasil, S.A ('ANB') and Bloque de Once Aeroportos de Brasil ('BOAB') in Brazil.



Spain	A Coruña (LCG) Adolfo Suárez Madrid-Barajas (MAD) Albacete (ABC) Algeciras (AEI) Alicante-Elche Miguel Hernández (ALC) Almería (LEI) Asturias (OVD) Badajoz (BJZ) Bilbao (BIO) Burgos (RGS) Ceuta (JCU) César Manrique-Lanzarote (ACE) Córdoba (ODB) El Hierro (VDE) Federico García Lorca Granada-Jaén (GRX) Fuerteventura (FUE) Girona-Costa Brava (GRO) Gran Canaria (LPA) Huesca-Pirineos (HSK) Ibiza (IBZ) Internacional Región de Murcia (RMU) Jerez (XRY) Josep Tarradellas Barcelona-El Prat (BCN) La Gomera (GMZ)	La Palma (SPC) León (LEN) Logroño-Agoncillo (RJL) Madrid - Cuatro Vientos (LECU) Melilla (MLN) Menorca (MAH) Málaga-Costa del Sol (AGP) Palma de Mallorca (PMI) Pamplona (PNA) Reus (REU) Sabadell (QSA) Salamanca (SLM) San Sebastián (EAS) Santiago-Rosalía de Castro (SCQ) Seve Ballesteros-Santander (SDR) Sevilla (SVQ) Son Bonet (LESB) Tenerife Norte-Ciudad de La Laguna (TFN) Tenerife Sur (TFS) Valencia (VLC) Valladolid (VLL) Vigo (VGO) Vitoria (VIT) Zaragoza (ZAZ)
	United Kingdom Londres-Luton (LTN), United Kingdom.	
Brazil	Aeroportos do Nordeste do Brasil S.A. (ANB): Recife Guararapes - Gilberto Freyre (REC) Maceió - Zumbi dos Palmares (MCZ) Aracaju - Santa Maria (AJU) João Pessoa - Presidente Castro Pinto (JPA) Juazeiro do Norte - Orlando Bezerra de Menezes (JDO) Campina Grande - Presidente João Suassuna (CPV)	Bloco de Onze Aeroportos do Brasil S.A. (BOAB): São Paulo/Congonhas - Deputado Freitas Nobre (CGH) Campo Grande (CGR) Corumbá (CMG) Ponta Porã (PMG) Santarém - Maestro Wilson Fonseca (STM) Marabá - João Correia da Rocha (MAB) Carajás - Parauapebas (CKS) Altamira (ATM) Uberlândia - Tenente Coronel Aviator César Bombonato (UDI) Montes Claros - Mário Ribeiro (MOC) Uberaba - Mário de Almeida Franco (UBA)
Participating companies	Aena Internacional's involvement includes 12 airports in Mexico, 2 airports in Jamaica, and 2 airports in Colombia.	

SPAIN	
2022	2023
No. of employees	
8,196	7,892
Passengers	
243,693,689	283,195,399
Operations	
2,216,474	2,403,918
Cargo (TN)	
1,000,356	1,079,676

UNITED KINGDOM	
2022	2023
No. of employees	
685	628
Passengers	
13,136,865	16,195,502
Operations	
118,064	128,442
Cargo (TN)	
32,001	26,043

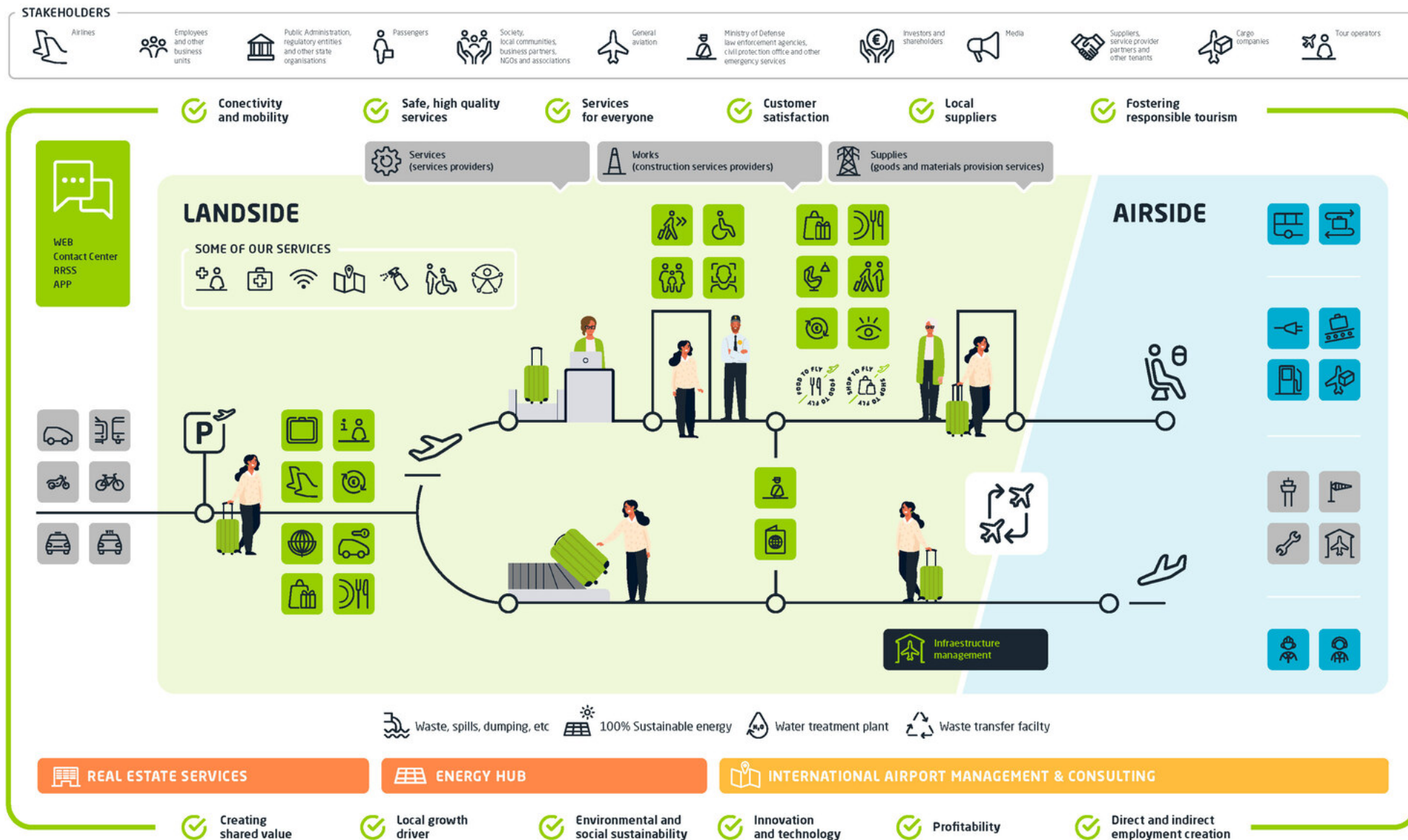
BRAZIL	
2022	2023
No. of employees	
349	795
Passengers	
13,862,694	20,287,680
Operations	
135,074	202,723
Cargo (TN)	
71,140	71,266

The scope of the information includes companies in which Aena holds more than a 50% stake, as reflected in the Annual Accounts under the control criterion (Aena Group); comprising Aena SME, SA, the Concessionaire Company of the

Region of Murcia International Airport (SCAIRM), Aena Internacional (ADI) in Spain, the companies of the London Luton Airport Group in the United Kingdom, as well as the Concessionaire Company Aeroportos do Nordeste do Brasil, S.A ("Aena Brasil") and the Block of Eleven Airports in Brazil ("BOAB").

Aena and its value chain

(GRI 2-6)



Activities performed by the Company and its value chain

(GRI 2-6)

Aena's main activity is airport management. The Company performs its activities based on the following segment classification:

- The Airports segment: It is shaped by aeronautical activity and the management of associated commercial spaces. These are the Group's operations in which it takes on the role of manager of the airport and its commercial spaces, including the car park network and some VIP spaces.
- Real Estate Services segment: This corresponds to the provision of services for the lease or transfer of use of land, office buildings, warehouses, hangars and cargo bays to airlines, air cargo operators, handling agents and other airport service providers for supporting the activity and developing complementary services.
- The SCAIRM segment: This corresponds to the activity carried out by the Company 'Aena Sociedad Concesionaria del Aeropuerto Internacional de la Región de Murcia S.M.E., S.A.'.
- The International segment: Developed through its state-owned subsidiary company Aena Desarrollo Internacional S.M.E., S.A. (Aena Internacional), which participates in the management of 23 airports in different countries, using Aena's aeronautical experience and know-how. Aena Internacional assumes all functions corresponding to its participation in international business, backed by Aena's experience, know-how and resources. Additionally, in the field of airport consultancy, it participates as an expert in airport operations in international strategic projects.

Upstream

The types of actors comprising Aena's supply chain (upstream) are all those suppliers that provide goods and services to the Company, with a main distinction being made between:

- Work (construction, improvement, expansion and maintenance of airport terminals, roads, etc.).
- Services (consultancies, maintenance, etc.).
- Supply (administrative and non-administrative products).

Depending on the product or service provided, the nature of the relationships with suppliers may be short-, medium- or long-term, and their geographical location varies according to the country in which the Aena Group companies operate⁶.

⁶For more details and related indicators, see section '4.1.2. Description of the supply chain'.

Downstream

This refers to all activities and services aimed at end users, whether they are individuals, organisations, etc. With regard to the types of companies downstream of Aena, the following are noteworthy:

- Passengers (mobility and transportation services, parking, customer service, etc.)
- Airlines (aeronautical operation services, ground handling, baggage management, control authorities, slots, etc.)
- Business partners (retail and food and beverage services, maintenance, VIP lounges)
- Investments (airport infrastructure - may have only financial participation, or partial operational control in partnership).

They use Aena's products and services to physically move or start up their own business. Like in business relationships with suppliers, the nature of these relationships with downstream companies can be short-, medium- or long-term. Finally, it is worth highlighting that most downstream companies are located in the same jurisdictions in which Aena operates.

Aena's privileged position as an industry leader is based on the efficient and appropriate response to the expectations and needs posed by stakeholders throughout its value chain. In this way, trusting relationships are established that contribute to the creation of differential value.

1. Context and strategy

(GRI 2-6)

1.1. The aviation sector

(GRI 3-3)

The aviation sector has a key strategic role to play in global economic development, highlighted by its potential to influence trade, tourism, investment projects and connectivity of territories worldwide, and to drive local and regional development in the foundations of its operations.

The aviation sector facilitates and promotes world trade, opening the way to the globalisation of production, connecting cultures, countries, companies and people.

With the end of the COVID-19 restrictions, the operation of the sector has regained ground globally. Early estimates by the International Civil Aviation Organisation (ICAOI)⁷ positioned 2023 as the year when pre-pandemic flows are reached, including projecting a sector growth of 3% compared to 2019. At the beginning of 2023, the projections on the evolution of traffic in the Spanish airport network led the Company to estimate closing the current year with around 280 million passengers, equivalent to a 102% recovery in traffic compared to 2019. Indeed, today we can say that the numbers achieved in 2023, with figures of 283.2 million passengers. In this regard, various entities project that global passenger traffic will grow between 3.3% and 4.3% (CAGR) over the next 20 years, driven by emerging markets⁸.

In 2023, more than 314.1 million passengers have transited through the airports of the Aena Group (Aena SME, SA., London Luton Airport, and Northeast Brazil Airport Group), which is 16.0% more than in 2022 and 2.3% more than in 2019.

In view of this context, in Spain, the importance of air transport, and therefore of Aena's activity, takes on a leading role in the country's connectivity, due to its continental geographical position and its peninsular-insular distribution. In economic terms, for every million domestic flight passengers in Spain, €102 million of GDP and 1,852 full-time jobs are generated. In addition to this, the 10% increase in the number of airline seats on offer increases foreign direct investment by almost 5%, exports by 2.5% and the number of headquarters of large companies in the airport's area of influence by 4%.⁹

Likewise, it is worth noting Aena's growing leadership in global airport management. Proof of this has been the awarding of the group of 11 airports in Brazil, the largest international operation in Aena's history, which, under the brand ANB, has managed another six airports in the northeast of the country since 2020. Aena also has a presence in the United Kingdom, where it manages 51% of London-Luton Airport, and in Mexico, Colombia and Jamaica. In Brazil, Aena is immersed in an ambitious investment plan to increase the connectivity of infrastructures in the northeast and, with the integration of the BOAB airports, it will lead the largest network of concession airports in the country.

However, alongside this growth and desire for leadership, Aena, and the aviation sector in general, faces complex and diverse challenges¹⁰ that emerge in the current global context. Looking ahead, a good understanding of the context is key for the company to best respond to major risks and identify opportunities:

⁷ Forecasts Complete and Sustainable Recovery and Growth of Air Passenger Demand in 2023

⁸ 20-year traffic forecast by IATA, ACI, Boeing, Airbus.

⁹ Information obtained from a study conducted by Iberia.

¹⁰ Based on the ENAIRE Action Plan 2025 and the Aena Strategic Plan 2026.



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

TRENDS AND RISKS

SCENARIO

MACROECONOMIC AND POLITICAL CONTEXT CONCENTRATION AND COMPETITION

See note 3.1.1. of the consolidated annual accounts for the fiscal year 2023.

Regarding the macroeconomic environment, the economic situation remains subject to risks such as persistent inflation or the tightening of monetary policy, with rising rates. Lower disposable income of families could mean a containment of non-essential expenses, affecting tourist flows.

The global geopolitical situation is currently marked by the uncertainty derived from the evolution of the war conflicts in the Middle East and Ukraine, whose impact on the world economy and tourism can be significant, both in the short and medium term.

The most relevant impact derived from the current macroeconomic and geopolitical crisis is a consequence of the high increase in the cost of electrical energy that occurred in 2022, reducing considerably during 2023.

Risks associated with the emergence of new pandemics.

External factors that could have a negative impact on the evolution of tourist flows and the economic situation of airlines, causing a drop in traffic and the loss of competitive position that could also be affected by the appearance of new means of transport, alternative airports and by changes in the strategy of the already existing ones.

The Company is facing the rise of other means of transport, such as the entry into service of new AVE corridors in Spain and the liberalization of the railway sector with the emergence of new operators that have entered the market.

Concentration of clients in both aeronautical and commercial activities and dependence on its two main airports (Adolfo Suárez Madrid - Barajas and Josep Tarradellas Barcelona - El Prat).

CYBERSECURITY

Systems and infrastructures dependent on information and communications technologies face the risks inherent to cybersecurity, the result of threats and exploitation of increasingly sophisticated internal and external vulnerabilities, as a consequence of cyberattacks and other threats to confidentiality, integrity, availability, traceability and authenticity of the information stored in the systems, as well as their capacity.

OPERATIONAL AND PHYSICAL SECURITY

The physical or operational security risks derived from terrorist attacks, wars aviation accidents or any other kind of incidents, the probability of which has not decreased and may evolve into new scenarios.

THIRD-PARTY DEPENDENCY

The Group depends on the services provided by third parties at its airports (handling companies, security, air traffic controllers, etc.). Aspects such as labour conflicts and non-compliance with service levels could have an impact on operations, in a scenario of widespread cost increases and difficulty in recruiting qualified personnel.

INVESTMENTS PLANNING AND EXECUTION

Risk derived from the increase in the need for planned investment as well as non-compliance with deadlines, budgets or quality of the contracted actions, which affect the operations or profitability of the airports, or which involve non-compliance with the obligations of the regulatory framework, as a consequence of actions from third parties (awardees or public organizations) or derived from the evolution of other external conditions that could affect the execution of the actions (anticipation of investment needs with respect to what is planned in some airports due to the recovery in demand, prices of construction materials, environmental and operational regulation, etc.).

SUSTAINABILITY AND CLIMATE CHANGE

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.

Aena 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:

**TRENDS AND RISKS****SCENARIO**

- 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.

When making traffic forecasts, in addition to the expected macroeconomic environment, the Group has analyzed the main risks, uncertainties and factors that affect air traffic, both globally and in the air sector, highlighting the possible impact of environmental measures.

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 risks, mainly regulatory ones, could have on air traffic will depend on the conditions under which the new measures are applied. Although at present not all the regulations included in the legislative package at an environmental level have yet been approved, so there is not enough specificity about the scope and deadlines for their implementation. For this reason, and to limit the uncertainty associated with the application of these measures, the projections prepared by the Group have considered forecast scenarios with ranges based on confidence levels produced by the econometric models, which take these factors into account.

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.

INNOVATION AND DIGITAL TRANSFORMATION

Need to maintain innovation and technological development policies appropriate to business needs aimed at improving the passenger experience, strengthening airport security and improving operational efficiency.
Potential impacts derived from regulatory or other restrictions, which could delay or limit the execution of pilot tests or the implementation and deployment of innovations.

INTERNATIONALISATION

Aena's international activity is subject to risks associated with the materialization of potential impacts that have not been contemplated in the planning and analysis of acquisitions, as well as those derived from the subsequent development of operations in third countries (through subsidiaries and investees) and to the fact that profitability prospects may not be as expected due to the worsening economic situation, adverse legal and regulatory changes or other effects on concession contracts. Specifically, the investment made in Brazil requires a continuous analysis of the recovery and evolution of its main indicators, which may be affected by the circumstances of the market/country in which it operates.



TRENDS AND RISKS	SCENARIO
COMMERCIAL BUSINESS AND REAL ESTATE DEVELOPMENT	<p>The Group is exposed to risks specifically related to the evolution of commercial activity, with income from commercial activity being linked to both the volume of passengers and their spending capacity. In a context of traffic recovery, the evolution of commercial activity may be affected by changes in trends in the sector and in the passenger mix as well as by regulatory aspects that could affect certain products in the duty-free field. The evolution of macroeconomic factors and changes in consumption trends also affect the real estate business, posing additional challenges linked to the development strategy of airport cities.</p>
REGULATORY FRAMEWORK AND REGULATORY ASPECTS	<p>See note 3.1.2. of the Consolidated Annual Accounts for the year 2023.</p> <p>Changes in regulations and uncertainty regarding the interpretation of legislation arising in different matters, such as ESG, and the need to adapt to new and continuous legal requirements that may lead to an increase in litigation arising from conflicts with operators, suppliers and clients, as well as affecting the management and reputation of the company.</p> <p>Aena operates in a heavily regulated sector, which guarantees that the management of the airport network is carried out with public service criteria, establishes an airport tariff regime, and requires different airport security measures to be ensured.</p> <p>Effects related to DORA II and the resolutions of the National Markets and Competition Commission (CNMC) for the supervision of airport fees and the granting of the economic rebalancing provided for in the standard.</p>
PUBLIC-PRIVATE ORGANISATION AND REGULATION	<p>Aena is a listed state-owned trading company and, as such, its management capacity in certain areas is affected by the application of public and private law regulations.</p>
TAX COMPLIANCE AND TRANSPARENCY	<p>A good governance model allows us to generate value in the short, medium and long term for shareholders, customers, suppliers and other interest groups and strengthens the company's control environment, its reputation and credibility with third parties.</p> <p>The Company has its own Regulatory Compliance System, which includes procedures and policies against corruption and fraud, as well as different corporate policies that are reviewed periodically.</p>
SERVICE QUALITY	<p>Impacts on the quality of service perceived by passengers and in relation to other airports, which affect the Group's reputation or could lead to non-compliance.</p>
SHAREHOLDER IMPLICATION	<p>The way in which clients, suppliers, administrations, employees, shareholders, etc. involved in the management of companies has evolved towards a more digital profile, more sensitive to environmental protection and health, more participatory and willing to make themselves heard.</p> <p>Companies must transparently offer sufficient information about their sustainability policies, their development, application and results.</p>

To address the challenges of the context, Aena has multiple tools focused on minimising identified risks and capitalising on key opportunities. These include:

- Strategic Plan 2022-2026.
- Risk Control and Management System.

1.2. Progress of the Strategic Plan 2022-2026

(GRI 2-22)

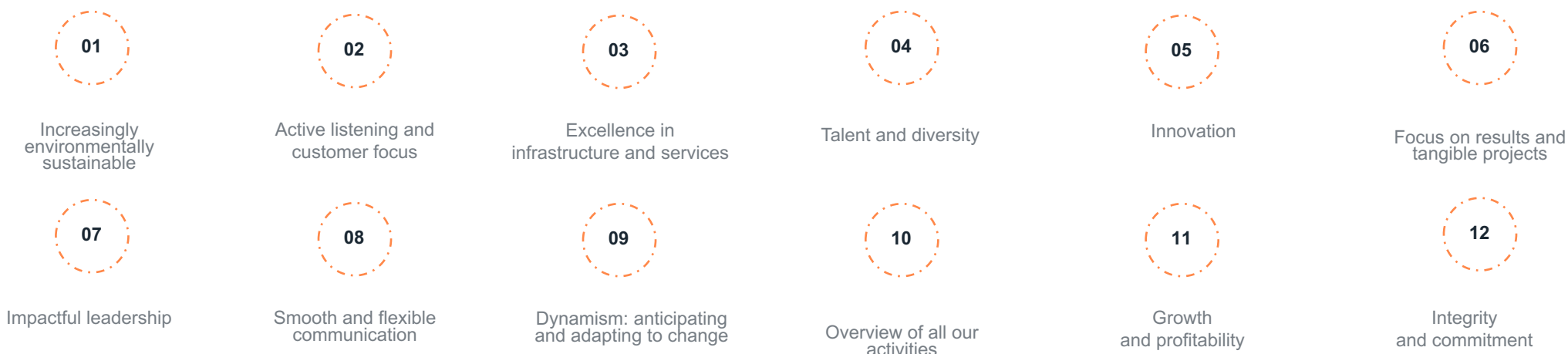
In 2022, Aena launched the Strategic Plan 2022-2026, whose objective is to make Aena's airports the world's safest, most efficient, sustainable and welcoming, catalysts for economy and tourism, and value generators for our shareholders, our customers and society.

In this regard, together with the development of the core business, which involves maintaining the leadership position in the safety and efficiency of its airports 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.

All with sustainability as a cross-divisional factor in its growth, and innovation, technology and digitisation, customer orientation, and culture and talent as key enablers.

In 2023, the Annual General Meeting has approved an 80% pay-out, without applying the effects of the DF7, during the entire period of the Strategic Plan

Strategic Plan 2022- 2026. Values and purposes



Aeronautical activity

The aviation business strategy pursues three 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 Strategic Plan anticipates a total investment in Spain in the period 2022-2026 of more than €2,916 million, with an annual average of €583 million.

Although the Strategic Plan anticipated a recovery to pre-COVID-19 levels by 2024, 2023 closed with a new all-time passenger record for the Aena Group, more than 314.1 million passengers, 16.0% more than in 2022. It also handled 2,674.8 thousand aircraft movements, 8.3% more than in 2022; and 1,165,608.7 tonnes of cargo were moved, 5.6% more than last year.

For the coming fiscal years, the Plan envisages:

- Disappearance in 2025 of the charge limits.
- 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.

Commercial activity

The Strategic Plan also envisages commercial activity as a key pillar of growth which, in 2023, has significantly improved pre-pandemic levels. Among the main objectives envisaged in this respect are the following:

- Increase the commercial revenue per passenger by 12% in 2026 in comparison with 2019.
- Publish and formalise the following tenders:
 - The world's largest Duty-Free Shop tender.
 - Adolfo Suárez Madrid-Barajas Airport food and beverage tender.

- Car rentals tender to maximise value integrating new mobility agents (car rental, car sharing, maintenance, etc.).

- Ensure a positive evolution of its own business (parking and VIP services).
- Expansion of the offer of digital services and our loyalty programme throughout the entire customer journey and beyond the airport.

In this regard, it should be noted that, during 2023, revenues from fixed and variable rents billed and collected in the period amounted to 1,426.0 thousand and revenues per passenger amounted to 5.04 euros, which represents an increase of 21.8% and of 18.4% compared to 2019.

It is also worth highlighting two important milestones in the matter in the fiscal year 2023:

- The approval by the Board of Directors of Aena of the awarding of the tender for the renovation of the food and beverage offer at Adolfo Suárez Madrid-Barajas Airport.
- On 27 July 2023, Aena's Board of Directors approved the awarding of the management of duty-free shops for a 12-year period for the six lots tendered, grouping together 27 airports in the Spanish network.
- Launch of car rental tenders with over 21,500 parking spaces and an estimated turnover of €10,000 million.

Thus meeting the objectives set forth in the Strategic Plan.

International activity

The priority objective for the period is the consolidation of the international portfolio and the fulfilment of the business plans, as set out in the Strategic Plan, with Brazil at the forefront. On 28 March 2023, the concession contract for the 11 airports in Brazil was formalised and on 5 June 2023, the concession contract became fully effective, with the concession term commencing on that date. Operations have started to take effect in the last quarter of the year:

- In October, Aena took over operations at three airports (Congonhas, Campo Grande and Uberlândia).
- In November, at another eight airports (Ponta-Pora, Corumbá, Uberaba, Montes Claros, Marabá, Carajás, Santarém, Altamira).

The market in this country is set up as strategic, in which 20% of the country's air traffic is managed from 2023. All this is accompanied by an ambitious investment plan.



Airport Cities and surrounding businesses

During the course of 2023, the Airport Cities project continued to be developed:

- Regarding the logistics development project of Airport City Adolfo Suárez Madrid-Barajas (AREA 1), the tender was declared void in the first half of 2023. Despite a high level of participation and interest in the bidding process, worsening macroeconomic and financial conditions caused participants to be unable to maintain their initial offers. Thus, during the second half of 2023, Aena worked on defining new lines for its future strategy with the aim of adapting the project to the market and capturing its full value. As a central element of these analysis works, a market consultation process was initiated on December 5, from which the definition of the new strategy and the bidding terms of the next tender will be concluded.
- Regarding the Airport City Josep Tarradellas Barcelona-El Prat, progress is being made in the preparation and urban planning procedures necessary for its tender.
- Regarding the development of land and assets with high potential for complementary airport activities in other airports, progress has continued in 2023 in the Master Plan of Valencia Airport, which is expected to be completed in the first quarter of 2024. The Master Plan for Málaga-Costa del Sol Airport is expected to be completed in the first semester of 2024.

Sustainability as a cross-divisional growth factor

Given Aena's commitment to sustainability, it has set ambitious decarbonisation targets, ahead of the industry, to be carbon neutral by 2026 and Net Zero by 2040. For this purpose, the Climate Action Plan (CAP) has been developed, representing an investment of €550 million from 2021 to 2030. Moreover, with the aim of framing its commitment to sustainability, it has defined the following values to be incorporated into its actions in this area.

Aena constantly reviews its strategy in this regard for the optimal development of its airports. The vast scope of the Airport Cities project suggests its development in different temporal phases.



2. Risks and their management

(GRI 3-3)

2.1. Structure, control and risk management¹¹

(GRI 2-12; 2-24)

Aena has 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 risks that could affect these objectives are systematically identified, analysed, evaluated, managed, and controlled with uniform criteria.

This system enables Aena to adapt to the complexity of its business activities in a globalized competitive environment, where the realization of risks occurs more rapidly.

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

The object of the Risk Control and Management Policy is to establish a general framework for action, as well as the principles and responsibilities that make it possible to reasonably ensure that the risks of any nature faced by the Aena Group are identified, assessed, managed, communicated and supervised through an appropriate and effective risk control and management system.






The System is based on the main international reference standards and best practices in risk control and management (ISO 31000 Risk Management Standard and COSO III Committee of Sponsoring Organizations of the Treadway Commission). It is also aligned with the national regulatory framework in this area (requirements of the Corporate Enterprises Act and the recommendations of the Good Governance Code of Listed Companies and the CNMV's Technical Guide 3/2017 on Audit Committees of Public Interest Entities).

¹¹ 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 III (Committee of Sponsoring Organizations of the Treadway Commission)

PHASES	RESPONSIBILITIES			PRINCIPLES
IDENTIFICATION OF RISKS Strategic Operational Financial Technology Legal and Compliance Information Social, Environmental and Good Governance	Corporate areas	Internal Audit Division	Board of Directors	 Achievement of strategic objectives
RISK ASSESSMENT Prioritization according to its criticality based on its impact and likelihood of occurrence.				 Development of operations according to the safety and quality terms planned
RISK MANAGEMENT Actions or responses focused on mitigating, accepting, sharing or avoiding identified risks				 Protection of shareholders' rights and those of any other significant stakeholder group
REPORTING AND MONITORING OF RISKS Each risk should have a monitoring system with controls and indicators.				 Protection of financial strength and sustainability
UPDATING OF RISKS Identified risks are reviewed and evaluated at least annually	Management Committee	Internal Audit Division	Board of Directors	 Safeguarding of reputation
MONITORING OF THE RISK CONTROL AND MANAGEMENT SYSTEM Evaluation of the suitability of the risks included in the risk management system, and the operation of the systems implemented for control and management	Audit Committee			

Aena Risk control and management policy

(GRI 2-24)

Aena's Risk Control and Management Policy, updated in December 2023, aims to establish a suitable general framework for controlling and managing threats and uncertainties of any nature that could affect Aena, setting out the general guidelines of the Risk Management System.

The Risk Control and 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 III¹² 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 that they are significant, the main strategic, operational, financial, legal and compliance (including those related to corruption), information, technological, social, environmental and governance risks.

All identified risks are assessed, 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 annually by the Executive Management Committee, using the information provided by the Corporate Divisions. The Audit Division is responsible for submitting to the Audit Committee, for approval, the Annual Work Plan, as well as the information on its execution, who also supervises it. The resulting map receives final approval from the Board of Directors on an annual basis.

It is important to highlight that the risks associated with the international development of Aena are an integral part of its Risk Control and Management System.

Likewise, the fundamental principles of risk management applicable to the foreign subsidiaries are consistent with the contents of Aena's Risk Management and Control Policy, adapting business risk management to its dimensions and economic reality.

¹²COSO Enterprise Risk Management – Integrating with Strategy and Performance

¹³ The number of Directors with training and experience in risk auditing can be found in Chapter 1. Sustainable Governance Model of Block B.

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

The Risk Control and Management Policy sets out the roles and responsibilities of the areas involved in risk control and management at the Company:

- 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 System¹³.
- The Audit Committee oversees and evaluates the Risk Management System, ensuring that key financial and non-financial risks are identified, managed, communicated, and maintained at planned levels. This oversight covers the various 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 Directorates identify and assess the risks within their area of responsibility, execute mitigating activities associated with the risks, propose and report indicators for proper monitoring, establish action plans to mitigate risks, and report on the effectiveness of these measures.
- The Internal Audit Department 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 to identify, manage, and adequately quantify the key risks affecting Aena, and reporting to the company's governing bodies. This department is structurally independent from the rest of the areas and directorates.

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.
- 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

The Aena Group implements various measures aimed at fostering a culture of risk at all levels:

- The connection between the Company's key challenges and risks is established directly with the definition of strategic objectives, thereby linking the performance of employees, especially those with roles of significant responsibility.
- Performance-related criteria for risk management and risk control are integrated with variable remuneration, as part of the employee evaluation process (performance management system).

- The design and implementation of training and awareness initiatives in the field of risk control and management for all levels of the Company are conducted. Specifically, monthly monitoring of risk indicators (KRIs) and quarterly monitoring of risk measures are carried out. During these monitoring activities, necessary actions are coordinated with responsible parties, such as reminders, updates in the use of the reporting application (SAP-GRC), and training for new personnel in the system, among other measures. In this regard, a total of 10 specific training activities were conducted in 2023, with 4 targeting Aena staff and 6 targeting ANB staff (3 in 2022 targeting ANB staff). Additionally, 4 specific actions (online sessions) were scheduled for raising awareness and addressing doubts related to the risk management system, targeting ANB employees.
- Investment in technological platforms that facilitate and streamline the identification, management and monitoring of key risks (SAP GRC).

2.2. Risks in 2023¹⁴

(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 2023, the Risk Map¹⁵ has been updated taking into account both internal sources (Strategic Plan) and external sources (best practices of competitors, World Economic Forum and The Global Risks Report). Thus, after the timely review, the Risk Map has maintained the number of risks at a total of 15 (in 2022: 16 risks to a total of 15¹⁶), which are classified as: strategic, operational, financial, technological, legal and compliance, information and social, environmental and governance.

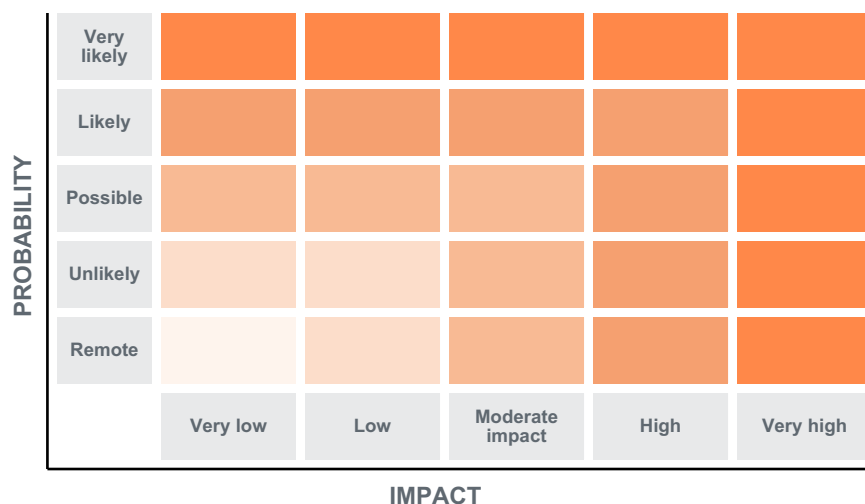
The Executive Management Committee has held several sessions and workshops to assess the criticality of risks, considering their economic, operational and reputational impact, as well as their probability of occurrence. These sessions have also addressed the review of the definition of existing risks according to their category and the identification of possible emerging risks that were not detected in previous phases of the process.

Challenges and Emerging Risks, Control Mechanisms, and Mitigating Activities:

In relation to the procedures followed by the company to ensure that new challenges (emerging risks) are addressed, the Risk Control and Management Policy establishes that the Corporate Risk Map will be reviewed annually and assessments of identified risks will be conducted, primarily through the information on defined risks provided in the monitoring system that their responsible parties must report based on the management carried out in the exercise.

Beyond these periodic updates, both the Management Committee and the Board of Directors regularly analyze the new risks facing the company, gathering action plans, contingency plans, mitigating activities, and indicators of key risks from relevant management areas.

The following table describes the main types of risks along with the principal control mechanisms (action plans, contingency plans, and mitigating activities) associated with them.



¹⁴ For more information, see Section E of the Annual Corporate Governance Report included as an Appendix of this Report.

¹⁵ 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.

¹⁶ See section E of the Annual Corporate Governance Report.



CATEGORIES OF RISKS

TYPE OF RISKS	DESCRIPTION	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 Aena Group achieving its long-term vision and objectives. This category of risks includes those arising from changes in the environment in which the Aena Group operates (political, economic, etc.), 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. Monitoring controls of commercial activity (CICO) Tracking of Airport Cities planning and commercialization. Integrated Quality, Environmental, Energy Efficiency Management Policy and occupational health and safety. Annual tariff consultation process for the following year. Potential detection programs 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 in the execution of investments, coordination of operations and air control, 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, monitoring and coordination of incidents. and coordination of incidents. Handling management tools and procedures. 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. 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).

CATEGORIES OF RISKS

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 examine, with a reasonably independent security scope, the Internal Control over Financial Reporting System (ICFR) of Aena S.M.E., S.A. (controlling company) and its subsidiaries (the Aena Consolidated Group or the Group) as of 31 December 2022, based on 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 Aena 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.



CATEGORIES OF RISKS

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) for information systems recovery.
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.
Sustainability Strategy of Aena
Presence in ESG indexes, such as FTSE4good, DJSI.
Involvement in international initiatives (ACA Programme, Net Zero Carbon), reporting to the Carbon Disclosure Project (CDP).
Collaboration with third parties.

BLOCK B

Sustainability Report

Non-Financial Information
Statement





1- Sustainable Governance Model → GRI 3-3



Commitment to the Sustainable Development Goals (SDGs)



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

Annual General Meeting
Board of Directors
Audit Committee
Appointments, Remuneration and Corporate Governance Committee
Sustainability and Climate Action Committee
Executive Committee
Executive Management Committee



15 Directors (50% independent)

The Board of Directors of Aena is composed of 15 members. Currently, there is a vacancy in it due to the resignation of one Director, so the number of Directors as of December 31, 2023, amounts to 14.



50% female presence on the Board of Directors

In 2023, ESG issues have been present on the Board's agenda

The updating of the Sustainability Policy, the Human Rights Policy, the Stakeholder Relations Policy and the Policy on the Integrated Management of Quality, the Environment, Energy Efficiency and Occupational Health and Safety. The formulation of the 2022 Non-Financial Information Statement for approval by the Annual General Meeting Approval of the 2022 Climate Action Plan Update Report.

The impact of new fuels on airports

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 and Risk Maps, among others.

Data protection

Compliance model.
Mechanisms to inform data subjects of the privacy of their data.
Measures to ensure compliance with regulations.
Internal and external audits.
Corporate culture in matters of personal data protection.

Sustainable financing

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

35.80% of revenue aligned according to the Taxonomy
15.71% of CapEx aligned according to the Taxonomy
38.18% of OpEx aligned according to the Taxonomy

1.1. Organisational details, capital structure and organisation

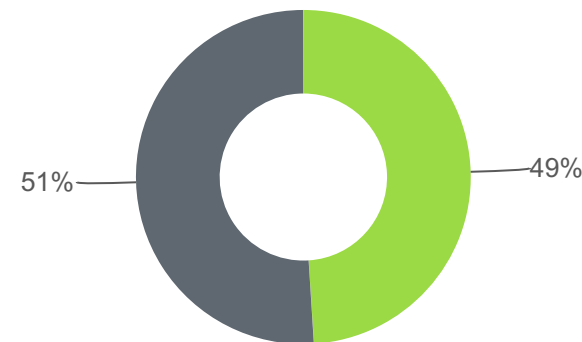
1.1.1. Organisational details and ownership structure

(GRI 2-1; 201-4)

Aena S.M.E., S.A. (hereinafter, 'Aena') is a state-owned commercial company incorporated as a listed public limited company and the parent company of a group comprising several subsidiaries and investees with a national and international presence, which:

- It has been listed on the Stock Exchanges of Madrid, Barcelona, Bilbao and Valencia since 11 February 2015, forming part of the IBEX 35 since June 2015.
- 51% corresponds to its majority shareholder ENAIRE (Public Business Entity dependent on the Spanish Ministry of Transport and Sustainable Mobility) and the remaining 49% corresponds to free float.
- Its share capital 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.
- Through its subsidiary Aena Desarrollo Internacional S.M.E., S.A. (hereinafter, 'Aena Internacional') it also participates in the management of 34 airports in different countries in Europe and America (United Kingdom, Brazil, Mexico, Jamaica and Colombia).

In 2023, Aena has set an all-time record for passenger volume in Spain.



73.500.000 shares: free float 76.500.000 shares: Enaire (State Administration)

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

150,000,000 shares

150,000,000 voting rights

Minimum number of shares to attend the Meeting: 1



Significant shareholders (as at 31 December 2023)

Denomination	% of voting rights attributed to the shares			% of voting rights through financial instruments	% of total voting rights
	% Total (A)	% directo	% indirecto	% (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	2.841	0.000	2.841	3.416	6.257
The Children's Investment Master Fund	0.000	0.000	0.000	3.416	3.416
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.

Note: For further information on Aena's shareholdings, please consult the section on Significant Shareholdings and Treasury Stock on the website of the Spanish Securities Market Commission. See the section 'Links of interest'.



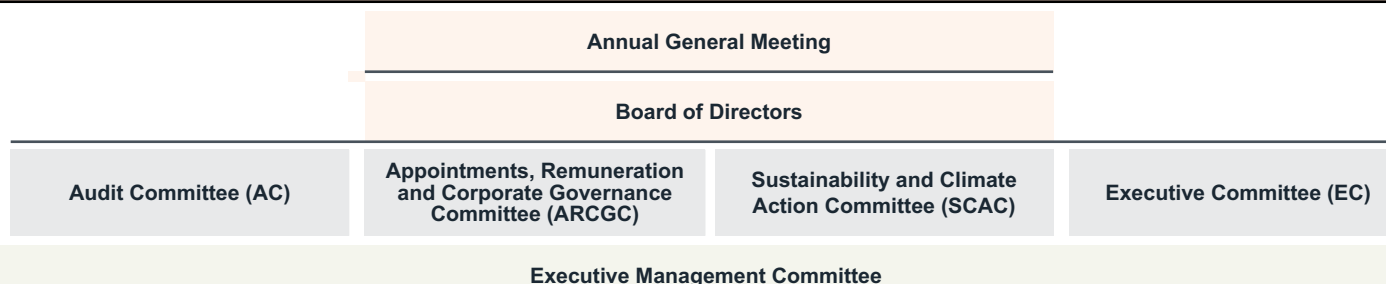
1.1.2. Governing Bodies

(GRI 2-9; 3-3)

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

Remuneration and Corporate Governance Committee, the Sustainability and Climate Action Committee and the Executive Committee.

Aena has a corporate governance system that aims to reinforce Aena's corporate governance as a governance focused on the best interests of the company and its shareholders



The various internal regulations, such as its Corporate Bylaws, the Regulations of the Board of Directors and the Annual General Meeting, the Internal Regulations for Conduct in the Securities Market, as well as a whole set of policies and procedures, are essential strategic elements to ensure the good governance of the Company

Corporate Bylaws.
Regulations of the Board of Directors.
Regulations of the Annual General Meeting.
Internal Rules of Conduct in the Securities Market.
Corporate Governance Policy.
Board of Directors member selection policy.
Code of Conduct.
Third Party Code of Conduct.
Regulatory compliance policy.
Anti-corruption and fraud policy.
Internal Information System and Whistleblower Protection Policy.
Aena's Protocol for the Prohibition of Retaliation
Procedure for the Management of the Internal Information System and Whistleblower Protection

General Regulatory Compliance System Manual.
General policy for the communication of economic-financial, non-financial and corporate information.
Policy of communications and contacts with shareholders, institutional investors and voting advisors.
Shareholder remuneration policy.
Risk control and management policy.
Corporate tax policy.
Sustainability Policy.
Policy of relations with Stakeholders.
Human Rights Policy.
Integrated Quality, Environmental, Energy Efficiency and Occupational Health and Safety Management Policy.
Information Security Policy.
Data Policy.

Code of Good Governance of the CNMV.
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.
Principles of the International Corporate Governance Network (ICGN).
Corporate Governance Principles of the OECD.
Royal Legislative Decree 1/2010, of 2 July, approving the consolidated text of the Corporate Enterprises Act, Act 6/2023, of 17 March, on Securities Markets and Investment Services, and other applicable Spanish legislation.



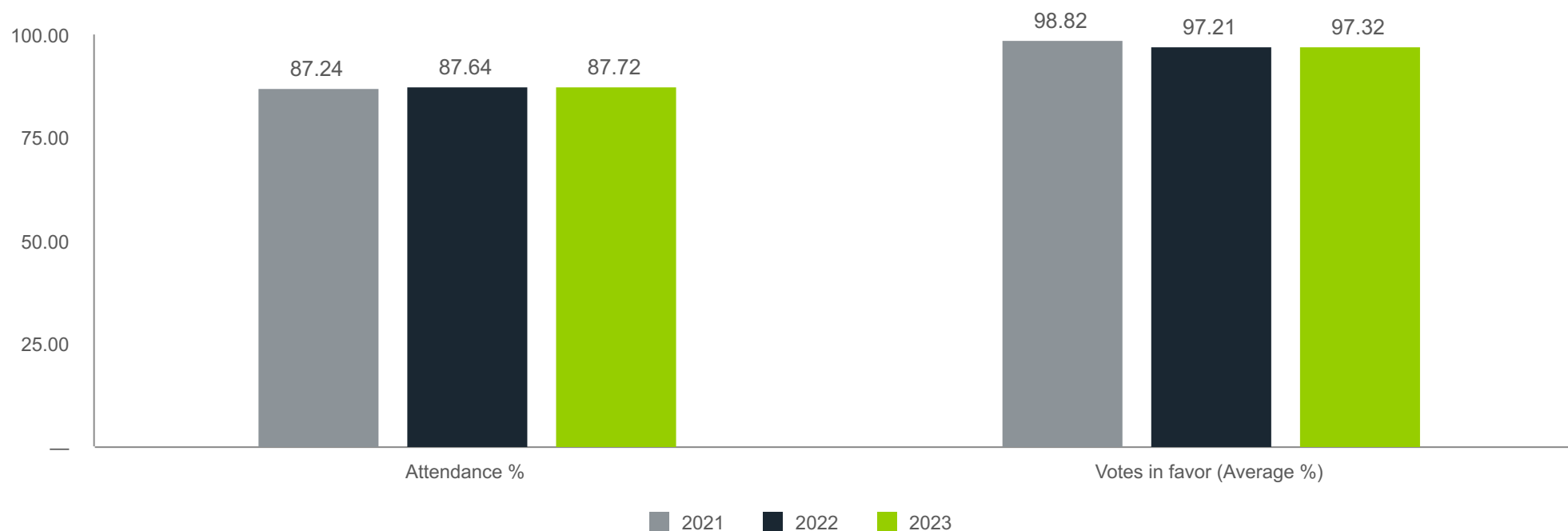
Annual General Meeting

(GRI 2-29)

The Annual General Meeting is Aena's highest sovereign corporate body, where all shareholders meet to deliberate and decide on matters within their competence, depending on the majorities required in each case, or to be informed of any additional matters that the Board of Directors deems necessary.

The organisation and operational rules are contained in Aena's Corporate Bylaws and in the Regulations of the Annual General Meeting. These regulations set out the rights of shareholders, which include, among others, the right to complete the agenda and submit new proposed resolutions, to receive information prior to the Annual General Meeting, to attend and be represented at the meeting, and to delegate representation to intermediary entities

Aena uses various mechanisms to encourage attendance, participation, communication and interaction with all shareholders and enforce their rights. These mechanisms include proxy voting, remote voting in advance, live broadcasting of the Annual General Meeting via the Company's website, and the possibility of attending and holding the meeting by telematic means.





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 Annual General Meeting, expressing in their request the matters that must be addressed. In this case, the Board of Directors shall convene the Annual General 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 Annual General 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.

It is also envisaged that the AGM may be held in person with the possibility of remote attendance by electronic or telematic means.

Annual General Meeting (AGM 2023)^(A)

Held on 20th April on the first call (GRI 2-10; 2-14; 2-16; 2-20)

Minimum number of shares to attend the Meeting: 1

Asistencia y participación: 87.72% del capital
(0.099% más que en 2022)

Average percentage of votes in favour of the approval of agreements: 97.32% (97.21% in 2022)

Main characteristics of the AGM 2023

Summary of the agreements approved by the Annual General Meeting 2023

Separate approval of each of the matters submitted

The Annual General 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 Annual General Meeting of the Company, guaranteeing open dialogue and intervention.

The AGM has been live streamed on the Company's website.

Examination and approval of the Non-Financial Information Statement (NFIS) corresponding to the year ended 31 December 2022.

Appointment of the external accounts auditor for fiscal years 2024, 2025 and 2026.

With regard to the composition on the Board:

- Ratification of the appointments of Ms M^a del Coriseo González-Izquierdo Revilla and Mr Tomás Varela Muiña as Independent Directors.
- Appointment of Ms M^a Carmen Corral Escribano as Nominee Director.
- Re-election of Ms Angélica Martínez Ortega, Mr Juan Ignacio Díaz Bidart and Ms Pilar Arranz Notario as Nominee Directors, as well as Ms Leticia Iglesias Herraiz as Independent Director.

Amendment of the Corporate Bylaws to add technical improvements regarding the non-delegable powers of the Board of Directors and the meetings thereof.

Consultative vote on the Updated Report on the 2022 Climate Action Plan and the Annual Report on Directors' Remuneration for the year 2022.

The Annual General 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 fiscal year 2022 (99.95% in favour) and the voting of the Updated Report of the Climate Action Plan (90.37% in favour) and the Annual Report on Remuneration of the Directors (96.79%).

(A) The call for Aena's Annual General Meeting, which was held on 20 April, as well as the corresponding documentation, were made available to the different stakeholders almost two months in advance. Moreover, the call contained instructions on how to proceed to allow telematic attendance at the General Meeting, to ensure the correct exercising of rights in real time and to establish the necessary procedures to ensure security and efficiency. It also included instructions on how to accredit the identity of shareholders and proxies. All of this is available on the Company's website (see the corresponding link in the 'Links of interest' section of this report).

Communication with shareholders

(GRI 2-29)

Aena ensures two-way communication with shareholders, including institutional shareholders, investors, voting advisors and other market agents through frequent participation and organisation of conferences, roadshows and events of various kinds. It also offers various communication channels, such as by telephone, the investor relations portal on the corporate website and the e-mail address of the Shareholders and Investors Service Office (ir@aena).

The main principles and commitments that guide the Company's actions with this stakeholder group are set out in¹:

- The Code of Conduct, which defines the principles on which Aena must base its relations with investors and shareholders (transparency, trust and sustainable reciprocal benefit).
- The Policy of communication and contacts with shareholders, institutional investors and proxy advisors, which defines, among others:
 - The competence of the Board of Directors to manage and supervise, at the highest level, the information provided to shareholders, institutional investors, markets and stakeholders in general, protecting, safeguarding and facilitating the exercising of their rights and interests within the framework of the defence of the corporate interest in accordance with general principles, such as guaranteeing transparency, veracity, immediacy, equality, homogeneity, coherence, integrity and symmetry in the dissemination of information, as well as equal treatment in the recognition and exercising of the rights of all shareholders who are under identical conditions.
 - The main general channels of communication, including the corporate website, the Shareholders and Investors Office, etc.
- The general policy for the communication of Aena's economic-financial, non-financial and corporate information, with the aim of:
 - Develop general and specific principles that must govern communication with the different stakeholders, as a strategic value that contributes to the Company achieving its corporate and business objectives.
 - Define the main channels of communication of economic-financial, non-financial and corporate information to maximise the dissemination and quality of the information available to the market, investors and other stakeholders.

- The Stakeholder Relations Policy, the purpose of which is to recognise the importance of stakeholder management as a key element for achieving social interest and developing a responsible and sustainable business model, and to establish the principles and guidelines for such management, understanding stakeholders to be those groups that have the ability to influence the achievement of the Company's objectives or that may be impacted by its activity.
- The Shareholder Remuneration Policy, the purpose of which is to link shareholder remuneration to the profit generated by Aena, consisting of the distribution as dividends of an amount equivalent to 80% of Aena's individual net profit for each fiscal year.

The Board of Directors is the body responsible for approving the aforementioned corporate policies. Likewise, the Appointments, Remuneration and Corporate Governance Committee is responsible for supervising the application of the General Policy on the communication of economic-financial, non-financial and corporate information, as well as the Policy on Communication and Contacts with Shareholders, Institutional Investors and Proxy Advisors, and for supervising and assessing the processes of relations with the different stakeholders.

During 2023, contact with the markets has been maintained in accordance with the usual practices summarised in the following activities, both with investors and analysts:

- Participation in conferences, roadshows and reverse roadshows. As of the date of this report, 18 such events have been attended.
- Meetings at Aena's facilities. A total of 17 meetings have been held, with the participation of different members of the management team and the investor relations team.
- Calls/e-mails. Permanent and individualised attention through the specific channels created for this purpose, which has resulted in more than 400 queries being resolved.

It is important to note that on 10 October 2023, Aena made its first long-term bond issue in the fixed-income market within the framework of an EMTN Programme, thus initiating a new channel of communication with the fixed-income investment community.

The main areas of interest have been the recovery of activity, as well as its impact on the cost base and activity margins, together with the growing commitment to ESG aspects.

¹ Both the Code of Conduct and the aforementioned policies are available on the Company's website (see relevant links in the 'Links of interest' section of this report).



The Board of Directors

(GRI 2-9)

The Board of Directors is the highest administrative and representation body of Aena, 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 Annual General Meeting, to the exclusive competence of the Annual General Meeting².

It is also constituted as a supervisory and control body, guided by the Company's corporate interest, performing its functions with unity of purpose and independence from management, and treating each shareholder equally. In this regard, it is responsible, among other things, for³:

- Establish strategies and guidelines for the Company's management, as well as the bases of the corporate organisation and procedures for informing shareholders and the markets in general.
- Evaluate the management of the directors, monitoring compliance with the objectives set and respect for the Company's corporate purpose and interests.
- Make appropriate decisions on business and financial operations of particular relevance.
- Decide on the Company's tax strategy and monitor internal information and control systems.
- Approve the Company's strategic or business plan, as well as its sustainability policies.
- The determination of the risk control and management policy, including those of a fiscal nature, the regulatory compliance policy, and monitoring of internal information and control systems.

Its competencies also include the creation of an Audit Committee, an Appointments, Remuneration and Corporate Governance Committee, and a Sustainability and Climate Action Committee, as well as an Executive Committee.

The Board of Directors entrusts the management team and the corresponding executive bodies with the ordinary management of Aena's business.

With regard to the functioning and composition of the Board, the following amendments were made in 2023, which were included in the Board of Directors' Regulations and in the Company's Corporate Bylaws, as appropriate, and which were approved in accordance with the requirements established by law:

Amendments in 2023

The possibility of appointing one or more Vice-Chairs of the Board of Directors, preferably at least one of them being an Independent Director, in order to facilitate the better functioning of the Board of Directors. In this regard, the following appointments were made:

Mr Jaime Terceiro Lomba, Independent Director and Coordinator, as First Vice-Chairman.

Mr F. Javier Marín San Andrés, Executive Director, as Second Vice-Chairman, who will also act as Executive Vice-Chairman of the Company.

The incorporation of a reserved competence of the Board of Directors with regard to the supervision of the process for preparing and submitting the financial information and the management report, which will include, where appropriate, the mandatory non-financial information, as set forth in Royal Legislative Decree 1/2010, of 2 July, approving the Consolidated Text of the Corporate Enterprises Act.

With regard to the venue of Board of Directors' meetings, in cases where the Board of Directors is held exclusively by telematic means, that is, without the physical attendance of any of the Directors, the meeting will be deemed to be held at the registered office.

² Its composition and functions are set out in the Corporate Bylaws, the Regulations of the Board of Directors and the various Corporate Policies that may be applicable in this respect, always in accordance with the recommendations of the CNMV's Good Governance Code for Listed Companies. These documents are publicly available on the Company's website and the link to them can be consulted in the 'Links of interest' chapter.

³ The Directors have the broadest powers to obtain information, in accordance with the provisions of its Regulations, on all matters relating to the Company. In order to be assisted in the performance of their functions, External Directors may specifically request the Company to recruit advisors and experts.



Composition, Leadership and Independence

(GRI 2-11)

At the close of the fiscal year 2023, the Board of Directors of Aena is composed of 15 members, with one vacancy due to the recent resignation tendered on 29 November 2023 by Nominee Director Ms Pilar Arranz Notario.⁴

The profiles of the members of Aena's Board of Directors provide a diversity of knowledge, skills, ages, origins, experience and gender. All of them been selected according to their honourability, suitability, solvency, competence, experience, qualifications, training, availability, dedication and commitment.

Pursuant to the Corporate Bylaws and the Board of Directors' Regulations, Directors are classified as Executive and Non-Executive or External. Non-Executive or External Directors may be, in turn, Nominee, Independent or other External Directors. The Board of Directors should, in any case, endeavour to ensure that External Directors represent a majority over Executive Directors; and that Independent Directors represent at least one third of the total number of Directors, the number of Executive Directors being the minimum necessary for the proper functioning of the Company.

The Chairman and Chief Executive Officer (Article 39.2 of the Bylaws and 15.2 of the Board Regulations) of Aena, Mr Maurici Lucena Betriu has delegated all the powers that are legally and statutorily delegated (except those reserved by the Board of Directors itself) and guarantees the effective functioning of the Board of Directors. His functions, which include exercising the most senior management of the Company and its representation, directing debates, ensuring the proper functioning of the Board of Directors and promoting the participation of all Directors in meetings and deliberations, are set out in Article 15 of the Board of Directors' regulations.

The Vice-Chairmen (Article 16 of the Board of Directors' Regulations), Mr Jaime Terceiro Lomba, as First Vice-Chairman, and Mr F. Javier Marín San Andrés, as Second Vice-Chairman, will replace the Chairman in the event of his delegation, absence or illness and, in general, will always perform the functions or duties deemed appropriate by the Board of Directors or by the Chairman himself. The position of Vice-Chairman will preferably be held by an Independent member and, if there are several, by at least one of them.

The main duties of the Lead Independent Director, Mr Jaime Terceiro Lomba, elected from among the Independent Directors, include the following:

- Chair the meetings of the Board of Directors in the event of vacancy, absence, impossibility or illness of the Chairman and Vice-Chairmen.

- Coordinate the succession plan for the Chairman of the Board and Chief Executive of the Company, so that it takes place in an orderly manner.
- Request the call of the Board of Directors or the inclusion of new items on the agenda of a Board meeting that has already been called.
- Coordinate and gather the Non-Executive Directors.
- Lead, where appropriate, the periodic evaluation of the Chairman of the Board of Directors.
- Echo the concerns of the Non-Executive Directors.
- Liaise with investors and shareholders to ascertain their views in order to form an opinion on their concerns.

The Board of Directors' Regulations establish the necessary conditions that a Director must meet in order to hold the category of Independent Director. Among them, it establishes that the following may not be elected as such⁵:

They may not be Independent Directors if they meet any of the following conditions:

- 1 Employees or Executive Directors of companies of the Aena Group, unless 3 or 5 years has elapsed, respectively, since the termination of that relationship.
- 2 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.
- 3 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.
- 4 Those who maintain or have maintained during the last year a business relationship with the Company or with any Group Company (own behalf, supplier of goods or services, advisor, consultant, etc.).
- 5 Those who have been Aena Directors for a continuous period of more than 12 years.

⁴ On November 28, 2023, Ms. Pilar Arranz Notario, Nominee Director, resigned as a member of the Board of Directors with effect from November 29, 2023, creating a vacancy on the Executive Committee and the Sustainability and Climate Action Committee, of which she was also a member.

On January 16, 2024, Ms. Ángela Paloma Martín Fernández, Nominee Director, resigned as a member of the Board of Directors with effect from January 29, 2024.

Likewise, on January 17, 2024, Ms. María Isabel Badía Gamarra, Nominee Director, resigned as a member of the Board of Directors with effect also from January 29, 2024, creating a vacancy on the Executive Committee, of which she was also a member.

To fill the vacancies, the Board of Directors, at its meeting on January 30, 2024, approved, at the proposal of the majority shareholder Enaie, the appointment by co-option of Ms. Beatriz Alcocer Pinilla, Mr. Ángel Faus Alcaraz, and Ms. Ainhoa Morondo Quintano as Nominee Directors. These appointments were approved subject to their ratification and, if applicable, reelection for the statutory term of four (4) years, by the General Meeting of Shareholders at its first meeting.

At the same meeting of the Board of Directors, it was decided to appoint Ms. Beatriz Alcocer Pinilla as a member of the Executive Committee and the Sustainability and Climate Action Committee, and Ms. Ainhoa Morondo Quintano as a member of the Executive Committee.

⁵ Art. 8.5 del Reglamento del Consejo de Administración.



A Board of Directors that is diverse and balanced in skills, origins, experiences, age and gender (as of 31 December 2023) (GRI 2-9; 405-1)^(A)

Promotes the participation of shareholders and other stakeholders.

Integrates sustainability, in its social, environmental and corporate governance aspects, as the basis for Aena's actions.

Oversees risk assessment and management, and the integrity of reporting systems, to ensure sustainable value creation, among others

50.0% Women
(7 of 14 members) (40% in 2022)

Duration of the position: **4 years**
3.46 years average term of office

53.4 years: average age of the Board
(28.6% between 25 and 45 años y 71.4% over 45 years)

1 Lead independent Director

7 Directors with experience in the sector
12 with financial experience

Nº of Board meetings: **15**
99,11% attendance

7 Directors are members of Board of Directors
in other companies ^(B)

Annual Performance Evaluation of the Board of
Directors held by an external advisor

Individual election of Board ^(C)
2 Vice-Chairmen

Duration of the position ^(D)

(A) See details of the composition of the Board of Directors in 2022 in the 2022 Aena Non-Financial Information Statement (link available in 'Links of Interest').

(B) All Directors were appointed by the AGM with the exception of Ms Angela Paloma Martín Fernández and Ms Maria Isabel Badía Gamarra, who, as there were 2 vacancies on the Board of Directors due to the resignation of 2 Board members, were appointed on 20 June 2023 by the Board of Directors via the co-optation procedure, whose ratification and re-election must be carried out at the next AGM.

(C) In accordance with the provisions of the Board Regulations, 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

(D) 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).

	Chairman and CEO	Executive Director	7 Independent Directors 50% Independent Directors							5 Nominee Directors 35.71% Nominee Directors				
	Maurici Lucena	Javier Marin Second Vice-Chairman	Irene Cano Independent director	Leticia Iglesias Independent director	Tomás Varela Independent director	Amancio López Independent director	Jaime Terceiro Lead Independent Director and first Vice-Chairman	Juan Rio Independent director	María del Coriseo González-Izquierdo Independent director	Angélica Martínez Nominee Director	Manuel Delacampagne Nominee director	Maria Isabel Badía Nominee director	María del Carmen Corral Nominee director	Angela Paloma Martín Nominee director
Gender	Man	Man	Woman	Woman	Man	Man	Man	Man	Woman	Woman	Men	Woman	Woman	Women
Year of appointment	2018	2020	2020	2019	2022	2015	2015	2020	2022	2018	2021	2023	2023	2023
Member of other expert committees	EC (C)	—	ARCGC (M) SC(C)	AC (M) SC (M)	AC (C) ARCGC (M)	ARCGC (C)	AC (M) EC (M)	SC (M)	SC (M) ARCGC (M)	AC (M) EC (M)	AC (M)	EC (M)	ARCGC (M)	—
Training	E/F	AE, E/F	E/F	E/F, AUD, CIB	E/F	E/F	AE, E/F	E/F, SC/ENG	E/F, OT	E/F, OT	E/F, OT	OT	SC/ENG	OT
Professional Experience	FS, SM, IT, AER, UN, OT	IT, FS, AUD, AER, INFRA, SM, UN, T, ESG, OT,	FS, AUD, IT, ESG, SM, OT	FS, AUD, ESG, SM, CO, OT,	FS, AUD, ESG, AD, OT	FS, T, A., ESG, OT	FS, AUD, UN, AER, SM, OT	IT, AUD, SF, INFR, SM, ESG, OT	IT, FS, ESG, CO, OT, SM	FS, AUD, INFR, SM, CO, OT	IT, AUD, FS, SM, OT	INFR, OT, SM	FS, INFR., OT, SM	IT, OT, SM
Directors in other listed entities (number)	—	—	—	2 ^(A)	1 ^(B)	—	—	—	—	—	—	—	—	—
% Attendance at Board meetings	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	86%	100%	86%
% Attendance at Committee meetings ^(C)	—	—	ARCGC:80% SC: 100%	AC: 100% SC: 100%	ARCGC: 90% SC: 100%	ARCGC:100%	AC: 100%	SC: 100%	ARCGC: 100% SC:100%	EC: 100% AC: 100%	AC: 100%	—	ARCGC: 100%	—
Shares (no.) or (%)	—	340 shares	—	—	—	—	—	—	—	—	—	—	—	—

Member of Committees: EC: Executive Committee; AC: Audit Committee; ARCGC: 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; Cybersecurity: CIB; Other: OT

Professional Experience: Innovation/New technologies/Digital transformation: IT; Cybersecurity: CYB; 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.

(A) Independent Director of ACERINOX, S.A. and LAR ESPAÑA REAL ESTATE SOCIMI, S.A.

(B) Independent Director of Julius Baer Gruppe AG.

(C) No Executive Committee meeting has been held in 2023 (2 meetings in 2022).



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

In accordance with the provisions of the Policy for the Selection of Members of the Board of Directors, the selection of Aena Directors is based on a prior analysis of the needs of the Board of Directors.

The assessment thereof is carried out taking into account the diversity of knowledge, skills, experience, age and gender on the Board of Directors, avoiding, in all cases, any type of implicit bias that could imply discrimination on the grounds of race, nationality, social origin, gender, age, marital status, sexual orientation, religion, political ideology, disability or any other personal, physical or social condition of individuals.

- In relation to the selection of new members of the Board of Directors, the Board carries out an analysis of the Company's needs, supported with advice and a report from the Appointments, Remuneration and Corporate Governance Committee (hereinafter, ARCGC), which itself relies on the collaboration of external advisors⁶ for the selection processes of Independent Directors.
- Proposals for the selection or re-election of Nominee Directors and Executive Directors are submitted by the Board of Directors together with the prior report of the ARCGC, whereas proposals for the selection or re-election of Independent Directors are submitted by the ARCGC.
- In any case, the proposal for appointment or re-election of any member of the Board must be accompanied by a supporting report from the Board of Directors assessing the competence, experience and merits of the proposed candidate.
- The ARCGC's proposals and reports evaluate the honourability, suitability, solvency, competence, experience, qualifications, training, availability and commitment of candidates for members of the Board of Directors. 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.

In accordance with the provisions contained in the Law and in the Corporate Bylaws, proposals for the appointment and re-election of Directors are submitted for the approval of the Annual General Meeting⁷ or, in the event of appointment by co-opting, of the Board of Directors:

- Directors are individually elected when a vacancy arises on the Board of Directors.
- 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 Annual General Meeting continue to hold the positions they previously held, without the need for a new appointment.

After the first 4 years, Directors may be re-elected following the indicated procedure, for equal periods, as long as the Annual General Meeting 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 12 years (art. 11 Regulations of the Board).

In 2023, the Annual General Meeting:

- Has ratified the appointments and approved the re-election of Independent Directors, Ms Maria del Coriseo González-Izquierdo Revilla and Mr Tomás Varela Muiña, who, following the aforementioned procedure, had been co-opted onto the Board.
- Has approved the appointment, as Nominee Director, of Ms M^a Carmen Corral Escribano, in view of the vacancy arising on the Board of Directors due to the resignation tendered by Nominee Director, Ms Eva Ballesté, in April 2023.
- Has approved the re-election of Nominee Directors, Ms Angélica Martínez Ortega, Mr Juan Ignacio Díaz Bidart and Ms Pilar Arranz Notario, as well as the re-election of Independent Director, Ms Leticia Iglesias Herraiz.

⁶ It must have the collaboration of external advisors in the selection of candidates when it comes to the selection of Independent Directors, and the collaboration of such external advisors is optional when it comes to the selection of Nominee Directors.

⁷ In the event that the vacancy occurs after the AGM, the appointment is made by the Board by the co-opting procedure which, in any case, will be ratified at the next AGM.



For its part, the Board of Directors has appointed, through the co-optation procedure, after the holding of the Annual General Meeting in 2023:

- Ms Ángela Paloma Martín Fernández as Nominee Director, following the resignation tendered by Nominee Director, Mr Juan Ignacio Díaz Bidart in May 2023; and
- Ms M^a Isabel Badía Gamarra, as Nominee Director, following the resignation tendered by Nominee Director, Mr Raúl Míguez Bailo in June 2023.

Both appointments must be ratified at the next Annual General Meeting.

The Annual General Meeting is responsible for the appointment and removal of Directors and the ratification, if applicable, of appointments by co-option.

For its part, the Corporate Governance Policy includes, among its principles, that of ensuring the orderly and planned succession of the Chairman of the Board of Directors and of the Company's Chief Executive, so that it does not influence the regular development of their activities, through the figure of the Lead Independent Director. The Appointments, Remuneration and Corporate Governance Committee is the committee responsible for examining and organising the succession of the Chairman of the Board of Directors and the Company's Chief Executive. 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 manner⁸. For its part, the Lead Independent Director has the power to coordinate the succession plan of the Chairman of the Board of Directors⁹.

Aena's corporate governance system is based on the principle of guaranteeing the diversity and balance of the Board of Directors, ensuring, where appropriate, an orderly and efficient succession of the Company's chief executive and Chief Executive Officer.

Diversity on the Board of Directors

Diversity, in all areas, is a crucial aspect to ensure the proper functioning of the Board of Directors. This is reflected in the aforementioned Policy for the selection of members of the Board of Directors, which provides the appropriate framework to:

- Ensure that the Board has an appropriate composition, taking into account gender and age diversity as important factors for obtaining diverse points of view;
- Encourage diversity in its different aspects (knowledge, skills, experience, age and gender);
- Reject any form of discrimination based on racial, national, social or sexual origin, regardless of gender identity, sexual orientation, religion, political opinions or any other characteristic.

The Board of Directors is the body responsible for determining the Policy for the selection of members of the Board of Directors, taking into account the recommendations of good governance, and for ensuring that this Policy:

- Is concrete and verifiable;
- Ensures that proposals for appointment or reappointment are based on a prior analysis of the needs of the Board of Directors; and
- Promotes diversity of knowledge, experience, age and gender on the Board of Directors¹⁰.

For its part, in terms of gender diversity, the Appointments, Remuneration and Corporate Governance Committee has among its powers:

- Establishing a representation target for the under-represented gender on the Board of Directors, developing guidance on how to achieve this target and reporting to the Board on gender diversity issues, ensuring that this is reported in the annual Corporate Governance Report that is reported to the Annual General Meeting together with the Management Report.
- Annually verifying compliance with the Policy for the selection of Members of the Board of Directors carried out by the Board of Directors, reporting thereon in the annual Corporate Governance Report that is reported to the Annual General Meeting together with the Management Report.

⁸Art. 24 Regulations of the Board of Directors.

⁹ Art. 15 Regulations of the Board of Directors.

¹⁰ See Art. 9 of the Regulations of the Board of Directors..



The ARCGC has drawn up a matrix of competencies of the Board of Directors, which is aligned with the most advanced recommendations on corporate governance and is updated in accordance with the needs of the sector in which Aena operates, its main lines of business and its special legal nature as a state-owned commercial company listed on the stock market. This matrix reflects the key skills, knowledge and experience of each of its Board members, facilitating the supervision of the overall diversity in the composition of the Board of Directors, as well as making the most appropriate and informed decisions at any given time.

The Board of Directors updates the matrix of competencies when deemed necessary and a new member joins.

As a new feature this year, and following the dissemination by the CNMV of the Code of Good Governance in Cybersecurity, drawn up by the National Cybersecurity Forum, cybersecurity has been included as one of the competencies of the matrix. With this, Aena aims to ensure that its Board of Directors has profiles with experience and training in this area to face the new challenges arising from the global increase in cyber-attacks on organisations.

The Policy for the selection of members of the Board of Directors includes the Company's target of having at least 40% women on the Board of Directors. At the end of 2023, women represent 50% of the Board, compared to 40% in 2022

Training of the Board of Directors

(GRI 2-17)

The Directors' Training Plan for 2023 was approved by the Appointments, Remuneration and Corporate Governance Committee in November 2022, in accordance with best good governance practices. The schedule of these training sessions, which are held with the established frequency, is adjusted to the needs detected, to particularly relevant emerging aspects and to the availability of the Directors, always favouring their attendance.

A total of 6 training sessions have been held in 2023, several of them related to ESG aspects. Specifically, the Directors participated in sessions on the taxonomy of sustainable finance in aviation and on regulatory developments in due diligence and regulatory compliance.

In addition to the above, it should be noted that Aena provides specific training sessions for new directors joining the Company. These sessions include knowledge on good governance.

Aena promotes the knowledge of the Company's governing bodies on issues related to sustainability and emerging trends.

Evaluation of the Board of Directors

(GRI 2-18)

The Board of Directors annually establishes a plan of action that includes the evaluation by the Board of Directors of:

- Its own functioning and the quality and efficiency of its work.
- The functioning and composition of its Committees.
- Diversity in the composition and competencies of the Board of Directors.
- The performance of the Chairman of the Board of Directors in his capacity as such, and the first executive and Chief Executive Officer of the Company, and
- The performance and contribution of each Director, paying special attention to the Chairs of the different Board of Directors Committees.

The evaluation of the various Committees is based on the report they submit to the Board of Directors and, for the latter, on the report submitted by the Appointments, Remuneration and Corporate Governance Committee. Currently, the evaluation of the Board and its Committees is carried out by an independent external consultant. Thus, the following main conclusions were drawn from the evaluation carried out¹¹:

- The responses obtained to the questions posed to the Directors on the evaluation of the Board of Directors were very positive, with 94% of the questions posed to the Directors being answered with 'excellent' or 'adequate'.
- The functioning of the Committees was rated as 'excellent' in the majority of cases.
- There is evidence of adequate participation and involvement of the management team both in the meetings of the Board of Directors and in the Committees, especially in the meetings of the Audit Committee, which are regularly attended by executives related to matters within their competence, such as the Economic-Financial Director, the Internal Audit Director and the Director of Infrastructures and Technologies.

¹¹ A summary of its main conclusions is published in the Annual Corporate Governance Report, available on the Company's website (see corresponding links in the 'Links of interest' section of this report).

- The members of the Board of Directors, in general, give a positive assessment of the degree of compliance with the 2023 Action Plan, considering that the Company has carried out various actions to comply with it, highlighting a special effort in the training aimed at Directors.

In addition to the above, an Action Plan for fiscal year 2024 has been prepared in order to reinforce the areas of improvement detected in the evaluation.

Meetings of the Board of Directors

(GRI 2-16)

During the fiscal year 2023, 15 meetings of the Board of Directors were held (15 in 2022) with an attendance rate of 99.11% (98.22% in 2022) and 2 meetings were held by written vote and without a meeting.

Among the matters dealt with, those related to ESG aspects should be highlighted, among which the following stand out:

- Formulation of the Non-Financial Information Statement (NFIS), corresponding to the fiscal year 2022.
- Approval of the Updated Climate Action Plan Report for the fiscal year 2022.
- Review of the Corporate Policies, such as the Corporate Governance Policy, the Sustainability Policy, the Human Rights Policy, the Policy on the Integrated Management of Quality, the Environment, Energy Efficiency and Occupational Health and Safety, and the Stakeholder Relations Policy.
- The impact of new fuels on airports.
- Customer experience and innovation.
- Adaptation of the Regulatory Compliance System to Act 2/2023, of 20 February, regulating the protection of persons reporting regulatory and anti-corruption violations.

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.

ESG issues appearing on the Board's agenda during 2023 (GRI 2-12)

	Business Ethics Review of the Corporate Governance Policy, the Sustainability Policy, the Human Rights Policy, the Policy on the Integrated Management of Quality, the Environment, Energy Efficiency and Occupational Health and Safety, and the Stakeholder Relations Policy.
	Impact of new fuels at airports
	Non-financial information Formulation of the 2022 Non-Financial Information Statement for approval by the Annual General Meeting
	Climate change Approval of the updated 2022 Climate Action Plan report
	Customer Experience and Innovation
	Adaptation of the Regulatory Compliance System to Act 2/2023, of 20 February Regulates the protection of persons reporting regulatory and anti-corruption violations.

Committees supporting the Board of Directors

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

	 Audit Committee	 Appointments, Remuneration and Corporate Governance Committee	 Sustainability and Climate Action Committee	 Executive Committee
Some ESG Competencies	<p>Monitor and control the financial and non-financial reporting system as well as risk assessments related to operations, technology, law, society, environment, politics and reputation.</p> <p>Confidentially establish and monitor any irregularities communicated by employees.</p> <p>Coordinate the compliance bodies, as well as review the compliance policy and other policies and procedures to curb misconduct.</p> <p>Oversee the management of the Complaints Channel.</p>	<p>Specify targets for gender diversity.</p> <p>Ensure compliance with the Company's internal codes of conduct and corporate governance codes, as well as periodically evaluate and review the corporate governance system.</p> <p>Supervise communication policies.</p> <p>Monitor and evaluate the methods for building relationships with different stakeholders.</p> <p>Organise the reporting process for diversity and non-financial data.</p> <p>Recognise, support and oversee the Company's innovation-related strategies and practices.</p>	<p>Understand, promote, guide and supervise the Company's objectives, action plans, practices and policies in environmental and social matters.</p> <p>Evaluate and verify the performance and compliance with the environmental and social strategy and practices.</p> <p>Monitor that the practices of the company in environmental and social matters are in line with the established strategy and policies.</p> <p>Support and supervise Aena's contribution to the achievement of the SDGs.</p> <p>Promote a coordinated strategy for social action, sponsorship and patronage.</p> <p>Review and supervise compliance with the Climate Action Plan, as well as the corresponding annual follow-up report.</p>	<p>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 Board of Directors' Regulations.</p>
Composition I: Independent; N: Nominee; E: Executive	I I I N N	I I I I N	I I I I	N N I E
Independent directors (%)	60%	80%	100%	25%
Presence of women	40%	60%	75%	50%
Meetings	11	10	5	0
Other relevant information	<p>All members have experience in the financial and in audit and risk sectors.</p> <p>3 members with experience in listed companies.</p> <p>2 members with experience in ESG.</p>	<p>5 members with senior management experience.</p> <p>4 members with experience in ESG.</p> <p>2 members with expertise in innovation, new technologies/digital transformation.</p>	<p>All members have expertise in ESG.</p> <p>3 members with expertise in innovation, new technologies/digital transformation.</p> <p>As of 31 December 2023, due to the recent resignation of Nominee Director, Ms Pilar Arranz Notario, there is a vacancy on the Sustainability and Climate Action Committee.</p>	<p>4 members with experience in the aeronautical sector/infrastructure and transport.</p> <p>3 members with experience in Auditing and Risks.</p> <p>1 member with expertise in innovation, new technologies/digital transformation.</p> <p>As of 31 December 2023, as mentioned in previous sections, due to the recent resignation of Nominee Director, Ms Pilar Arranz Notario, there is a vacancy on the Executive Committee.</p>

Note: The information regarding the composition of the Committees is as of December 31, 2023.



The Board of Directors has four committees¹²: the Executive Committee, the Audit Committee, the Appointments, Remuneration and Corporate Governance Committee, and the Sustainability and Climate Action Committee. ESG competencies are not only vested in the latter, but the other Committees also have ESG-related competencies, which are detailed below¹³.

Executive Management Committee

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

Aena's organisational structure is shaped with a view to the generation of value and the promotion of strategic business axes, such as international expansion and the promotion of innovation and sustainability, guaranteeing compliance with regulatory obligations at all times. In this context, sustainability is seen as a cross-divisional factor in the Company, and innovation, technology and digitisation, customer orientation, culture and talent as key enablers.

In February 2023, the Board of Directors approved a new organisational structure of the Company's management. This new organisation responds to the objective of taking advantage of synergies between the different national and international areas of Aena, strengthening the international positioning and promoting innovation and sustainability, essential aspects to complete the Company's transformation.

As a result, the Executive Management Committee is made up of the Chairman – Chief Executive Officer, the Executive Vice-President and 8 directors (including the Secretary General and the Board of Directors), of which 6 are women, representing 60%. They have extensive experience in the fields of aviation, finance, transport, commerce, real estate and sustainability. Its key functions include:

- Ensuring compliance with the strategic objectives set by the Board of Directors.
- Maximising the value of the Company to its shareholders and ensuring its long-term viability.
- Reviewing the Corporate Policies submitted to the corresponding Committees for their subsequent approval by the Board of Directors.

To ensure proper management, the members of the Executive Management Committee and the Internal Audit Director report, on a recurring basis, to the Board of Directors and its Committees on the performance and execution of the various projects and on the matters within their competence.

Specifically, in 2023, it is worth highlighting the participation of the Economic-Financial Director in all the meetings of the Board of Directors, as well as that of the Internal Audit Director in the meetings of the Audit Committee. For her part, the Director of Innovation, Sustainability and Customer Experience reported to the Board of Directors on the impact of new fuels at airports, as well as on the update of the 2022 Climate Action Plan report, and is responsible for ensuring the correct implementation of a sustainable culture at the Company. Moreover, the Director of Organisation and People has spoken at the Board of Directors to report on the objectives of the company and the management team, as well as her performance and achievement of the objectives.

The Executive Management Committee is responsible for deploying the corporate strategy and ensuring the achievement of the strategic objectives, approved by the Board of Directors, through the different business lines.

¹² 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 the corporate website with the details of these Committees are available in the 'Links of interest' chapter.

¹³ For detailed information on the matters covered by the different Committees during fiscal year 2023, 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 2023 Committees can be found in the 2022 NFIS, with the link available in the chapter 'Links of interest'.

Composition of the Executive Management Committee at 31/12/2023



Maurici Lucena Betriu
Chairman and CEO



Javier Marín San Andrés
Executive Vice-Chairman



María José Cuenda Chamorro
Chief Commercial Officer and Real Estate



Elena Mayoral Corcuera
Managing Director of Airports



Amparo Brea Álvarez
Director of Innovation, Sustainability and Customers Experience



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



Elena Roldán Centeno
General Secretary and Board of Directors



José Leo Vizcaíno
Economic-Financial Director



Begoña Gosálvez Mayordomo
Director of Organisation and People



María Gómez Rodríguez
Communication Director

Remuneration of the Board of Directors 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 that of the Internal Audit Manager, 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, of 5 March; 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 Spanish Ministry of Finance, of 8 January 2013, which approves the maximum amounts of remuneration by attendance, regulate the remuneration of Directors.

As a result of the foregoing, Aena has no discretionary power to set the remuneration of its Directors in accordance with the provisions of Article 217 of Royal Legislative Decree 1/2010, of 2 July, approving the consolidated text of the Corporate Enterprises Act¹⁴.

In 2023, the consultative vote of the Annual Report on Remuneration of Directors corresponding to the fiscal year 2022 was supported by practically the entire Annual General Meeting, with a percentage of vote in favour of 96.79%¹⁵.

¹⁴ Directors may only receive a maximum remuneration for their attendance at meetings of the Board of Directors. For more information, see the Annual Report on the Remuneration of Directors (see 'Links of Interest' section).

¹⁵ The consultative vote of the Annual Report on Remuneration of Directors corresponding to the fiscal year 2022 was supported by practically the entire Annual General Meeting, with a percentage of vote in favour of 96.79% (95.53%, in 2022).

Remuneration of Directors ^(A)

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. ^(B)

	2022		2023	
	Male	Female	Male	Female
	€11,994	€11,994	€11,994	€11,994

(A) 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.

(B) During fiscal year 2023, remunerations corresponding to attendance by High Ranking Officials, Maurici Lucena Betriu, Angélica Martínez Ortega, Juan Ignacio Díaz Bidart and Angela Paloma Martín, were paid into the Public Treasury. In the case of Juan Ignacio Díaz Bidart, the allowances were paid into the Public Treasury until 10 May 2023, when he resigned. In the case of Ángela Paloma Martín, the allowances have been paid into the Public Treasury since her appointment on 20 June 2023.

Remuneration of Senior Management

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 (3.0% in fiscal year 2023 and 3.5% in fiscal year 2022). The variable supplement depends on the fulfilment of the Company's objectives, including a sustainability objective, which is weighted at 25%, out of the 50% to 40% weighted company objectives for Senior Management.

	2022		2023	
	Male	Female	Male	Female
	€137,487	€136,365	€158,203.43	€156,403.16
Total	0.8%		1.1%	

Remuneration received by Directors and managers (GRI 405-2) ^(A)

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):

	2022		2023	
	Chairman and CEO	Managing Director of Airports (currently the Executive Vice-President)	Chairman and CEO	Managing Director of Airports (currently the Executive Vice-President)
The basic (fixed) remuneration	€118,993.2	€96,199.92	€122,562.96	€104,274.24
The supplementary remuneration that includes:				
Job allowance	€47,597.28	€22,852.07	€49,020.72	€23,537.64
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 Managing Director of Airports in 25% of 50% of the company objectives (10% of 50% in 2021).	€13,230.62	€27,595.57	€13,640.4	€56,597.28
Other items	€1,344.53	€5,071.78	€1,350.89	€5,120.74
Total	€181,165.63	€151,719.34	€186,574.97	€189,529.9

(A) 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'.



1.2. Culture and corporate ethics

(GRI 2-1; 3-3)

Aena, due to its legal nature as a state-owned commercial company and a listed public limited company, is subject to a regulatory regime that covers both public and private regulation¹⁶.

It is also subject to specific regulations applicable to the sector in which it operates. It is worth highlighting, for example, in Spain, the Airport Regulation Document (DORA), which establishes the conditions to be met at the airports in the Aena network in terms of quality and the environment, capacity and investments, as well as the provisions of the State Aviation Safety Agency (AESA), the European Aviation Safety Agency (EASA), the General Directorate of Civil Aviation (DGAC) and the International Civil Aviation Organisation (ICAO).

In addition to the above, Aena complies with other requirements it voluntarily adheres to, which are related, for example, to quality and the environment from the application of standards such as ISO 20906, ISO 9001:2015, ISO 14001:2015 and the Airport Carbon Accreditation; the standards related to the guidelines for the implementation of information security controls such as ISO 27002:2022; or, with regard to fiscal responsibility, the renewal of the Haz Foundation's 't for transparent' seal, among others

All this is complemented by a series of guidelines and principles set out in the corporate policies approved by Aena's Board of Directors, as well as in internal standards that help to align the Company's management with its strategic objectives, which support Aena's vocation for good corporate governance and contribute to diligently exercising the necessary control over its governing bodies and other staff, as well as, where appropriate, third parties, to prevent and mitigate any type of unethical conduct or non-compliance with regulations. These guidelines and principles are binding for Aena and for the companies that form part of its group, under the terms set out in Article 42 of the Code of Commerce¹⁷ (hereinafter, 'Aena Group').

These regulations are reviewed at least annually and whenever necessary to align them with the company's strategic objectives, applicable regulations and to integrate best practices.



¹⁶ Aena, through its subsidiary Aena Desarrollo Internacional S.M.E., S.A. (Aena Internacional), is present in Brazil through the company Aeroportos do Nordeste do Brasil S.A. (ANB) and the company Bloco de Onze Aeroportos do Brasil S.A. (BOAB), and, in the United Kingdom through the indirect shareholding in the management of London-Luton Airport, with the regulations of each country being applicable.

¹⁷ In each country in which Aena is present, specific rules are also available adapted to its own context. In 2023, the United Kingdom Aena's subsidiaries have adapted their internal standards to ensure its full alignment with those of Aena in Spain.



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 UPDATE
Code of Conduct	30/05/2023
Internal Information System and Whistleblower Protection Policy	
Procedure for the Management of the Internal Information System and Whistleblower Protection	
Aena's Protocol for the Prohibition of Retaliation	25/07/2023
Third Party Code of Conduct	
Regulatory Compliance Policy	
Anti-Corruption and Fraud Policy	30/05/2023
General Regulatory Compliance System Manual	
Board of Directors Member Selection Policy	
Policy of communications and contacts with shareholders, institutional investors and voting advisors	19/12/2023
Sustainability policy	
Risk control and management policy	
Integrated Quality, Environmental, Energy Efficiency and Occupational Health and Safety Management Policy	
General policy for the communication of Aena's economic-financial, non-financial and corporate information	
Corporate tax policy	
Corporate Governance Policy	
Information security policy	
Human Rights Policy	
Policy of relations with stakeholders	
Data policy	
Shareholder Remuneration Policy	

The body responsible for approving all Policies and Codes of Conduct is the Board of Directors. Likewise, all of them are binding and applicable to the Group Aena.

All internal standards are posted on the Corporate Intranet. The corporate policies and Codes of Conduct are also available on the Aena's website.

1.2.1. Regulatory Compliance System

(GRI 2-23; 3-3)

Aena has a General Regulatory Compliance System (hereinafter, 'GRCS') that allows it to identify, manage, prevent and mitigate the risk of non-compliance with applicable laws and regulations, as well as to ensure compliance with the commitments and obligations acquired through internal policies or procedures, promote an ethical business culture of regulatory compliance, and guarantee, before third parties and before judicial and administrative bodies, that it exercises proper preventive control over employees, executives and management bodies. Depending on the characteristics of each country, the respective compliance system in place at Aena or its subsidiaries is deployed to address their specific casuistry and rules, which, where relevant, may be applicable.

The General Regulatory Compliance System is cross-divisional in nature and is aligned with market best practices.

Within the framework of the GRCS, Aena has a series of elements that guarantee the proper implementation and monitoring of the 'culture of compliance'^{18, 19}.

- Regulatory Compliance Policy.
- Code of Conduct.
- Third Party Code of Conduct.
- Anti-Corruption and Fraud Policy.
- Aena's General Regulatory Compliance System Manual.
- Internal Information System and Whistleblower Protection Policy.
- Procedure for the Management of the Internal Information System and Whistleblower Protection.
- Aena Prohibition of Retaliation Protocol (Internal Information System-Complaints Channel).
- Regulations on the functions of the General Compliance System.

The listed Policies, as an internal reference framework, bind and apply to all members of the Board of Directors, senior management, and all employees of the Company, including those of the companies forming part of the Group. However, at Aena's subsidiaries in Brazil and in the United Kingdom, they will be applied without prejudice to the necessary adaptation required to comply with local regulations. The other documents are applicable in Aena and its subsidiaries in Spain and serve as a reference for Aena subsidiaries in Brazil and in the United Kingdom to ensure the correct deployment of their respective systems.

Parties responsible for supervising and monitoring the System

(GRI 2-13)

The Board of Directors has ultimate responsibility for Aena's Compliance System, including:

- The approval and execution of the Compliance System, as well as the other policies that specify the process of forming Aena's willingness in this area (and are integrated into the GRCS), and the decision-making process, their implementation and possible amendments.
- The implementation of the Company's Internal Information System.

Through the Audit Committee:

- The Board of Directors defines the structure and composition of the Compliance Supervision and Control Body (CSCB) and oversees its operation.
- The Annual Activity Plan of the CSCB is approved, which oversees its compliance, as well as the operation of the Complaints Channel.

For its part, the CSCB, appointed and dependent on the Board of Directors of Aena, is responsible for:

- Internal Information System and Whistleblower Protection.
- The implementation, development and application of the General Regulatory Compliance System

Aena's Compliance Division acts under the supervision and direction of the CSCB and:

- Performs the functions linked to the ordinary management of the System, such as the continuous monitoring of procedures, standards and controls.
- Is responsible for the management of information and the processing of investigation files.

¹⁸ The Compliance System is not linked to the remuneration of employees or to the Performance Management System (PMS) of the workforce in general. However, in Aena in Spain and its subsidiaries and Brazil, it is for workers performing functions in the area of Compliance.

¹⁹ The Management Procedure for the Internal Information System and Whistleblower Protection and the Protocol for the Prohibition of Retaliation are only applicable in Aena in Spain and its subsidiaries. In the United Kingdom, in addition to those listed, Aena's subsidiaries other specific policies are also available, such as the Complaints Channel Policy, Competition Compliance Policy, etc.



Finally, Aena's Functional Divisions are responsible for complying with the policies and procedures established by the Company, as well as acting ethically and responsibly. In this regard, they will be responsible for maintaining an effective control environment, ensuring that their areas of responsibility act in accordance with applicable legislation and other applicable internal regulations.

The CSCB and the Compliance Division inform the Board of Directors of Aena, at least annually, of the result of their monitoring work and of the actions carried out in compliance with their functions.

Aena Group companies not domiciled in Spain have their own Compliance Bodies and maintain an ongoing relationship with Aena's CSCB through the Aena Compliance Division, guaranteeing continuous communication and compliance with the principles of independence, collaboration and coordination. Its internal standards, protocols and procedures are defined in accordance with Aena's corporate policies in Spain and in accordance with local regulations²⁰.

In order to develop a culture of compliance, the Group periodically promotes training and awareness-raising actions aimed at all internal areas. Aena also participates in compliance forums in order to integrate the best sector practices and join compliance associations.

Internal Compliance Control Model

In order to provide consistency to the Regulatory Compliance System and achieve a reasonable level of security within the Company, based on a previously prepared risk map and taking into account existing controls, the GRCS is structured around a set of measures aimed at preventing, detecting and reacting to the commission of possible crimes or regulatory breaches.

These measures are:

- Prevention, that is, all the Company's internal regulations and policies, both of a general and specific nature, which contribute to mitigating the risk of crimes, unethical practices or regulatory breaches being committed in the course of our business.

In this regard, all Aena's divisions ensure compliance with the Company's internal policies or regulations, and identify areas for improvement to implement or correct the procedures deemed appropriate to prevent the risks of regulatory breaches in the organisation.

- Detection or action procedures, which determine the information required and the way to act in situations involving regulatory breaches and/or practices contrary to the values and principles set out in the applicable Code of Conduct.

This model is based on the COSO framework, in accordance with the recommendations of the CNMV.

Aena's compliance risks are identified in the risks and controls matrix and are managed, monitored and controlled periodically.

Compliance Action Plan in 2023

In 2023, at Aena and its companies domiciled in Spain, all the documentation comprising the General Regulatory Compliance System has been reviewed, and the following actions were specifically carried out:

- Risk analysis and compliance controls for the continuous improvement of the System.
- Adaptation of current management tools to the regulatory requirements.
- Implementation of the Internal Information System, in compliance with the provisions of Act 2/2023, in order to guarantee the protection of whistleblowers against possible retaliation, which includes the Complaints Channel, as a formal mechanism for communication, consultation or reporting irregularities.
- Deployment of the Training, Communication and Awareness Plan designed by the CSCB, with the implementation of online training courses on the importance of Compliance, the Internal Information System and the prevention of corruption, as well as informative videos on raising awareness of the culture of compliance, to reinforce knowledge of the Regulatory Compliance System, the Code of Conduct and contribute to preventing or mitigating the risk of committing criminal acts.

For its part, Aena's subsidiaries in the United Kingdom, practically all corporate policies have been reviewed and adhered during 2023. In addition, the a risk map has been developed and compliance controls, which is reviewed and reported annually to the Audit and Risk Committee, as well as to the corresponding local administrative bodies.

²⁰ At the subsidiaries in the United Kingdom, there has been established a Compliance Committee to set the parameters for compliance activities and monitor their progress. The Committee meets at least once every three months and both the Audit and Risk Committee of United Kingdom subsidiaries and Aena's CSCB receive reports on its activities. The Group's policies and practices are adequate, periodically reviewed and in line with those established for the parent company.

In the subsidiaries of Aena in Brazil, there is also an Aena Compliance Committee that reports to the Audit Committee. Aena's airports in Brazil, including those of the new company, BOAB, have their own policies and procedures, aligned with those of Aena, which are adequate and periodically reviewed by its Compliance Body.

To ensure awareness of the main policies, an Internal Standards Manual has been drawn up and disseminated to employees.



Finally, in Brazil, at the subsidiary Aena Brasil (ANB), corporate policies have been updated, with adherence to all modified corporate policies approved by the Aena Group headquarters, and the compliance risk map has been reviewed and approved by the corresponding bodies. On the other hand, at the new subsidiary Bloque do Once Aeropuertos do Brasil (BOAB), during 2023, work has been carried out on the implementation of the compliance system and its constituent policies. The corresponding monitoring has been conducted through the responsible bodies for this purpose, both in

Brazil and Spain. Additionally, a Compliance Committee has been established at BOAB, and a whistleblower channel has been implemented, along with a procedure, in line with what the Aena headquarters has. For the new company BOAB, the compliance training program has also been initiated, and it has been included in the dissemination and communication campaigns of the local compliance culture, once the management structure for regulatory compliance in Brazil has been coordinated and integrated.

The Board of Directors guarantees the implementation of the highest standards of ethics and business integrity in the exercise of its functions, a basis for guiding its actions and thereby achieving the goals and values of the Company. It also ensures that the Company's management complies with ethical standards in 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 their 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
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REGULATORY COMPLIANCE SYSTEM

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

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

Board of Directors Supervises, through the Audit Committee, the operation of the Compliance Supervision and Control Body. Approve 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
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DUE DILIGENCE AND DEVELOPING A CULTURE OF GOOD ETHICS AND COMPLIANCE

Regulatory framework and public commitment	Risk diagnosis and default impacts	Implementation of risk control, prevention and mitigation measures	Training, communication and awareness	Monitoring and reporting	Investigation of incidents, repairs and corrective proposals
Regulatory compliance policy	Determine, analyse and assess possible risks in the most methodical way, adopting a preventive and proactive culture.	Prevention control: ensure compliance with internal regulations, policies and standards.	Training and awareness actions to promote a corporate culture based on compliance and ethics. The actions in 2023 have consisted of continuing the Communication and Awareness Plan created by the CSCB.	Complaints Channel.	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.



Due diligence and developing a culture of ethics and compliance

Regulatory framework and public commitment	Risk diagnosis and default impacts	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 Whistleblowing 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 ^(A)	<p>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.</p> <p>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.</p> <p>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.</p>
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 CSCB, by conducting an ongoing assessment of risk maps, compliance policies and regulatory adaptations to the GRCS in all processes.	Actively participating 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.
Policy of the Internal Information System and Whistleblower Protection	Its purpose is to ensure the protection of whistleblowers against possible reprisals and to outline the general principles of the Internal Information System and Whistleblower Protection in which the Whistleblower Channel is integrated as a formal mechanism for communication, consultation, or reporting of irregularities.	Forecasts necessary for the Internal Information System and existing internal information channels to comply with the requirements established in current legislation.	Deployment of the Training, Communication, and Awareness Plan, and review and update of policies.	Appointment of the Internal Information System Manager and promotion of information exchange among the different System Managers within the Group.	In Aena, there is a Procedure for managing the Internal Information System and Whistleblower Protection, as well as a Protocol for Prohibition of Retaliation. Additionally, there are procedures for dealing with Workplace Harassment and Protocols for addressing Sexual Harassment and Gender-based Harassment. In Brazil and the United Kingdom, the companies within the Group establish their respective internal information procedures with the necessary adaptations to comply with the applicable regulations in each case.

Also, refer to the information contained in the image "Measures for the Prevention of Corruption."

(A) In 2023, the implementation of the action plan proposed by the Internal Audit Department following the internal review of the compliance system and function has been completed. This plan was aimed at addressing the detected incidents.



1.2.2 Regulatory Compliance Policy

(GRI 2-23, 2-26)

The Regulatory Compliance Policy, reviewed in 2023 and approved by the Board of Directors, seeks to reinforce Aena's commitment to good corporate governance and is based on the Group's adherence to the values and standards established in the Code of Conduct. This Policy applies to the Board of Directors, executives and all employees of the Aena Group, without exception, regardless of their position, responsibility or geographic location.

As established in the Policy, in the other companies in which Aena participates directly or indirectly without having effective control over them, promotion through its participation in their governing bodies, the adoption of regulatory compliance policies and the establishment of compliance supervision and control systems as currently occurs for these purposes (see section 1.2.1. Compliance System).

The Regulatory Compliance Policy is configured as the general framework on whose principles the Company's compliance model is based, and is complemented by the different corporate policies that address certain aspects thereof.

The Regulatory Compliance Policy adopts the following specific objectives:

- Formally ratify Aena's commitment to establishing a culture of regulatory compliance that enables the development of honest, integral, and transparent professional conduct, as well as demonstrating a strong condemnation of the commission of any kind of illegal act, particularly in criminal matters, without, under any circumstances, justifying its commission on the basis of benefit to the organization.
- Identify the principles of action associated with the main areas of compliance that affect Aena.
- Establish the principles, mechanisms, and procedures in Aena to prevent, identify, and address situations where unethical, unlawful practices, or regulatory breaches occur in the course of business activities.

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

Legislation Safeguarding and complying with current legislation and 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 commission of illegal or criminal acts, promoting a culture of prevention.	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 Promoting self-control processes in the decision-making, and actions of 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.
Protection against retaliation: Ensuring the protection of whistleblowers against possible retaliation, and the management and processing of communications, information, complaints and queries received through the Internal Information System and Whistleblower Protection.		



1.2.3. Code of Conduct

(GRI 2-23, 2-26)

The Group's Code of Conduct sets out the ethical principles and standards that should guide all employees in their actions, regardless of their responsibilities and their geographical or functional location.

This Code applies to the members of the Administrative Bodies, of the Senior Management and to all employees of Aena or any other company wholly owned by Aena and domiciled in Spain. It will apply to persons representing companies not domiciled in Spain, provided it is compatible with the local regulations that apply to them.

Both at Aena's subsidiaries in the United Kingdom, and in Brazil, are adhered to the Group's Code of Conduct, without prejudice to the inclusion of certain specificities derived from the functional and regulatory needs of the local country in order to favour implementation. The aforementioned Codes have been approved by their own Administrative Bodies.

The principles set out in the Code of Conduct inspire Aena's management. In the last 3 years, almost 100% of the workforce has participated in related training activities.

The principles and guidelines of conduct are structured in the Code of Conduct around five large blocks that capture the ethical, respect, integrity and sustainability values:

- Conduct related to people.
- Conduct related to work.
- Conduct related to Aena's environment, stakeholders and image.
- Conduct related to information.
- Conduct related to legal obligations.

In accordance with the duty of communication, it is the responsibility of all those subject to the Code to know and respect the internal standards in order to prevent any type of breach. In Spain, as well as in the United Kingdom and Brazil, in the event of a breach, the corresponding sanctions may be established, depending on the disciplinary regime applicable in each case.²¹

²¹ In Spain, there is a 'whistleblower software' Complaints Channel Platform for reporting complaints and queries, as well as an e-mail address for queries to the compliance body. Likewise, in Brazil, Aena airports have the Ethics Channel, as well as an e-mail address set up for this purpose (compliance@aenabrasil.com.br). In the United Kingdom, London-Luton Airport has the corresponding Whistleblowing Channel. See more information in this regard in section 1.2.10 of this chapter.

²² Further information about this can be found in chapter 3 of this report.

²³ In 2023, 626 employees have received such training.

²⁴ Include employees of BOAB.

The Code of Conduct is reviewed annually, primarily as part of the process of monitoring, controlling and evaluating the proper operation of the Regulatory Compliance System.

Moreover, in Spain, the Code of Conduct for third parties was approved in 2023, highlighting respect for human and labour rights, compliance with safety and service quality requirements, environmental commitment, best ethical practices, rejection of corruption and any conduct of a similar nature, or conduct related to information, whether carried out directly by said third parties or through other companies that may form part of the Company's value chain²².

Code of Conduct Training

During 2023, training and awareness-raising activities on the Code of Conduct were carried out in Spain:

- Employee-oriented: publications in the corporate newsletter, training sessions on the General Regulatory Compliance System²³, as well as specific training for members of the CSCB and Senior Management on the Internal Information System and on Whistleblower Protection.
- Third party-oriented, through the dissemination on the corporate website of the Code of Conduct, corporate policies, including the Third Party Code of Conduct, the Policy of the Internal Information System and Whistleblower Protection, the Procedure of the Internal Information System and Whistleblower Protection, and the Protocol for the Prohibition of Retaliation.

In Brazil, at Aena's subsidiaries, compliance-related communication actions, including those related to the Code of Conduct, are carried out monthly. Additionally, during 2023, 773 employees participated in training sessions (100% of employees in 2022).²⁴

For its part, in the United Kingdom at London-Luton Airport: 311 employees have participated in training activities regarding the Code of Conduct.

Both in Spain, and in Brazil and the United Kingdom, the respective Codes of Conduct and corporate policies are made available to employees and third parties, and can be downloaded from the intranet and/or the corporate website.



Aena, both in Spain, and in Brazil and the United Kingdom, informs its new employees of their duty to know and comply with the Code of Conduct, providing them with the documentation when they start their activity as part of their welcome pack. In Brazil, employees must also acknowledge in writing that they have read, know and understand the Code of Conduct. On the other hand, at London-Luton Airport, in 2023, 175 employees acknowledged in writing that they had read, understood, and understood the Code of Conduct.

1.2.4. Prevention of fraud, corruption and bribery

(GRI 2-23, 2-26; 3-3; 205-1)

Aena's Anti-Corruption and Fraud Policy, updated in May 2023 and approved by the Board of Directors, formalises the Group's commitment to permanent vigilance and punishment of fraudulent acts and conduct that encourage corruption in any of its manifestations, to maintaining effective communication and awareness-raising mechanisms for all employees, managers and governing bodies, and to developing a corporate culture of ethics and honesty.

This Policy is mandatory for members of the Board of Directors, executives and all employees of the Aena Group regardless of where they reside or where they conduct their business, as well as consultants, partners and third-party representatives who may act on their behalf.

In accordance with the provisions of the Policy, it is applicable to subsidiaries controlled directly or indirectly by Aena, adapting, where appropriate, those or other matters that are strictly necessary to make them compatible with and comply with applicable local legal or regulatory provisions. Thus, in 2023, both in Brazil and in the United Kingdom, the corresponding Board of Directors formalised their adherence to the revised policy, without prejudice to further development based on the needs of legal compliance in accordance with the applicable local legislation²⁵.

Aena does not tolerate or permit any form of corruption, extortion or bribery in the performance of its business, whether in the public or private sector.

The principles contained in the Policy include:

- The promotion of a preventive culture based on the principle of 'zero tolerance' towards corruption in business and any illicit act or situation of fraud, which is absolute and prevails over the possible obtaining of any type of economic benefit for Aena or its professionals. It also bases its actions on the application of ethical principles by all its professionals, regardless of their hierarchical level and the place where they work.

²⁵In accordance with the provisions of the anti-corruption and fraud Policy, this is applicable to subsidiaries controlled directly or indirectly by Aena, adapting, where appropriate, those procedural or other matters that are strictly necessary to make them compatible and comply with the legal or regulatory provisions, requirements that are applicable in each case, and developing and/or adapting the principles included in the aforementioned policy to the particularities of their own nature and jurisdiction. In this regard:

In the United Kingdom, Aena's subsidiaries there are also different policies, aligned with that of Aena in 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.

In the case of the Group's subsidiaries in Brazil, the Anti-Corruption and Fraud Policy is published on its website and internal Sharepoint. This policy is binding on all employees and members of the Management Board. This Policy also rejects any form of corruption, prohibits certain practices and establishes the necessary due diligence measures to prevent its occurrence with respect to business partners, corporate operations, suppliers and commercial customers. It also defines the role of local compliance committees in monitoring and investigating potential violations. The specific measures to combat fraud, corruption and bribery are as follows:

– Due diligence procedures performed by the Procurement 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, 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.



- The utmost consideration and monitoring of the risks associated with fraud, corruption and bribery, through the relevant internal procedures and, where appropriate, particularly in all those relating to relations with third parties²⁶.
- The implementation of procedures or controls of various kinds to prevent actions that could be considered an act of corruption or bribery.

With regard to due diligence procedures, in addition to the general provisions of the Code of Conduct²⁷, the policy details the prohibited conduct, under the terms set out therein, in relation to gifts and hospitality, expenses, allowances and travel, facilitation payments, contributions to political parties, activities with social content, patronage and sponsorship, and accounting books and records. In any case, to ensure the prevention and control of corruption, the following measures are adopted:

- Control measures in contracting with suppliers, commercial customers, and representatives and commercial agents.
- Control measures in relationships with partners.
- Control measures in corporate operations.
- Control measures in relationships with public officials and authorities.

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

Training on the prevention of fraud, corruption and bribery

(GRI 205-2)

During 2023, both periodic and specific awareness-raising actions²⁸ were carried out on the prevention of corruption and fraud aimed at all employees in Spain, Brazil and Luton. This has been complemented by the development of specific anti-corruption training to be delivered in 2024²⁹:

- In Spain, for those workers who joined in 2023, more than 626³⁰ have participated (240 in 2022). Additionally, work has been done on developing specific training in the subject for delivery during the 2024 fiscal year, which includes aspects related to the policy, principles, and measures contemplated in the subject, detailing the actions that constitute corruption offenses that generate criminal liability for companies.
- In the United Kingdom, at London-Luton Airport, workers, upon starting their activity, have received specific training in various areas, including anti-corruption and bribery. Additionally, all training is available through the Airport Hub (LLA Hub). As a result, 300 employees completed training in 2023 (274 in 2022).
- For its part, at Aena's subsidiaries in Brazil, 773 workers (436 in 2022)³¹ have received training on anti-corruption and related topics (Brazil's General Data Protection Law [LGDP], Compliance, Conflict of Interests, etc.).

The policy, procedures and associated information are available to all employees through internal channels and the Aena website in Spain, Brazil and the United Kingdom.

²⁶ In this regard, the current compliance risk map of Aena identifies risks related to public corruption and corruption in business. For its mitigation and prevention, the corresponding controls have been implemented, which are applicable to the entire organisation's activities. The control activity is carried out for all operations included in its scope of control.

In Aena's subsidiaries in Brazil, compliance management reviews compliance risks. Additionally, a compliance risk map will be developed for BOAB.

Finally, in the United Kingdom, the relevant questionnaire is provided for the identification of potential risks in this regard.

Additionally to the above:

- As stated in the Regulatory Compliance System Manual and in the Regulatory Compliance Risk Control and Management Procedure of Aena, the identified regulatory compliance risks that may occur as a consequence of the activities carried out in Aena are reviewed annually. The risks are evaluated and prioritized according to their criticality: "According to Aena's risk and control matrix and following what is established in Spanish legislation, through its activity Aena has identified the risk of corruption, which covers both the risk of Public Corruption (including Bribery, Transnational Public Corruption, Influence Peddling, Illegal Financing of Political Parties and Embezzlement), such as the risk of Corruption in business. The criteria to determine the materiality and significance (criticality) of compliance risks are established in accordance with Aena's risk assessment methodology. Once the necessary controls and measures have been implemented, the level of risk management is determined, based on the existence of general and specific controls, the sufficiency of the controls and their effectiveness.
- In the UK, the risk of corruption and bribery is recorded in the legal team's own risk matrix, which is reviewed quarterly. The risk of bribery and corruption is also indicated in the legal and regulatory risk matrix of Aena's subsidiaries in the United Kingdom, which is reviewed annually.
- In Brazil, each Aena's subsidiary prepares/reviews the regulatory non-compliance risk map annually, which includes, in accordance with local legislation, the risk of corruption and bribery, as well as controls. The compliance risk matrix is updated annually. Likewise, associated controls are available.

²⁷ 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).

²⁸ Joint communication to Group companies by the President and local compliance officers in subsidiaries, webinar in Brazil, informative session in Spain on the handling of gifts.

²⁹ In the UK, workers receive specific training in different areas when starting their activity (including anti-corruption and bribery). In Brazil, as previously indicated, 757 workers have received training on the Compliance System, the Code of Conduct, anti-corruption and fraud, etc.

³⁰ Training on the Compliance System, which includes specific aspects on corruption prevention.

³¹ Including BOAB's employees.



Communications on corruption and bribery

(GRI 205-3)

In Spain, as well as in the United Kingdom and Brazil, there is a complaints channel, as well as other communication tools, through which possible irregularities detected in this area can be reported (for more information, see chapter 1.2.10. Complaints channel).

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.

With regard to contributions to political representatives and parties, these are expressly prohibited in Aena's Code of Conduct, as well as in the Anti-Corruption and Fraud Policy, and therefore none have been made during the fiscal year 2023.

Nature of the confirmed corruption cases (GRI 205-3)	2022				2023			
	Spain	United Kingdom	Brazil	Total Consolidated	Spain	United Kingdom	Brazil	Total Consolidated
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

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.

Depending on the type of transaction and/or stakeholder (*)

(*)Aena's Executive Management Committee may develop criteria whereby, in accordance with criteria commonly accepted in the international community, certain operations or investments are considered to be high risk. If a transaction meets these standards, the Company's decision-making bodies will be specifically informed in the transaction proposal reports so that they can take this into account when authorising the activity. If the transaction is approved, this will be clearly stated and the mitigating measures taken, if any, will be disclosed

Gifts and hospitality, or commercial or entertainment invitations

It is prohibited to receive or give, to promise or offer any kind of payment, gift, service, or commercial or entertainment invitation 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.

Political contributions

Political contributions are strictly prohibited. Links, membership or collaboration with political parties or with other types of entities, institutions or associations with public purposes that exceed those of Aena, as well as contributions or services to them, must be made in such a way that their personal nature is made clear and any involvement of Aena is avoided, during free time and without the use of Aena's resources.

Social content, patronage and sponsorship activities

Proper approval and authorisation in accordance with applicable regulations, and may never be used as a cover for illegal payments in violation of the Code of Conduct.

Books and accounting records

Keep books, records and accounts that contain all necessary details and properly reflect the operations and disposals of the organisation's assets. Follow the 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, safeguarding them. Strictly prohibiting the deliberate misstatement, omission or secret usage in the recording of Aena accounts, funds or assets with the intention to defraud or commit a breach.

Corporate operations

Maximum diligence and analysis and assessment of all implications and risks, evaluating:
- Legal framework of the sector and country in which the entity operates.
- Shareholders and the entity. Proper constitution and functioning of the entity.
- Proper management of accounting, financial and corporate records
- Regulatory compliance.
- Inclusion of anti-corruption clause.

Facilitation payments

Facilitation payments are strictly prohibited. Any activity that could lead to a facilitation payment being made or accepted by or on behalf of Aena or that could suggest that such a payment may be made or accepted must be avoided.

Suppliers, business customers, representatives and business agents—business transactions

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. Agents may not receive any consideration until after they have signed the corresponding contract and payments will be made according to the internal procedures established at Aena.

Partners

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.

Due diligence process with partners.

Have anti-corruption protocols and controls, and inclusion of anti-corruption clauses. In the event that additional risks are identified, an enhanced due diligence process with the purpose of carrying out investigations of greater depth and scope will be conducted, and additional measures will be established, where appropriate.

Public officials and authorities

Compliance with the values, principles and standards of conduct
Refraining from acting or dealing with public officials or authorities in the event of a conflict of interest.
Supervising and verifying the veracity and integrity of the information provided to the Public Administrations.
Proper conservation and custody by the person assigned for this purpose of all documentation exchanged with the public sector.

Other measures to make it effective

Adequately take into account the risks associated with fraud, corruption and bribery, specifically all those related to relations with third parties, in Aena's internal procedures and in the Risk Management Systems.

Promote the knowledge of and respect for these procedures 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.

1.2.5. Related Party Transactions Procedure

(GRI 2-15)

Article 38 of the Regulations of the Board of Directors of Aena, in accordance with the provisions of Royal Legislative Decree 1/2010, of 2 July, which approves the consolidated text of the Corporate Enterprises Act, states, in relation to related-party transactions, that:

- The Board of Directors will approve, following a favourable report from the Audit Committee, those related-party transactions carried out by the Company 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. Said approval is one of the powers of the Board of Directors that cannot be delegated.
- The Board of Directors, through the Audit Committee, will assess whether the related-party transactions are fair and reasonable from the Company's point of view and, if applicable, from the point of view of the shareholders other than the related party, as well as whether the economic conditions thereof are reasonable.
- With regard to the disclosure regime, related-party transactions will be disclosed in the Annual Corporate Governance Report, in the Report on the annual accounts and in the regular public information under the terms set forth in the applicable regulations.
Likewise, related-party transactions whose value exceeds certain thresholds will be published on the Company's corporate website and through the corresponding communication to the CNMV, in accordance with the provisions of Royal Legislative Decree 1/2010 of 2 July, approving the consolidated text of the Corporate Enterprises Act.
- The Company may approve a procedure for related-party transactions, establishing the rules and procedure for their content, approval and dissemination.

In this regard, the Board of Directors of Aena has established a Procedure for Related-Party Transactions of Group Aena, the latest update of which was approved in May 2023. The aim thereof is to regulate the procedure to be followed in those transactions that Aena or any of the companies belonging to its group carry out with Related Parties of the Company, and which entail a transfer of resources, services or obligations, regardless of whether or not there is any consideration.

Among other matters, this Procedure details 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 Annual General Meeting, the Board of Directors or the Executive Management Committee, as a delegated body.

- The calculation rules.
- The rules for the publication of transactions actually performed.
- The periodic control procedure.
- The Register of Related-Party Transactions.
- Internal training actions on Related-Party Transactions.

Aena informs stakeholders of the various related-party transactions carried out during the year in the Report on the annual accounts, in the Annual Corporate Governance Report, as well as on Aena's corporate website and that of the CNMV, where applicable.

1.2.6. Conflicts of interest

(GRI 2-11; 2-15)

In accordance with the principle of zero tolerance for any kind of illegal behaviour, Aena regulates conflicts of interest between different groups (members of the Board of Directors, related persons, shareholders, management team, employees, management bodies, etc.) through internal standards and instructions approved for this purpose. In this regard:

- In the Regulations of the Board of Directors:
 - In accordance with the duty of diligence, the members of the Board of Directors must always subordinate their private interest to the interest of the Company, being obliged, among other matters, to express their objection to any decision submitted to the Board of Directors that is contrary to the law, the Corporate Bylaws, the Regulations or the corporate interest, requesting that such objection be recorded in the minutes of the meeting. In particular, Independent Directors and other Directors who are not affected by the potential conflict of interest must express their objection in the case of decisions that may adversely affect shareholders who are not represented on the Board of Directors.

- In order to comply with the duty of loyalty and the duty of non-competition, no member of the Board of Directors may engage in activities on their own behalf or on behalf of others that would place them in permanent conflict with the interests of the Company. Likewise, they must refrain from participating in the deliberation and voting on resolutions or decisions in which the Director or a person related to them has a direct or indirect conflict of interest, except for those resolutions or decisions that affect them in their capacity as director or in the cases provided for by law, such as the approval of transactions related to the parent company. They must also inform the Board of Directors of any situation of direct or indirect conflict that they may have with the interests of the Company and, in the event of a conflict, the Director affected will refrain from intervening in the transaction to which the conflict refers.
- In the Conflict of Interest Management Procedure, the purpose is to establish Aena's procedures for preventing conflicts of interest in which members of the Board of Directors and shareholders, as well as their respective related persons, may find themselves, in accordance with the provisions of the corporate and regulatory legislation in force and in Aena's Corporate Governance system. Likewise, this Procedure covers the actions regarding the prevention of conflicts of interest of both the members of Aena's management team and the Directors thereof who are considered High Ranking Government Officials of the State, subject to Act 3/2015 of 30 March, regulating the exercising of powers of High Ranking Government Officials of the State.
- In the Code of Conduct, in section 4.15 on conflicts of interest and incompatibilities, it is specifically indicated 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, putting aside their personal interests at the expense of those of Aena and intervening or influencing the decision-making affected by the conflict of interest. Likewise, Persons Subject to the Code of Conduct must inform the CSCB in writing of any possible conflict of interest in which they are involved, and may not, under any circumstances, perform transactions or activities that entail or may entail a conflict of interest without the prior written authorisation of the aforementioned Compliance Body.
- The General Instruction on Conflicts of Interest, which the CSCB approves for members of Senior Management³² in order to establish guidelines for the management, control and communication of possible Conflicts of Interest of their functional managers, complementing the provisions of the Code of Conduct.

- The Regulations on Duties of the General Regulatory Compliance System of Aena regulates the potential for conflicts of interest for the CSCB and members of the Compliance Division.
- The Procedure for the Management of the Internal System and Whistleblower Protection establishes how to operate in any situation in which the objectivity of the person who has to make decisions on a communication, information or complaint may be compromised by their relationship with the whistleblower, the person reported, or the facts reported.

Also, in Spain, an informative video on conflicts of interest has been published to raise awareness among workers.

In the United Kingdom, staff conflicts of interest and general conflicts of interest (for example, awarding contracts to those where there is a conflict) are included in the Anti-Corruption, Fraud and Conflict of Interest Policy. Conflict of interest controls are also built into tendering processes.

For its part, at Aena subsidiaries in Brazil, a due diligence is carried out on suppliers through which it collects information on politically exposed persons and potential conflicts of interest³³. During 2023, and within the dissemination and awareness activities carried out, specific training has been given in the area of conflict of interest aimed at the sales and procurement areas. The more general training on conflicts of interest is included in the general Code of Conduct training for all employees.

1.2.7. Specific measures to combat money laundering (GRI 2-23; 2-26; 3-3)

The Anti-Corruption and Fraud Policy applicable to Group Aena includes due diligence measures in its relations with partners focused on preventing corruption in all its forms, including money laundering.

In this regard, Aena will enter into transactions with partners who have accredited a reputable performance in their sector and have a recognised track record of ethical behaviour. Moreover, the third party must be suitably assessed by Aena through a due diligence procedure, in order to ensure that the third party is trustworthy and, consequently, that it does not perform activities that may entail risks, economic damage or compromise the reputation and good image of Aena; taking into account issues such as:

- The type of transaction to be performed,
- The type of agreement or contract to be signed,
- The identity of the third party or its shareholders, jurisdiction, etc.

³² It is applicable to Aena and to companies wholly owned by Aena and domiciled in Spain.

³³ For contracts with corruption risks, that is, where there is interaction with public entities or with significant values, a procedure is currently being developed to standardize this flow.

In any case, the due diligence process will determine:

- The identity of the counterparty and their directors in fact or by law, and;
- The identity of the beneficial owner, as established in the provisions set forth in the current regulations (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.

Any transaction, contract, agreement or financial arrangement is prohibited by Aena if there is good reason to believe that it could involve unethical or corrupt behaviour. Only partners who have established a reputation for ethical behaviour and sound market performance will complete transactions with them. Through a due diligence process that examines, among other things, the type of transaction to be performed, third parties (partners, sales agents and representatives) can be easily assessed.

Likewise, both in Spain and Brazil, within the framework of the internal financial information control system and the compliance system, specific measures are established to assist in the fight against money laundering. In Brazil, training is also provided in this area. In the United Kingdom, at Aena's subsidiaries has adhered to Aena's Anti-Corruption and Fraud Policy, and has an approved tax policy in line with that of Aena, 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.

1.2.8. European Transparency Registry and Lobbying

(GRI 2-28; 415-1)

Since 2016, Aena has been registered in the European Transparency Register, reporting periodically on its activities and the resources attributable to the activities covered by it³⁴.

Specifically, the main EU legislative or policy proposals of interest to the Company include air transport policy, environment, safety, security, passenger rights, external relations, competition, ground handling, flight schedules, Single European Sky, trade, aid, etc.³⁵

In this framework, Aena has signed the code of conduct of the Transparency Register, which is mandatory in order to be registered in it.

As stated, Aena is a member of the European Airports Council International (ACI Europe), a Council made up of national airport associations, business partners and educational centres, which actively collaborate to ensure two-way communication and an active defence of legislative, technical, environmental, passenger and commercial interests, among others. Specifically, in ACI Europe, issues such as airport capacity and slots, improvement of airport connectivity, aviation liberalization and external relations, customer service, airport governance and management of airport change, regional airports, and the Single European Sky and SESAR initiative are addressed. Additionally, ACI Europe actively participates in promoting climate action in the airport sector.

In addition to the above, Aena is a member of and participates in industry associations, business associations and specific working groups in the different areas of activity.

As indicated in the Code of Conduct and the Anti-Corruption and Fraud Policy, it is expressly forbidden to make donations or contributions to political parties, federations, coalitions or constituencies using Company resources; and any link, membership or collaboration with them or with other types of entities, institutions or associations with public purposes that exceed those of Aena, as well as contributions or services to them, must be made in such a way that their personal nature is clear and any involvement of Aena is avoided, during free time and without the use of Aena's resources. As a result, no contributions were made to political parties in the fiscal year 2023.

Political contributions are strictly prohibited by Group Aena.

As far as the United Kingdom and Brazil are concerned, it should also be mentioned that Aena's subsidiaries do not make contributions to lobbying practices.

³⁴ The last update of the information in the Register was carried out in March 2023. As can be seen on the website, the identification number in the Register is 141532321289-19.

³⁵ To date, one Aena professional is involved on a part-time basis in the activities described in the register, having spent between €10,000 - €24,999 on them.



1.2.9. Unfair competition³⁶

(GRI 206-1)

With the aim of promoting an ethical corporate and compliance culture and respect for antitrust regulations, at Aena, aspects related to the protection of unfair competition are being integrated into the compliance system. In this sense, the guarantor divisions carry out appropriate controls, which are supervised by the Compliance Division.

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

In addition to the above, in Spain, the conditions imposed in the DORA act as a guarantee to avoid any conduct related to unfair competition, with regard to price fixing. Thus, the document establishes the criteria for the annual determination of airport charges for the 2022-2026 period, always avoiding the execution of anti-competitive agreements.

Likewise, with regard to contracts with suppliers and other third parties, Aena is subject to the provisions of 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. The standard contains a series of measures to respond to situations where there is sufficient evidence of illegal collusion during the procurement procedure³⁷, in which case, the Spanish National Markets and Competition Commission (CNMC [Comisión Nacional de los Mercados y la Competencia]) or the corresponding regional competition authority would be notified.

In 2023, training has been provided to the Board of Directors on compliance with minimum social safeguards, including aspects related to competition requirements.

In the United Kingdom, Aena's subsidiaries have a Competition Compliance Policy that reflects its commitment to conducting its commercial activity with the highest level of integrity and in accordance with all applicable laws, including the competition law. In addition to expressly including the rejection and prohibition of any agreement that may prevent, restrict or distort competition, the standard refers to the responsibility not to abuse its possible dominant position in the market in any way³⁸.

In Brazil, for Aena's subsidiaries, the commitment in this matter is materialised through the implementation of a series of controls aimed at preventing possible risks associated with unfair competition practices. This includes:

- The adoption of the Local Procurement Standard procedure, which involves the approval of proposals under established competitive criteria.
- Values for the transfer of areas are determined based on the market average, with the relevant approval authority (either the meeting or the board).
- Publication on the website for services with significant market reach.

Through the complaints channels set up by the Company in the relevant countries in which it operates³⁹, any third party can report regulatory and anti-corruption violations, including those relating to unfair competition and monopolistic practices.

During fiscal year 2023, and like in 2022, no proceedings have been opened or finalised against Aena in Spain, the United Kingdom and Brazil for anti-competitive practices, nor has any communication been received in this regard through the channels provided for this purpose.

³⁶ As reported in the Sustainability Report - EINF 2023, on February 20, 2020, the Mercantile Court summoned Aena to respond to the lawsuit filed by Ryanair DAC, seeking the annulment of a penalty imposed by Aena on Ryanair amounting to €9,000, an immaterial amount for the Organization, the annulment of the contractual clause establishing the penalty, and the reimbursement of the imposed amount. The annulment of the contested clause is based on the allegation that it was imposed through an abuse of dominant position. The trial was scheduled for March 1, 2023; however, it was postponed and took place on January 8, 2024. Aena has consistently argued that the Plaintiff's claim is not a matter of abuse of dominant position, but rather opposition to the imposition of the corresponding penalty, thus a contractual matter. Aena believes that, to address this issue, it should be under the jurisdiction of civil courts, as stated at the appropriate procedural stage.

³⁷ As defined in Article 1 of Act 15/2007, of 3 July, on the protection of competition.

³⁸ This policy, along with all other standards, is available on the LLA Hub platform.

³⁹ See section below '1.2.10. Complaints Channel'.

1.2.10. Complaints channel⁴⁰

(GRI 2-16; 2-26; 205-3; 406-1)

Aena Group's companies, provide third parties with communication channels through which they can report, complain or make enquiries about violations of the Code of Conduct, breaches of internal regulations and the regulatory compliance system, criminal or administrative offences, labour law on occupational health and safety and any actions or omissions that may constitute breaches of the European Union law.

In this regard, during 2023 in Spain, Aena, following the entry into force of Act 2/2023, of 20 February, regulating the protection of persons who report regulatory violations and the fight against corruption, an Internal Information System and Whistleblower Protection has been implemented⁴¹. Within the framework of this System, a set of internal policies and procedures have been developed to make specific communication channels available to whistleblowers and, where appropriate, to adapt them, and to ensure their protection.

During 2023, Aena has adapted its GRCS to respond to the requirements of Act 2/2023 and to guarantee the protection of whistleblowers under the terms of Act 2/2023. Moreover, regular internal communication actions have been carried out and the Complaints Channel on the corporate website has been updated to make it easier to access.

Thus, to guarantee communication for both Aena staff and third parties, and in order to foster dialogue and active listening within the culture of regulatory compliance and ethics as a basic element of the Internal Information System, in Spain, Aena makes the following available:

- Complaints channel: online platform accessible on Aena's corporate website in a separate and easily accessible section.
- By post addressed to the Head of Aena's Internal Information System, with registered office at Calle Peonías, 12, 28042 (Madrid).

- The possibility to communicate any conduct verbally by means of a request by the whistleblower for a face-to-face meeting with the Head of the Internal Information System or the person delegated by the latter, within a maximum period of seven days.

The CSCB, through the Compliance Division, monitors and manages the communications received, ensuring:

- Confidentiality, independence, data protection and secrecy of communications.
- The possibility to submit and process anonymous communications.
- The absence of any retaliation, sanction or unfavourable consequence for the whistleblower.
- Proper management of the conflict of interest.
- Respect for the rights of those reported, especially the right to privacy, the right to judicial protection and defence, the right to be informed of the actions or omissions attributed to them, the right to be heard at any time, the right to the presumption of innocence, and respect for the honour of the persons affected.

All information, complaints and queries received are processed securely and confidentially, ensuring the integrity of the information and the processing of personal data and, where appropriate, the proper management of possible conflicts of interest.

The management and processing of information is carried out in accordance with the provisions of the Procedure for the Management of the Internal Information System and Whistleblower Protection⁴² and includes the measures for protecting whistleblowers set forth in Aena's Protocol for the prohibition of retaliation. Likewise, communications related to workplace harassment and sexual and gender-based harassment will be processed in accordance with the provisions of their specific procedures⁴³.

In the event of violation, disciplinary measures will be imposed in accordance with the applicable regulations and those stipulated in the Code of Conduct:

- For employees, in accordance with the 1st Collective Bargaining Agreement of the Aena Group of companies, in article 97 on sanctions that may be imposed, depending on the classification of the misconduct (minor, serious and very serious).
- For members of the Board of Directors, the provisions of the Board of Directors' Regulations and applicable legislation will apply to them for these purposes.

⁴⁰ Links to the complaints channels that Aena makes available to third parties in each of the countries in which it operates can be consulted in the 'Links of interest' chapter of this document.

⁴¹ In Spain, the channels available for receiving complaints are Aena S.M.E., S.A., SCAIRM, and ADI.

⁴² The procedure for managing communications that come through the Whistleblowing Channel is included in the Procedure for the Management of the Internal Information System and Whistleblower Protection, which is public for all interest groups through the Aena website.

⁴³ For more information, see Chapter 5 of this report.



- For employees who are linked to Aena by means of a Senior Management contract, the provisions of the contracts that regulate their relationship with Aena, as well as the applicable regulations, will apply to them for these purposes.

During 2023, awareness-raising actions regarding the whistleblowing channel have been carried out for Aena employees in Spain. These actions include information about the types of reports that can be made (violations of the Code of Conduct, occupational health and safety issues, workplace harassment, sexual harassment, etc.), the guarantees provided by the channel, and more. Additionally, periodic information on this topic has been presented to the Governing Bodies.

For its part, in the United Kingdom, Aena's subsidiaries have a specific policy for reporting irregular conduct, the Whistleblowing Policy, which establishes the process and procedure to be followed by those subject to it in the event of detecting any irregularity⁴⁴.

The channels enabled for this purpose include:

- The Ethics Channel (EthicsPoint), to report any matter anonymously. This channel is managed by a third party.
- Navex reporting line.
- Direct communication with the manager, the Whistleblowing Officer, the General Counsel, the Human Resources Officer, or the CEO.
- A confidential external telephone service managed by an external company (legal counsel);

In Brazil, Aena's subsidiaries have their own specific channel, the Ethics Channel, whose operation, as well as the procedure to be followed in the event of receiving a complaint of irregular conduct, is established in their respective Ethics Channel Management Procedure, which has been revised this year to adapt it to the requirements arising from adherence to the Internal Information System and Whistleblower Protection Policy. Through this procedure, the confidentiality of the identity of whistleblowers is guaranteed, as well as the right of defence and the presumption of innocence of the persons under investigation. In addition to the above, reports of this nature can be directed through the e-mail address compliance@aenabrasil.com.br

The Compliance Committee of each Aena company in Brazil, together with the technical support of the Compliance Manager, is the body to which any communication of this nature should be addressed, who will be responsible for ensuring that all reports received are independently analysed.

Like in Spain and the United Kingdom, in 2023, Aena's subsidiaries in Brazil have promoted actions to raise awareness of the ethics channel and the reporting of irregular conduct for employees.

In 2023, Aena processed 81 reports (16 in Spain, 6 in the United Kingdom, and 59 in Brazil⁴⁵) through the respective whistleblowing channels.⁴⁶ This marks an increase of 21 reports compared to 2022 when there were 24 reports in Spain, one in the United Kingdom, and 35 in Brazil. Aena is committed to resolving all reports received.

None of the reports received in any of the Aena Group subsidiaries have led to the initiation of criminal, civil, or any other judicial proceedings, nor have they resulted in sanctions being imposed.

⁴⁴ Rules available on the intranet for all users.

⁴⁵ Out of the 59 reports received in the Aena subsidiaries in Brazil, fifteen are related to workplace harassment. Two of them fall under the category "Respect for People," and thirteen fall under the category "Respect for Legality and Ethical Principles."

⁴⁶ The data regarding closed complaints after concluding the investigation.

The number of complaints processed in Spain is 16, which refers to those closed after concluding the investigation: (5 complaints from 2022, 11 complaints from 2023).

Complaints of workplace harassment have not been quantified in the table because there are none closed received through the complaint channel. Complaints of harassment received through other channels are not included in the table. Specifically, one complaint of workplace harassment has been archived due to the informant withdrawing.

At the end of the reporting period, measures have been implemented concerning 12 communications, either corrective or improvement measures depending on whether any non-compliance has been identified or not. Out of these, the follow-up on the implementation of measures for 5 communications has been closed. The remaining 4 communications have not led to the implementation of measures.



	2023	Spain					Brazil					United Kindong				
		Nº	Status and actions				Nº	Status and actions				Nº	Status and actions			
			Remediation plans implemented	Incident no longer subject to action	Incident reviewed	Planes de remediación implementados con resultados revisados a través de procesos rutinarios de revisión de gestión interna		Remediation plans implemented	Incident no longer subject to action	Incident reviewed	Planes de remediación implementados con resultados revisados a través de procesos rutinarios de revisión de gestión interna		Remediation plans implemented	Incident no longer subject to action	Incident reviewed	Planes de remediación implementados con resultados revisados a través de procesos rutinarios de revisión de gestión interna
Respect for the people	39	3	2	0	0	1	35	18	17	0	0	1	1	0	0	0
Discrimination based on sexual orientation	1	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0
Other types of discrimination	3	3	1	1	0	1	0	0	0	0	0	0	0	0	0	0
Professionalism, responsibility and cooperation at work	4	3	1	1	0	1	0	0	0	0	0	1	1	0	0	0
Responsible use of resources	1	0	0	0	0	0	0	0	0	0	0	1	0	0	1	0
Health and Safety at Work	2	1	0	0	0	1	1	1	0	0	0	0	0	0	0	0
Relationships with clients, suppliers and other partners	3	0	0	0	0	0	2	1	0	1	0	1	0	1	0	0
Corruption and fraud	3	1	1	0	0	0	2	1	1	0	0	0	0	0	0	0
Corporate image and reputation	1	0	0	0	0	0	0	0	0	0	0	1	0	1	0	0
Conflict of interest and incompatibilities	7	0	0	0	0	0	7	0	6	0	1	0	0	0	0	0
Confidentiality and authenticity of information	1	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0
Data Protection	1	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0
Respect for legality and ethical principles	15	2	0	1	0	1	12	4	8	0	0	1	0	0	1	0
	81	16	7	4	0	5	59	25	32	1	1	6	2	2	2	0



1.2.11. Data protection

(GRI 3-3)

The Group Aena has a data protection and privacy compliance model based on respect for the fundamental right to data protection and privacy, which is formally set out in the Code of Conduct and other documents.

In the Code of Conduct, Information Security Policy, Human Rights Policy and other documents, the Group Aena formalises its commitment to fundamental respect for data protection and privacy.

This model is based on the Information Security Policy, the basic pillar for the secure processing of Aena's information, the objective of which is the efficient and dynamic protection of information through a preventive, detective and reactive approach. Its guidelines have been defined in accordance with the ISO 27001 standard, which establishes an internationally recognised security reference framework.

This security framework is supported by a set of security processes, standards, procedures and tools implemented for the security assets through which an Information Security Management System is developed.

This Policy is applicable to the Aena Group, and compliance with it is mandatory for the Board of Directors, executives and, in general, all employees of the Aena Group, without exception and regardless of their position, responsibility or geographical location.

Notwithstanding the foregoing, subsidiaries domiciled outside Spain may make the necessary adaptations to the Policy in order to comply with the local law applicable to them.

The Aena Group has different policies aimed at ensuring the privacy of different types of users, available online⁴⁷:

- Privacy Policy for Shareholders and Investors.
- Privacy policy for users of the airport facilities, as well as for users of the website.
- Employee Privacy Policies.
- Privacy Policy for staff of collaborating companies.
- Cookies Policy.

These policies describe how the personal data of each of the groups are processed and inform them of the processing of their personal data. Thus, among other matters, they inform of the group company or companies acting as data controller, the types of data processed, the purposes of this processing, the legal bases for this processing, the retention and deletion periods, 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. When automated decisions are used, adequate information is provided on these and their characteristics.

It is guaranteed that the data will only be used for the informed purposes and during the defined retention periods, and that the different data subjects will be informed of the processing of their personal data through the corresponding informative clauses and/or privacy information policies at the time the data is collected from them.

Considering that information-related conduct is among Aena's action guidelines, any breach of this nature may lead to the imposition of disciplinary sanctions.

⁴⁷ In addition to these, Spain has other specific policies aimed at guaranteeing the protection of users of the different services. For example, general terms and conditions of use of the Aena mobile application and privacy policy or the Biometric System Privacy Policy..



Data protection roles and governance

To ensure compliance with internal regulations in Spain, a series of roles have been established to ensure compliance with personal data protection. Thus, the Data Protection Officer and the Central Data Unit.⁴⁸

The Corporate Divisions of Aena participate in the Data Protection Committee, which also has implications in this area and acts with a consultative and supportive capacity.

In Brazil, ANB has a Governance Program for the protection of personal data. According to the same, the Data Protection Officer coordinates the implementation of the Program in all airports, with the support of the Data Protection Committee and the Privacy focal points of each Airport, assigning clear objectives and supervising and evaluating their performance. in the implementation phase. For their part, the responsibility of all employees in the full application of the Program is established, as well as the constant duty to comply with the data protection principles and guidelines⁴⁹. As for BOAB, the mapping of personal data is pending, which will begin in 2024. The cybersecurity of these airports is already being carried out by the ICT area.

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 e-mail at ocpd@aena.es, and with the Data Protection Officer, at the following address: dpd@aena.es

In the United Kingdom, at Aenás subsidiaries, a Data Protection Officer of their own is available.

In ANB, there is a Data Protection Officer and a Data Protection Committee in place.

⁴⁹ Currently, the Data Protection Governance program is implemented in ANB, although documentary adaptations and third-party management can be used for BOAB. During 2024, personal data mapping (ROPA) for BOAB will be carried out. In any case, cybersecurity actions are already being developed by the ICT department.

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, United Kingdom, and Brazil (Sharepoint) and Corporate Website (all users) ^(A)
Scope	<p>It includes directors, executives and, in general, all employees of the Aena Group without exception and regardless of their position, responsibility, occupation or geographical location, contracted companies, collaborating companies and customers and, more generally, anyone who has access to the organisation's information and/or systems as well as to all physical infrastructures (buildings, airports, etc.).</p> <p>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.</p>
Main features	<p>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.</p> <p>It includes the main guidelines regarding the dimensions of information, information processing, use of resources, control of access to information assets, protection and security of information assets. Consequently, it 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.</p>

Set of procedures, guides and measures

To ensure that all information assets are properly protected, limiting their use to the purposes of the processes for which they are intended and ensuring that access to them is controlled, this set applies to administrators, directors and employees, as well as to all natural persons and legal entities that have a relationship with the Company.

Mechanisms to inform data subjects of the privacy of their data ^(C)

	Employee Data Privacy Policy ^(B)	Privacy Policy for users of the airport facilities and the corporate website	Privacy Policy for personnel collaborating companies	Privacy Policy for Shareholders and Investors
Available on	Corporate website and intranet	Corporate website for all users, suppliers and customers	Corporate website, for all employees of collaborating companies	Corporate website
Countries	Spain and United Kingdom	Spain, United Kingdom and Brazil	Spain and Brazil	Spain
Main features	<p>They include information about:</p> <ul style="list-style-type: none"> • 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 			

(A) See chapter 'Links of interest'.

(B) In Spain, the United Kingdom, and Brazil, the subsidiaries of the Aena Group include clauses in the employment contracts of employees aimed at informing them about the personal data collected and the processing carried out on such data, as well as providing contact information to exercise the rights established by the applicable local regulations. The clause is signed by the employees, who retain a copy.

(C) Tender documents include specific clauses on data protection applicable to third parties.

Measures to guarantee privacy. Risks.⁵⁰

Aena has a management system for compliance with applicable data protection regulations, which includes a set of rules, procedures, instructions, and guidelines, as well as procedures for addressing data subjects' rights, methodologies for conducting risk analyses to ensure the protection of data subjects' rights and freedoms, analysis of new personal data processing activities that arise, and the preparation of corresponding data protection impact assessments.

In this regard, there is a privacy risk analysis methodology that applies to the processing of personal data. In this way, possible risks and impacts associated with new products or services that require the processing of personal data ("privacy by design") are monitored and any event that may cause a significant change in an existing treatment, and different measures are established for its treatment. This process is reviewed periodically in order to pursue continuous improvement and is applicable to all personal data processing activities carried out for the benefit of the various interested parties, including employees, shareholders, customers and suppliers.

Therefore, all processing of personal data must go through a risk identification process to guarantee the rights and freedoms of the interested parties, an assessment of said risks, based on their probability of occurrence and their impact, and apply the corresponding controls and measures, both technical and organizational, to reduce the level of risk to tolerable levels, all in accordance with the guides and standards developed by the Control Authority.

In the UK, risk analysis is managed in multiple ways depending on the specific aspect of regulation that is the focus. This includes, but is not limited to:

- Review of the proposed new processing activity.
- Review of changes to existing processing activity.
- Periodic review of existing treatment activities.
- Review of the new system/platform.
- Review of new third-party data processors.

Currently, data sharing agreements are taken into account in all identified engagements of third party data processors to safeguard the transfer and subsequent processing activity they carry out under the instructions of the London-Luton Airport. The intention is to take advantage of this process by issuing all proposed third-party processors a data protection assessment prior to going live.

Once assessments have been completed for each of the activities listed above, any identified risks are documented and mitigation tasks are assigned to the relevant parties to complete before being reviewed again.

Approval is granted in cases where no risks are identified or, after mitigation, the risks are reduced to an acceptable level.

In Brazil, risks related to privacy and data protection are identified in the compliance risk map, with the corresponding mitigation measures. Likewise, for the ANB subsidiary there is a Data Protection Governance Program with actions aimed at:

- Monthly communications
- Mandatory standard training.
- Internal webinar.
- ROPA update.
- Contractual clauses.
- Third party evaluation.
- Information Security Policy.
- Privacy Policy

As for the BOAB subsidiary, the mapping of personal data is pending.

⁵⁰ In accordance with the Company's Risk Control and Management Policy, risks related to data security and compliance are included in the category of 'legal and compliance' risks. Given that the Company's Risk Map incorporates the governance, supervision and review model, the same governance model applies to all of them. The Board of Directors establishes the level of acceptable risk and defines, updates and approves the Risk Control and Management Policy used by Aena. Subsequently, Aena's Management Committee updates the risk map annually under the supervision of the Audit Committee based on the data supplied monthly by the various corporate departments. The Aena Code of Conduct establishes that failure to comply with data protection legislation may result in disciplinary sanctions being imposed in accordance with labour legislation in Spain in the event of a violation.



Measures to ensure compliance with regulations. Audits

Aena develops a programme of internal audits and 'in situ' reviews to identify possible failures in data protection and the implementation of recommendations. All this is focused on reinforcing the level of compliance with data protection regulations.

As an example of this, in 2023, a total of 5 "in situ" reviews have been carried out (3 in 2022) having detected 53 deficiencies (34 in 2022) to which action plans have been implemented. The UK plans to introduce regular on-site internal audits in 2024⁵¹.

Corporate culture in matters of personal data protection

During 2023, and with the mission of promoting a culture of personal data protection, a series of training and awareness-raising actions have been carried out in this area which, in Spain, have contributed to the training of 4,679 employees (988 employees in 2022) and in the United Kingdom, 231 employees have completed the mandatory online training of the Data Protection Governance Program (304 employees in 2022). It should be noted that in Brazil, training is provided to the entire workforce in order to disseminate and publicize the Data Protection Governance Program and, in 2023, 448 employees (542 until 2022) have received training on the General Data Protection Law (LGPD). In addition, the local ICT area carries out specific training on access controls and security improvements.

Likewise, in Spain, employees are equipped with a series of materials and general information in this regard (disclosure plans, procedures, guides, etc.) through the data protection portal published on the intranet. At Aena's subsidiaries in Brazil⁵² this work is carried out by sending internal communications in this regard.

Additionally, in Spain, the Airport Group's Data Protection Coordinators periodically participate in video conferences where the Data Protection Delegate addresses the most pertinent issues that have arisen and addresses any doubts or questions that the Coordinators may have. In 2023, a total of 7 have been held (16 in 2022). For its part, a video conference on the subject has been held in Brazil in 2023. Finally, it is worth highlighting the periodic distribution of informative pills on data protection, both in Spain and Brazil, throughout the year⁵³.

At Aena, in 2023, 5 information requests have been received from the Control Authority regarding data protection, and a personal data security breach has been detected that has been notified to the Control Authority and the interested party.

Data Protection Indicators (GRI 418-1)

	2022				2023			
	Spain	United Kingdom	Brazil	Total Consolidated	Spain	United Kingdom	Brazil	Total Consolidated
Total identified cases of customer data leaks, thefts or losses (number)	0	0	0	0	1	0	0	1
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	1	0	0	1
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)	1	0	0	1	5	0	0	5

⁵¹ In Brazil, the ICT department has implemented cybersecurity measures following Aena Group's guidelines, as well as internal regulations, double protection resources, communications, tests, etc. However, no audits have been conducted. Similarly, no audits of this nature have been carried out at London-Luton Airport in the United Kingdom. However, in 2022, 44 reviews were conducted, and 23 deficiencies were detected.

⁵² Likewise, in Brazil, videoconferences have been held by an external consultancy, addressing the issue of elimination and sanitation of personal data.

⁵³ Undertaking not carried out at London-Luton Airport in the United Kingdom.

1.3. Tax Transparency

Fiscal Approach

(GRI 207-1)

The Board of Directors of Aena, as the body responsible for it, approved the tax strategy in 2017 outlined in the Corporate Tax Policy, in accordance with the provisions of its Regulations⁵⁴. The aim of the tax strategy can be summarised as the management of fiscal matters in a transparent, proactive and responsible manner with all stakeholders, for the purpose of complying with the tax legislation, minimising reputational risk, making it compatible with the creation of value for the shareholder.

This commitment is formally included in the Company's Corporate Tax Policy, approved by the Board of Directors and applicable to the Aena Group, and aims to ensure compliance with the applicable tax regulations, in the Company's corporate interest, and to ensure adequate coordination of the tax policy followed by the other entities controlled by Aena, avoiding tax risks and inefficiencies in the execution of financial and operating decisions. Thus, At Aena's subsidiaries in the United Kingdom and in Brazil this policy is adopted, committing themselves to always complying with the legislation applicable to their activity and their tax obligations, as well as the adoption of best tax practices embraced by Aena, including the monitoring of recommendations and guidelines from the OECD in this regard.

In the United Kingdom, the subsidiaries which operate in the London-Luton Airport adhere to the Group's Corporate Tax Policy.

Fiscal governance

(GRI 207-2)

The Board of Directors is the body responsible for determining the risk management and control policy, including tax-related matters. Meanwhile, the Audit Committee acts as the body responsible for reviewing and supervising certain corporate policies, including the aforementioned Corporate Tax Policy.⁵⁵

The Head of the Economic-Financial Management reports to the Board of Directors at least twice a year, coinciding with the preparation of the Annual Accounts and the filing of the Corporate Income Tax, on the fiscal policies applied, as well as on operations with significant tax impact.

Likewise, the competencies of the Sustainability and Climate Action Committee include 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.

To achieve the SDGs, it is essential to respect and comply with the established obligations and commitments assumed in tax matters.

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 Corporate Tax Policy and Aena's Code of Conduct.

Risk control and management

(GRI 2-26; 207-2)

The Company's risk map includes tax risks under the category of 'legal and compliance' risks, which are thus subject to the Company's risk management, monitoring and review model. Based on the information received monthly from the various corporate departments, the risk map is updated annually under the supervision of the Audit Committee⁵⁶.

In addition to the above, both in Spain and in the United Kingdom and Brazil, within the framework of the internal financial information control system and the compliance system, specific measures are established focused on preventing and mitigating any type of risk that could be related to tax evasion practices.

As with all other matters, any third party may report through the complaints channel any irregular conduct and act against the law, policies and procedures of Aena, including those related to fiscal and tax aspects.

With regard to non-cooperative jurisdictions, and in accordance with the Corporate Tax Policy, the Company does not incorporate companies or perform transactions in tax havens in order to avoid its tax obligations. In this way, Aena does not have a presence, nor does it carry out any activity in those territories classified as tax havens in accordance with applicable Spanish legislation.

⁵⁴ 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. However, the Tax Policy is reviewed annually, with the last review having taken place on 19 December 2023.

⁵⁵ 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.

⁵⁶ Additionally, at London-Luton Airport in the United Kingdom, tax risks are continuously assessed with specialised tax advisors. Any related risks are added to the Group's Risk Register and, if applicable, are subsequently discussed in the relevant Committee, as described in the Risk Policy in force.



Participation of stakeholders and management of tax concerns

(GRI 207-3)

In order to respect the tax legislation of each jurisdiction in which Aena operates and reduce the level of risk, the Company processes tax matters within a framework of transparency, proactivity and responsibility towards its stakeholders,⁵⁷ ensuring that its operations are consistent with value creation.

Aena has adhered to the Code of Good Tax Practices since 2017 and presents the Fiscal Transparency Report in line with the Company's commitment to responsible taxation. It has also been recognised as one of the 13 IBEX 35 companies awarded in the fiscal year 2023 with the 't' seal, awarded by the Haz Foundation, reflecting the Company's transparency in tax matters.

Within the framework of the Company's Corporate Tax Policy, the Group includes the principles of transparency, mutual trust and honesty in its relations with the tax authorities, providing the information and documentation requested in the shortest possible time and with the greatest possible coverage. In this regard, the Company publishes its total tax contribution in the Annual Accounts and on the corporate website, as well as the taxes paid in the different jurisdictions where it operates through controlled companies.

Likewise, in accordance with the principle of integrity, set out in the Corporate Tax Policy, the Company guarantees compliance with tax regulations, as well as maintaining a cooperative and good faith relationship with the different Tax Administrations. In this regard, the Company undertakes to cooperate fully with the Tax Authorities in any proceedings.

⁵⁷ 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.



1.3.1. Tax contributions

(GRI 201-4, 207-4)

The Aena Group tax contributions⁵⁸ for the fiscal year 2023 amounted to 902.20 M€ (526.5 M€ in 2022). Taxes borne amounted to € 735.7 M (455.7 M€ in 2022), with the most significant being profit tax of 433.3 M€.

The tax contribution in the fiscal year 2023 is distributed between 37.4 M€ of taxes paid in the United Kingdom (4.1% of the total) -32.5 M€ in 2022-, 834.9 M€ in Spain (92.5% of the total) -469 M€ in 2022-, and 29.9 M€ in Brazil (3.3%) -24.9 M€ in 2022-.

Tax indicators (GRI 207-4, 201-4)

Tax jurisdictions where Aena has shares	Revenue from intragroup 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
2023									
Spain	16.5	1,869.3	220.9	-0.5	-	19.8	414.4	454.5	153.2
United Kingdom	-	41.9	6	5.9	-	-	17.9	12.8	7.6
Brazil	-	158.6	10.9	14.9	-	-	1	53.4	4.1
2022									
Spain	11.7	1,110.9	192.03	-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	-

⁵⁸ 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. In addition, with respect to information from the United Kingdom, the London-Luton Airport Group reports tax information in its Annual Accounts, which are also audited by an independent third party.



1.4. Sustainability: Aena's management pillar

(GRI 2-22)

Aena Group'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.

The Sustainability objectives are included in the Company's 2022-2026 Strategic Plan, which reaffirms the commitments acquired in the 2021-2030 Sustainability Strategy.

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).

In Brazil, work continues on the development of a Sustainability Strategic Plan, which includes both environmental and social aspects, aligned with the main corporate objectives and adapted to the needs of the operating environment.

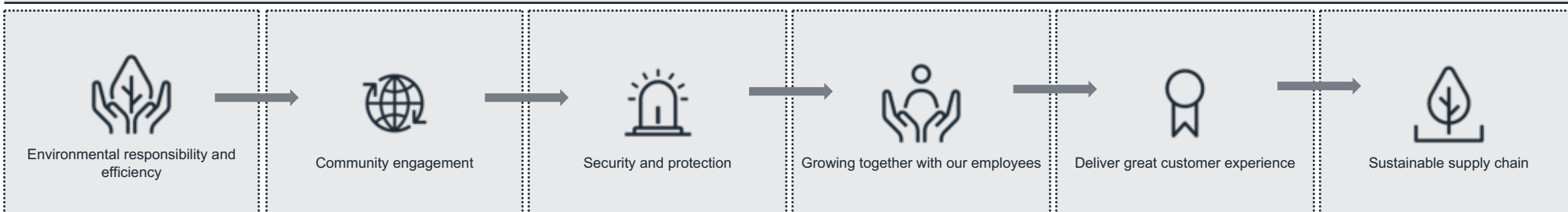
With the aim of achieving this roadmap, the Company configures its governance model to ensure its effectiveness and correct development, in order to deal with the main ESG stakes and challenges.

New challenges and 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 ESG 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, protection of human rights, most vulnerable groups)	Protecting, caring for and managing internal talent

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





1.4.1. Sustainability policy

The Sustainability Policy, approved in 2021 and updated in 2023, defines and establishes the principles, commitments, objectives and strategy to be followed by Aena Group to carry out its activity, optimizing the contribution to sustainable development, and creating long-term value throughout. throughout its entire value chain, through ethical and transparent behaviour. It also defines and establishes the supervision and control mechanisms to guarantee their achievement.

In this sense, the Policy that is applicable to Aena Group, constitutes the internal framework of reference with which the Company reaffirms its commitment to the creation of long-term value for all its

interest groups, 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.

Among its principles of action are integrating sustainability in all organizational areas and levels, transferring this culture to all interest groups, ensuring sustainable management and alignment with social and environmental sustainability objectives throughout the entire 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)

- Integrate sustainability across all business areas and organisational levels of the Company.
- Integrate the due diligence process regarding sustainability in all the Company's processes.
- 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, health and safety 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.
- Collaborate with third parties that pursue a social purpose.
- 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.

Sustainability Strategy: 5 Strategic Programmes

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 to 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.⁵⁹

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 annually 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 AGM.

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.

⁵⁹ 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

Innovation, Sustainability and Customer Experience Management.
Organisation and Human Resources Management.



Approval

All organisational areas and employees with direct and active involvement in the actions.

Commissioning and development



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 M€⁶⁰, 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 incentive⁶¹.

The Company links the approval at the Annual General 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	 Resoinsible use of resources	 Community and sustainable value chain	 Social commitment	 Communication and transparency
Action lines	Renewable energies. Energy efficiency. Own sustainable 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 in the Spanish network and London Luton Airport. 70% reduction in own CO2e emissions in the Spanish network (base year 2019). Development of a human rights due diligence procedure.					



Associated investment, close to 750 M€

↑

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).

⁶⁰ Total economic budget of the Strategy for the period 2021–2030.

⁶¹ 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.

At Aena airports in Brazil, as was previously indicated, although a Sustainability Strategy of their own is not yet available, they do carry out activities in ESG matters.



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 Group. 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 Group 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

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.

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.

SDGs



Outstanding actions and achievements

Consultative vote and approval of the Updated Climate Action Plan Report at the Annual General 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.

Attainment of Level A in the CDP climate change questionnaire.

Inclusion of environmental criteria in the contracting specifications and mandatory clauses.

70% reduction in own CO₂e emissions in the Spanish network (base year 2019)

106,920 Tn 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

Awarding 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 10% discount for Club Aena member passengers who park their vehicle with an environmental 'zero emissions' mark in the airport car parks.

Provision of 2,086 charging points for ground and air-side electric vehicles at Aena's airports in Spain.

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.

29,273 properties insulated in the 2000-2023 period with an associated amount of 361,592,376 € at the Spanish and London-Luton airports.

Preparation of the Strategic Noise Maps Phase IV in 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.

Report section

Commitment to the environment

Social management of our
Innovation value chain
Responsible governance



Objectives and strategic benefits

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.

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.

SDGs



Outstanding actions and achievements

Aena with music includes collaborations with the Teatro Real Foundation, Gran Teatro Liceu Foundation, Taller de Músics Escola de Música, and the Pau Casals Foundation.

The Aena Research Project is endowed with a maximum amount of €840,000 for a total duration of 4 years.

The Aena Society Project is endowed with a maximum amount of €460,000 for a total duration of 2 years.

Agreements with universities.

Inclusion of social clauses in its contracting documents.

Update on their Human Rights Policy
Implementation of a Human Rights Due Diligence Procedure.

+ than 3,847,005 € in contributions to foundations and non-profit associations in Spain and the United Kingdom.

Safe, quality services
Commitment to society and human rights
Innovation

Objectives and strategic benefits

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.

SDGs



Outstanding actions and achievements

More than 4,029 m² for solidarity spaces, to give a voice to social entities, and 19,008 m² dedicated to cultural exhibitions, representing a contribution in kind of 366,485 euros in 2022.

3,847,005 € in contributions to Foundations and non-profit organisations (570,106 € in United Kingdom by London-Luton Airport and 3,276,900 € in Spain).

Updates to the Anti-Corruption and Fraud Policy and Regulatory Compliance.

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.

Report section

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 in Spain.

37.7% of total employees at the Company in 2023 are women.

45.2% of executive, middle management and graduate positions are occupied by women

Employer Branding Project in Spain.

Promotion of work-life balance

Teleworking policy – no-presence work in Spain and hybrid working arrangements in the United Kingdom.

Work Disconnection Policy in Spain.

1.56% of employees with functional diversity at the Company.

Call for integration into the labour market or job creation actions to be undertaken by social entities, foundations or associations: 90000 €/year in Spain..

Member of the LGBTI Diversity and Inclusion Business Network in Spain.

Psychological support for employees.

Wage gap below 3% in Spain.

Staff and social issues

Social management of our value chain

Commitment to society and human rights

1.5. Taxonomy: sustainable finance

(GRI 3-3)

Aena is assessed by ESG providers and analysts periodically. The results obtained reflect an improvement in the score received in recent years, demonstrating its commitment to sustainability.

In line with this, aiming to seek funding alternatives that provide added value for society and the environment, and to incorporate ESG factors into its financing decisions, Aena currently has several financing instruments linked to the Company's sustainable commitments⁶². It is worth noting that, during 2023, Aena signed a sustainable syndicated credit line for 2,000 billion euros. The most notable feature of this operation is that the interest rate is determined not only by the credit rating but also by the achievement of a CO₂ emission reduction target.

ESG scoring provider	Score obtained		Associated Financing	Start date ^(A)	Product characteristics
	2022	2023			
 (Best score: 0)	8.6	8.8	Loan agreement with Intesa Sanpaolo for an amount of €500 million.	2021	The economic conditions of the loan are linked not only to the ordinary interest rate but also to the ESG adjustment, based on the evolution of sustainability parameters, tied to Aena's ESG performance, which is assessed by an external ESG provider.
 (Best score: 100)	65	68	Loan agreement with ICO for an amount of €250 million.	2021	The economic conditions of the loan are linked not only to the ordinary interest rate but also to the ESG adjustment, based on the evolution of sustainability parameters, tied to Aena's ESG performance, which is assessed by an external ESG provider.
 (Best score: 10)	6.2				
 (Best score: 5)	4.9	5			
 (Best score: A)	A	A-			
 Member of Dow Jones Sustainability Indices Powered by the S&P Global CSA	64	67			

^(A) Current as of the date of this report

⁶² In the Company's Annual Accounts, information about the amounts disbursed and their costs in 2023 can be consulted.



Additionally, it is worth noting that:

- Aena is included in the "Europe's Climate Leaders 2023" ranking, conducted by the Financial Times.
- London-Luton Airport has achieved the highest rating in the Global Real Estate Sustainability Benchmark (GRESB).

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 is amended by the Delegated Regulation (EU) 2023/2486 published in June 2023. Article 5 of this document details the amendments made so that non-financial companies may disclose key performance indicators, including any accompanying information in accordance with Annex V, which shows the amendments of Annexes I and II of the Delegated Regulation (EU) 2021/2178 regarding the disclosure of taxonomy-eligible activities.

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.

This report continues with the process from the previous year and incorporates information into the analysis regarding eligible and non-eligible economic activities for new environmental objectives in relation to turnover, investments in fixed assets and operating expenses and the changes in the disclosure of key indicators of results for non-financial companies, as established in Delegated Regulation (EU) 2023/2486.

In order to guarantee an effective report on taxonomy, during the 2023 financial year Aena has worked on the automating the process to follow to obtain the information in a timely manner, including the analysis of the flow of information, the areas involved and the IT systems that are used.

Accounting policy

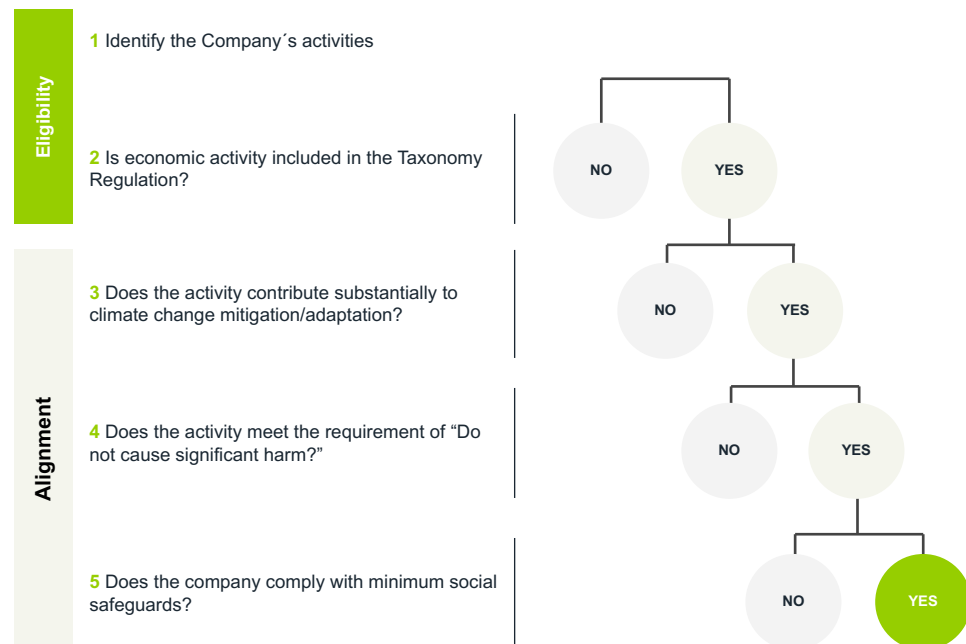
This section explains how turnover, fixed asset investments and operating expenses have been determined and allocated to the numerator and the basis on which the turnover, fixed asset investments and operating expenses have been calculated including, if applicable, any analysis in the allocation of revenue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



	Turnover	CapEx	OpEx
Processing financial information for calculating the % of eligibility and alignment	<p>The information is obtained by the extraction of 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. Items of negative revenue (discounts, returns, etc.) are listed in the breakdown of turnover. The answer to question 13 of the EU Taxonomy FAQs issued by the European Commission in October 2022, states "Negative revenue can be treated as a value of 0% for taxonomy eligibility in the report". In order to carry out a homogeneous processing of the information, all negative items of revenue have been considered as zero value.</p>	<p>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.</p> <p>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.</p> <p>In addition, 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.</p> <p>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.</p>	<p>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:</p> <ol style="list-style-type: none"> Building renovation measures Short-term leases Maintenance and repairs. Non-capitalized R&D investments <p>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 very 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.</p>
Calculations of eligibility	<p>Calculation of the denominator: net amount of the consolidated turnover of the Aena group.</p> <p>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. a. Identification of eligible activities).</p>	<p>Calculation of the denominator: sum of the group's consolidated capital investments related to property, plant and equipment and intangible fixed assets.</p> <p>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.</p>	<p>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:</p> <ol style="list-style-type: none"> Building renovation measures Short-term leases Maintenance and repairs, as well as all expenses associated with concession contracts that are part of the organisation's assets. Non-capitalised R&D investments <p>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.</p> <p>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.</p>
Calculations of alignment	<p>Calculation of the denominator: the same value as detailed in previous section is used.</p> <p>Calculation of the numerator: the following steps are applied to its calculation:</p> <ol style="list-style-type: none"> 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). Assessment of compliance with the minimum social guarantees at the Aena group level. 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: <ol style="list-style-type: none"> it has concluded that the minimum management unit tested meets SC and DNSH criteria. it has concluded that the group meets the criteria established in the minimum social guarantees. 		

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 present in the following documents:

- Annexes I and II of the Delegated Regulation 2021/2139, for climate objectives.
- Annex I, II, III and IV of the Delegated Regulation 2023/2486, for the four environmental objectives.

This study allows Aena to assess the adjustment of its activity to these descriptions and it applies to 46 airports, 2 national heliports and 18 international airports (17 in Brazil and 1 in the United Kingdom). The nature of Aena's economic activities can be distinguished into three categories:

- Aeronautical activity (regulated):
 - Activities carried out on the airside: airfield landing and transit services; aircraft parking; use of air bridges; 400 Hz power system; fuels and lubricants; ground handling services; and other services.
 - 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.
- Commercial activity:
 - Activity in the terminal building: lease of spaces for food and beverage and speciality 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.
 - Activity outside the terminal building: passenger parking lots; car rentals.
- 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 process of identifying eligible activities for the 2023 financial year, the clarifications published by the European Commission during 2022 in the FAQ documents are maintained:

- 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 and Delegated Regulation 2023/2486, the economic activities carried out by Aena are the following:

- Activities that are identified in Annex I of the Delegated Regulation 2021/2139 of activities that contribute to the mitigation of climate change:

- 6.15: “Infrastructure enabling 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 (tailpipe emissions) or for the actual airport operations, including 400Hz and PCA (pre-conditioned air) supply, availability of boarding bridges 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 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 that also contribute to the mitigation of climate change, which are the following:

- 6.5 Transport by motorbikes, passenger cars and light commercial vehicles.
- 6.20: Air transport ground handling operations (activity added in the amendment of the climate delegated regulation and for which, therefore, eligibility only needs to be reported in 2023).
- 7.3: Installation, maintenance and repair of energy-efficient equipment.
- 7.4: Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings).
- 7.6. Installation, maintenance and repair of renewable energy technologies.

- Activities identified in Annexes I, II, III and IV of the Delegated Regulation 2023/2486, for the four environmental objectives, of which in this fiscal year it is only necessary to report on the eligibility with the taxonomy and not on the alignment:

- Activities of Annex I of the Delegated Regulation 2023/2486 that contribute to the sustainable use and protection of water and marine resources:
 - 2.2 “Urban wastewater treatment”: Aena operates and maintains wastewater purification stations at some of its airports.
- Activities of Annex II of the Delegated Regulation 2023/2486 that contribute to the transition to a circular economy:
 - 2.2 “Production of alternative water resources for purposes other than human consumption”: Aena maintains and operates rain and stormwater collection facilities used to replace water from drinking water intake or supply systems.
 - 3.4 “Maintenance of roads and motorways”: Aena performs maintenance work on its access roads, aircraft taxiways and aprons in its operations.
- Activities of Annex III of the Delegated Regulation 2023/2486 that contribute to the pollution prevention and control:
 - 2.4 “Remediation of contaminated sites and areas”: Aena promotes remediation of soils and manages a piezometric control network to control the quality of the soil and associated groundwater at its airports.

b) Identification of taxonomy-compliant activities (alignment)

In this exercise, only the alignment of the activities included in the Delegated Regulation 2021/2139 on climate objectives must be reported.

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. Criteria for substantial contribution to the mitigation of climate change

- 6.5: Transport by motorbikes, passenger cars and light commercial vehicles

Annex I of the Delegated Regulation 2021/2139 and its amendment includes activity 6.5 “Transportation by motorcycles, passenger cars and light commercial vehicles”, which encompasses activities that are adjusted with “Purchase, financing, renting, leasing and operation of vehicles designated as category M1, N1, both falling under the scope of Regulation (EC) No 715/2007 of the European Parliament and of the Council, or L (2- and 3-wheel vehicles and quadricycles)”.

Activity 6.5 refers to those activities related to the purchase of vehicles whose characteristics allow compliance with the legislation related to the elimination of emissions.

Given the foregoing, Aena considers that the measures carried out in the purchase of electric vehicles 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.

- 6.15: Infrastructure enabling 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 enabling low-carbon road transport and public transport”, which encompasses activities that conform to the “Construction, modernisation, maintenance and operation of infrastructure that is required for zero tailpipe CO₂ operation of zero-emissions road transport, as well as infrastructure dedicated to transshipment, and infrastructure required for operating urban transport”.

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 lots, which offer discounts on the 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 CO ₂ exhaust emissions: electric charging points, improvements in the mains connection, hydrogen fuelling stations or electric roads.	The criterion applied by Aena for compliance with the SC criteria is that the infrastructure (parking lot) 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 for compliance 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 terminals etc.).
2. The infrastructure is not intended for the transportation or storage of fossil fuels	The criterion applied by Aena for compliance 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 the Delegated Regulation 2021/2139 and its amendment includes activity 6.17 “Low-carbon airport infrastructure”, which encompasses activities that are aligned with the “Construction, modernisation, maintenance and operation of infrastructure that is required for zero tailpipe CO₂ operation of aircraft or the airport’s own operations, and for provision of fixed electrical ground power and preconditioned air to stationary aircraft as well as infrastructure dedicated to transshipment with rail and water transport”.

Activity 6.17 does not specifically define which infrastructures this activity encompasses, referring to them as those “required for zero tailpipe CO₂ operation of aircraft or the airport’s own operations”. Aircraft parking spaces and boarding bridges equipped with 400Hz power supply points and airside pre-conditioned air (PCA) contribute to emissions reduction by allowing them not to use other means of power generation from fossil fuels. In relation to its own operations on the airside, the use of electric vehicles replacing fossil fuel vehicles to carry out the operations of handling agents allows for said operation to be carried out with zero CO₂ emissions.

For all of the above, Aena considers that the activity it performs in relation to the 400Hz and PCA supply, available in aircraft parking stations and those own operations with the potential to be zero emissions – as is the case with handling agents – have 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 airports considering the following:

Delegated Regulation 2021/2139

1. The activity meets one or more of the following criteria:

a. the infrastructure is intended for the operation of aircraft with zero CO₂ tailpipe emissions: electricity refuelling and hydrogen refuelling.

b. the infrastructure is intended for the fixed supply of electric power and pre-conditioned air on land to parked aircraft.

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.

2. The infrastructure is not intended for the transportation or storage of fossil fuels

Evaluation of compliance with SC

Not considered in the evaluation.

The criterion applied by Aena for compliance 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 boarding gates) and remote parking stands, equipped with PCA / Total parking stands.

The criterion applied by Aena for compliance with the SC criteria is that the infrastructure intended for airport operations (handling agents) has electrical charging points for electrical equipment and vehicles.

The criterion applied by Aena for compliance 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 non-eligible and therefore are not part of the numerator in both the eligibility and alignment KPIs.

7.3: Installation, maintenance and repair of energy efficiency 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 renovation measures consisting in 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 charging stations for electric vehicles in buildings (and 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 parking spaces attached to buildings)”.

Activity 7.4 refers to those activities related to the “installation, maintenance and repair of charging stations for electric vehicles in buildings and parking spaces attached to buildings”. Aena 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 management 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, speciality 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

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 buildings.

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.

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.

Evaluation of compliance with SC

The criterion for compliance 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.
Based on data extracted from the latest Report on the "Statuses of the Energy Certification of Buildings" by IDAE^(A), it has been concluded that the energy rating of 15% of the most energy-efficient buildings in the Spanish real estate park corresponds to the letter "D". With this in mind, it should be noted that buildings with energy certification between "A" and "D" are considered to meet the criteria for substantial contribution.

Not considered in the evaluation.

The criterion applied by Aena for compliance with the SC criteria is they have an energy certificate for the buildings and certification of the current ISO 14001 standard.

IDAE (Institute for Energy Diversification and Saving), 2021. States of the Energy Certification of Buildings. 10th Report. Ministry of Transport, Mobility and Urban Agenda. Download date: 02/01/2024 https://www.miteco.gob.es/content/dam/miteco/es/energia/files-1/Eficiencia/CertificacionEnergetica/documentosinformativos/2022_Informe-seguimiento.pdf

ii. Principles of do not significant harm to another environmental objective (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:

- An assessment has been carried out to identify the physical climate risks of the managed infrastructure (managed airport), considering the hazards listed in the table 'Classification of climate-related hazards' specified in Annex I, Appendix A of the Delegated Regulation and it is concluded that some of the infrastructures are exposed to risks derived from extreme temperatures and precipitation, heat waves, drought and flooding.
- In the event of there being any risks related to the effects listed in said table, 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:
 - Climate projections and assessment of the impacts of physical climate risks over a time horizon between 10 and 30 years.
 - At least two of the possible scenario trajectories established by the Intergovernmental Panel on Climate Change (IPCC) (SSP12.6, RCP4.5 and RCP8.5) have been considered.
 - 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 protection and recovery of biodiversity and ecosystems

It is considered that the activities of 6.15 "Infrastructure enabling low-carbon road transport and public transport" and 6.17 "Low-carbon airport infrastructure" do not cause significant harm in relation to the objectives of sustainable use and protection of water and marine resources, pollution prevention and control and protection and restoration of biodiversity and ecosystems, 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.

Activity 6.5 “Transport by motorbikes, passenger cars and light commercial vehicles” has established a DNSH principle for pollution prevention and control that is considered to be complied with, given that, in the technical specifications for the purchase of electric vehicles, it is detailed that they must comply with all the specific and general requirements on standardisation, the environment, energy savings and security established in Spain and the European Union. More so, in that it is also provided with the ‘CE’ marking and the ‘CE’ statement of conformity.

Transition to a circular economy.

It is considered that the activities of 6.15 “Infrastructure enabling low-carbon road transport and public transport” and 6.17 “Low-carbon airport infrastructure” 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 waste (CDW) for work related to the expansion or construction of the managed infrastructure equal to or greater than 70%.

Activity 6.5 “Transport by motorbikes, passenger cars and light commercial vehicles” is not considered to cause significant harm in relation to the objective of transition to a circular economy. The activity complies with the established DNSH principle since AENA has a waste management system included in the environmental management system that follows the requirements of the externally verified ISO14001 Standard. This ensures waste management in the use and maintenance phases and subsequent reuse and recycling at the end of its useful life.

iii. Minimum safeguards

Article 18, paragraph 1 of Delegated Regulation 2020/852 establishes that minimum safeguards shall be procedures implemented by an undertaking that is carrying out an economic activity to ensure the alignment with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights.

In accordance with the indications described in paragraph 52 of the delegated regulation, the Platform on Sustainable Finance should advise the Commission on developing further measures to improve data availability and quality, taking into account the objective of avoiding undue administrative burden, on addressing other sustainability objectives, including social objectives, and on the functioning of minimum safeguards and the possible need to supplement them. In this context, in July 2022, the platform published a “Draft Report on Minimum Safeguards” and subsequently in October, the “Final Report on Minimum Safeguards” was published, which provides recommendations for evaluating compliance with minimum social guarantees (minimum safeguards).

This report proposes the minimum requirements to assess compliance with the criteria related to 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 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 is considered to be complied with, since Aena establishes its formal and express commitment to the rejection of any fraudulent or corrupt practice in any form through its corporate policies, and it has processes to prevent corruption such as internal controls, measures for the prevention and detection of bribes, as well as training and awareness activities for its employees.

Additionally, there are no firm convictions for aspects related to corruption or bribery.

For more information see section 1.2. Ethical and corporate culture of this report.

Taxation

This is considered to be complied with, since Aena has measures to foresee the management of tax risk, which is integrated in the company's risk map, and has a tax strategy included in the Corporate Tax Policy. Likewise, Aena adheres to the Code of Good Tax Practices and publishes its total tax contribution in the Annual Accounts and on the corporate website, as well as the taxes paid in the different jurisdictions where it operates through controlled companies.

Likewise, in accordance with the principle of integrity, set out in the Corporate Tax Policy, the Company guarantees compliance with tax regulations, as well as maintaining a cooperative and good faith relationship with the different Tax Administrations. In this regard, the Company undertakes to cooperate fully with the Tax Authorities in any proceedings.

Additionally, there are no firm convictions for aspects related to tax evasion.

For more information see section 1.3. Fiscal transparency of this report.

Fair competition

This is considered to be complied with, since Aena is committed to avoiding any type of conduct related to unfair competition in its internal regulations, it has measures and integrates aspects related to the protection against unfair competition and in its compliance system. In addition to the above, in Spain, the conditions imposed in the DORA act as a guarantee to avoid any conduct related to unfair competition, with regard to price fixing. And, with regard to contracts with suppliers and other third parties, Aena is subject to the provisions of Act 9/2017, of 8 November, on Public Sector Contracts. Finally, Aena facilitates training programmes for the governing bodies and conducts employee awareness actions through information modules in this subject.

Additionally, there are no firm convictions for violating competition laws.

For more information per section 1.2.9 Unfair competition of this report.



Key indicators results⁶³

Proportion of turnover derived from products or services associated with economic activities aligned with the corresponding taxonomy-disclosure for the year 2023																			
Financial year 2023	Year 2023			Substantial contribution criteria						DNSH criteria (“Does Not Significantly Harm”)									
Economic activities	Code	Turnover	Proportion of Turnover, year 2023	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity	Minimum safeguards	Proportion of Taxonomy-aligned (A.1.) or eligible (A.2.) turnover, year 2022	Category enabling activity	Category transitional activity
Text	Currency	%		Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E	T
A) TAXONOMY-ELIGIBLE ACTIVITIES																			
A.1) Environmentally sustainable activities (Taxonomy-aligned)																			
Transport by motorbikes, passenger cars and light commercial vehicles	CCM 6.5	0	0.00%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	N/A		
Infrastructure enabling low-carbon road transport and public transport	CCM 6.15	0.22	0.00%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.00%	E	
Low carbon airport infrastructure	CCM 6.17	204.36	4.04%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	3.83%	E	
Installation, maintenance and repair of energy efficiency equipment	CCM 7.3	0	0.00%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.00%	E	
Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings)	CCM 7.4	0	0.00%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.00%	E	
Installation, maintenance and repair of renewable energy technologies	CCM 7.6	0	0.00%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.00%	E	
Acquisition and ownership of buildings	CCM 7.7	1,608.43	31.76%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	32.80%		
Turnover of environmentally sustainable activities (Taxonomy-aligned) (A.1)		1,813.01	35.80%	35.80%	0.00%	0.00%	0.00%	0.00%	0.00%	Y	Y	Y	Y	Y	Y	Y	36.60%		
Of which enabling		204.58	4.04%	4.04%	0.00%	0.00%	0.00%	0.00%	0.00%	Y	Y	Y	Y	Y	Y	Y	3.80%	E	
Of which transitional		0	0.00%	0.00%						Y	Y	Y	Y	Y	Y	Y	0.00%		T

⁶³ Details of the 2022 indicators can be consulted in "Annex I: Taxonomy 2022."

**A.2) Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)**

				EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	
Transport by motorbikes, passenger cars and light commercial vehicles	CCM 6.5	0.00	0.00%	EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/A
Infrastructure enabling low-carbon road transport and public transport	CCM 6.15	1.91	0.04%	EL	N/EL	N/EL	N/EL	N/EL	N/EL	0.04%
Low carbon airport infrastructure	CCM 6.17	398.30	7.87%	EL	N/EL	N/EL	N/EL	N/EL	N/EL	2.70%
Air transport ground handling operations	CCM 6.20	0.00	0.00%	EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/A
Installation, maintenance and repair of energy efficiency equipment	CCM 7.3	0.00	0.00%	EL	N/EL	N/EL	N/EL	N/EL	N/EL	0.00%
Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings)	CCM 7.4	0.00	0.00%	EL	N/EL	N/EL	N/EL	N/EL	N/EL	0.00%
Installation, maintenance and repair of renewable energy technologies	CCM 7.6	0.00	0.00%	EL	N/EL	N/EL	N/EL	N/EL	N/EL	0.00%
Acquisition and ownership of buildings	CCM 7.7	1,141.93	22.55%	EL	N/EL	N/EL	N/EL	N/EL	N/EL	21.40%
Urban waste water treatment	WRT 2.2	0.00	0.00%	N/EL	N/EL	EL	N/EL	N/EL	N/EL	N/A
Production of alternative water resources for purposes other than human consumption	CE 2.2	0.00	0.00%	N/EL	N/EL	N/EL	N/EL	EL	N/EL	N/A
Maintenance of roads and motorways	CE 3.4	0.00	0.00%	N/EL	N/EL	N/EL	N/EL	EL	N/EL	N/A
Remediation of contaminated sites and areas	PPC 2.4	0.00	0.00%	N/EL	N/EL	N/EL	EL	N/EL	N/EL	N/A
Turnover of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		1,542.14	30.45%	30.45%	0.00%	0.00%	0.00%	0.00%	0.00%	24.10%
Turnover of Taxonomy-eligible activities (A.1+A.2)		3,355.15	66.25%	66.25%	0.00%	0.00%	0.00%	0.00%	0.00%	60.80%
B) TAXONOMY-NON-ELIGIBLE ACTIVITIES										
Turnover of Taxonomy-noneligible activities		1,708.93	33.75%							
TOTAL		5,064.08	100.00%							

Y: Yes, Taxonomy-eligible and Taxonomy-aligned activity with the relevant environmental objective
N: No, Taxonomy-eligible but not Taxonomy-aligned activity with the relevant environmental objective
EL: Eligible, Taxonomy-eligible activity for the relevant environmental objective
N/EL – Not eligible, Taxonomy-non-eligible activity for the relevant environmental objective



	Proportion of turnover/Total turnover	
	Taxonomy-aligned per objective	Taxonomy-eligible by objective
CCM	35.80%	66.25%
CCA		0.00%
WTR		0.00%
CE		0.00%
PPC		0.00%
BIO		0.00%

Eligible turnover under the taxonomic criteria in fiscal year 2023 has risen to €3,355.15 million (66.25% of total turnover). Of these, €1,813.01 M (35.80% of total turnover) are considered aligned in accordance with the Taxonomy. This turnover comes mainly from activity 7.7 pertaining to the acquisition and ownership of Aena buildings. The results increase slightly in eligibility and remain without significant changes in alignment compared to the previous year's report.


The proportion of CapEx (Capital Expenditures) derived from products or services associated with economic activities aligned with the corresponding taxonomy-disclosure for the year 2023.

Financial year 2023	Year 2023			Substantial contribution criteria						DNSH criteria ("Does Not Significantly Harm")									
Economic activities	Code	Turnover	Proportion of Turnover, year 2023	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity	Minimum safeguards	Proportion of Taxonomy-aligned (A.1.) or eligible (A.2.) turnover, year 2022	Category enabling activity	Category transitional activity
Text		Currency	%	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E	T
A) TAXONOMY-ELIGIBLE ACTIVITIES																			
A.1) Environmentally sustainable activities (Taxonomy-aligned)																			
Transport by motorbikes, passenger cars and light commercial vehicles	CCM 6.5	1.94	0.13%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	N/A		
Infrastructure enabling low-carbon road transport and public transport	CCM 6.15	0.05	0.00%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.00%	E	
Low carbon airport infrastructure	CCM 6.17	40.14	2.68%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	5.35%	E	
Installation, maintenance and repair of energy efficiency equipment	CCM 7.3	20.31	1.36%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	2.51%	E	
Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings)	CCM 7.4	11.78	0.79%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.54%	E	
Installation, maintenance and repair of renewable energy technologies	CCM 7.6	1.7	0.11%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.11%	E	
Acquisition and ownership of buildings	CCM 7.7	159.42	10.64%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	20.25%		
CapEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)		235.34	15.71%	15.71%	0.00%	0.00%	0.00%	0.00%	Y	Y	Y	Y	Y	Y	Y	Y	28.76%		
Of which enabling		73.98	4.94%	4.94%	0.00%	0.00%	0.00%	0.00%	0.00%	Y	Y	Y	Y	Y	Y	Y	8.51%	E	
Of which transitional		0.00	0.00%	0.00%						Y	Y	Y	Y	Y	Y	Y	0.00%		T

**A.2) Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)**

				EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL		
Transport by motorbikes, passenger cars and light commercial vehicles	CCM 6.5	0.07	0.01%	EL	N/EL	N/EL	N/EL	N/EL	N/EL		N/A
Infrastructure enabling low-carbon road transport and public transport	CCM 6.15	0.62	0.04%	EL	N/EL	N/EL	N/EL	N/EL	N/EL		0.03%
Low carbon airport infrastructure	CCM 6.17	7.62	0.51%	EL	N/EL	N/EL	N/EL	N/EL	N/EL		2.30%
Air transport ground handling operations	CCM 6.20	6.25	0.42%	EL	N/EL	N/EL	N/EL	N/EL	N/EL		N/A
Installation, maintenance and repair of energy efficiency equipment	CCM 7.3	23.37	1.56%	EL	N/EL	N/EL	N/EL	N/EL	N/EL		0.00%
Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings)	CCM 7.4	0.00	0.00%	EL	N/EL	N/EL	N/EL	N/EL	N/EL		0.00%
Installation, maintenance and repair of renewable energy technologies	CCM 7.6	1.35	0.09%	EL	N/EL	N/EL	N/EL	N/EL	N/EL		0.00%
Acquisition and ownership of buildings	CCM 7.7	57.74	3.85%	EL	N/EL	N/EL	N/EL	N/EL	N/EL		23.63%
Urban waste water treatment	WRT 2.2	2.71	0.18%	N/EL	N/EL	EL	N/EL	N/EL	N/EL		N/A
Production of alternative water resources for purposes other than human consumption	CE 2.2	1.38	0.09%	N/EL	N/EL	N/EL	N/EL	EL	N/EL		N/A
Maintenance of roads and motorways	CE 3.4	41.36	2.76%	N/EL	N/EL	N/EL	N/EL	EL	N/EL		N/A
Remediation of contaminated sites and areas	PPC 2.4	0.01	0.00%	N/EL	N/EL	N/EL	EL	N/EL	N/EL		N/A
CapEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		142.48	9.51%	6.48%	0.00%	0.18%	0.00%	2.85%	0.00%		25.96%
CapEx of Taxonomy-eligible activities (A.1+A.2)		377.82	25.22%	22.18%	0.00%	0.18%	0.00%	2.85%	0.00%		54.72%
B) TAXONOMY-NON-ELIGIBLE ACTIVITIES											
CapEx of Taxonomy-noneligible activities		1,120.36	74.78%								
TOTAL		1,498.18	100.00%								

Y: Yes, Taxonomy-eligible and Taxonomy-aligned activity with the relevant environmental objective
N: No, Taxonomy-eligible but not Taxonomy-aligned activity with the relevant environmental objective
EL: Eligible, Taxonomy-eligible activity for the relevant environmental objective
N/EL – Not eligible, Taxonomy-non-eligible activity for the relevant environmental objective



	Proportion of CapEx/Total CapEx	
	Taxonomy-aligned per objective	Taxonomy-eligible by objective
CCM	15.71%	22.18%
CCA		0.00%
WTR		0.18%
CE		2.85%
PPC		0.00%
BIO		0.00%

Regarding the eligible CapEX, it has decreased from €386.58 million in 2022 to €377.82 million (25.22% of the total CapEX) in 2023. Of these, €235.34 million (15.71% of the total) have been considered aligned according to the European Taxonomy. The eligibility percentage has decreased significantly, due to an increase in CAPEX intangible assets due to the acquisition of the Aena subsidiary BOAB in 2023, which has increased the value of the denominator of the corresponding KPI, although on the other hand it has added a certain volume of CapEx associated with the new environmental objectives.


The proportion of OpEx (Operating Expenses) derived from products or services associated with economic activities aligned with the corresponding taxonomy-disclosure for the year 2023.

Financial year 2023	Year 2023			Substantial contribution criteria						DNSH criteria ("Does Not Significantly Harm")									
Economic activities	Code	Turnover	Proportion of Turnover, year 2023	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity	Minimum safeguards	Proportion of Taxonomy-aligned (A.1.) or eligible (A.2.) turnover, year 2022	Category enabling activity	Category transitional activity
Text	Currency	%		Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E	T
A) TAXONOMY-ELIGIBLE ACTIVITIES																			
A.1) Environmentally sustainable activities (Taxonomy-aligned)																			
Transport by motorbikes, passenger cars and light commercial vehicles	CCM 6.5	0.00	0.00%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	N/A		
Infrastructure enabling low-carbon road transport and public transport	CCM 6.15	0.01	0.00%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.00%	E	
Low carbon airport infrastructure	CCM 6.17	13.48	4.11%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	4.14%	E	
Installation, maintenance and repair of energy efficiency equipment	CCM 7.3	0.00	0.00%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.00%	E	
Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings)	CCM 7.4	0.00	0.00%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.00%	E	
Installation, maintenance and repair of renewable energy technologies	CCM 7.6	0.00	0.00%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.00%	E	
Acquisition and ownership of buildings	CCM 7.7	111.63	34.06%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	29.23%		
OpEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)		125.12	38.18%	38.18%	0.00%	0.00%	0.00%	0.00%	0.00%	Y	Y	Y	Y	Y	Y	Y	33.37%		
Of which enabling		13.49	4.12%	4.12%	0.00%	0.00%	0.00%	0.00%	0.00%	Y	Y	Y	Y	Y	Y	Y	4.15%	E	
Of which transitional		0.00	0.00%	0.00%						Y	Y	Y	Y	Y	Y	Y	0.00%		T

**A.2) Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)**

				EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	
Transport by motorbikes, passenger cars and light commercial vehicles	CCM 6.5	0.00	0.00%	EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/A
Infrastructure enabling low-carbon road transport and public transport	CCM 6.15	0.12	0.04%	EL	N/EL	N/EL	N/EL	N/EL	N/EL	0.00%
Low carbon airport infrastructure	CCM 6.17	6.32	1.93%	EL	N/EL	N/EL	N/EL	N/EL	N/EL	2.00%
Air transport ground handling operations	CCM 6.20	0.00	0.00%	EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/A
Installation, maintenance and repair of energy efficiency equipment	CCM 7.3	0.00	0.00%	EL	N/EL	N/EL	N/EL	N/EL	N/EL	0.00%
Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings)	CCM 7.4	0.00	0.00%	EL	N/EL	N/EL	N/EL	N/EL	N/EL	0.00%
Installation, maintenance and repair of renewable energy technologies	CCM 7.6	0.00	0.00%	EL	N/EL	N/EL	N/EL	N/EL	N/EL	0.00%
Acquisition and ownership of buildings	CCM 7.7	58.17	17.75%	EL	N/EL	N/EL	N/EL	N/EL	N/EL	25.00%
Urban waste water treatment	WRT 2.2	0.00	0.00%	N/EL	N/EL	EL	N/EL	N/EL	N/EL	N/A
Production of alternative water resources for purposes other than human consumption	CE 2.2	0.00	0.00%	N/EL	N/EL	N/EL	N/EL	EL	N/EL	N/A
Maintenance of roads and motorways	CE 3.4	0.00	0.00%	N/EL	N/EL	N/EL	N/EL	EL	N/EL	N/A
Remediation of contaminated sites and areas	PPC 2.4	1.04	0.32%	N/EL	N/EL	N/EL	EL	N/EL	N/EL	N/A
OpEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		65.65	20.03%	19.72%	0.00%	0.00%	0.32%	0.00%	0.00%	27.00%
OpEx of Taxonomy-eligible activities (A.1+A.2)		190.77	58.21%	57.90%	0.00%	0.00%	0.32%	0.00%	0.00%	60.40%
B) TAXONOMY-NON-ELIGIBLE ACTIVITIES										
OpEx of Taxonomy-noneligible activities		136.93	41.79%							
TOTAL		327.70	100.00%							

Y: Yes, Taxonomy-eligible and Taxonomy-aligned activity with the relevant environmental objective
N: No, Taxonomy-eligible but not Taxonomy-aligned activity with the relevant environmental objective
EL: Eligible, Taxonomy-eligible activity for the relevant environmental objective
N/EL – Not eligible, Taxonomy-non-eligible activity for the relevant environmental objective



	Proportion of OpEx/Total OpEx	
	Taxonomy-aligned per objective	Taxonomy-eligible by objective
CCM	38.18%	57.90%
CCA		0.00%
WTR		0.00%
CE		0.00%
PPC		0.32%
BIO		0.00%

Finally, in 2023, the eligible OpEX has amounted to €190.77 million (58.21% of the total), of which €125.12 million (38.18%) are aligned. The results increase in alignment compared to the previous year's report.



2- Commitment to the environment



GRI 2-22; 3-3



Compromiso con los ODS



Achievements in 2023

100% of activity in Spain and the United Kingdom is certified in accordance with ISO 14001.

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

70% reduction in own CO₂e emissions in the Spanish network (base year 2019).

Achievement of ACI EU Airport Carbon Accreditation level 4 at London-Luton Airport and level 3 at Adolfo Suárez Madrid-Barajas Airport, Barcelona-El Prat Josep Tarradellas Airport, Palma de Mallorca Airport and Málaga-Costa del Sol Airport.

29,273 homes insulated in the period 2000-2023 in the Spanish network and at London-Luton Airport.

Noise management

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

Implementation of noise monitoring systems.
Spain: Achieve a total of 33,000 sound-insulated homes by 2030

Water management

Control of water use and efficiency measures.
Water footprint (Spain).
Initiatives for responsible water consumption.

Aena and the climate emergency

Updated Report of the Climate Action Plan in Spain approved at the Annual General Meeting 2023.

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

Objectives

Achieving carbon neutrality in Spain by 2026.
Net Zero Emissions for the entire Company by 2040.
Obtaining validation of short and long-term goals (1.5°C) based on SBTi by 2024.

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

Protect and promote local and global biodiversity.
Collaborations with third parties to contribute to the protection and conservation of biodiversity.
Monitoring and control of the presence of fauna in the airport enclosure.
Preparation of Fauna and Habitat Studies

Efficient water management and circular economy

Reduction of waste generated.
Use of sustainable materials.
Impulse given to segregation and recycling.
Efficient water management
Collaboration and awareness.

Objectives

Spain 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.
Zero Waste by 2040

Brazil: Zero Waste by 2040.
United Kingdom: Maintain Zero Waste

Air pollution

Strategic projects for reducing pollution affecting air quality (NO_x, SO_x, PM₁₀)
Characterisation, control, monitoring and correction of emissions through air quality monitoring networks.

Reduction objective

In Spain, by 2030

22% of NO_x emissions per passenger compared to 2019.
36% of SO_x emissions per passenger compared to 2019.
15% of PM emissions per passenger compared to 2019.
United Kingdom:
Assess the quality of existing local air;
Identify the airport's contribution to local air quality and key airport-related sources;
Provide mitigation measures to reduce air quality emissions from these sources.

2.1. Sustainable environmental management model

(GRI 3-3)

Current scenario

Following the hiatus caused by the pandemic, the aviation sector is working to ensure that future generations can continue to enjoy air transport that favours connectivity, without forgetting that the future of transport will only be possible if it is developed sustainably.

Based on this, the aviation sector is immersed in a sustainable revolution, setting specific objectives and developing actions through important levers such as innovation and new technologies to promote sustainability and reduce its CO2 emissions.

In this regard, the new European regulatory framework reinforces this vision, and despite the emergence of new challenges such as geopolitical conflicts, the energy crisis, macroeconomic uncertainties (inflation, interest rates) and new environmental requirements that will increase costs, Aena is more committed than ever to sustainability and to becoming a driving force for change towards air transport that is more respectful and in balance with our environment.

This chapter provides a detailed description of governance, management of the aforementioned risks and the Company's environmental strategy, as well as the metrics, objectives and progress achieved in the different areas of environmental management.

Thus, in Spain, the Strategic Plan 2022-2026 establishes sustainability as a cross-divisional factor in the Company's roadmap, including several key enablers to achieve responsible growth, giving special importance to the environmental line, in line with what is already reflected in the DORA 2022-2026, the Sustainability Strategy 2022-2030 and the Climate Action Plan 2021-2030.

In addition, in the United Kingdom, London-Luton Airport's Responsible Business Strategy includes minimising the environmental impact, through a series of specific annual objectives, as a strategic priority.

In terms of Brazil, in the current scenario, it is worth noting that Aena was awarded the concession for the operation and maintenance of eleven airports in Brazil (BOAB), which are already working to align their objectives with those of the Company in the area of sustainability.

Through this roadmap, Aena establishes sustainability as a key strategic axis, seeking to minimise the environmental footprint and making responsible and efficient use of resources. In this way, it sets the conditions for the sustainable development of the airport network and provides the necessary environmental standards so that the development of the sector is carried out respecting the environment.

Frameworks and areas of environmental management

The Sustainability Strategy 2021-2030 and the Spanish Climate Action Plan 2021-2030⁶⁴ serve as a guide for action for the Company until 2030, in 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.

At London-Luton Airport in the United Kingdom, commitments to these aspects are set out in the Responsible Business Strategy 2020-2025 and the Carbon Reduction Plan.

In Brazil, work continues on the preparation of a Strategic Plan on sustainability, which includes the environmental aspect, 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)

⁶⁴ The Climate Action Plan was integrated into the Sustainability Strategy.

The Board of Directors of Aena recognises the importance of sustainability and the fight against climate change as fundamental priorities when managing the Company. Over the course of 2023, significant progress has been made in the implementation and execution of the actions defined in the Sustainability Strategy 2021-2030 and the Climate Action Plan. Specifically, the progress and achievement of climate action targets has been presented in the 2022 Updated Climate Action Plan Report to shareholders at the Annual General Meeting. This practice of transparency and accountability will be maintained in future fiscal years, ensuring the proper execution and effective implementation of the Climate Action Plan.

The responsibilities of the Board of Directors in the environmental field include the following functions:

- Monitoring, approving and reporting on the Climate Action Plan and subsequent reports.
- Guiding and controlling the strategy, objectives, risks and results in matters related to the environment.
- Implementing a remuneration model linked to environmental sustainability objectives.
- Supporting 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.

On the other hand, the Sustainability and Climate Action Committee, under the Board of Directors of Aena, is responsible for ensuring the correct materialisation, implementation, reporting and quarterly supervision of compliance with the objectives of the Climate Action Plan 2021-2030.

There is also the position of Chief Green Officer (CGO), whose goal is to integrate sustainability as a fundamental element in the Company's decision-making and to reinforce commitment in this area to all stakeholders. The main responsibilities of the CGO include embedding sustainability in all business areas of the Company, as well as communicating any sustainability updates and developments to both the Board of Directors and employees through the designated channels. The CGO is also part of the Executive Management Committee and among its specific functions is the development and supervision of Aena's Sustainability Strategy 2021-2030.

Finally, as evidence of the commitment to achieving the objectives, the Company links the approval at the Annual General Meeting of the Updated Climate Action Report 2022.

The company also has an internal working group created specifically to coordinate, in a cross-divisional manner, the deployment of the Climate Action Plan and support its implementation, encouraging the active and direct involvement of all areas and employees.

In the United Kingdom, the CEO of London-Luton Airport has the most senior role for sustainability objectives and risks. Moreover, the Sustainability Committee is established, which is chaired by the Chief Green Officer (CGO) of Aena in Spain. The relevance of environmental sustainability has meant that the achievement of the associated objectives has been linked to the management system and the evaluation of the performance of its employees⁶⁵.



In this regard, progressive compliance with the Climate Action Plan 2021- 2030 influences the remuneration of Aena's workforce in Spain, including the CEO, members of the Executive Management Committee, Sustainability Director, and all other Senior Management and employees.

In the case of London-Luton Airport in the United Kingdom, the key sustainability objectives are included within the Management Bonus Objectives and determine the level of bonus remuneration based on performance. These objectives apply to the CEO, all members of the executive team, the sustainability officer and the senior manager of Net Zero.

In Brazil, the governance of environmental affairs falls under the responsibility of the quality and environmental manager, who coordinates environmental policies approved by the Board of Directors. This individual also oversees the acquisition of the corresponding certifications for the airports of Aena's subsidiaries in Brazil, as well as coordination with Aena in Spain in defining climate action and sustainability plans for the future. This management reports to the Directorate of Institutional Relations and Communication, with the ultimate responsibility for environmental matters lying with the CEO. Additionally, in 2023, a Sustainability Committee was established, consisting of all Corporate Directors, with the aim of establishing the principles of the Sustainability Strategy and its corresponding objectives, as well as monitoring them.

⁶⁵ Aena's subsidiaries in Brazil do not yet have sustainability objectives linked to variable remuneration.

2.1.1. Natural capital management model⁶⁶ (GRI 2-23)

<div> <div>  </div> <div> Policies and strategies </div> </div> <div> <div>  </div> <div> Strategic Objectives </div> </div>	
Spain, United Kingdom, Brazil	
<p>Sustainability Policy: approved by the Board of Directors and updated in 2023, it defines and establishes the commitments, policies, objectives and strategy to be followed by Aena 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, behaving ethically and transparently. 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 towards the circular economy that includes all processes.</p> <p>Integrated Quality, Environmental, Energy Efficiency and Occupational Health and Safety Management Policy: updated in 2023, it presents the principles that serve as a guide and reference framework in the development of the Company's activity in environmental matters, in an integrated manner with quality and occupational health and safety. These include ensuring the protection of the environment and preventing pollution, 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.</p>	
Spain	
<p>Sustainability Strategy 2021-2030: this sets out the Company's sustainability roadmap for the period 2021-2030, focusing on the Company's commitment to the fight against climate change, the improvement of air quality, the correct management of noise and water, and the protection of biodiversity in order to achieve this. It also establishes a series of measures and indicators for the monitoring and fulfilment of the objectives set.</p> <p>Climate Action Plan 2021-2030: reflects Aena's commitment to decarbonisation and climate emergency as key issues in its management. The objectives and commitments set out in the Spanish Government's declaration on the climate and environmental emergency, the National Integrated Energy and Climate Plan 2021-2030, the SDGs and the recommendations of the TCFD.</p> <p>Strategic Plan for Water Management 2021-2030: includes the diagnosis of the airport water management situation, as well as strategic and specific objectives for improvement and action plans and initiatives to ensure sustainable water management in line with the SDGs.</p> <p>Supplier Environmental Surveillance (ISO 14001): conducting an environmental assessment of the Company's property portfolio and tenant operations.</p> <p>Action Plans regarding noise pollution.</p>	<p>To achieve carbon neutrality by 2026 and Net Zero Carbon by 2040.</p> <p>To achieve Zero Waste by 2040.</p> <p>Reduce NOx emissions per passenger by 22% of 2019 levels by 2030.</p> <p>Reduce SOx emissions per passenger by 36% of 2019 levels by 2030.</p> <p>Reduce PM emissions per passenger by 15% of 2019 levels by 2030.</p> <p>Decrease water consumption per passenger by 10% by 2030 compared to 2019 (5% reduction by 2026).</p> <p>Increase the use of alternative water sources per passenger by 150% by 2030 compared to 2019 (50% increase by 2026).</p> <p>Maintain and expand noise monitoring systems.</p> <p>Increase the volume of insulated homes by 36%, reaching 33,000 insulated homes by 2030.</p>

⁶⁶ The 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

Energy Policy: aligned with ISO 50001, this Policy shows the airport's commitment to improving energy management and performance.

Environmental Policy: recognises and accepts the airport's responsibility in minimising its environmental impact, and undertakes to continuously review its performance.

Responsible Business Strategy: 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.

Enquiries and complaints policy on aircraft noise at the Airport.

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.

Waste Zero

Explore the feasibility of using reclaimed water and develop water saving initiatives.

Develop an air quality strategy and reduce NOx and PM air pollution.

Minimise the impact of aircraft de-icing products

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

ANB Integrated Quality, Environmental and Energy Efficiency Management Policy: policy aligned with the Group's commitments

ANB Sustainability Policy: aligned with the Group's commitments

Fauna Risk Management Committee

Aeronautical Noise Management Committee

Net Zero Carbon 2040 Commitment.

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: Zero Waste target.

Migration of all consumed electricity to the deregulated energy market that allows the purchase of green energy for airports of ANB.

Noise control and implementation of action plans.



2.1.2. Environmental certifications

(GRI 3-3)

In Spain, Aena's environmental commitments are articulated through its Integrated Quality and Environmental Management System (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.

	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 sites.	Certified: central services and airports in Spain and the United Kingdom. They have been renovated in 2023. At Aena's subsidiaries airports network in Brazil, the Integrated Management System is in the process of being implemented, with certification planned between 2025-2026.
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.	Certified: central services and airports in Spain. They have been renovated in 2023. At Aena's subsidiaries airports network in Brazil, the Integrated Management System is in the process of being implemented, with certification planned between 2025-2026.
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 Airport and Tenerife Sur Airport, with the latest validation date occurring in 2023.
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.	Certification renewed in 2023 at: <ul style="list-style-type: none">• Reus Airport.• Valladolid Airport.• SATE Adolfo Suárez Madrid-Barajas Airport.• Zaragoza Airport.• London-Luton Airport.



	Management Instruments	Certifications
Standard ISO 20906	<p>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.</p> <p>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 their Noise Monitoring Systems.</p>	<p>Certifications renewed in 2023:</p> <ul style="list-style-type: none"> • Adolfo Suárez Madrid-Barajas Airport • Alicante-Elche Miguel Hernández Airport • Josep Tarradellas Barcelona-El Prat Airport • Málaga-Costa del Sol Airport • Palma de Mallorca Airport • Valencia Airport
ACI EU Airport Carbon Accreditation	<p>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.</p> <p>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.</p> <p>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.</p> <p>Note that ACA certification is based on the GHG Protocol.</p>	<p>Certificaciones obtained:</p> <p>Level 4 - Transformation</p> <ul style="list-style-type: none"> • London-Luton Airport (upgraded in May 23). <p>Level 3 - Optimisation</p> <ul style="list-style-type: none"> • Málaga-Costa del Sol Airport (upgraded in May 23) • Palma de Mallorca Airport (upgraded in May 23) • Barcelona-El Prat Josep Tarradellas Airport (level renewed in May 23) • Adolfo Suárez Madrid-Barajas Airport (level renewed in May 23) <p>Level 2 - Reduction:</p> <ul style="list-style-type: none"> • César Manrique-Lanzarote Airport (level renewed in May 23) • Menorca Airport (level renewed in May 23) • Alicante-Elche Airport (level renewed in May 23) • Ibiza Airport (level renewed in May 23) <p>Level 1 - Inventory</p> <ul style="list-style-type: none"> • Santiago-Rosalía de Castro Airport (level renewed in June 23)

In Brazil due to the new BOAB concession, the certification plan was revised to include all ANB airports. With this, the forecast of obtaining ISO 14001, ISO 9001, ISO 50001 and ISO 14064 certifications between 2025 and 2028 was verified. It is also planned to obtain ACA Certification, in a staggered manner per airport and concession block.

2.1.3. Management of environmental risks and impacts

(GRI 3-3; 413-1)

Aena has several tools at its disposal to identify, monitor and manage environmental risks, highlighting those related to environmental compliance, climate change (see section '2.2.3. Risks and opportunities related to climate change') or noise impact.

- As part of the Environmental Management System, the legal requirements in environmental matters that affect the Company are identified, facilitating the monitoring of their compliance.
- This is complemented by the Company's Risk Control and Management System, which is supported by Aena Group's risk map where existing environmental and sustainability risks are identified. This System also includes mechanisms for the management of identified risks.

In addition to the above, in the United Kingdom, London-Luton Airport has established in its environmental and energy manual compliance with the ISO 14001 and 50001 standards and the identification of risks and opportunities related to energy management, which will be used to inform the management of the management systems. Risks and opportunities are identified, described and addressed (as appropriate) through the risk governance structure, which in turn identifies the environmental aspects of the activities and services to be controlled and those that can be influenced, taking into account a life cycle perspective, new or planned developments and new or modified activities.

Likewise, Aena integrates the environmental factor into its decision-making through the Environmental Impact Assessments of its Master Plans and Projects, especially in those that may have a significant impact on the environment. In this way, the preservation of natural resources is favoured, 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)

		2022			2023 (A)		
		Spain	United Kingdom	Brazil	Spain	United Kingdom	Brazil
Number of people assigned to environmental management		Central Services: 63 (Aena+AT) and 57 (airports, some of which are partially dedicated to environmental management)	7	2	SSCC: 60 (Aena+AT) and 57 (airports, some of which with partial dedication to environmental management).	8	5
Investment allocated to the protection and improvement of the environment (€)		€19,814,000	€383,344	€2,388,066.28	€47,349,000	€0	€1,402,393.1
Expense allocated to the protection and improvement of the environment (€)		€16,310,000	-	€1,020,767	€14,907,000	€0	€1,358,877.0
Investment in R&D&I to reduce the impacts generated by pollution, generation of waste or the use of resources (€)		€288,336	-	€928,048	€332,020	€0	€1,880,378.7
Investment allocated to R&D&I activities in the field of environment and climate change (€)		€185.83	-	€10,653,666.96	€284,989	€753,110.9	€1,357,715.4
Investment allocated to R&D&I activities in environmental and climate change matters (€)		€7,292,832 (corresponding to waste management)	€441,628.2	€486,940	€8,121,159.42	€330,341.2	€0
Noncompliance with environmental legislation and regulations, including those related to water consumption	No°	0	0	0	1	0	0
	€	€0	€0	€0	€2,990.74	€0	€0
Return on the environmental investments	CapEX	See section 'Taxonomy of Sustainable Finances'.					
	OpEX						
Provisions and undertakings for environmental risks		See 2022 Consolidated Annual Accounts and Management Report			See 2023 Consolidated Annual Accounts and Management Report		

(A) Exchange rate as of December 31, 2023: EURvsGBP= 0.86905 | EURvsBRL= 5.3618

2.1.4. Environmental inquiries⁶⁷

(GRI 2-25; 2-26; 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 that can be found on the public website, through which they are responded to in a swift and transparent manner.
- The Sound Insulation Plans Management Office, which has the specific function of receiving noise-related issues.
- The Environmental Office at Adolfo Suárez Madrid-Barajas Airport ('OFIMA'), and the Environmental Office at Barcelona-El Prat Josep Tarradellas Airport ('SAIM'), through which complaints are received that may arise in the neighbouring populations of this specific airport facility, similar to the previous one but relating specifically to this airport.
- The interactive noise map (WebTrack) on the website, which allows users to track 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 the United Kingdom, London-Luton Airport provides users with an interactive noise map called TraVis website, from which environmental enquiries and complaints about aircraft noise can be made. There are also other ways to contact for these purposes (via phone, e-mail, etc.).

In Brazil, users of Aena's subsidiaries airports and others affected can make queries, suggestions, complaints and claims in this area 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:

- 24,899 complaints received by Aena regarding environmental matters (33,512 in 2022).
- 99.70% of noise-related complaints in Aena (99.92% in 2022).
- 100% of responses solved (100% in 2022).

Indicators of environmental complaints

	2022				2023			
	Spain	United Kingdom	Brazil	Total Consolidated	Spain	United Kingdom	Brazil	Total Consolidated
Environmental complaints	13,978	19,533	1	33,512	9,471	15,415	13	24,899
Noise related complaints	13,964	19,519	0	33,483	9,414	15,411	0	24,825

Note: In 2022, 83% of noise complaints received in the United Kingdom corresponded to those made by 10 people.

⁶⁷ See links to the websites referenced in this section in the chapter 'Links of Interest'.

2.1.5. Sustainability and value chain

Green leases

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

In Spain, Aena carries out operations known as green leasing in its real estate activity with the aim of minimising the environmental impact of these practices (reduction of energy consumption, waste generation, emissions, etc.). To achieve this purpose, mandatory clauses are included throughout the execution of the contract. Likewise, and with regard to the relationship with its suppliers, the procurement specifications introduce environmental issues as a criterion when evaluating 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 United Kingdom, London-Luton Airport has introduced the Sustainable Supply Chain Charter (SSCC) in 2023, which extends sustainability practices (environmental, social and business) throughout the supply chain. This charter sets out the airport's criteria for the sustainability performance of its suppliers. In this way, the SSCC makes it possible to recognise differences in the activity and maturity of sustainability management and thus the sustainability performance of suppliers. Based on the information managed in the SSCC, the Airport requires its suppliers to collaborate in specific areas and actions relevant to sustainability. For the development of this tool, the airport has followed the same practices established in its environmental policy and the actions defined in the Responsible Business Strategy. All of this allows for the ongoing assessment of the management of environmental, social and corporate governance issues.

It is also worth noting the collaboration between London-Luton Airport and the London School of Economics to assess the impacts of the supply chain and develop a series of recommendations on this.

Based on the previous aspects, objectives related to the environmental management in the supply chain have been established at the UK airport, 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).

In Brazil, Aena's subsidiaries airports also incorporate environmental clauses in procurement processes to ensure compliance with the country's environmental legislation when contracting third parties. In addition, a specific analysis is conducted 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 clauses or criteria established in supplier contracts with suppliers and lessees may result in the imposition of penalties and sanctions.

Sustainability Policy

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.

Integrated Quality, Environmental, Energy Efficiency and Occupational Health and Safety Management Policy

Implements guidelines related to 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. During 2023, this Policy has been updated by incorporating and adapting its principles to what is required by the main ESG analysts/suppliers.

Real estate development white papers

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 complement 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.

Environmental clauses in contracting specifications

Environmental clauses in contracting specifications: The procurement specifications have environmental clauses that establish requirements such as obtaining certifications in this area, like ISO 14001. In the case of technical specifications for contracts of handling agents, for example, the need for an equipment replacement plan to reduce pollutant emissions has been formalised.

In this regard, the world's largest handling tender was awarded in 2023, in which the agents were required to have at least 49% of sustainable vehicles and equipment in 2030, rising to 78% by 2030. The successful bidders' proposals represent very significant improvements on the minimums set out in the specifications of 34% electric fleet in 2024 and 49% in 2030, specifically, 80% and 88%, respectively. Shared use of equipment is also encouraged in order to increase efficiency in operations and a maximum age of 10 years is established for gardeners and 12 years for the rest.

In the United Kingdom, sustainability in procurement processes is managed with the support of information provided by the Sustainable Supply Chain Charter and the work of LLA's 'acquisitions committee', which analyses relevant acquisition requests from a sustainability perspective. All of this is led by the executive team or a representative of the sustainability team in order to achieve a sustainability-focused management of the objectives. In addition to including sustainability objectives in contracts, monitoring is carried out at the airport to ensure that these objectives are achieved.

Likewise, the contracting specifications include environmental issues as a criterion in the evaluation of the successful 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.).

Supervision of environmental behaviour

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.

Technical conditions for the leasing of commercial premises

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.

Third-party awareness mechanisms and creation of a collaboration forum for sustainability

Aena makes good practices of environmental management available to contractors and lessees, promoting collaborative and responsible performance in their management.

In this regard, during 2023, the following stand out:

- 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.

In the United Kingdom, the collaboration between London-Luton Airport and the London School of Economics to assess the impacts of the supply chain and develop a series of recommendations on this.

Supplier Code of Conduct

The Aena Group has a Supplier Code of Conduct that 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 Third Party Code of Conduct applies to Aena companies wholly or majority owned by Aena and domiciled in Spain. The Third Party Code of Conduct is applicable to third parties with which companies not domiciled in Spain contract, provided that it is compatible with the local regulations applicable to them and they do not have their own Code with a similar scope. In this regard, Aena's airports in Brazil and the United Kingdom have their Code of Conduct for third parties, adapted to their own context (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 the Aena Group to ensure the improvement of its environmental performance, in collaboration with third parties. As initiatives, the following are noteworthy:

- The acquisition of electric vehicles (passenger cars and vans) in the new tender contracts for the Aena fleet, in order to reach 100% sustainable vehicles by 2026. In this regard, it should be noted that in 2023 the percentage of electric vehicles (passenger cars and vans) in the fleet of the airport network in Spain reached 42%.
- In the United Kingdom, at London-Luton Airport sustainable purchasing criteria are applied in the acquisition of goods and services including, among others, zero emission vehicles, renewable energy systems, lighting, energy efficiency, sustainability improvements in buildings, heating systems and fuel supply.
- 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 33% in 2023 (35% in 2022). 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).

During 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 sending of waste to landfill, maximising its reuse.



Operational Phase

The operational control process and the identification 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.



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). This can be viewed in the Guide to the Technical Evaluation of Suppliers' Contracts.

In the United Kingdom, environmental controls are in place under the agreement with the main construction contractor partner, which shares weekly environmental site reports with the airport's health and safety team in the event of potential environmental risks.



Purchase of products/services

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). This can be viewed in the Guide to the Technical Evaluation of Suppliers' Contracts.

In the United Kingdom, environmental controls are in place under the agreement with the main construction contractor partner, which shares weekly environmental site reports with the airport's health and safety team in the event of potential environmental risks.

Low carbon products offered by Aena.

Promotion of the use of a sustainable vehicle to access Spanish airports through a 10% discount for passengers included in the 'Aena Club Cliente' programme who park their vehicle with an environmental 'zero emissions' mark in the airport car parks.

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.

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: a benchmark organisation in sustainability and corporate social responsibility in Spain, whose mission is to integrate social, environmental and governance aspects into the strategy and management of companies and organisations.

Additionally, it is also a member of different climate-related partnerships in which it actively participates:

- Renewable And Low-Carbon Fuels Value Chain Industrial Alliance: initiative to drive the production and supply of renewable and low-carbon fuels in the aviation and water sectors.
- 'Por el Clima' (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 Declaration: 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.
- 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).

- Alliance for the promotion of the use of green hydrogen in aviation: sectoral alliance driven by the Ministry of Transport, Mobility and Urban Agenda with the aim of promoting the use of green hydrogen in Spanish aviation.
- ACI Europe: sectoral association, chaired until June 2023 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 programme). 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.
- Alliance for the Sustainability of Air Transport: its objective is based on leading the decarbonisation of the sector, covering all possible solutions and technologies to achieve this and boosting Spain's industrial capacity to offer disruptive technologies, as well as other low-carbon alternatives and circular economy projects. It also encourages public-private partnerships to promote R&D&I and speed up the development of low-carbon aircraft. Fostering the large-scale production of sustainable aviation fuels (SAF) in Spain is another of its objectives, as well as promoting the development of initiatives that guarantee the circularity of the waste generated by the sector.
- Alliance for Zero Emissions Aviation (AZEA): an EC initiative of public and private partners sharing the objective of preparing the entry into commercial service of electric and hydrogen-powered aircraft.
- Renewable and Low Carbons Fuels (RLCF): an initiative focused on boosting the production and supply of renewable and low-carbon fuels in the aviation and maritime sectors.
- Agreement with Saving the Amazon Foundation to plant more than 10,000 trees in Brazil, with the aim of contributing to the restoration and protection of the Amazon and the fight against climate change.
- London-Luton Airport is part of the following sustainability organisations: UK Sustainable Aviation Group and UK Airports Sustainability Forum.



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 an A, above the average in its industry.
- Science Based Targets initiative (SBTi): this initiative drives ambitious climate action in the private sector by encouraging companies to set science-based emission reduction targets. During 2023, the Aena Group has submitted its established short- and long-term reduction targets to SBTi in order to obtain its validation.
- Airport Carbon Accreditation: this is the carbon footprint certification programme that accredits the calculation of the carbon footprint of airports and the evolution of their CO2 emissions reduction commitments acquired (see more information in section 2.2.1).
- GRESB: international sustainability framework that compares the ESG management and performance of major infrastructure assets around the world. In 2023, London-Luton Airport has been ranked as the best performing airport in the United Kingdom for governance and sustainability disclosure, achieving the highest rating in the assessment.

2.2.Aena and the climate emergency⁶⁸

(GRI 3-3)

Following the Paris Agreement, the international community committed to keep global warming below 2°C compared to the pre-industrial temperature and to maintain efforts to limit it to 1.5°C, responding to the current climate emergency. In this context, the European Union is leading the global commitment to the climate change crisis through the European Green Pact, which aims to reduce GHG (greenhouse gas) emissions by at least 55% by 2030 compared to 1990 levels, in order to achieve neutrality by 2050.

To achieve this, the European Commission presented the 'Fit for 55' package of measures, which includes legislative proposals that affect the European framework for air mobility, such as the ReFuelEU Aviation initiative, which requires the introduction of a minimum percentage of sustainable aviation fuels in the coming years, or the reform of the EU Emissions Trading Scheme (EU ETS), both approved in 2023.

For its part, Spain is promoting initiatives in its fight against climate change, in line with the 'Climate Change and Energy Transition Act', whose objectives are integrated by Aena into its roadmap in order to remain in line with regulatory requirements.

In the United Kingdom, London-Luton Airport is governed from a regulatory perspective by the Department for Transport (DFT) and the Civil Aviation Authority (CAA). These government organisations describe the key regulatory frameworks to be met. In this regard, corporate policies include the United Kingdom's Jet Zero Strategy - 2050, the UK Zero Carbon Airports to 2040 requirement (under consultation), and the United Kingdom's SAF (Sustainable Aviation Fuel) Mandate (on airlines and fuel suppliers).

2.2.1. Climate Action Plan

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

In 2023, the Board of Directors of Aena presented the 2022 Updated Climate Action Plan Report to the Shareholders General Meeting for it to be approved on a consultative basis. At the voting, the updated Climate Action Plan (CAP) Report obtained 90.37% of votes in favour. This report includes the progress made in implementing the actions and objectives of the CAP.

Since 2021, Aena presents the Updated Climate Action Plan Report for advisory voting by the General Shareholders' Meeting, consolidating the Company as the first in Spain and one of the few in the world to be accountable to its shareholders about its decarbonization plans.

The 2021-2030 Climate Action Plan (CAP) of Aena is part of the Sustainability Strategy 2021-2030. The main objectives of this plan are to achieve carbon neutrality by 2026 and to be Net Zero Emissions by 2040. Additionally, the CAP aims to promote decarbonization among Aena's stakeholders, with particular attention to airlines, to also impact the reduction of the Company's Scope 3 emissions. It is worth noting that this plan is aligned with the Sustainable Development Goals (SDGs) and complies with the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD), of which Aena has been a Supporter since 2022, and the Sustainability Accounting Standards Board (SASB).

The Climate Action Plan establishes an investment of approximately 550 million euros for the period 2021-2030.

⁶⁸ This section of the report, '2.2. 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).

The CAP establishes a roadmap marked by annual strategic objectives associated with to a series of programmes, lines of action, initiatives and projects, which in turn contribute to achieving the specific targets associated with each action. Schematically, the CAP comprises three strategic programmes, the deployment of which contemplates various measures in energy efficiency, the use of renewable energies, sustainable mobility, the reduction of third-party emissions, and the decarbonisation of operational processes and activities. These are:

1. **Carbon neutrality (Scope 1 and 2 emissions):** affects the Company's own emissions. It aims for Aena to become a carbon neutral airport operator in 2026 in order to achieve Net Zero Emissions by 2040. It therefore affects all of the Company's Scope 1 and 2 emissions.
2. **Sustainable Aviation (Scope 3 emissions):** aims to act as a driver for other aviation stakeholders operating at the airports to speed up their decarbonisation and the implementation of new sustainable fuels by involving relevant stakeholders such as airlines and ground handling agents.
3. **Sustainable community and value chain (Scope 3 emissions):** aims to improve the sustainability of the environment by collaborating with suppliers, lessees, transport agents and the community, promoting sustainable mobility to and from the airport.

The Climate Action Plan is aligned with the Company's adherence, since 2019, to the NetZero initiative of 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. In this regard, Aena's internal decarbonisation objectives have been developed in line with this commitment, giving greater support and viability to the action routes defined.

All the efforts that Aena has undertaken in decarbonization have been reflected in 2023 through the achievement of an A- level in CDP.

On the other hand, it is worth noting that London Luton Airport has its own roadmap to achieve the Net Zero goal by 2040 set by ACI EU. Additionally, its Responsible Business Strategy 2020-2025 includes a commitment to ensure environmental responsibility and efficiency, focusing on climate change, water, waste, air quality, noise, sustainable mobility, etc. All of this revolves around four key areas: achieving net zero emissions, providing sustainable aviation, making a positive impact on the community, and being a responsible company, as well as six main commitments to achieve net zero airport operation. These six areas of focus cover renewable energy, vehicles, air conditioning and low-carbon emitting generators, energy efficiency improvements, the use of other new technologies where feasible.

Both the roadmap towards Net Zero by 2040 and the Responsible Business Strategy 2020-2025 were shared and approved by the governing bodies of Aena's subsidiaries in the United Kingdom.

For its part, at Aena's subsidiaries in Brazil is developing a sustainability strategy whose main objective is focused on achieving ACI's Net Zero by 2040.

Continuing with its commitments to decarbonisation, Aena has set its 2023 science-based emission reduction targets in its commitment to the Science Based Targets initiative (SBTi). These targets are currently being validated by SBTi.



Specific decarbonisation targets

(GRI 3-3)

The roadmap established by the Climate Action Plan (CAP) sets out Aena's commitment and actions to achieve the goals of reducing the carbon footprint, covering all scope 1 and 2 emissions. The path to follow set out by the CAP has annual strategic objectives to reduce own emissions, such as producing renewable energy by expanding self-consumption, purchasing energy from renewable sources, improving energy efficiency in buildings,

promoting the use of SAF, reducing emissions attributable to handling agents by increasing electric vehicles, installing electric charging points, promoting sustainable mobility to and from airports, and actively engaging the supply chain and communities in driving sustainability.



CLIMATE ACTION PLAN 2021 - 2030: 3 STRATEGIC PROGRAMMES

ZERO CARBON Scope 1 and 2

Become a carbon neutral airport operator (2026) and lay the foundations to achieve Net Zero Carbon (2040).

SUSTAINABLE AVIATION Scope 3

Act as a driving force for other agents in the aviation sector such as airlines and handling agents to speed up their decarbonisation.

COMMUNITY AND SUSTAINABLE VALUE CHAIN Scope 3

Improve the sustainability of the environment by collaborating with suppliers, lessees, transportation agents and the community, etc., to reduce transport emissions from/to the airport.

The CAP has a scope that goes beyond the airport itself by promoting improvements in sustainability in the air transport sector, developing initiatives that have an impact beyond the airport's own operations.



Spain

United Kingdom

Brazil

Short-term

2023

Purchase of electricity, 100% with renewable origin guarantee (ongoing objective since 2020).

A 61% reduction in absolute Scope 1 and 2 GHG emissions with respect to the base year 2019 (the base year and the CAP objectives were established in 2021 and the base year emissions are 136,631 tCO₂eq). Offsetting up to 8% of emissions to reach a total of 69% reduction and offsetting of emissions.

2026

Achieve Carbon Neutrality in the airport network.
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.

Establishment of 3,150 electric charging points in parking areas for passengers, employees, and airside.

Accreditation of Airport Carbon Accreditation from ACI EU level 4+ at Adolfo Suárez Madrid-Barajas and Josep Tarradellas Barcelona-El Prat airports.

44% of the handling fleet sustainable (electric equipment and sustainable fuel).

Implementation of new measures and collaborative improvements to optimize airport operations efficiency, as well as European airspace congestion, reducing waiting times and flight times.

100% electric shuttle fleet between terminals at Adolfo Suárez Madrid-Barajas and Josep Tarradellas Barcelona El Prat airports.

2023

Maintain the purchase of electricity with a 100% renewable origin guarantee.

2026

25% of energy supply from renewable energies in own facilities.
Implementation of the energy efficiency measures obtained in the airport's energy audit.

2023

Energy efficiency actions in internal operations.

Purchase of electricity with a guarantee of renewable origin.

2024

Conduct and analyse studies for the implementation of PCA and 400Hz systems.
Progressive replacement of fossil fuels with ethanol and biodiesel.

2026

Replace the types of gases used in air conditioning systems with gases that do not cause damage to the environment.

Purchase of 100% electricity with a guarantee of renewable origin for all airports in the Aena subsidiaries in Brazil.

Implement charging points for electric handling vehicles and on passenger car parks.

2027

ACI EU Airport Carbon Accreditation of level 3.

Medium/Long

2030

Reduction of electrical consumption per passenger by 10%.

Reduction of air conditioning energy consumption per passenger by 9%.

Utilization of 65% sustainable fuel in boilers and cogeneration.

78% of the handling fleet sustainable (electric equipment and sustainable fuel).

Installation of hydrogen stations at the 5 main airports.

2040

Achievement of Net Zero by ACI EU.

2030

Increase in the number of electric charging points in parking lots.
100% own fleet of low-carbon vehicles.

Fully efficient lighting for runways and airfields.

2035

100% own fleet of electric vehicles.

2039

Complete low-carbon heating system.

2040

ACI EU's Net Zero Achievement.

2040

ACI EU's Net Zero Achievement.

2023 mitigation actions and measures to achieve the decarbonisation objectives



Improve the energy efficiency of the facilities and uses of renewable energy

- Electricity consumption in the Spanish airport network and at London-Luton Airport in the United Kingdom comes from sources with 100% renewable origin guarantee. In the airports of Aena's subsidiaries in Brazil, on the other hand, it has reached 33%, with ANB airports at 37%.
- Aena, in its objective to achieve 100% self-sufficiency starting in 2026, has put into operation the new photovoltaic plant at Gran Canaria Airport, and the new photovoltaic plants of 7.5 MW and 120 MWn are under construction at Adolfo Suárez Madrid-Barajas Airport.
- Among the energy efficiency measures are those related to air conditioning and the replacement of LED lighting, etc. In the United Kingdom, at London-Luton Airport, 90% (85% in 2022) of the existing lighting has been replaced by LED, and in Aena's airports, the implementation of LED lighting in their terminal buildings continues with the aim of reaching 100% by 2026.



Collaborations with third parties

- Value chain: Working closely with suppliers to achieve reductions in emissions from partners at our airports and in our supply chains.
- Drive for more efficient aircraft at the London-Luton Airport in the United Kingdom
- Launch of the Sustainable Supply Chain Charter at London-Luton Airport in the United Kingdom
- Participation in various forums on sustainability and the aviation sector.
- 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.
- 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 is implemented at 5 Spanish airports and also has Advanced Towers at 10 of its airports.
- In relation to ENAIRE, Aena has participated in monitoring the sustainability criteria of the new contract for the provision of air navigation services, which ensures that they are in line with Aena in terms of sustainability.
- 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 2023, 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 into the remote 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: awarding of the new specifications for Aircraft Ground Handling at Spanish airports with sustainability criteria and objectives that exceed the objectives established in the CAP.
- Pilot pooling project in handling vehicles at Palma de Mallorca Airport: this project restricted to pushback vehicles has delivered positive results in usage time of 15%, which implies up to 1 tonne of CO2 per year per equipment in standard use.
- Launch of "Aena with Research," to boost research projects and technology transfer in the airport sector, in areas related to social and environmental sustainability and the sustainable transformation of air transport.



Airport Carbon Accreditation

Over 90% of carbon emissions are accredited by the Airport Carbon Accreditation (ACA) programme:

- London Luton Airport has reached Level 4 'Transformation' in 2023.
- In Spain, Adolfo Suárez Madrid-Barajas Airport, Barcelona-El Prat Josep Tarradellas Airport, Palma de Mallorca Airport and Málaga-Costa del Sol Airport have Level 3 'Optimisation'. César Manrique-Lanzarote Airport, Ibiza Airport, Alicante-Elche Airport and Menorca Airport have Level 2 'Reduction', and Santiago-Rosalía de Castro Airport has Level 1 'Inventory'. In 2026, the goal is to have reached level 4+ at 19 airports in the Spanish network and level 5 by 2030.
- Meanwhile, at Aena's subsidiaries in Brazil are working on joining the programme.



Sustainable mobility

- Replacement of Aena's fleet of passenger cars with cleaner and more efficient vehicles and expansion of the charging point network for electric or hybrid vehicles, reaching 42% of electric vehicles in its own fleet of passenger cars and vans in 2023 (28.7% in 2022) and y 2,086 charging points (1,063 in 2022) on the ground and air side of airports. The objective in Aena is to have 100% sustainable vehicles and more than 3,000 recharge points on the airside and landside by 2026.
- Expansion of parking spaces for bicycles and/or electric scooters at Fuerteventura Airport, Barcelona-El Prat Josep Tarradellas Airport, Girona-Costa Brava Airport, Jerez Airport and Valencia Airport. Girona-Costa Brava Airport has also installed a bicycle assembly and repair station.



Communication and reporting

- Establishment of reduction targets for adherence to the Science Based Target initiative (in the process of validation).
- Participation in the Carbon Disclosure Project (CDP), the main climate change reporting framework, where the Company has obtained level A-, in 2023.
- Adherence to various initiatives in the field of combating climate change (see section '2.1.6. Participation in environmental associations').
- London-Luton Airport's participation in GRESB, an international framework that compares the environmental, social and governance management and performance of assets worldwide, in which it has obtained a five-star rating.



Evolution and progress of the decarbonisation targets set (GRI 305-5)

Spain

- 70% reduction in own greenhouse gas emissions (base year 2019)
- Purchase of 100% renewable electricity: Aena Spain and its tenants have consumed renewable electricity with a 100% source guarantee at all its airports and offices since 2020.
- Electrification of 42% of its own fleet of passenger cars and vans
- 2,086 charging points for ground and airside electric vehicles at network airports.
- 24% of the handling fleet (vehicles and equipment) that operates at airports is electric.
- New photovoltaic plant in operation at Gran Canaria airport and the awarding of the 120 MWn photovoltaic plant at Adolfo Suárez Madrid-Barajas Airport and tender of the plant at Barcelona-El Prat Josep Tarradellas Airport.
- Nine airports are certified by the ACI EU Airport Carbon Accreditation (ACA). In 2023, Málaga-Costa del Sol Airport has been upgraded to Level 3 'Optimisation', on a par with Adolfo Suárez Madrid-Barajas Airport, Barcelona-El Prat Josep Tarradellas Airport and Palma de Mallorca Airport, which have renewed their certification for this level. On the other hand, Alicante-Elche Airport, Ibiza Airport, César Manrique-Lanzarote Airport and Menorca Airport have renewed Level 2 'Reduction' of the accreditation, and Santiago-Rosalía de Castro Airport has Level 1 'Inventory'.
- 5 airports with A-CDM and 10 airports with Advanced Towers.
- 4.52% of Aena car park bookings of zero emissions vehicles that have benefited from the 10% discount through 'Aena Club Cliente'.

United Kingdom

- 77% reduction in own greenhouse gas emissions (base year 2019).
- Level 4 Accreditation in the Airport Carbon Accreditation certification.
- 26.4% electric handling vehicles.
- 12 electric charging points for vehicles in Luton.

Brazil

- 35% purchase of clean energy from the Deregulated Energy Market.
- Conducting operational efficiency tests within the pilot project for the use of electric buses at airports.
- 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.
- 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 equipped several of its facilities with smart meters.

2.2.2. Supervision and monitoring of the Climate Action Plan

(GRI 2-9; 2-12; 2-13; 2-19)

The relevance of climate change at the Company has led to the issue being addressed cross-divisionally and linked to the management and performance evaluation system for senior management and all Aena employees.

In this regard, progressive compliance with the Climate Action Plan 2021- 2030 influences the remuneration of Aena's workforce in Spain, including the CEO, members of the Executive Management Committee, Sustainability Director, and all other Senior Management and employees.

In the case of London-Luton Airport in the United Kingdom, the key sustainability objectives, which include those related to climate change, among other issues, are included within the Management Bonus Objectives. These objectives apply to the CEO, all members of the

executive team, the sustainability officer and the senior manager of Net Zero⁶⁹.

	Function	Frequency
Annual General Meeting	Consultative voting and monitoring of the Climate Action Plan.	Annual
Board of Directors	Approval of the CAP and annual and timely supervision. Guidance and control of the strategy, policies, objectives, risks and results in matters related to climate action	Annual
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	Report, supervision and reporting of the Climate Action Plan.	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, the progress being made 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

⁶⁹ Aena's subsidiaries in Brazil do not yet have sustainability objectives linked to variable remuneration.

2.2.3. Risks and opportunities related to climate change

(GRI 3-3; 201-2)

The climate risks are reflected in the Aena Group's risk map, which also takes into account the corresponding management, supervision and control mechanisms⁷⁰, which in turn include indicators and measures linked to compliance with the Climate Action Plan. In compliance with best practices in the field, Aena follows the recommendations of the Task Force on Climate-Related Financial Disclosures (TCFD) in its process of analysing climate change-related risks and opportunities.

In 2023, the climate risk study of the Spanish network has been updated, considering various climate scenarios⁷¹ to model possible interactions of climate variables and project potential impacts.⁷²

Physical risks: the extreme rainfall and temperatures, the heat waves, water stress or droughts, sea level rising, and the risk of river flooding, among others, are the potential physical risks identified that could have a direct impact on airport infrastructures or the management of transport services in the medium/long-term. Based on the physical risk analysis conducted and taking into account the adaptation measures already carried out or planned, the vulnerability of airport activity in the different operational areas to climate change has been determined. Moreover, as a result of a possible materialisation of these risks, an increase in climate control expenses (OpEx) could be expected, as well as the potential future need to incur investments to extend runways at some airports that avoid operational restrictions or to protect the facilities from extreme rainfall or sea level rises (CapEx), among others.

Transition risks: Aena has carried out an assessment of the materiality of the risks identified, selecting, through the value of their criticality in the different time horizons, the following risks that it considers to be a priority due to its potential materialisation and impact:

- **Regulatory and legal risks:**
 - Fit for 55 EU regulatory package.
 - Flight ban with high-speed rail (AVE) alternative.
- **Technology risks:**

- New sustainable technologies and fuels at airports .

- **Market risks:**

- Economic recession because of the energetic crisis.

- **Reputational risks:**

- Stigmatisation of the sector.

Opportunities: Based on the assessment of climate risks, the following opportunities have been detected related to the decarbonization of the sector:

- Renewal of its own sustainable fleet for the use of alternative fuels: electric and use of HVO.
- Renewable electricity production for self-consumption.
- Development of Efficient Airport Operations Management technologies that enable more efficient, competitive, safe and sustainable traffic.
- Multimodal hubs to improve the customer experience: connections from airports to train stations/ports and sustainable shuttles between terminals.
- Development of services adapted to changes in consumer preferences resulting from climate change.
- Deployment of low-emission services: installation of charging points at airports.

⁷⁰ 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. For more information, see the section related to risks and its management of this report.

⁷¹ 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 2°C of global warming will not be exceeded.

- Scenario SSP1-2.6: SSP scenarios consider both the emissions level and the Shared Socioeconomic Pathway (*). The "1" refers to the socioeconomic trend, in this case, sustainable development, and the "2.6" to the approximate level of radiative forcing (**) for the year 2100. This scenario shares similarities with RCP2.6 in terms of climate projections, although it encompasses a wider range of future greenhouse gases and atmospheric pollutants. These types of scenarios are considered in the IPCC Sixth Assessment Report. To analyze transition risks, the Net Zero Emissions by 2050 (NZE) climate scenario from the International Energy Agency has been used, which is a scenario that limits global warming to 1.5°C by 2100. The time horizons correspond to the current situation, as well as to 10 and 30 years.

⁷² Looking towards future development, the analysis of climate risks can be complemented with the quantification of the potential financial impact on Aena, caused by critical risks, on revenues, operating costs, capital investments, and share capitalization, among others, depending on the type of risk, whether it be physical or transitional.

On the other hand, in the United Kingdom, a climate change adaptation report has been carried out for London-Luton Airport, based on an exercise to identify physical risks, transition risks and climate-related opportunities related to the business activity, resulting in an assessment of the potential impact on its assets, operations and strategic functions⁷³:

- **Physical risks:** heavy rain and flooding of drainage infrastructure, increased temperature affecting working conditions, increased temperature affecting take off weight, cooler conditions increasing de-icing requirements and decreased visibility that may affect airport operations.
- **Transition risks:** compliance with regulatory requirements (as well as net zero emissions 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 United Kingdom to take a leading role in guiding the aviation sector. With projections of longer summer seasons, the frequency of fog and low temperatures is expected to decrease, leading to better conditions for operations. Operational improvements could lead to a greater use of positive offers with the latest technologies and improved infrastructure.

Based on the above, the Company is currently preparing the corresponding Company Action Plan based on the adaptation measures detected in the risk assessment and the mitigation measures, which would complement the CAP and the Net Zero Roadmap, all of which make up Aena's comprehensive response to the management of risks and opportunities arising from climate change⁷⁴:

- **Mitigation measures:** these consist of reducing the negative environmental impacts resulting from airport activity and developing environmentally friendly modes of transport. The aim is to encourage airlines to collaborate with other stakeholders, promoting the reduction of greenhouse gases released into the atmosphere and contributing to the mitigation of climate change.

- **Adaptation measures:** these consist of actions for the adaptation of airport activities and infrastructure to the foreseeable evolution of climate variables, the possible impacts of climate change and the possible effects on airport infrastructures and operations, detected in the Physical Climate Risk Study and in the Strategic Environmental Assessment of the airport Master Plans. This analysis covers intermediate time horizons up to the foreseeable development horizon.⁷⁵

Likewise, procedures are available to minimise the impact of emergency situations⁷⁶ 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 meteorological situations that may affect operations, such as the Winter Action Plan for ice and snow contingencies, better known as the Winter Plan, active at the 21 Spanish airports in the network that, during the winter months, are at risk of suffering adverse weather conditions. The other facilities in the network maintain a level of response to this type of inclement weather that varies according to their operational needs and geographical location. For the Winter Plan, Aena establishes the procedures to be followed by airports in the event of this type of contingency with the aim of minimising the impact of ice and snow on air traffic at airports, where safety is the priority at all times.

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 United Kingdom, 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.

⁷³ The risks and opportunities have been identified and assessed using a standardised risk assessment framework that considers the impact thresholds, the probability of events and the severity of the impacts. The reference framework has been expanded to include a high-level assessment of transition risks at London Luton Airport and consider current best practices by progressively introducing the TCFD guidelines. For more details, see the London-Luton Airport Climate Change Adaptation Report 2021 1 (link available in 'Links of Interest').

⁷⁴ For more detailed information, please refer to the Climate Action Plan of Aena Spain and the Net Zero Roadmap of London Luton Airport, whose links are available in the "Useful Links" section.

⁷⁵ Specifically, at the airports of Aena's subsidiaries in Brazil, a series of adaptation measures have been concluded to be implemented to minimize the detected risks and their potential impacts. These measures are related to the adjustment of the Master Plans of the airports in a coordinated manner, and their inclusion in the planned works in the upcoming time horizon.

⁷⁶ As there are specific emergency plans available for each airport, the local team is responsible for this. 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.

IN SPAIN CLIMATE RISKS AND OPPORTUNITIES ANALYSIS



Physical risks

Extreme temperatures
Heatwaves
Extreme rainfall
Water stress and droughts
River flooding
Increased sea levels



Transition risks

Regulatory and legal risks:

Fit for 55 EU regulatory package.
Flight ban with high-speed rail (AVE) alternative.

Technology risks:

Sustainable new technologies and fuels at airports.

Market risks:

Economic recession due to energy crisis.

Reputational risks:

Stigmatisation of the sector.



Opportunities

- Renewable of its own sustainable fleet for the use of alternative fuels: electric and use of HVO.
- Renewable electricity production: photovoltaic plan.
- Development of Efficient Airport Operations Management technologies that enable more efficient, competitive, safe and sustainable traffic.
- Multimodal hubs to improve the customer experience: connections from airports to train stations/ports and sustainable shuttles between terminals.
- Development of services adapted to changes in consumer preferences resulting from climate change.
- Deployment of low-emission services: installation of charging points at airports.

IN THE UNITED KINGDOM - LONDON-LUTON AIRPORT CLIMATE RISKS AND OPPORTUNITIES ANALYSIS



Physical risks

Reduced visibility (fog, cloud cover, etc.)
Heatwaves
Cold snaps and frost
Flooding
Intense rainfall



Transition risks

Policies

Policies that restrict actions that contribute to the adverse effects of climate change or limit the capacity of the sector.

Technological

Competitiveness of the airport.
Technology solutions involving risky investments.

Market

Changes in demand and airport capacity.
Changes in market segments and competition from low-carbon emissions options.

Reputational

Change in customer or community perception of the contribution to the transition to a low carbon economy.



Opportunities

- Empowering the role of a leader in the aviation sector.
- Improved operating conditions, due to less frequent extreme minimum temperatures and prolongation of the summer season in some destinations.
- Implementation of new technologies.

2.2.4. Metrics.

Carbon footprint

(GRI 3-3; 305-1; 305-2; 305-3; 305-4; 305-5)

Of the total greenhouse gas (GHG) emissions worldwide, approximately 2.5% come from the aviation sector. Within this percentage, around 80% of CO₂ emissions originate from flights over 1,500 km in distance, for which there is no practical alternative transportation.⁷⁷ Regarding the contribution of the aviation sector to GHG emissions in Europe, it amounts to 4%, and if we consider only the transportation sector, it constitutes approximately 14.4% compared to other modes of transportation. On the other hand, 95% of these emissions are generated by aircraft, while the remainder is attributable to direct airport control, meaning activities carried out at airport facilities involving numerous agents (both own activities and those of the value chain).

The Aena Group monitors its carbon footprint to assess the effectiveness of the measures implemented. In this way, Spain's carbon footprint (scope 1 and 2) has been reduced by 70% with respect to the base year 2019⁷⁸, exceeding the target of achieving a 61% reduction in greenhouse gas (GHG) emissions set in the Climate Action Plan.

In terms of Scope 3 emissions from Spanish airports, a 12.69% reduction has been achieved compared to 2019 thanks to the implementation of collaboration initiatives with third parties and efficiency in operations.

On a consolidated level, Scope 1 emissions reached 17,380.97 tCO₂ in 2023 (21,087.76 tCO₂ in 2022) and, with regard to Scope 2 (Market Based) emissions, these have totalled 26,566.42 tCO₂ in 2023 (30,428.92 tCO₂ in 2022). This reduction is thanks to the purchase of electricity with a guarantee of renewable origin due to the implementation of mitigation and efficiency measures.

Despite the traffic volume recovering in 2023, surpassing the number of passengers in 2019 and the addition of the 11 new airports from Aena's subsidiary in BOAB, the Aena Group has managed to reduce its scope 1 and 2 emissions thanks to the implementation of mitigation and efficiency measures and the purchase of electricity with a renewable origin guarantee.

Evolution of GHG emissions (equivalent tonnes of CO₂) (GRI 305-5)

Intensity of GHG emissions, kg CO₂e/ATU Scopes 1 and 2 (Market Based) (GRI 305-4)

	Spain	United Kingdom	Brazil	Total Consolidated
2021	0.16	0.32	0.13	0.17
2022	0.09	0.09	0.17	0.10
2023	0.08	0.08	0.03	0.07

Note:

CO₂e includes CO₂, CH₄ and N₂O calculation.

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)

⁷⁷ Source: ATAG.

⁷⁸ This base year is chosen for the reason that during the preparation of the CAP in 2021, 2019 was the last historical year that was most standardised with respect to the number of operations (during which 136,630.5 tn CO₂e were issued). At London-Luton Airport in the United Kingdom, 2019 was selected for the same reason, with the corresponding emissions for that year for Scope 1 and 2 being 7,947 tCO₂e

Carbon footprint (GRI 305-1; 305-2; 305-3)^(A)

	2021				2022				2023			
	Spain	United Kingdom	Brazil	Total Consolidated	Spain	United Kingdom	Brazil	Total Consolidated	Spain ^(F)	United Kingdom ^(G)	Brazil ^{(H)(I)(J)}	Total Consolidated
Direct emissions (scope 1)^(B)	14,313.60	2,032.20	558.60	16,904.40	17,603.88	2,256.88	1,227.01	21,087.77	14,309.09	2,248.53	823.35	17,380.97
Indirect emissions (scope 2) Market Based^(C)	31,870.90	1,332.00	2,246.40	35,449.30	26,974.16	0.00	3,454.76	30,428.92	26,263.37	0.00	303.05	26,566.42
Emissions (scope 3)^{(D)(E)}	2,242,058.00	93,845.00	-	2,335,903.00	3,280,029.40	-	-	3,280,029.40	3,375,955.11	268,462.70	571,902.01	4,216,319.82

The commercial areas at Spanish airports (concession companies) 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.

(A) To calculate Aena's emissions, the operational control approach according to the GHG Protocol is followed and the following sources have been used for the emission factors, these being updated each year:

- Scope 1: MITERD, EMEP/EEA (Corinair), US EPA and US FAA.

- Scope 2: REE and 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, emissions and GWP factors are obtained from DEFRA.

The calculation methodology is based on the GHG Protocol (WRI&WBCSD)

Sources for fuel densities:

– 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 (PCI) and emission factors: MITERD ("Emission factors: Carbon footprint registration, compensation and carbon dioxide absorption projects", data for the corresponding year and National Inventory of Greenhouse Gases Greenhouse (1990-2021), ed. 2023). See chapter "Links of interest."

(B) Direct emissions or scope 1. Direct emissions from sources or processes and activities controlled by Aena at airports. The sources of GHG emissions are:

• Stationary combustion. Emissions generated by generating sets, portable generators, boilers, fire extinguishing service practices (SEI) and auxiliary pumps of fire water tanks.

• Combustions from mobile sources. Emissions from vehicles belonging to airports, both light and heavy.

Refrigerant gases are not included because they are not representative of the total footprint.

(C) The calculation of emissions calculated for Scope 2 has been carried out according to market criteria (market based).

Indirect emissions or scope 2. Indirect emissions that are 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.

(D) Indirect emissions of scope 3. Indirect emissions from third parties that are produced by the LTO cycle (landing and takeoff of aircraft of airlines operating at airports), APUs (Auxiliary Power Units that supply energy to aircraft when are on land), vehicles and machinery that provide Handling and other services (land access, employee travel, etc.). Indirect emissions of scope 3 of the Aena Group according to categories established in CDP (Carbon Disclosure Project).

(E) In 2023, a series of modifications have been introduced in the scope 3 calculation methodology for its adaptation and improvement in accordance with the GHG Protocol recommendations, according to the guide "The Corporate Value Chain (Scope 3) Accounting and Reporting Standard". These changes affect the calculation of categories 2 and 15.

(F) In 2023, Aena's biogenic CO₂e emissions reached a value of 595.96 corresponding to the use of HVO, biogas and biopropane derived from biomass.

(G) In the United Kingdom, in 2023, the Scope 2 (Market Based) emissions at London-Luton Airport are 0 as it has 100% of its electricity purchase with a guarantee of renewable energy and does not have to purchase heating-cooling energy.

(H) Due to the recent entry into operation of the airports of Aena's subsidiary in Brazil, BOAB, for the purpose of calculating these indicators and all those related to the Scope 1 footprint, all the consumption data of fuels for these airports, as they do not have them. For these purposes, for each of the infrastructures, the consumption of an airport of the Aena ANB subsidiary with a similar number of ATUs has been taken as a reference, subsequently adjusting the values to the real monthly ATUs of each of the airports. Additionally, and since the proportion of diesel/ gasoline is not available, the value of this percentage in ANB has been considered.

(I) Due to the recent entry into operation of the airports of Aena's subsidiary in Brazil, BOAB, the electricity consumption data of these airports have been estimated, when the real data could not be collected, for the purpose of the calculation of these indicators and all those related to the Scope 2 footprint. For these purposes, consumption from previous months has been taken into consideration, for those cases in which they were available, and otherwise, it has been estimated based on to the volume of passengers at the same airport.

(J) The figure corresponding to the tons of CO₂eq of category 11 of scope 3 of the airports of the Aena subsidiary in Brazil ANB has been estimated from the value of this category in airports with similar characteristics of Aena in Spain and adjusted their equivalence according to the number of ATUs. Likewise, due to the recent entry into operation of the airports of Aena's subsidiary in Brazil, BOAB, the Scope 3 CO₂e emissions corresponding to these airports have also been estimated. For these purposes, the emissions obtained at ANB airports and the period of BOAB's operation with Aena and its ATUs have been taken into consideration.

The carbon footprint of Aena's (Spain) activities for the years 2019, 2020, 2021, and 2022 has been verified by accredited independent entities (SGS and Bureau Veritas) with a level of limited assurance, consistent with the scopes, objectives, and criteria of UNE-EN ISO 14064-3:2019.

The carbon footprint for the year 2023 has been verified by Deloitte S.L., also with a level of limited assurance, consistent with the scopes, objectives, and criteria of UNE-EN ISO 14064-3:2019.



Direct GHG emissions (Scope 1) (GRI 305-1)

	2021				2022				2023			
					Spain							
	CO ₂	CH ₄	N ₂ O	CO ₂ e	CO ₂	CH ₄	N ₂ O	CO ₂ e	CO ₂	CH ₄	N ₂ O	CO ₂ e
Diesel	7,950	0.2	0.2	8,015.9	9,474.89	0.97	0.17	9,545.56	7,825.8993	0.7354	0.1398	7,883.5456
Petrol	138.5	0.04	0.01	142.2	138.26	0.03	0.002	139.53	95.1935	0.0661	0.0017	97.4992
Natural gas	5,933.8	0.1	0.1	5,967.8	7,751.05	0.615	0.0123	7,771.53	6,199.8826	0.545	0	6,215.1438
Propane	35.5	0.0005	0.002	36.2	36.37	0	0	36.37	25.5465	0	0	25.5465
Kerosene	149.9	0.004	0.005	151.5	110.22	0.015	0.0009	110.9	58.4927	0.0081	0.0005	58.8517
HVO	0	0	0	0	0	0	0	0.0	22.7577	0.0037	0.0189	27.9
Biomethane	0	0	0	0	0	0	0	0.0	0	0.0011	0.0013	0.4
Biopropane	0	0	0	0	0	0	0	0.0	0	0	0	0.2
TOTAL	14,207.7	0.4	0.3	14,313.6	17,510.79	1.62	0.18	17,603.9	14,227.8	1.4	0.2	14,309.1
	United Kingdom											
Fuel/diesel	629	0.2	8	637.2	930.09	0.28	13.04	943.41	913.62	0.11	12.12	925.85
Natural gas	1,386	2	1	1,389	1,304.69	1.79	0.72	1,307.19	1,314.4	2.02	0.64	1,317.06
Propane	6	0.005	0.004	6	6.27	0	0	6.27	0	0	0	0
LPG	0	0	0	0	0	0	0	0	4.99	0	0	4.99
HVO	0	0	0	0	0	0	0	0	0.63	0	0	0.63
TOTAL	2,021	2.2	9	2,032.2	2,241.05	2.07	13.76	2,256.87	2,233.64	2.13	12.76	2,248.53
	Brazil											
Diesel	526.19	0.01	0.01	526.2	1,160.39	0.08	0.065	1.178	773.97	0.05	0.04	774.06
Petrol	32.42	0.01	0.002	32.4	47.11	0	0	49	35.34	0.01	0	35.35
Propane	0	0	0	0	0	0	0	0	0	0	0	0
Kerosene	0	0	0	0	0	0	0	0	0	0	0	0
TOTAL	558.64	0.02	0.012	558.64	1,207.5	0.08	0.065	1,227	809.31	0.06	0.04	809.41



Indirect GHG emissions (Scope 2) MARKET - BASED (GRI 305-2)

	2021				2022				2023			
	Spain											
	CO ₂	CH ₄	N ₂ O	CO ₂ e	CO ₂	CH ₄	N ₂ O	CO ₂ e	CO ₂	CH ₄	N ₂ O	CO ₂ e
Electric power	0.0	-	-	0	0.0	-	-	0	0.0	-	-	0
Heating and cooling energy	31,870.9	-	-	31,870.9	26,974.16	-	-	26,974.16	26,263.37	-	-	26,263.37
TOTAL	31,870.9	-	-	31,870.9	26,974.16	-	-	26,974.16	26,263.37	-	-	26,263.37
	United Kingdom											
Electric power	1,244	-	-	1,244	-	-	-	-	0.0	-	-	0
Heating and cooling energy	-	-	-	-	-	-	-	-	-	-	-	-
TOTAL	1,244	-	-	1,244	-	-	-	-	-	-	-	-
	Brazil											
Electric power	2,246.4	-	-	2,246.4	3,454.76	-	-	3,454.76	303.05	-	-	303.05
Heating and cooling energy	-	-	-	-	-	-	-	-	-	-	-	-
TOTAL	2,246.4	-	-	2,246.4	3,454.76	-	-	3,454.76	303.05	-	-	303.05

Scope 3 emissions⁷⁹

(GRI 305-3)

The origin of the most relevant 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.
- Acquisition of goods and services.
- Downstream transportation and distribution, which includes the movement of passengers to or from Aena airports as well as the distribution of goods to the nearest transportation hub.

Of the above, the emissions derived from the Landing and Take Off (LTO) cycle of aircraft are the most important to Aena in Spain, and make up approximately 64% of the total emissions (55% in 2022). This data covers emissions from the taxiing, climb-out and take off manoeuvres of aircraft on all flights originating at network airports, as well as emissions generated in the approaching, landing and taxiing manoeuvres of aircraft on all flights landing at Aena airports.

Aircraft LTO cycle emissions are calculated using the latest available Emissions Inventory of the Ministry for the Ecological Transition and Demographic Challenge of Spain. Additionally, the emissions of auxiliary power units (APUs) on the ground are obtained by modelling the actual operations of aircraft at airports. The emissions of handling agents have been provided by the main 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. Emissions due to the production of goods and services purchased or acquired by Aena, as well as the production of capital goods purchased or acquired, are calculated using an input/output economic analysis using economic data from the reporting period and relevant emission factors. Emissions related to passenger transportation to or from airports are calculated based on passenger numbers, statistics of transportation modes used, distances from airports to corresponding city centers, and information from the national vehicle fleet by Autonomous Community. On the other hand, emissions related to the distribution of goods from airports are calculated based on cargo traffic data and the distance from airports to the nearest transportation hubs.

For the United Kingdom, for London-Luton Airport the most relevant sources of Scope 3 emissions are those directly related to aviation (52%) and passenger access to the airport⁸⁰. Aviation-related emissions include those due to the LTO cycle and the testing of APUs and aircraft engines. In addition to these emissions, those related to passenger mobility, waste and the supply chain are calculated.

For the calculation of LTO emissions, data from flight records, fuel consumption and combustion improvements due to fleet renewal are used. On the other hand, emissions from APUs are modelled and emissions from engine testing are calculated using data derived from records and invoicing.

Finally, for calculating emissions from surface access, emission factors from the central government for public and private transportation modes in the United Kingdom are used.

In the case of the airports of Aena's subsidiaries in Brazil, although the calculation methodology has been the same as that used for calculating scope 3 emissions in Spanish and UK airports, a series of estimations have been made due to the lack of primary data available at the time of closing this report, for the calculation of categories 1, 2, 7, 8, 9, and 11.⁸¹

2.2.5. Efficiency in the use of energy and use of renewable energy

(GRI 3-3)

The Aena Group carries out various actions aimed at reducing energy consumption at its facilities. These include those related to increasing self-consumption, with the use of renewable energies (photovoltaic plan, geothermal energy, etc.) and others aimed at improving energy efficiency and optimising energy-intensive processes. All of them contribute to reducing Group'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

All energy from renewable sources, either generated or acquired, is distributed both in the activity of the airports and to the licensees sharing in the facilities.

⁷⁹ Regarding the excluded Scope 3 categories, the reasons for exclusion are as follows:

- Category 4: Upstream transportation and distribution: Aena does not contract logistics services, so any expenses related to the transportation of products purchased by Aena cannot be separated and are already included in Category 1.
- Category 12: Waste from products sold by the organization: Aena does not produce products, so there are no associated waste and therefore this category is not applicable.
- Category 13: Leased assets to the organization: All assets leased by Aena to other entities (concessionaires) are assumed as owned by Aena and have already been reported in other categories.
- Category 14: Franchises: Aena does not have franchises, so this category is not applicable.

⁸⁰ In the EINF 2022, this information was not reported because it was not available at the time of publication. However, it is currently available in the Sustainability Report of London Luton Airport, which can be accessed at: (<https://www.london-luton.co.uk/corporate/sustainability/reports-and-performance>).

⁸¹ Categories 1 and 2: Expenses for the Aena subsidiary ANB have been estimated using the value of ATUs (Airport Terminal Units) for the year 2022. Similarly, the value of these categories for the BOAB subsidiary has been estimated based on those of the ANB subsidiary. Categories 7, 8, 9, and 11: Estimates have been made based on the available data in 2022 and the ATU ratio for 2022/2023. Similarly, the value of these categories for the BOAB subsidiary has been estimated based on those of the ANB subsidiary.



Regarding Aena's photovoltaic energy deployment Plan, in 2023, the design and execution of 2 large photovoltaic solar parks have been awarded at Adolfo Suárez Madrid-Barajas and Josep Tarradellas Barcelona-El Prat airports. The Madrid installation will feature over 235,000 photovoltaic modules and generate 212 GWh of energy annually, equivalent to the average consumption of 65,000 households per year. This will avoid the estimated emission of 27,000 tons of CO₂ annually into the atmosphere over its estimated 25-year lifespan. The installation at the Barcelona airport will have 20,800 photovoltaic modules, generating 19.90 GWh of energy annually, equivalent to the average consumption of 6,000 households per year, with an estimated emission savings of 2,300 tons of CO₂ annually during its lifespan.

The electricity consumption of Aena's facilities in Spain and the United Kingdom comes from 100% renewable sources, and 33% in the case of Brazil (35% in 2022).

Feasibility studies have also been carried out for geothermal/aerothermal facilities at the three main Spanish airports in the network to cover 100% of the heating demand and part of the cooling demand. The study has been completed with the geothermal response tests at Palma de Mallorca airport and will be carried out in 2024 at Adolfo Suárez Madrid-Barajas Airport

In the United Kingdom, London-Luton Airport has planned to develop its own photovoltaic plant by 2023, which, with an output of at least 10 GWh in the first year of generation, will supply a minimum of 25% of the Airport's electricity needs by 2026. At the moment, airports in Brazil do not have projects related to renewable energy self-consumption.

Measures aimed at improving energy efficiency

In order to reduce energy consumption at the network's airports, a process is being developed to continuously identify possible areas for improvement. Based on this, a series of measures have been carried out aimed at adapting and controlling energy consumption in the actual operation of the airports, and technological improvements in lighting and air conditioning (presence detectors, replacement with LEDs, renovation of air conditioning facilities and automatic lighting regulation). Among the actions carried out by the Company in 2023, it is worth highlighting the following:

- The development of a pilot project in 2022 in the boarding area of terminal 2 at Valencia Airport for the installation of environmental sensors that allow the operation of the cooling and heating production systems to be controlled. Through these measures, energy savings of between 15% and 25% have been achieved. Based on these results, during 2023 the feasibility has been analysed for its definitive implementation at more airports.

- At London-Luton Airport in the United Kingdom, lighting has been upgraded with energy-efficient LED technology, which has achieved around 90% 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.
- At Aena's airport facilities in Brazil, operational improvements and technological replacements are made in terms of energy consumption, as a result of the execution of works.

Likewise, in order to properly manage energy consumption, Aena has provided smart meters to some of its facilities and across its property portfolio. For example, the terminal at Adolfo Suárez Madrid-Barajas Airport has an energy management platform that allows a systematic analysis of consumption and, based on the results, develops measures to improve the energy efficiency of the terminal equipment.

Moreover, Aena conducts energy audits at airports to obtain information on the control and monitoring systems for energy consumption at its facilities (paying special attention to those related to lighting and HVAC systems⁸², the corresponding possible aspects for improvement and, where appropriate, to develop action plans.

At Aena's subsidiaries in Brazil, a project for energy efficiency diagnostics is being developed, to be implemented in 2024.

With regard to the energy efficiency certifications of facilities, the terminal buildings at Spanish airports have the corresponding certificates, which will be renewed during the first quarter of 2024. It should also be noted that in the United Kingdom, London-Luton Airport has renewed its energy management system certification in 2022 based on the ISO 50.001 standard, which is still in force today.

⁸² An audit includes the assessment of both technical and economic aspects that influence the energy consumption of all facilities and any other energy-consuming equipment and its main objective is to understand how such consumption is managed, detect weaknesses and propose improvement measures that reduce consumption and improve energy efficiency.

The energy savings achieved through the implementation of energy efficiency measures at the following Spanish airports amounted to 36,134 GJ.

ENERGY EFFICIENCY IN 2023 (GRI 3-3)





















Some relevant related actions



HVAC Systems



Lighting

Airport	Action	Description
Adolfo Suárez Madrid/Barajas	 HVAC Systems	Supply and assembly with installation of new chiller, supply and assembly with installation of new air conditioner with CE1 humidifier
Adolfo Suárez Madrid/Barajas	 HVAC Systems	Replacing air handling units (UTAs) in the Millennium Zone.
Adolfo Suárez Madrid/Barajas	 HVAC Systems	Replacing the East TWR air compressors.
Adolfo Suárez Madrid/Barajas	 HVAC Systems	Replacing T4 Terminal CGA Precision HVAC Equipment.
Adolfo Suárez Madrid/Barajas	 Lighting	Replacing fluorescent lighting with LED lighting in the signage installed in T4 and T4S.
Adolfo Suárez Madrid/Barajas	 Lighting	Redistribution and integration of the lighting DALI
Adolfo Suárez Madrid/Barajas	 Lighting	Efficient supply and installation in T4
Adolfo Suárez Madrid/Barajas	 Lighting	Installing lighting and guidance systems in car parks P1, P2 and P4
Alicante-Elche Miguel Hernández	 HVAC Systems	Installing VHS fans.
Alicante-Elche Miguel Hernández	 HVAC Systems	Improving energy efficiency in UTAs.
Alicante-Elche Miguel Hernández	 HVAC Systems	Improving condensates in fan coils and installation of calorimeters
Alicante-Elche Miguel Hernández	 HVAC Systems	Improving forced extraction in terminal bathrooms
Alicante-Elche Miguel Hernández	 HVAC Systems	Supply and installation of solar filters in the control tower
Bilbao	 HVAC Systems	Replacement of the second heating boiler in the Terminal building
Federico García Lorca Granada-Jaén	 HVAC Systems	Comprehensive renovation of the technical block building.
Federico García Lorca Granada-Jaén	 HVAC Systems	Efficient HVAC in the technical block building.
La Palma	 HVAC Systems	Adaptation of cold production for the air conditioning of the passenger Terminal.
Palma de Mallorca	 HVAC Systems	Renovation of HVAC equipment.
Palma de Mallorca	 HVAC Systems	Replacement of HVAC equipment.
Tenerife Norte	 HVAC Systems	Installation of sunscreens in the curtain wall of the island boarding area.

Note: Energy efficiency measures of this nature have not been carried out at the airports of Aena's subsidiaries in Brazil and the United Kingdom.



Madrid-Cuatro Vientos	Lightning	Change of lighting to LED technology.
Fuerteventura	Lightning	Change of lighting to LED technology.
Gran Canaria	Lightning	Change of lighting to LED technology.
César Manrique-Lanzarote	Lightning	Change of lighting to LED technology.
Valencia	Lightning	Change of lighting to LED technology.
Palma de Mallorca	Lightning	Change of lighting to LED technology.
Salamanca	Lightning	Change of lighting to LED technology.
Tenerife Norte-Ciudad de La Laguna	Lightning	Change of lighting to LED technology.
Tenerife Sur	Lightning	Change of lighting to LED technology.
Tenerife Norte-Ciudad de La Laguna	Lightning	Change of lighting to LED technology.
Josep Tarradellas Barcelona-El Prat	Lightning	Change of lighting to LED technology.
Girona-Costa Brava	Lightning	Change of lighting to LED technology.
Melilla	Lightning	Change of lighting to LED technology.
Pamplona	Lightning	Change of lighting to LED technology.
Almería	HVAC Systems	Renovation of HVAC production equipment
Bilbao	HVAC Systems	Thermal and acoustic insulation improvements on the ground floor of the terminal building
Fuerteventura	HVAC Systems	New HVAC on the second floor of the technical block
Ibiza	HVAC Systems	Improving the energy efficiency of the HVAC installation
Málaga	HVAC Systems	Replacing HVAC equipment in the pre-jet bridges of pier D in T3
Málaga	HVAC Systems	Adaptation of dependency
Tenerife norte	HVAC Systems	New air conditioning system for the business centre
Tenerife sur	HVAC Systems	Replacing the air compressors in terminal 1
Valladolid	HVAC Systems	New waterproofing of the terminal building
Valladolid	HVAC Systems	Supply and installation of new windows in the fire and rescue service building
Vigo	HVAC Systems	Renovation of the HVAC systems on three jet bridges
Alicante-Elche Miguel Hernández	Lightning	Lighting control in various areas of the terminal
Alicante-Elche Miguel Hernández	Lightning	Change of lighting to LED technology
Alicante-Elche Miguel Hernández	Lightning	Change of lighting to LED technology in the technical block
Josep Tarradellas Barcelona-El Prat	Lightning	LED Lighting in the Power Station
Ibiza	Lightning	Change of lighting to LED technology
Ibiza	Lightning	Improving lighting on the commercial aviation apron
Ibiza	Lightning	New airfield nomenclature
La Palma	Lightning	Regeneration of the runway surface and adaptation of the strip
Salamanca	Lightning	Adaptation of the mega towers
Santander	Lightning	Improved lighting in TWR
Sevilla	Lightning	Installation of new LED lighting on the runway axis
Sevilla	Lightning	Legalisation of the fire brigade's electrical installation and the falconry



2.2.6. Renewable Energies

(GRI 3-3)

The use of renewable energies (wind, photovoltaic, solar thermal, and geothermal) is crucial to achieving the goal of making Aena a carbon-neutral airport operator in Spain by 2026 and laying the foundation for achieving net zero emissions by 2040 across the entire Group. This allows the company to reduce its dependence on fossil fuels and consequently decrease greenhouse gas emissions.

In 2023, as part of the deployment of photovoltaic energy in Spanish airports, the design and execution of the photovoltaic plant at Adolfo Suárez Madrid-Barajas Airport, with a capacity of 120 MWn, has been awarded. Additionally, the corresponding photovoltaic plant for Josep Tarradellas Barcelona-El Prat Airport has been tendered, complementing the existing renewable installations at Spanish airports.

% Electricity with renewable source guarantee			
	Spain	United Kingdom	Brazil
2021	100%	100%	84.1%
2022	100%	100%	35%
2023	100%	100%	85.4%

Renewable energy facilities in Spain (GRI 302-1)				
		2021	2022	2023
Energy generated from renewable sources (GJ)	Wind power	7,594	6,878	6,768
	Solar power/photovoltaics	15,918	17,784	21,362
	Solar thermal energy	0	0	0
	Geothermal	213.86	88	117
	Subtotal	23,726	24,750	28,247
Energy consumed from renewable sources (GJ)	Wind power	7,067	6,421	6,480
	Solar power/photovoltaics	15,824	17,688	21,260
	Solar thermal energy	0	0	0
	Geothermal	214	88	117
	Subtotal	23,105	24,198	27,857

**Energy sold from renewable sources (GJ)**

Wind power	527	457	289
Solar power/photovoltaics	94	95	102
Solar thermal energy	0	0	0
Geothermal	0	0	0
Subtotal	621	552	391

Sources for fuel densities:

- Royal Decree 61/2006, of January 31, which determines the specifications for gasoline, diesel, fuel oils, 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 for gasoline, diesel, the use of biofuels, and the sulfur content of fuels for maritime use.
- Iberian Association of Natural Gas for Mobility
- GHG Protocol

Sources for lower heating values (LHV):

- Ministry for Ecological Transition and Demographic Challenge (MITERD): "Emission Factors: Carbon Footprint Register, Compensation, and Carbon Dioxide Absorption Projects," data for the corresponding year
- Institute for Diversification and Energy Saving (IDAE): Table of lower heating values of the main energy sources (see "Useful Links" chapter).

Reduction of emissions thanks to renewable energy facilities and energy efficiency measures⁸³

(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 origin, which has avoided the emission of 106,920 of tCO₂ during fiscal year 2023 (145,532 of tCO₂ in 2022). In Aena's subsidiaries in Brazil, the implementation of renewable self-consumption installations is not considered, but there is a plan to progressively increase the purchase of renewable energy with guaranteed origin each year.

Emissions avoided due to the Company's own renewable energy facilities and energy efficiency, as well as to the purchase of electricity from a renewable source (tonnes of CO₂e)

	2022				2023			
	Spain	United Kingdom	Brazil	Total	Spain	United Kingdom	Brazil	Total
Tonnes of CO₂e	139,428.00	4,199.63	1,905.00	145,532.63	98,591.40	6,559.72	1,768.78	106,919.90

Note: The CO₂ calculation is obtained from the relationship established between the electricity generated by the indicated facilities and the estimated CO₂ applicable.

Source of the electrical factor: REE

In 2022 and 2023, the location emission factor (LB) was applied according to actual %GdO

⁸³In the United Kingdom, no implementation measures have been developed to date for self-consumption renewables, although it falls within its 2030 planning.



Reduction in GHG emissions (Scope 1)

	2021		2022		2023	
Aena facilities	kWh generated	tCO ₂ e avoided	kWh generated	tCO ₂ e avoided	kWh generated	tCO ₂ e avoided
Cogeneration plant at Bilbao Airport (thermal energy)	482,015	57	386,887	55,3	48,471	4.8
Reus Airport geothermal power plant	59,407	7	24,460	3,5	32,568	3.3
Total (Scope 1)	541,422	64	411,348	58,8	81,039	8.1

Reduction in GHG emissions (Scope 2)

	2021		2022		2023	
Aena facilities	kWh generated	tCO ₂ e avoided	kWh generated	tCO ₂ e avoided	kWh generated	tCO ₂ e avoided
Wind turbines at La Palma Airport	2,109,511	249	1,910,688	273.2	1,880,123	187.7
Photovoltaic modules at Menorca Airport	64,591	8	149,864	21.4	846,590	84.5
Photovoltaic modules at Ibiza Airport	78,725	9	55,555	7.9	83,101	8.3
Photovoltaic modules at Alicante-Elche Airport	38,635	5	46,965	6.7	47,405	4.7
Photovoltaic modules at Adolfo Suárez Madrid-Barajas Airport	15,465	2	0	0	37,000	3.7
Photovoltaic modules at Madrid-Cuatro Vientos Airport	20,323	2	20,657	3	20,929	2.1
Photovoltaic modules at La Palma Airport	30,535	4	55,193	7.9	93,377	9.3
Photovoltaic modules at Valencia Airport	31,800	4	29,482	4.2	31,547	3.1
Photovoltaic modules at Vigo Airport	11,195	1	10,336	1.5	1,940	0.2
Self-consumption photovoltaic plant at Tenerife Sur Airport	1,752,063	207	1,473,045	210.6	1,817,387	181.4
Self-consumption photovoltaic plant at César Manrique-Lanzarote Airport	555,160	66	1,485,472	212.4	1,276,867	127.5
Self-consumption photovoltaic plant at Fuerteventura Airport	1,823,289	215	1,613,305	230.7	1,668,568	166.6
Self-consumption photovoltaic plant at Gran Canaria Airport	'--	'--	'--	'--	9,084	0.9
Cogeneration plant at Bilbao Airport (electricity)	342,368	40	269,888	38.6	23,726	2.4
Total (Scope 2)	6,873,659	811	7,120,449	1,018.2	7,837,644	782.4



Main energy consumption indicators

(GRI 302-4)

In 2023, Aena's self-consumption of renewable energy amounts to 27,857 (24,198 GJ in 2022), an increase of 15% compared to the previous fiscal year. On a consolidated level, renewable energy consumption (purchase and production) totalled 3,740,860.81 0 in 2023 (3,519,485 GJ in 2022).

Energy intensity⁸⁴

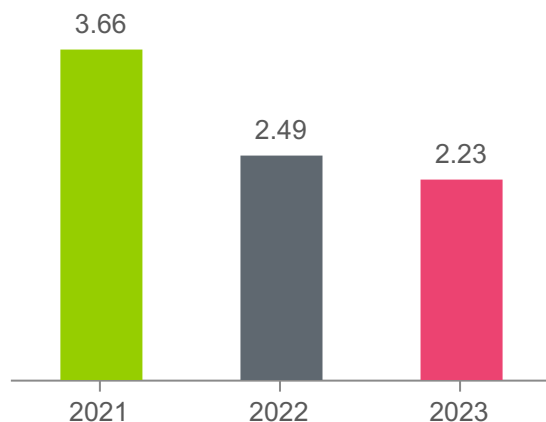
(GRI 302-3)

kWh/ATU⁸⁵

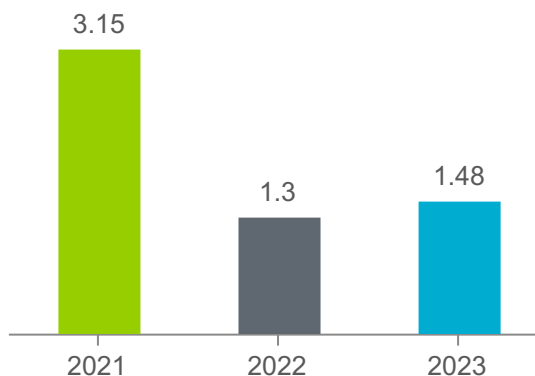
The Group's total energy consumption in fiscal year 2023 was 4,676,421 (4,566,879 GJ⁸⁶ in 2022) which represents an increase of 2% compared to the previous fiscal year. This increase is very insignificant when considering the higher demand resulting from the increased traffic volume and the activation of the new airports of Aena's subsidiary, BOAB, in Brazil.

Energy performance and operational management of network airports, aimed at improving energy efficiency, are key indicators of sustainable design and building evolution.

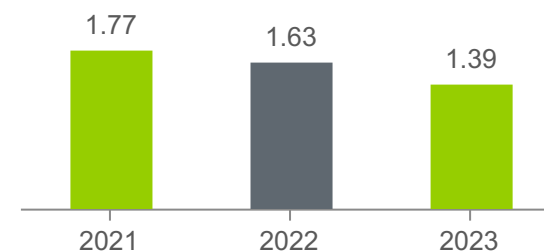
Spain



United Kingdom



Brazil



⁸⁴ It includes the consumption of fuels, electricity, heating, and cooling. In Spain, the ratio covers energy consumption within the organization, including the consumption of concessionaires.

⁸⁵ 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).

⁸⁶ Includes consumption of fuel, electricity, heating and cooling.



Energy consumption scheme within the organisation

(GRI 302-1)^{87,88, 89}

Consumption of non-renewable fuels (GJ)

	2021				2022				2023			
	Spain	United Kingdom	Brazil	Total Consolidated	Spain	United Kingdom	Brazil	Total Consolidated	Spain	United Kingdom	Brazil	Total Consolidated
Fuel/diesel	109,872	9,162	7,578	126,612	129,780	13,870.63	10,290.06	153,941	112,248	14,875.5	11,727.32	138,850.82
Petrol	2,044	0	487	2,531	1,947	0	528.32	2,475	1,340	0	706.71	2,046.71
Natural Gas	105,999	29,329	0	135,328	138,313	25,780.09	0	164,093	122,635	25,919.3	0	148,554.3
Propane	558	102	0	660	554	104.49	0	658	389	0	0	389
LPG	0	0	0	0	0	0	0	0	0	128.63	0	128.63
Kerosene	2,054	0	0	2,054	1,542	0	0	1,542	820	0	0	820
Subtotal	220,526	38,593	8,065	267,185	272,136	39,755	10,818	322,709	237,432	40,923.43	12,434.03	290,789.46

Consumption of renewable fuels (GJ)

	2023			
	Spain	United Kingdom	Brazil	Total Consolidated
Biofuel (HVO, Biopropane, and Biomethane)	9,628	706.38	0	10,334.38
Subtotal	9,628	706.38	0	10,334.38

Note: In the case of Spain, the consumption of biofuels refers to HVO, biopropane, and biomethane, while in the case of the United Kingdom, it is limited to the use of HVO.
Information not applicable in previous exercises.

⁸⁷ Aena's electricity consumption data include the consumption of the concession companies in Aena's Spanish network (100% of sites), recording consumption of 494,352 GJ of electricity in fiscal year 2022, representing 14.7% of Aena's global consumption in Spain.

⁸⁸ United Kingdom and Brazil electricity consumption data does not include consumption by licensees.

⁸⁹ Aena's purchase of heating/cooling comes from the SAMPOL cogeneration plant, which supplies part of the airport's HVAC system.



Electricity consumption and purchase of non-renewable thermal energy (GJ)

	2021				2022				2023			
	Spain	United Kingdom	Brazil	Total Consolidated	Spain	United Kingdom	Brazil	Total Consolidated	Spain	United Kingdom	Brazil ^(A)	Total Consolidated
Electricity	-	14,158	21,079	35,237	-	-	100,290	100,290	0	0	28,336.9	28,336.9
Heating	212,700	27,301	-	240,001	218,115	-	-	218,115	199,750	0	0	199,750
Cooling	392,902	-	-	392,902	406,280	-	-	406,280	406,349	0	0	406,349
Subtotal	605,602	41,459	21,079	668,140	624,395	0	100,290	724,685	606,099	0	28,336.9	634,435.9

A) Due to the recent entry into operation of the airports of Aena's subsidiary in Brazil, BOAB, the electricity consumption data of these airports have been estimated, when the actual data could not be collected. For these purposes, consumption from previous months has been taken into consideration, for those cases in which it was available, and otherwise, it has been estimated based on the volume of passengers at the same airport.

Electricity consumption and purchase of thermal energy (GJ)

	2021				2022				2023			
	Spain	United Kingdom	Brazil	Total Consolidated	Spain	United Kingdom	Brazil	Total Consolidated	Spain	United Kingdom	Brazil ^(A)	Total Consolidated
Electricity	2,907,279	44,832	111,492	3,063,603	3,387,090	78,181	54,126	3,519,397	3,461,310	114,041.24	165,392.57	3,740,743.81
Heating/Cooling	214	-	-	214	88	-	-	88	117	0	0	117
Subtotal	2,907,493	44,832	111,492	3,063,817	3,387,178	78,181	54,126	3,519,485	3,461,427	114,041.24	165,392.57	3,740,860.81

Note: in the case of renewable energy consumption (electricity and heating/cooling) at Aena airports, the purchase of electricity with a guarantee of 100% renewable origin is included, as well as the self-consumption corresponding to the renewable energy facilities in the table above (Renewable energy facilities in Spain). Renewable thermal energy has not been purchased in 2023.

(A) Due to the recent entry into operation of the airports of Aena's subsidiary in Brazil, BOAB, the electricity consumption data of these airports have been estimated, when the actual data could not be collected. For these purposes, consumption from previous months has been taken into consideration, for those cases in which it was available, and otherwise, it has been estimated based on the volume of passengers at the same airport.

Total energy consumption (GJ)

	2021				2022				2023			
	Spain	United Kingdom	Brazil	Total Consolidated	Spain	United Kingdom	Brazil	Total Consolidated	Spain	United Kingdom	Brazil	Total Consolidated
Renewable energy consumption	2,907,493	80,052	111,492	3,099,037	3,387,178	78,181	54,126	3,519,485	3,471,055	114,747.62	165,392.57	3,751,195.19
Non-renewable energy consumption	826,128	45,538	29,144	900,810	896,532	39,755	111,108	1,047,395	843,531	40,923.43	40,770.93	925,225.36
Total	3,733,621	125,590	140,636	3,999,847	4,283,710	117,936	165,234	4,566,880	4,314,586	155,671	206,164	4,676,421

2.3. Pollution

(GRI 3-3)

2.3.1. Air pollution

The Aena Group is committed to improving air quality in the environment where it operates, as reflected in the Integrated Quality, Environmental Management, Energy Efficiency, Health, and Safety Policy. This commitment is implemented in Spain through the Sustainability Strategy 2021-2030, aligned with the Climate Action Plan 2021-2030.

Through these initiatives, aspects related to air quality are addressed by defining strategic projects aimed at reducing CO₂ emissions and other atmospheric pollutants (NO_x, SO_x, and PM₁₀).

The strategic targets in Spain established for 2030 are as follows:

Own emissions	Third-party emissions
22% reduction in NO _x emissions per passenger compared to 2019	Aena will act as a driving force for other agents in the sector, contributing to the reduction of NO _x , SO _x and PM emissions from its operations
36% reduction in SO _x emissions per passenger compared to 2019	
15% reduction in PM emissions per passenger compared to 2019	

In order to achieve this, there are plans to adopt 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 developed in the environment of the main airports, through which the air quality levels corresponding to concentration levels of the main substances are monitored, such as sulphur dioxide (SO₂), nitrogen oxides (NO_x) and suspended particulate matter (PM10 and PM2.5), emitted as a result of airport operations or other sources located in the environment.

In Spain, Aena has implemented air quality stations at Adolfo Suárez Madrid-Barajas Airport, Barcelona-El Prat Josep Tarradellas Airport, Palma de Mallorca Airport, Alicante-Elche Airport and Málaga-Costa del Sol Airport⁹⁰. In some cases, measurement stations are integrated and form part of the municipal and/or autonomous community air quality surveillance networks. Moreover, Gran Canaria Airport annually conducts a measurement campaign.

As for London-Luton Airport in the United Kingdom, continuing the Company's commitment to reducing the impact on local air quality, it has developed the Air Quality Strategy. The British government requires local authorities to identify possible exceedances of pollutant levels and, if necessary, establish measures to prevent it. Consequently, the Airport continuously collaborates with the Luton Borough Council, as the main stakeholder, to monitor and assess air quality in its surroundings.

Following that established in the Responsible Business Strategy, London-Luton Airport is progressing with its new air quality monitoring programme, which is currently out to tender. Based on this, the monitoring programme will be automated and more regular data will be provided through a centralised dashboard and management system. Measurement towards the achievement of the objectives will be made possible through the collection of data by air quality monitoring equipment, which assesses trends in pollutant concentrations⁹¹ in the area. The key pollutants for air quality are those that are at the highest risk of exceeding the permitted air quality levels in the United Kingdom: nitrogen dioxide (NO₂) and particulate matter (PM10 and PM2.5).

To date, 19 different locations are monitored, those having greatest impact, to verify NO₂ measurements. The concentration levels of particulate matter (PM) are measured in one location.

Every month, the airport publishes a report of the results obtained with the local authorities, while the annual results of air quality levels are available as part of the annual follow-up report. Moreover, improvement actions have been developed at the airport to guarantee the achievement of the established targets, including collaborations with third parties, such as the approval of a specific policy for buses and coaches to improve air quality around the terminal area.

⁹⁰ You can consult 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. See chapter 'Links of interest'.

⁹¹ Particulate matter (PM₁₀) and NO₂



At Aena's subsidiaries airports in Brazil, the simulation studies of atmospheric emissions resulting from aircraft and ground equipment operations carried out in 2023 have been analysed, in order to define a number of actions to carry out in the coming years related to reducing the pollution of these gases resulting from aviation activities, the use of sustainable fuels, 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.

Specific objectives regarding atmospheric pollution

	Spain	United Kingdom	Brazil
Short-term	<ul style="list-style-type: none"> • 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. 	<ul style="list-style-type: none"> • Improve air quality levels • Implement monitoring that adds value in terms of data and allows us to understand the effects of different sources in real time. • Collect environmental data with good spatial coverage and design improvements of actions based on the analysis of the data obtained. 	<ul style="list-style-type: none"> • Implementation of actions resulting from the analysis of atmospheric emissions simulation studies
Medium/long term	<p>2030:</p> <ul style="list-style-type: none"> • 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. 	<ul style="list-style-type: none"> • Implementation of the Action Plan drawn from the air quality strategy that sets out the recommended mitigation measures taking into account the potential impact on local air quality in relevant areas of exposure, the cost of implementation, as well as any relevant targets and ongoing reporting and/or monitoring. 	<ul style="list-style-type: none"> • Improve optimal control of emission sources and improve air quality monitoring.

Evolution and progress of marked air pollution targets

	Spain	United Kingdom ^(A)	Brazil
	<ul style="list-style-type: none"> • 23% reduction in NOx emissions per passenger compared to 2019. • 44% reduction in SOx emissions per passenger compared to 2019. • 67% reduction in PM emissions per passenger compared to 2019 	<p>In the year 2023, a total of:</p> <ul style="list-style-type: none"> - NOx emissions: 6.1776 tons - SOx emissions: 0.2124 tons - PM10 emissions: 0.3708 tons 	<ul style="list-style-type: none"> • 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 pollution of these gases resulting from aviation activities.

(A) Data obtained from the average of measurements taken from January to September 2022.



Indicators on atmospheric pollution

(GRI 305-7)

Nitrogen oxides (NOx), sulphur oxides (SOx) and other significant air emissions ^{(A) (B) (C) (D)(E)}																		
	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
2021																		
Diesel	45.6732	4.6450	n/d	3.5274	0.1251	n/d	14.6282	1.3590	n/d	3.4370	0.3210	n/d	2.8784	0.2336	n/d	2.7122	0.2296	n/d
Petrol	0.6694	0.0000	n/d	0.0005	0.0000	n/d	5.9875	0.0000	n/d	0.6030	0.0000	n/d	0.0017	0.0000	n/d	0.0017	0.0000	n/d
Natural Gas	7.8439	1.9091	n/d	0.0710	0.0173	n/d	3.0740	0.7481	n/d	2.4380	0.5934	n/d	0.0827	0.0201	n/d	0.0827	0.0201	n/d
Propane	0.0393	0.0030	n/d	0.0003	0.0000	n/d	0.0230	0.0163	n/d	0.0192	0.0149	n/d	0.0278	0.0548	n/d	0.0278	0.0548	n/d
Kerosene	0.2388	0.0000	n/d	0.0483	0.0000	n/d	31.8897	0.0000	n/d	0.9595	0.0000	n/d	7.2066	0.0000	n/d	7.2066	0.0000	n/d
Total 2021	54.4646	6.5570	n/d	3.6476	0.1424	n/d	55.6023	2.1234	n/d	7.4567	0.9293	n/d	10.1972	0.3085	n/d	10.0310	0.3046	n/d
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
2023																		
Diesel	51.4471	4.0724	3.5966	6.7110	0.1951	0.0008	14.6596	1.0761	0.9241	3.6919	0.2271	0.1943	3.0398	0.3354	0.3053	2.8683	0.3292	0.3053
Petrol	0.4127	0.0000	0.1418	0.0106	0.0000	0.0001	4.3486	0.0000	1.3756	0.4209	0.0000	0.1632	0.0029	0.0000	0.0005	0.0026	0.0000	0.0005
Natural Gas	9.0750	1.9180	0.0000	0.0835	0.0174	0.0000	3.6201	0.7517	0.0000	2.8787	0.5961	0.0000	0.0976	0.0202	0.0000	0.0976	0.0202	0.0000
Propane	0.0288	0.0000	0.0000	0.0003	0.0000	0.0000	0.0121	0.0000	0.0000	0.0096	0.0000	0.0000	0.0003	0.0000	0.0000	0.0003	0.0000	0.0000
Kerosene	0.0591	0.0000	0.0000	0.0120	0.0000	0.0000	7.8984	0.0000	0.0000	0.2376	0.0000	0.0000	1.7849	0.0000	0.0000	1.7849	0.0000	0.0000
LPG	0.0000	0.0095	0.0000	0.0000	0.0001	0.0000	0.0000	0.0037	0.0000	0.0000	0.0030	0.0000	0.0000	0.0001	0.0000	0.0000	0.0001	0.0000
HVO	5.8699	0.1776	0.0000	0.0109	0.0000	0.0000	0.0320	0.0456	0.0000	0.0183	0.0096	0.0000	0.0196	0.0151	0.0000	0.0115	0.0151	0.0000
Biomethane	0.1869	0.0000	0.0000	0.0004	0.0000	0.0000	0.0096	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Biopropane	0.0021	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total 2023	67.0816	6.1776	3.7384	6.8287	0.2124	0.0009	30.5804	1.8771	2.2997	7.2570	0.8358	0.3575	4.9451	0.3708	0.3058	4.7652	0.3646	0.3058

(A) This table includes the most relevant air polluting emissions, not including those remaining that are not significant.

(B) 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 London-Luton Airport and Spanish airports, respectively: EMEP/EEA, US EPA and US FAA.

(C) In the case of the United Kingdom, all calculations and conversion factors are used in accordance with United Kingdom government standards under the Department for Environment and Rural Affairs (DEFRA) and the Environment Agency. This is detailed within the governance of our air quality action plan.116

(D) In the case of Aena airports in Brazil, there is no relative information available for the year 2021.

(E) Due to the recent commencement of operations at the airports of Aena's subsidiary in Brazil, BOAB, all fuel consumption data for these airports have been estimated for the calculation of these indicators, as the actual data is not available. For each infrastructure, the fuel consumption of an airport from Aena's subsidiary ANB with a similar number of ATUs has been used as a reference, and then adjusted to the actual monthly ATUs of each airport. Additionally, since the proportion of diesel/gasoline is not available, the value of this percentage in ANB has been considered.



2.3.2. Light pollution

GRI 3-3)

All Aena Group's airports, regardless of their location, comply with current regulations regarding operational safety with regard to the exterior lighting of their buildings.

Specifically, London-Luton Airport manages light pollution as part of the environmental and energy management policies covered by the ISO 50001 and ISO 14001 standards. Effective and efficient management applies to all lighting, both internal and external, including runway and airfield lighting covered and managed by the National Air Traffic Control Services (NATS).

2.3.3 Noise

(GRI 3-3)

Among the most important impacts derived from the 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 area. This commitment to noise management is also included in the Sustainability Policy and in the Integrated Quality, Environmental, Energy Efficiency and Occupational Health and Safety Management Policy.

Among the main aspects, in Spain work is continuing on improving the 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.

In the United Kingdom, London-Luton Airport has updated its Noise Action Plan 2024-2028 and submitted it for consultation with stakeholders in 2023.⁹² This Action Plan is pending approval by the British Government. In the same way as the previous noise action plan, the updated one includes the same 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's subsidiaries airports in Brazil, work is continuing on initiatives to improve the measurement and monitoring of aircraft noise, as well as on monitoring this information through the creation of External Committees with different actors from the local communities.

Spain	United Kingdom	Brazil
<p>2023:</p> <ul style="list-style-type: none">• Tender for a new Framework Agreement planned for the implementation of new actions, with a maximum amount of €60 million.• Incorporation of more than 2,000 homes into the SIP census at Palma de Mallorca Airport.• Approval of the start of actions associated with a New Phase of execution of the SIP at Valencia Airport with the incorporation of more than 5,000 homes into this plan.• Conducting of preliminary analyses and diagnoses for the preparation of the Noise Action Plans 2024-208 associated with Phase IV of the SNMs.• Implementation of the Noise Monitoring System at César Manrique-Lanzarote Airport. Work has also started for its implementation at Fuerteventura Airport.	<p>2023:</p> <p>482 isolated homes in the period 2016-2023 with an associated amount of €1,720,304.</p>	<p>2023:</p> <ul style="list-style-type: none">• Conducting of noise measurements and monitoring at critical points in the airport environment.• Constitution of the External Aeronautical Noise Committees, made up of Municipal, Environmental, Aeronautical and Air Space Control members, among others.

⁹²This Action Plan is pending approval from the British Government.



Specific objectives in reducing noise levels

	Spain	United Kingdom	Brazil
Short-term	<ul style="list-style-type: none">• Maintenance and expansion of noise monitoring systems at 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.• Preparation of the Noise Action Plans 2024-2028 with measures aligned with the Balanced Approach established by ICAO.	<ul style="list-style-type: none">• 95% of Continuous Descending Operations (CDO).• Creation and publication of a practice procedure for departures and arrivals to ensure that operators use the airport as sustainably as possible.• Compliance with acoustic easement limits, LAeq 16hr and LAeq 8hr.	<ul style="list-style-type: none">• All airports already have a permanent Noise Committee that meets every six months.
Medium/long term	<ul style="list-style-type: none">• Application of the measures established in the Action Plans against Noise 2024-2029 in order to obtain the reduction established by the EU• Continuation of the Acoustic Insulation Plans, with the expectation that the volume of insulated homes can be increased, reaching 33,000 insulated homes in 2030.	<ul style="list-style-type: none">• Work with neighbouring airports and stakeholders to bring forward a proposal for airspace improvement in line with the United Kingdom government's Airspace Modernisation Strategy.• Collaboration with a UK University to explore, through research, feasible ways to reduce noise at LLA.• Reduce the target complaint response time from 8 business days to 6 business days.	<ul style="list-style-type: none">• Carry out noise mitigation measures with the surrounding community. <p>2025 Installation of noise monitoring systems at all airports in Brazil</p>

(A) LAeq,16h: equivalent continuous sound level in dB(A) that, during the period from 7am to 11pm, contains the same sound energy as the actual fluctuating sound that occurred during that period.
LAeq,8h is the equivalent continuous noise level over an 8 hour period.

Measurement, reduction and control

(GRI AO7)

The Strategic Noise Maps (SNMs) regulated in Europe and the United Kingdom are used to diagnose noise exposure in the vicinity of airports⁹³.

The last SNMs carried out for Spain correspond to those relating to phase IV, which will be updated in 5 years as required by legislation. 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

⁹³ As this is a European and British regulation, Aena's subsidiaries airports in Brazil do not require the preparation of Strategic Noise Maps

SNM PHASE III:

Noise Levels	Gran Canaria	Lanzarote – Arrecife	Tenerife Sur	Tenerife Norte	Alicante - Elche	Bilbao ^(A)	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	-
Night 55 dB(A)	308	0	90	0	201	-	13	591	1,754 (B)	1,520	515	91	-

(A) 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.

(B) 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 Night 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
Night 55 dB(A)	0	0	-	-	70	0	19	14	50	409	131	49	0

The evolution of the number of people exposed to noise in the United Kingdom ^(A)

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
Night 57 dB(A)	2,300	900	600

(A) Associated legislation:

- Defra Action Plan Guidance For Airport Operators.
- Civil Aviation Act.
- EU Environmental Noise Directive 2002/49.
- European Directive 598/2014

During 2023, Aena, in compliance with legislation, has started to draw up the Noise Action Plans (PAR [Planes de Acción contra el Ruido]) 2024-2028, through coordination with the Air Navigation service provider and the DGAC in the preparation of diagnoses that serve as a starting point to analyse the feasibility of different measures at each airport and their possible implementation to contribute to reducing the affected population by 2030, as established in the Zero Pollution Action Plan. The measures to be carried out are within the ICAO Balanced Approach, the main ones being the following:

- Improvement of the fleet operating at airports
- Modifications of approach/take off procedures to reduce the affected population
- Avoid increased night-time operations.

Aena also collaborates with other stakeholders to achieve a reduction of 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, Aena monitors flight paths and noise levels in the vicinity of major airports through the Noise Monitoring Systems (SMR). This system is currently available at the following airports: Adolfo Suárez Madrid-Barajas Airport, Alicante-Elche Airport, Bilbao Airport, César Manrique-Lanzarote 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 context of the United Kingdom, London-Luton Airport has conducted the public consultation phase of the updated Noise Action Plan 2024-2028, which sets out a range of measures to be implemented within the framework of ICAO's balanced approach, with actions based on the assessment, prevention, and reduction of noise in the area.

The insulation scheme of the Airport is based on the established planning for acoustic easements. These easements are monitored annually to update eligible properties based on noise data obtained from the Topsonic noise monitoring system.

In the case of Aena's subsidiaries airports in Brazil, noise measurements were carried out during 2023 at critical points in the airport environment.

Sound Insulation Plans⁹⁴

(GRI 203-1; 203-2)

In 2023, Aena has continued to manage and execute the Sound Insulation Plans assigned to its Spanish airports, carrying out this activity within the framework of the provisions of Royal Decree 1367/2007 and Act 5/2010, of 17 March, as well as the corresponding Environmental Impact Statements. Thus, in Spain, the following actions implemented should be highlighted:

- Updating of the census of homes in the SIP at Palma de Mallorca Airport, which has meant an increase of more than 2,000 homes included in this plan and the receipt and processing of the first sound insulation applications associated with the new area defined by the isophone associated with the environmental impact statement for this airport in 2021.
- Launch of a New Phase of the SIP at Valencia Airport, with the submission to the affected local councils of their new acoustic footprint in order to be able to identify the homes that, meeting the established conditions, could be included in this plan, estimating that as a result of this initiative, actions to improve the sound insulation of approximately 5,000 new homes could be carried out.
- Start of preliminary actions associated with the SIP at Fuerteventura Airport planned in the Action Plan associated with its Acoustic Easement.
- This year, Aena has put out to tender a new Framework Agreement to promote the implementation of sound insulation actions for buildings located in the vicinity of its airport network. With a budget of €60 million to be executed over 5 years, it is divided into two lots: one of €40 million for Mainland Spain and the Balearic Islands and another of €20 million for the Canary Islands. Its purpose will be to enable the execution of the SIPs currently being developed by Aena, as well as to facilitate the implementation of the new plans for those airports where it has been proven that they need to be executed, mainly referring to César Manrique-Lanzarote Airport, Tenerife Sur Airport and Fuerteventura Airport.
- At the same time as these actions were put out to tender, Aena continued its institutional collaboration with Ministries, Autonomous Communities and City Councils within the Environmental Monitoring Committees of the airports to inform them of the progress of the actions associated with the respective Sound Insulation Plans, having held a total of 8 new informative meetings this year.

The set of actions carried out this year has allowed us to carry out the acoustic insulation of 1,217 properties.

⁹⁴ No soundproofing measures have been implemented in Brazil as of the closing date of this report.

Through the Sound Insulation Plans (SIPs), Aena responds to its commitment to improving the quality of life of residents in the vicinity of its airports and 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 of the actions until December 31, 2023, amount to €1,720,304 (€780,195 in 2022), benefiting a total of 482 households since 2016.

Communications

(GRI 2-29)

The noise management measures in the Spanish airport network are reported through the different tools set up for this:

- The WebTrack or Interactive Noise Maps, implemented at 13 airports in the Spanish network, provide the inhabitants of the locations neighbouring the airports with reliable and transparent information on aeronautical operations and the noise levels they generate. The information includes data such as flight number, aircraft type, altitude and flight path used by the aircraft.
- Monthly publication of Noise Reports on Aena's public website with information on noise levels, dispersion of flight paths, as well as airport operational information that may affect noise pollution.
- Environmental Monitoring Committees of the SIPs and Joint Committees created to establish the Acoustic Easements and their associated Action Plans.

Likewise, the Sound Insulation Plans Management Office, created by Aena and made available to the interested population, has been carrying out the management and technical and administrative advice required for the proper execution of these actions during 2023, including the processing of more than 1,630 requests for information, 1,430 soundproofing requests and the analysis and assessment of 485 soundproofing projects, as well as the monitoring and control of the completion of work on more than 1,120 homes.

In the case of London-Luton Airport, users have a website for recording complaints and suggestions, as well as telephone, e-mail, the online flight tracking system and an interactive Noise Map called TraVis⁹⁵.

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 discuss aspects related to noise.

In addition, quarterly and annual reports on aircraft movements are published, as well as the monitoring of noise and complaints generated by operations.

In the case of Aena's subsidiaries airports in Brazil, External Aeronautical Noise Committees have been set up, composed of municipal, environmental, aeronautical and airspace control agents, among others.

⁹⁵ Flight tracking system TraVis. See link in "Links of interest".



Airport	Number of insulated buildings (2000-2023) Spain	Amount allocated (€) (2000-2023) Spain
	Number of insulated buildings (2016-2023) United Kingdom	Amount allocated (€) (2016-2023) United Kingdom
A Coruña	848	7,294,768
Alicante-Elche	12,922	170,505,498
Barcelona-El Prat	3,231	42,689,929
Bilbao	2,100	25,065,583
Cesar Manrique - Lanzarote	0	221,343
Girona-Costa Brava (*)	0	50,902
Gran Canaria	628	10,191,523
Ibiza	612	6,447,287
La Palma	50	2,966,717
Adolfo Suárez Madrid-Barajas	22	402,329
Málaga-Costa del Sol	814	16,323,476
Melilla	0	0
Menorca	11	227,779
Palma de Mallorca	1,441	20,865,924
Pamplona	43	1,224,084
Sabadell	0	13,633
Santiago de Compostela	15	298,217
Sevilla	431	1,808,968
Tenerife-Norte	1,118	26,143,157
Tenerife-Sur	0	116,224
Valencia	4,247	23,044,396
Vigo	247	3,713,454
Vitoria	11	256,881
London-Luton ^(A)	482	1,720,304
Total 2000-2023 (Aena and London- Luton)	29,273	361,592,376

(A) Exchange rate as of December 31, 2023: EURvsGBP = 0.86905

2.4. Sustainable use of resources: water

(GRI 3-3)

2.4.1. Water management

(GRI 303-1)

Optimising water consumption is key for the Aena Group, given the high volume of passengers, employees and users that transit daily through the network's airports. Water, one of the main natural resources consumed, is used at our facilities mainly for human consumption, irrigation of green areas, sanitary use, cleaning, fire-fighting services and execution of works.

The strategic objectives of the Aena Group regarding water management are aligned with one of the principles of action defined in the Integrated Management Policy for Quality, Environment, Energy Efficiency, and Health and Safety at Work. Specifically, it aligns with the need to ensure environmental protection and pollution prevention, integrating sustainable development criteria to reduce the impact of our activities and promote the sustainable use of resources.

Based on this, Aena has the Strategic Water Management Plan 2021-2030 with a time horizon of 2021-2030, as a key instrument to guide the management of the resource at Spanish airports, 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).

These objectives were defined based on preparing a diagnosis of the initial situation in terms of water management at Spanish airports. For this purpose, detailed information on water management at Aena sites was collected through the study of the different phases of water cycle management:

- Water for 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).

Additionally, an assessment was made of the communication, participation and awareness of water and external risks, establishing the weak points, strong points and areas for improvement.

This diagnosis has made it possible to establish areas for 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, network sealing, environmental monitoring, pollutant management);
4. rainwater (e.g., leaks and treatment systems); and
5. external risks (e.g., outage in times of drought and flooding).

Finally, the water footprint was calculated taking into account 100% of the sites in Spain. The base 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 2023, 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 actions have been carried out for the proper management of water, aimed at improving water efficiency and optimising its use and exploitation.

Examples of this are the incorporation of taps with automatic sensors, the installation of flow meters to monitor consumption and control losses, and projects such as the water regeneration plant at Alicante-Elche Airport.

Aena also collaborates with its value chain on responsible water management through a series of initiatives. In Spain, posters have been installed to raise awareness among customers about the responsible use of water. On the other hand, lease contracts include clauses that seek to acquire the commitment of these parties to reduce their water consumption, which is monitored network-wide.



For its part, at London-Luton Airport in the United Kingdom, the current Responsible Business Strategy includes effective water management as a strategic pillar. In this context, the implementation of measures and systems to achieve more efficient use has continued in 2023.

In the context of Brazil, at the airports of Aena's subsidiary ANB, high-efficiency water treatment plants have been constructed. By 2024, these plants will be connected to reuse networks to utilize water for toilets, gardening, and fire networks.⁹⁶

Water management objectives

The strategic objectives are applicable to all activities and services provided by the Aena Group, 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
2026 <ul style="list-style-type: none">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 <ul style="list-style-type: none">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.	•Reduce water use per passenger and explore initiatives related to the use of reclaimed water.	2023 <ul style="list-style-type: none">Installation of on-site water treatment plants at ANB airports. 2024 <ul style="list-style-type: none">Installation of rainwater collection and reuse stations at ANB. 2025 <ul style="list-style-type: none">Installation of on-site water treatment plants at BOAB airports. 2026 <ul style="list-style-type: none">Reduction of drinking water consumption by 10% compared to 2022.

⁹⁶ Initiatives of this nature implemented at airports of Aena's subsidiary in Brazil, BOAB, will be subject to analysis in the future.

Evolution and progress of the objectives set in water management

Spain

2023:

- The total water consumption per passenger is 0.02 liters/passenger (a 12% increase in consumption/passenger compared to 2019), and the consumption of water from alternative sources is 0.003 liters/passenger (a 160% increase/passenger compared to 2019).

United Kingdom

2023:

- The total water consumption per passenger is 7.3 liters/passenger.

Brazil

The Sustainability and Climate Action Committee includes among its functions to understand, promote, guide, and supervise the objectives, action plans, practices, and policies of the Company regarding environmental and social matters, including those related to water management.

2.4.2. Initiatives for responsible water consumption

During the diagnosis mentioned in the previous section, the good practices carried out at several Aena airports in terms of water management were identified, which have the potential to be transferred to other network sites, highlighting 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 in Spain, such as Menorca Airport, have a complete system of flow meters with low consumption wireless transmission that help to 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 and in preventing risks. Another initiative already implemented at airports with greater water stress, such as Fuerteventura Airport, Ibiza Airport and César Manrique-Lanzarote Airport, the Company takes advantage of the circumstances of the environment and uses seawater through desalters.

Also noteworthy as efficiency measures is the reuse of treated wastewater for watering green areas, which avoids the additional consumption of water from the network for this purpose.

On the other hand, and as already mentioned, Adolfo Suárez Madrid-Barajas Airport and Barcelona-El Prat Josep Tarradellas Airport have two white papers that incorporate sustainability criteria into the urban and architectural design of property developments that may be carried out in the aforementioned infrastructures. Specifically, these criteria are related to the sustainable consumption of resources, as well as to the reuse of water through different channels (collection of rainwater on the roofs of buildings and its subsequent use, the implementation of separative networks and the promotion of sustainable urban drainage, for example).

Additionally, considering that part of the water consumption is due to human consumption, it is important to raise awareness among users of Aena's facilities about responsible water consumption. In this sense, specific signage has been installed in the services, promoting this measure among passengers, third parties and the Company's own employees.

With regard to the management of pollutants, it is worth highlighting the great control exercised over de-icing operations and the handling of anti-freezing fluids. In United Kingdom, at London-Luton Airport, for example, a spill tracking system is in place to monitor and report possible incidents and consequently manage the necessary corrective actions.

The potentially glycol-contaminating de-icing operation is carried out on platforms to prevent it from reaching the water network. In addition to this, interceptors around wells and drainage systems are in place for the early detection of fuel or glycol spills. In order to be able to carry out the entire process, the necessary permits from the relevant state authority authorising the handling of this type of product are in place.

At London-Luton Airport, a number of measures have also been implemented to reduce water consumption, including the installation of numerous water meters to identify opportunities for improvement in water use and to repair leaks more quickly. Low-flow taps and dual flush cisterns have also been installed in the new terminal and, as part of the new refurbishment of the bathrooms, the installation of ultra-efficient taps has begun, which will reduce water consumption for passengers and employees. Finally, it is worth noting that the recent tender for the management contract of water supply at the Airport includes requirements for improving water conservation, thereby extending its commitments to its supply chain.

In addition to carrying out specific measures such as those described, 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 to define or change work procedures and draw up water management standards to adapt to periods of scarcity.
- Awareness and communication: Preparation of a Communication 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 role at the facilities (subcontractors, passengers, etc.).
- Efficiency in drinking water consumption: Projects aimed at reducing water consumption by detecting leaks in existing networks, improving the facilities comprising the distribution, and the 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.

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.





Water consumption indicators

(GRI 303-2)

In 2023, water consumption amounted to a total of 6,673.62 thousand m3 (6,439.14 thousand m3 in 2022). It is worth considering the increase in passenger volume and the recent commencement of operations at the 11 new airports of Aena's subsidiary in Brazil, BOAB, in this regard.

The following table breaks down the total water consumption by the airport network by origin, as well as in regions with water scarcity:

Water Extraction/Consumption - Thousands of m3 (GRI 303-3; 303-5)

	2021				2022				2023			
	Spain	United Kingdom	Brazil	Total Consolidated	Spain	United Kingdom	Brazil	Total Consolidated	Spain	United Kingdom	Brazil	Total Consolidated
Desalting water/ Sea water (thousands of m3)	202.18	n/a	n/a	202.18	519.47	n/a	n/a	519.47	497.69	n/a	n/a	497.69
Volume corresponding to water stress zone	--	n/a	--	--	--	n/a	--	--	0.00	n/a	n/a	0.00
Well water/ Groundwater (thousands of m3)	1,399.14	n/a	65.06	1,464.20	2,367.53	n/a	75.17	2,442.70	2,187.79	n/a	72.77	2,260.56
Volume corresponding to water stress zone	--	n/a	--	--	--	n/a	--	--	550.61	n/a	6.15	556.76
Drinking water from the grid (thousands of m3)	2,689.73	48.20	161.88	2,899.81	3,162.53	108.46	116.37	3,387.36	3,348.50	117.94	235.62	3,702.06
Volume corresponding to water stress zone	--	--	--	--	--	--	--	--	2,393.50	117.94	11.40	2,522.84
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)	110.93	n/a	n/a	110.93	89.61	n/a	n/a	89.61	213.31	n/a	n/a	213.31
Volume corresponding to water stress zone	--	n/a	n/a	--	--	n/a	n/a	--	93.50	n/a	n/a	93.50
Total water consumption (thousands of m3)	4,401.98	48.20	226.94	4,677.12	6,139.14	108.46	191.54	6,439.14	6,247.29	117.94	308.39	6,673.62
Volume corresponding to water stress zone	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	3,037.61	117.94	17.55	3,173.10
Reused water/ Rainwater collected directly and stored/ Purified wastewater (thousands of m3)	297.12	n/a	n/a	297.12	412.85	n/a	n/a	412.85	403.51	n/a	n/a	403.51

Note: In the year 2023, water consumption by the leaseholder companies at Aena's Spanish airport network corresponds to 30.8% of the consumption reported here for 2023 (total consumption and reused water), amounting to 1,924.8 million m3.

For the airports of Aena's subsidiaries in Brazil, the water supplied to concessionaires constitutes 5% of the total water consumed. Information is not available for London-Luton Airport in the United Kingdom.

(A) The regions considered to be under water stress were obtained from the latest version of the WRI Aqueduct, from the World Resources Institute (WRI), those locations are above the 40% stress threshold (extreme and high level), corresponding to 27 airports in Aena's network: 25 locations in Spain, 1 in the United Kingdom, and 1 in Brazil. Compared to the previous version, the number of locations in water-stressed areas has been reduced.

(B) Due to the recent commencement of operations at Aena's subsidiary airports in Brazil, BOAB, water consumption data for these airports have been estimated when actual data is not available. For these purposes, consumption from previous months has been considered for cases where it was available, and otherwise estimated based on passenger volume at the same airport.

With regard to water spills, the units and sites in the Aena network monitor these through periodic analyses of compliance with the parameters established in the corresponding spill authorisations, considering both wastewater and rainwater, in order to cooperate with 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 national and local legislation, and these legal protocols are governed by the corresponding discharge authorisations.

It is important to note 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, these are cleared through hydrocarbon separating plants, while uncontaminated waters are discharged directly to the DPH or DPMT. Partial breaches are subject to a continuous monitoring, establishing the corresponding improvement actions⁹⁷.

In the United Kingdom, at the London-Luton Airport the minimum criteria for water quality standards are determined by the Environment Agency, which also oversees and issues the necessary permits, and the airport is responsible for implementing the necessary measures to prevent spills and ensure water quality. Consequently, London-Luton Airport monitors fuel spills and oversees the use of aircraft de-icing products. In this way, if there is a major fuel spill or it occurs more than once, the airline is contacted and the necessary measures are implemented to prevent it from happening again. With regard to the use of de-icing liquids, the necessary tools are available to link the glycols present in the water with the place where they were applied, so that action can be taken if necessary.

In the airports of Brazil, monthly samples are collected and analyzed for parameters within the legally established protocols.

⁹⁷ In the event that the measures carried out are not effective, they would receive a fine as established by the competent administration.

Wastewater discharges by water type – Thousands of m3 (GRI 303-4)

	Final destination	2022	2023(A)
SPAIN	Fresh water	16,456.7	3,543.0
	In areas of hydraulic stress	14,931.3	1,718.0
	Other waters	323.1	265.4
	In areas of hydraulic stress	219.0	208.5
BRAZIL	Fresh water	153.2	246.7
	In areas of hydraulic stress	--	14.0
	Other waters	--	0.0
	In areas of hydraulic stress	--	0.0

(A) In the case of London-Luton Airport in the United Kingdom, this categorization is not currently available, but efforts are underway to provide this information in future reports.

Wastewater discharges by destination - Thousands of m3 (GRI 303-4)

	Final destination	2021	2022	2023
Spain	Surface waters	371.68	655.16	263.80
	In areas of hydraulic stress	n/a	525.36	128.35
	Groundwater	47.83	35.13	39.71
	In areas of hydraulic stress	n/a	35.03	1.28
	Seawater	0.00	0.00	n/a
	In areas of hydraulic stress	0.00	0.00	n/a
	Water of third parties	2,433.53	16,089.53	3,504.88
	In areas of hydraulic stress	n/a	14,589.89	1,796.88
United Kingdom	Surface waters	n/a	n/a	n/a
	In areas of hydraulic stress	n/a	n/a	n/a
	Groundwater	n/a	n/a	n/a
	In areas of hydraulic stress	n/a	n/a	n/a
	Seawater	n/a	n/a	n/a
	In areas of hydraulic stress	n/a	n/a	n/a
	Water of third parties	n/a	104.13	106.15
	In areas of hydraulic stress	n/a	104.13	106.15
Brazil	Surface waters	n/a	n/a	69.72
	In areas of hydraulic stress	n/a	n/a	n/a
	Groundwater	n/a	n/a	29.41
	In areas of hydraulic stress	n/a	n/a	14.04
	Seawater	n/a	n/a	n/a
	In areas of hydraulic stress	n/a	n/a	n/a
	Water of third parties	120.00	153.24	147.57
	In areas of hydraulic stress	n/a	n/a	n/a
Total Consolidated	Surface waters	371.68	808.40	333.52
	In areas of hydraulic stress	n/a	525.36	128.35
	Groundwater	47.83	35.13	69.12
	In areas of hydraulic stress	n/a	35.03	15.32
	Seawater	n/a	0.00	0.00
	In areas of hydraulic stress	n/a	0.00	0.00
	Water of third parties	2,553.53	16,346.89	3,758.60
	In areas of hydraulic stress	n/a	14,589.89	1,903.03

Information corresponding to fiscal year 2021 in the United Kingdom 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 globally poses potentially significant risks, closely linked to the climate crisis. Consequently, the Aena Group includes its commitment to make airport activity compatible with the protection and conservation of the natural habitats existing in the environment and their biodiversity, through the Integrated Quality, Environmental, Energy Efficiency and Occupational Health and Safety Management Policy, applicable to the companies integrated in its Group, also promoting the adoption of this principle by the other companies with which it collaborates.

This commitment is also implemented at Spanish airports through the Sustainability Strategy 2021-2030 which, in the field of biodiversity conservation, includes two key lines of action:

- Biodiversity protection, communication and awareness initiatives.
- Volunteering actions.

To achieve these commitments, it carries out actions such as the protection of natural areas, the study of fauna in the environment, the control of vegetation in and around airports, and actions linked to combating the trafficking of wild species. For this purpose, both the geographical dispersion of airports and the diversity and typology of the existing ecosystems are taken into account, adapting the initiatives to the reality of the environment.

For its part, London-Luton Airport in the United Kingdom recognises in its Responsible Business Strategy its responsibility to protect biodiversity, addressing these aspects through the establishment of partnerships with third parties, on which work will be carried out in the coming fiscal years. Although Aena's subsidiaries in Brazil are currently preparing their own Sustainability Strategy, which is expected to be developed in 2024, they are already developing initiatives in the area of the protection of the biodiversity.

Main impacts of activity on the environment

(GRI 304-2)

The main impacts of the Aena Group on biodiversity are derived from:

- New buildings or the modification of existing infrastructures, in which case the Company seeks to avoid altering the habitat of certain species of fauna and flora and affecting vegetation as a result of new developments. To this end, specific measures are implemented to ensure the correct selection of the location of infrastructures, the design of facilities and the application of preventive and corrective measures. All of this in order to avoid and reduce the possible effects that could be caused as much as possible.

These impacts, both during the construction and operation phases of airport infrastructures, are assessed through the corresponding Environmental Impact Studies of projects, which are submitted for consultation to the affected public administrations and interested parties, concluding with the corresponding resolution issued by the Ministry.

In this regard, during 2023, in Spain, various environmental resolutions have been obtained by the Ministry for Ecological Transition and Demographic Challenge⁹⁸.

In these resolutions, which can be consulted on Aena's public website⁹⁹, it is established that as a result of the execution of the projects analysed, no significant impact is expected on any natural space, flora or fauna that is under special protection in any of the phases, through the application of the established measures that are supervised by the Ministry both during the construction and operation phases through the Environmental Surveillance Plan (PVA [Plan de Vigilancia Ambiental]) carried out by the company. Through this PVA, the application of each of the planned corrective measures is monitored, providing information on their efficiency and correct execution.

- Additionally and in general, the air activity itself may have a certain impact, mainly on local fauna, as well as the possible nuisance derived from the noise of aircraft engines. In any case, the Company makes the protection of natural heritage compatible with the maintenance of safety and quality standards inherent to airport activity, carrying out various measures to control and analyse fauna risks, which are detailed in the sections below.

⁹⁸ Resolution dated 6 July 2023, formulating the environmental impact statement for the project 'Sevilla Airport Engine Test Platform (AENA)'

Resolution dated 18 July 2023, formulating the environmental impact statement for the project 'Construction of Campa Rent A Car. Tenerife Sur Airport in the municipality of Granadilla de Abona, Santa Cruz de Tenerife'

Resolution dated 25 September 2023, formulating the environmental impact report on the project 'Doubling of the Internal Taxiway Apron in front of the 'NAT' at Alicante-Elche Airport'.

⁹⁹ For more information, see "Links of interest".



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
<ul style="list-style-type: none">• Initiatives regarding the protection of local fauna in collaboration with third parties.• Monitoring and control of the presence of fauna in the airport enclosure.• Preparation of Fauna and Habitat Studies at 28 airports.	<ul style="list-style-type: none">• Collaborations with third parties to contribute to the protection and restoration of other habitats related to the planting of tree species.	<ul style="list-style-type: none">• Collaborations with third parties to contribute to the protection of fauna and restoration of habitats.• Monitoring and control of the presence of fauna in the airport enclosure.• Studies of wildlife risk management and biodiversity protection at 6 airports

2.5.2. Protected spaces¹⁰⁰

(GRI 304-1; 304-2; 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 airports by means of adopting various measures that aimed to prevent any compromising effects that may be caused over these natural environments.

¹⁰⁰ Both London-Luton Airport in the United Kingdom and at Aena's subsidiaries airports in Brazil are not located in protected areas. In Spain, protected areas are located within Aena properties. Subsurface and underground lands are owned by Aena

Aena incorporates the sustainability criteria into the strategic decision-making process, through the environmental assessment 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 mechanisms¹⁰¹.

Environmental assessments, both for plans and projects, are based on the framework of the Mitigation Hierarchy, paying special attention to the protection of biodiversity and protected areas, integrating environmental aspects into decision-making, precautionary and preventive action, and ensuring channels for public information and participation. All of this is aimed at ensuring a net zero loss or a net gain in biodiversity.

Once the environmental resolutions that finalise the environmental impact assessments are issued, a monitoring process is carried out, during the construction and operation phase 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 even the need for adopting new measures can be detected.¹⁰²

When infrastructure and operational actions are carried out in areas with special protection, the Company follows an 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 order to ensure transparency, Aena publishes the Environmental Resolutions obtained by each airport on its website, which provide information on the nature of the significant impacts, direct and indirect, related to pollution, the possible loss of biodiversity or the transformation of the habitat. In this regard, the protected areas located in Spanish airports, and the restoration, conservation or offsetting measures that have been carried out on them, can be consulted in the environmental resolutions mentioned above.

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 of the Aena Group under the framework of the Operational Safety System (see Chapter 6), which allows the protection of natural heritage to be compatible with the maintenance of the safety and quality standards inherent to airport activity.

In this context, in Spain, and in compliance with the provisions established by the applicable regulations, the Fauna and Habitats Study is periodically prepared for each airport in the national network, 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 during 2023, the Fauna and Habitats Studies of 28 Spanish airports have been prepared.

Additionally, 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 carried out at Spanish airports involves the use of mechanical means, such as bloodless capture with traps and the use of sounds and pyrotechnics. Moreover, 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 at 35 airports and Spanish heliports managed by Aena.

In the case of Aena's subsidiary airports in Brazil (ANB), they have Wildlife Risk Management Studies and Biodiversity Protection at all 6 airports.¹⁰³ Additionally, similar to the Spanish airport network, they monitor and control the presence of wildlife within the airport premises and implement various measures to exclude them from operational areas, tailored to the situation of each airport.

¹⁰¹ In Spain, Act 21/2013, of 9 December, on environmental assessment (EIA), unifies in a single regulation the strategic environmental assessment of plans and programmes and the environmental impact assessment of projects, which makes it the instrument used by airport infrastructures to ensure the proper prevention of the environmental impacts that could be generated during and after the start-up of new facilities, while establishing effective prevention and correction mechanisms.

¹⁰² Aena publishes on its website the environmental resolutions obtained. See the "Links of interest" section.

¹⁰³ In the United Kingdom, London-Luton Airport does not have Wildlife and Habitat Studies.

In the case of the subsidiary ANB airports, biodiversity protection activities are carried out within the airport premises and in the airport security area with actions to protect biodiversity, based on wildlife inspections focused on the operational area (runway system). The inspections are aimed at identifying clusters, potential sources of attraction and access to fauna, and carrying out the most appropriate deterrent actions for the situation.

2.5.4. Control of vegetation in the environment of the airport¹⁰⁴

With regard to vegetation control, like with fauna, Aena monitors the impact of the habitats around airports, promoting collaboration with the entities responsible for their management and executing specific measures that promote care and respect for the environment with a guarantee of operational safety.

Agreements are also established with the public administration, NGOs and other stakeholders, such as farmers, companies and cooperatives, to promote the agricultural development of the land and ensure the preservation of the vegetation. Likewise, it collaborates with non-governmental organisations, such as 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 seeks the maximum possible participation and consensus of all stakeholders involved (scientific community, political-institutional environment, ports, airports, and citizens in general), with the aim of creating an operational framework for prevention, early warning and rapid response against species of invasive exotic flora on the island of La Palma. Among the actions that have been implemented in 2023 are the installation of totems and vinyls in the arrivals area with information about the need not to transfer species between islands to avoid the introduction of invasive species.

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 endemic to the Balearic Islands and is considered 'vulnerable' because it is suffering a significant decline in its populations. The Airport collaborates with the Island Council to provide the appropriate conditions in the pond, since it is one of the most important breeding centres on the island. Each season, the environmental technicians of the Island Council there perform census studies and tag samples for their monitoring.

In 2023, the #PlantHealth4Life campaign has been implemented at Spanish airports in collaboration with the Ministry of Agriculture. This campaign, launched by the European Food Safety Authority (EFSA), aims to reinforce information to passengers on the importance of not bringing in plants from third countries without phytosanitary guarantees. Posters have been put up to raise passenger awareness at airport exit flows.

2.5.5. Other noteworthy biodiversity actions

Regarding other collaborations with third parties to contribute to the protection and restoration of habitats, in the United Kingdom, London-Luton Airport has agreed to work with the organization Marston Vale on volunteer projects for tree planting. They have also participated in the 'Tree for Free' program, part of the Queen's Green Canopy initiative, acquiring a total of 1,000 tree specimens that were donated to local communities for planting. Additionally, the Greener Future initiative has been launched to support local community groups and charities demonstrating a commitment to biodiversity and addressing carbon emissions reduction.

For airports in the Aena subsidiaries in Brazil, it is planned to replant 1,300 trees around the airports in 2024 as an environmental compensation measure after having removed around 300 trees as part of construction works. Additionally, it is worth mentioning the holding of two committees per year to address aspects related to biodiversity along with interested parties at each airport.

Also, these airports 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 2023, Aena participated in the third edition of the National Aviation and Fauna Forum, held by AESA with the aim of fostering relations and coordination between all the agents involved in minimising the risk generated by fauna in aviation.

On the other hand, periodic coordination meetings have continued to be held between Spanish airports and the authorities designated by the airport's Fauna Risk Management Programme (PGRF [Programa de Gestión de Riesgos de Fauna]), the aim of which is to define and monitor management actions that allow the safe coexistence of fauna and air operations.

Also this year, in order to raise awareness of the local fauna among all staff working at Aena airports, 28 informative posters have been produced and distributed with images of the most common species at airports and their surroundings, their names and a brief description of their habits and presence in the area.

It is also worth highlighting the initiative developed in collaboration with the Saving the Amazon Foundation, through which more than 10,000 trees of native species have been planted in 2023 in the region of Porto Extrema (Brazil), with the help of local indigenous communities. All of this with the aim of contributing to the restoration and protection of the Amazon and the fight against climate change.

¹⁰⁴ Actions only implemented at airports in Spain within the Aena Group.

The most innovative actions regarding the protection of local fauna in Spain include the Radar Aviar project. It is 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 bird attraction points, which allows the information provided by the equipment to be integrated into decision-making and the application of appropriate mitigating measures. The equipment is currently operational at Bilbao Airport and will be implemented at other airports in the network.

2.6. Waste management and circular economy in airport facilities

(GRI 3-3)

The Aena Group is committed to the promotion 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. This commitment is reflected in the Sustainability Policy, the Integrated Quality, Environment, Energy Efficiency, and Occupational Health and Safety Management Policy, and is implemented in Spain through the Sustainability Strategy 2021-2030.

It is worth mentioning that in the United Kingdom, at London-Luton Airport, within the framework of its environmental policy, waste management plays a key role. The airport is committed to incorporating the principles of a circular economy by minimizing waste generation and reusing and recycling waste whenever feasible. In this context, proper waste management is considered fundamental, with investments being made in effective waste management and recycling practices. Additionally, active collaboration takes place to promote a circular economy with third parties and the community.

2.6.1. Waste management and circular economy model

(GRI 306-1; 306-2)

In the units and centers of the Aena Group, the following types of waste are generally generated, either from the activities carried out on the premises or by the tenants coexisting 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 inventory is prepared and kept up-to-date, in which the waste generated is classified including the following data¹⁰⁵:

- Nature of the waste (indicating if it is hazardous or not).
- Selective collection points for waste.
- Destination of the waste (indicating whether it is recovered, including reuse or recycling, or disposed of).

The inventory is accompanied by the preparation and updating of the chronological file of waste removals (hazardous and non-hazardous), 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.
- Type of treatment.
- When applicable, means of transport (vehicle registration) and collection frequency.

The documentation associated with the removal of waste by third parties is also filed by the maintenance staff 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 Plan, the Annual HW Report and the Annual Packaging Declaration to the Autonomous Community, if required.

Regarding the general guidelines for the control and management of the main types of waste generated:

¹⁰⁵ 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

- **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 in a segregated manner (paper-cardboard, glass, containers or organic matter and other waste) or in the specific containers of other selectively collected waste items (scrap, wood, pruning waste, 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 destined for recovery and one year if they are destined 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, recovery (including energy) and, finally, disposal. In any case, whenever possible, the site delivers the HW to managers who recover the waste, preventing its destination from being disposal.
- **Sanitary waste:** sanitary waste is managed, in its own right or by established agreements, according to the specific Sanitary Waste regulations or autonomous legislation, if any.
- **Construction and demolition waste (CDW):** the waste generated in the works carried out by the units or sites is stored in containers and delivered to an authorised manager or transferred to an authorised landfill. The RDSGI/ Manager of the works of the unit or site files a copy of the corresponding delivery records. The CDW generated in all other works are managed by the contracted company, as required by the applicable legislation in each case, and are controlled in accordance with the corresponding procedure.

In the United Kingdom, at London-Luton Airport, and at the airports of Aena's subsidiaries in Brazil, waste management is carried out similarly to Spain, adapting to the particularities of the legislation applicable in each country. In this regard, London-Luton Airport has closely collaborated with tenants and concessionaires in the terminal to facilitate waste segregation through their contracts. Waste classification is carried out on-site with the assistance of a waste manager located at the airport itself. All this has allowed achieving key objectives in recycling rates and achieving zero waste sent to landfill, as well as the implementation of optimal practices and outstanding performance in this area.

The projects developed in 2023 have continued with the aim of further increasing efficiency in waste segregation and recycling of non-aircraft waste. Successful interventions and new initiatives at London-Luton Airport include a waste classification incentive scheme for concession employees and collaboration with those responsible for food and beverage outlets in the terminal.

With regard to waste management at Aena's subsidiaries in Brazil, a set of planned and implemented procedures are followed, taking into account technical, regulatory and legal considerations, focused on minimising waste production and managing waste generated in a safe and efficient manner, protecting workers and preserving public health, natural resources and the environment.























During the waste management process, the contracted waste management companies are required to send electronic waste measurement reports detailing, among other things, the day, time and quantity of waste collected and treated with the corresponding application documents such as the Waste Transport Manifest (MTR), Final Destination Certificate (CDF) 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	 Valorization/Recycling	 Valorization/Reuse	 Municipal solid waste – Remaining fraction		
Party in Charge	 Aena	 Concessionaire			
Relationship	 Indirect	 Direct			

2.6.2. Zero Waste Objective by 2040

Within Aena's 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 2040¹⁰⁶. 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 United Kingdom is, within the context of waste management and a circular economy, to increase the percentage of recovered waste and avoid its sending to landfill. To this end, the following lines of action are developed:

- Operate a segregated waste stream throughout the airport, with a dedicated waste manager to ensure that it is handled in accordance with applicable regulations.
- Through the waste manager, carry out an additional classification and segregation of waste and extend the collection to new types of recyclable materials.
- Involve the airport's lessees to implement improvements in segregation, providing easily accessible separation containers and on-site assistance from the waste manager.
- Set a recycling rate target to reduce waste and promote its recovery.

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.

Objectives for waste management and promotion of the circular economy

Spain

2040

- Zero Waste target.

United Kingdom

2023

- Achieve 60% recycling of non-hazardous waste.
- Achieve 100% recovery of hazardous and non-hazardous waste.

Brazil

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

- Reduce waste destined for disposal by 50%.

2040

- Zero Waste target.

Short/Medium/Long term

¹⁰⁶ Objective focused on recurrent non-hazardous waste, excluding construction waste and hazardous waste

Evolution and progress of the objectives set in the area of waste management

Spain	United Kingdom	Brazil
2023 <ul style="list-style-type: none"> • 75.5% of non-hazardous waste recovered (76% in 2022) and 68.2% recovered in the case of hazardous waste (49% in 2022). 	2023 <ul style="list-style-type: none"> • A non-hazardous waste recycling rate of over 60% has been achieved (75% recycling of non-hazardous waste). 	2023 <ul style="list-style-type: none"> • Segregation actions for recyclable waste. • Implementation of containers for primary waste segregation in Terminal Buildings and Offices. • 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)

The preservation of natural resources is based on various aspects, with the proper management of waste generated by the network's airports being one of the key pillars. In this regard, Aena promotes initiatives at its airports and collaborates with stakeholders to move towards a circular economy. Likewise, some sites implement specific actions adapted to their particular circumstances.

In line with the practices established in previous years, the Company has installed specific signage in its terminal buildings and technical blocks with the aim of raising awareness of the importance of segregating waste in the appropriate containers.

Waste treatment and recycling

Several airports have a non-hazardous waste transfer plant, which centralises and improves temporary storage conditions, especially for the non-segregated fraction of waste similar to household waste. Specific points have also been set up for the temporary deposit of hazardous waste, which, due to its hazardous nature, is subject to specific pollution prevention measures. 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 companies¹⁰⁷. Likewise, as a general rule at Aena airports, waste managers are contractually required to perform the following:

- 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.

¹⁰⁷ See section '2.1.5. Sustainability and value chain' and 'Chapter 4'.



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.

In the United Kingdom, London-Luton Airport works closely with tenants to achieve the established goal of recycling non-hazardous waste. The results obtained are due to both the measures developed in 2022 and the implementation in 2023 of new recycling containers for passengers, as well as the increase in mixed waste management fees to discourage poor waste segregation.

In Brazil, the companies contracted by the airports of Aena's subsidiaries to manage the waste generated in the airport facilities are subject to all applicable laws, safety regulations, and obligations outlined in the contracts. This is ensured by including clauses in the awarded contracts. Additionally, contractors are required to submit periodic measurement reports and other documentation (certificates of treatment, final destination, etc.) that allow for monitoring of their performance and that of the company in this matter.

Reuse of waste

The Aena Group implements waste reuse initiatives, among which it is worth highlighting the reuse of sewage sludge as fertiliser in landscaped areas, as well as the generation of compost from food and beverage waste or garden waste at Bilbao Airport.

In the United Kingdom, the company Cawleys manages waste, which is responsible for conducting a thorough segregation prior to the disposal of any type of waste. This company is responsible for guaranteeing the management of waste for recycling or energy recovery, avoiding sending it to landfill wherever possible, thus complying with the commitment to zero waste to landfill. This management is a fundamental part of the airport's efforts to achieve the target of recovering 70% of the waste generated.

On the other hand, it should also be noted that London-Luton Airport requires the reuse of excavation material in works contracts whenever possible.

On the other hand, at the airports of Aena's subsidiaries in Brazil, waste management is carried out in compliance with the National Solid Waste Policy (PNRS), a federal law that establishes a set of guidelines and environmental management objectives to be achieved throughout the national territory, including the importance of conducting selective collections at the company's 6 airports. Therefore, the following priorities have been set for waste management in Brazil: waste generation prevention, reduction, reuse, recycling, solid waste treatment, and environmentally appropriate final disposal.

Removal of single-use plastics

Aena includes a specific clause in food and beverage service contracts that formalises the commitment to reduce the volume of plastic waste generated, prohibit the use of single-use plastics and encourage the use of products made from biodegradable or recyclable material¹⁰⁸

Similarly, the ban on single-use plastics is included in new contracts with food and beverage agents operating at London-Luton Airport. This is in addition to the UK government's strict legislation for certain single-use plastics and the establishment of additional recycling arrangements to ensure that the impact of single-use plastics is properly managed.

2.6.4. Initiatives with third parties in terms of waste reduction, reuse and recycling¹⁰⁹

(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, Aena has collaboration agreements with Ecoembes, Ecovidrio and ERP to ensure proper waste management. Barcelona-El Prat Josep Tarradellas Airport maintains close collaboration with the Trinijove Foundation, which is responsible for the collection and segregation of recoverable waste from this facility.

In addition, specific environmental clauses are included in contracts with third parties with the aim of reducing the amount of waste generated and increasing recovery rates, in line with the objectives of the Company's Sustainability Strategy.

¹⁰⁸ See section '2.1.5. Sustainability and value chain' and 'Chapter 4'.

¹⁰⁹ At London-Luton Airport in the United Kingdom, waste management is carried out through the company Cawleys, as indicated in the previous section on waste reuse.

2.6.5. Waste indicators

In 2023, the total non-hazardous waste generated by the Aena Group amounted to 40,472.1 tonnes (38,597.2 tonnes in 2022), due to the increase in air traffic volume. However, at Aena's airports in Spain, a percentage of non-hazardous waste recovery of over 75% (76% in 2022) and 100% (100% in 2022), was achieved in the case of London-Luton Airport in the United Kingdom, for both NHW and HW.

During 2023, el 73.0% of non-hazardous waste has been recycled/recovered (74.2% en 2022).

Waste generated (GRI 306-3), Waste not intended for disposal (GRI 306-4) and Waste intended for disposal (GRI 306-5) ^(A)

	2021				2022				2023			
	Spain	United Kingdom	Brazil	Total Consolidated	Spain	United Kingdom	Brazil	Total Consolidated	Spain	United Kingdom	Brazil ^(B)	Total Consolidated
Hazardous (tn)	440	13	82	535	730	20.8	29	779.8	600	27	53.8	680.8
Recovered (t)	332	12	0	344	354	20.8	0	374.8	409	27	0	436
Recovered (%)	75.0%	92.0%	0.0%	64.0%	48.5%	100.0%	0.0%	48.1%	68.2%	100.0%	0.0%	64.0%
Disposed of (t)	108	1	82	191	376	0	29.2	405	191	0	0	191
Disposed of (%)	25.0%	8.0%	100.0%	36.0%	51.5%	0.0%	100.0%	51.9%	31.8%	0.0%	0.0%	28.1%
Non-hazardous (tn)	21,631	587	1,227	23,445	35,433	1,619.2	1,545	38,597.2	36,308	2,111	2,053.1	40,472.1
Recovered (t)	13,858	358	57	14,273	26,982	1,619.21	37.1	28,638.2	27,396	2,111	37	29,544
Recovered (%)	64.0%	61.0%	5.0%	61.0%	76.1%	100.0%	2.4%	74.2%	75.5%	100.0%	1.8%	73.0%
Disposed of (t)	7,773	229	1,170	9,172	8,451	0	1,508.1	9,959	8,911	0	0	8,911
Disposed of (%)	36.0%	39.0%	95.0%	39.0%	23.9%	0.0%	97.6%	25.8%	24.5%	0.0%	0.0%	22.0%
Total (t)	22,071	600	1,309	23,980	36,163	1,640	1,574	39,377	36,908	2,138	2,106.9	41,152.9

(A) 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 makes it possible to compile the amount of waste generated by differentiating between more than 30 different types of waste and their degree of recovery. 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.

At London-Luton Airport, all waste is managed by the contracted waste manager, who completes segregation before transporting waste for which there are no recovery alternatives to a nearby disposal facility, whereas, in Brazil, this information has been obtained from the measurement reports submitted monthly by the waste managers, which contain all information related to the removal of waste from the airports by waste type.

The breakdown of the type of valuation of waste carried out by third parties is currently not available, although work is being done to be able to have this information in future reports.

(B) Waste: Due to the recent start of operations at Aena's subsidiary airports in Brazil, BOAB, all waste generation values at these airports have been estimated for the calculation of these indicators, as the actual data is not available. For this purpose, for each of the infrastructures, the consumption of an airport from Aena's ANB subsidiary with a similar number of ATUs has been taken as a reference, and then the values have been adjusted to the actual ATUs of each airport. Additionally, since the percentage of valorized waste is not available, the value of this proportion in ANB has been considered.

3- Commitment to society and human rights

→ GRI 2-22; 3-3



Commitment to SDGs



Principles that drive social sustainability

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.

Aena's commitment to Human Rights

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.

Impact of the activity on society and the environment

Lines of action:

Culture and heritage.

Vulnerable and socially problematic groups.

Accessibility.

Education and research.

Human rights.

The Aena Strategic Plan 2022-2026 proposes to continue implementing social sustainability and people development initiatives.

In the United Kingdom, London-Luton Airport includes a specific line on community engagement in its Responsible Business Strategy.

Main areas and initiatives of social action in 2023

More than €3,847,005 contributed to foundations and non-profit organisations in 2023

Aena with society, Aena with music and 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 & Greener Future Trust) in the United Kingdom.

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.



3.1. Commitments to sustainable development and society

(GRI 2-23; 2-28; 2-29; 3-3; 413-1)

Aena's Group commitment to social sustainability is included, at the highest level, through the Sustainability Policy. This commitment is also reflected in Aena's Strategic Plan, which recognises social sustainability and community relations as one of its key aspects and incorporates ambitious objectives in the area.

The Aena Strategic Plan reflects the objective to triple the amount allocated to social action initiatives by 2026 compared to 2019. And to achieve 1% of net profit by 2030.

This is done through the corresponding sustainability strategies, which include specific actions, aligned with the business model, and are adapted to the social realities of each country in which the Company operates in order to respond effectively to local needs.¹¹⁰

In Spain, the Sustainability Strategy 2021-2030 of Aena includes the line of action 'Community Relations', aimed at the creation of shared value in the local environment.¹¹¹ During 2023, its areas of action have been redefined, contemplating the existing ones, to adapt them to the social demands of the most current context, promote synergies to maximise the value generated, favour the involvement of employees and guarantee their alignment with the business model. As a result, the priority areas are support for vulnerable groups, improved accessibility, promotion of education and research, and respect for human rights.

For its part, in the United Kingdom, the community involvement strategy is included in the London-Luton Airport Responsible Business Strategy 2020-2025, which includes the promotion of healthy lifestyles, professional training for the future and the reduction of poverty as the main areas of action. Likewise, from 2023, it also includes as a priority area the development of environmental initiatives of a social nature, focused on caring for the environment and protecting biodiversity.

The projects and areas of action are monitored by the Sustainability and Climate Action Committee. Likewise, in Spain, the Corporate Responsibility and Institutional Relations Committee has been set up, an independent body with representation from different areas of the company, to ensure that the development of these projects is aligned with corporate criteria.

In the United Kingdom, at London-Luton Airport, the initiatives included in the London-Luton Airport Responsible Business Strategy 2020-2025, are promoted by the sustainability area who, in collaboration with third parties, promotes the deployment of social sustainability actions.

Aena adapts its social sustainability actions to respond to the needs of the socio-economic reality, working on the development of social initiatives to contribute to the creation of added value in the communities in which it operates.

¹¹⁰ At Aena subsidiaries in Brazil, although a Sustainability Strategy of their own is not yet available, they do carry out activities of this nature. Likewise, in 2024 it is planned to make progress in its development.

¹¹¹ 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 and responds to the needs 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, through the deployment of social actions aligned with the business model and local needs, focused on promoting participation in communities, favouring integration in the territory, contributing to the social wellbeing and improvement of people's quality of life, as well as promoting, among others, education, employment, cultural wealth and heritage, health, science and research, and inclusion of the most disadvantaged groups.

Principles that support social sustainability at Aena

Create shared value



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 the 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.

Social engagement: community relations

SPAIN

UNITED KINGDOM



Culture and heritage

Promotion of culture through support for recognised cultural organisations with the power to transform, whose activities are carried out in the area in which the company operates.



Vulnerable and socially problematic groups

Involvement in social and environmental issues that impact on the local environment, contributing to its improvement and progress.



Accessibility

Collaboration for the defence of the interests of groups with physical/ psychological problems, for the improvement and adaptation of facilities.



Education and research

Promoting the research fabric to resolve global problems that directly or indirectly affect Aena, based on science.



Human rights

"Having the appropriate mechanisms to identify, prevent, mitigate and account for how they address their impact on human rights"



Health in the present times, training, relieving poverty and a more ecological future.



Aena with music



Aena with society



Attention to passengers with special needs



Aena with research



Implementation of the human rights due diligence process



Support to aeronautical heritage



Help for vulnerable groups and emergency situations



Aena Chair



Value chain



Social environmental and sporting initiatives



Guided tours and open days



Corporate culture of human rights



Assignment of spaces, donations and voluntary flights



International cooperation

Make music, culture and knowledge of the sector accessible, especially to vulnerable groups.

Promote the engagement of employees and learn, as a second derivative, new currents of opinion.

Generation of synergies and teamwork through the development of cross-divisional projects.

Technology transfer in areas related to the sustainable transformation of air transport.

Synergies.
Social innovation.
Transparency.
Training and employment.

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)

For the implementation and development of effective social action, in line with the principles that support the Aena's Group Sustainability Policy and the strategies approved in each country, both Aena and its subsidiaries collaborate with other institutions, public and private. Among others, it is worth noting some institutions of relevance in the field of sustainability such as: the United Nations Global Compact, of which Aena is a signatory partner; Forética; Onuart Foundation and Seres Foundation; Community for Climate; Manifesto for a sustainable recovery; and the Alianza País Pobreza Infantil Cero against child poverty.¹¹²

During 2023, progress has been made in the development of the actions contemplated in Aena's Sustainability Strategy 2021- 2030 , some of which are ongoing and others newly implemented, in collaboration with the aforementioned institutions and other benchmark institutions. Specifically, in Spain:

- In the area of culture and heritage, it is worth noting the actions within the Aena with Music programme, in conjunction with leading organisations for the promotion of music and culture (Teatro Real Foundation, Pau Casals Foundation, Gran Teatre del Liceu Foundation and the Taller de Musics Music School).
- Likewise, actions have continued to be developed in aeronautical museums located at some airports in the Aena network in Spain, to promote the culture of the sector,¹¹³. And space has been made available at airports for the display of exhibitions, mainly of cultural content.
- Finally, it also worth mentioning the collaboration with the Enaire Foundation for the implementation of the 'La Arquería' Exhibition Hall.
- In the area focused on the protection of vulnerable groups, it is worth highlighting the launch of the first call for 'Aena with society' aid, with the aim of promoting and implementing social action projects with a positive and direct impact on the environment in which the Company operates, developed by social organisations endorsed by Aena employees.

Aena has also continued to support vulnerable groups in humanitarian emergencies, such as those caused by the earthquakes that struck Turkey and Syria on 6 February, the earthquake that struck Morocco on 9 September, and the floodings caused by Storm Daniel on 10 September. All this is through collaboration with the Spanish Red Cross.

With regard to environmental collaborations of a social nature, Aena has collaborated with the Saving the Amazon Foundation in the 'Aena Forest' project, through which the company has agreed to plant a tree for each of the Aena Group's employees. Local indigenous communities have been responsible for planting and caring for the trees, which results in the economic and social development of those communities.

Finally, Aena has continued to provide spaces in its airports, through the 'Solidarity Spaces' project, to social organisations to give a voice to their causes. It has also collaborated with these organisations through the lighting of its spaces, in general events or dissemination in the Newsletter, as well as in the collection of food and toys for vulnerable groups, or collaboration in the Holidays in Peace programme.

Several airports collaborate with various humanitarian organisations to facilitate the arrival and return of children from Sahrawi refugee camps.

- In the area of education and research, it is worth highlighting the launch of the first 'Aena with research' call to promote research and technology transfer projects in the airport sector, insofar as they contribute to drawing conclusions to address problems, needs or opportunities in the sector, especially in areas related to social and environmental sustainability and the sustainable transformation of air transport.

Guided tours and open days have also continued to be organised at airports for different groups.

For its part, Aena's subsidiaries in the United Kingdom, through the traditional financial contribution to the Community Trust Fund and the Greener Future Fund have collaborated with different social entities, generating a positive and direct impact on the communities closest to the airport.

In 2023, support for the Luton Food Bank and the East Anglian Air Ambulance service has been maintained through fundraising and volunteering by London- Luton Airport employees, providing food and medical equipment to the community.

Through the promotion of various sponsorship and donation campaigns, including events, prizes and passenger donations, among others, more than €210,000 has been raised and are destined for charitable organizations.

Additionally, over 375 hours of volunteering have been carried out by more than 70 London- Luton Airport employees, who have participated in activities aimed at improving the quality of life in the local community, such as waste collection, tree planting in the Marston Vale forest, fire prevention courses, and blood donation campaigns.

¹¹² Details of the agreements and collaboration agreements signed by Aena can be found on the corporate website. See chapter 'Links of interest'.

¹¹³ For example, in the Aeronautical Museum of Lanzarote, the Aeronautical Museum of Catalonia - Sabadell Airport, or the Museum of Airports, Navigation and Air Transport of Malaga.



With regard to Aena subsidiaries in Brazil, fifty families have been able to benefit from the allocation of land for agricultural use at João Pessoa Airport, contributing directly to local and economic development.

An agreement has also been signed for the donation of recyclable waste, generating value for the regional circular economy.

At the Campina Grande and Maceió - Zumbi dos Palmares Airports, in Brazil, several employees of the company have collaborated in organizing the Spotter Day and a guided tour for family members and minors from a shelter, aiming to bring the aeronautical culture closer to the local community and aviation photography enthusiasts.

The amount allocated to foundations and non-profit organisations amounts to more than €3,847,005 (€3,230,490 in 2022), of which €3,276,900 corresponds to Spain and more than €570,106¹¹⁴ to Aena's subsidiaries in the United Kingdom¹¹⁵.

With regard to in-kind contributions, in the terminals of Spanish airports, more than 4,029 m2 in 2023 has been allocated to solidarity spaces in 2023 (3,055 m2 in 2022¹¹⁶), to give a voice to social entities, and 19,008 m2¹¹⁷ to cultural exhibitions (7,970 m2 in 2022), which represents an in-kind contribution of €366,485 in 2023 (€517,548 in 2022).

¹¹⁴ Closing exchange rates used for balance sheet accounts: EURvsGBP= 0,86905.

¹¹⁵ No contributions of this nature have materialized in Aena's subsidiaries in Brazil in 2023..

¹¹⁶ During the first six months of 2022, different spaces at the Adolfo Suárez-Madrid Barajas Airport were used to expedite care for refugees from Syria and Ukraine. In 2023, although these spaces have continued to be used for resettlement, the number of days of occupation has been much lower.

¹¹⁷ Unlike 2022, in 2023 the Aeronautical Museum of Catalonia - Sabadell Airport and the Aeronautical Cultural Center - Josep Tarradellas Barcelona-Ei Prat Airport have been counted for these purposes. Both have a total of 11,430 m2.



Culture and Heritage

Aena with music:

Sponsorship programme to support the training of young artists and groups at risk of exclusion, promoting talent and bringing music to airports. Aena collaborates with the Teatro Real Foundation, the Pau Casals Foundation, the Gran Teatre del Liceu Foundation and the Taller de Musics Music School. In total, more than €450,000 is allocated to this collaboration programme.

Exhibit spaces: support for aeronautical heritage

•Aeronautical museums: Aena permanently exhibits these spaces, as is the case of Ibiza Airport with the exhibition 'Ibiza: a meeting point since ancient times' or the Aeronautical Museum of Lanzarote and the Museum of Airports, Navigation and Air Transport of Malaga, which received more than 700 visitors for International Museum Day.

•Display of exhibitions of various kinds at some of the airports in the network, in collaboration with recognised artists, on a temporary or permanent basis.

Other collaborations with third parties for the promotion of heritage:

For example, the collaboration with the Enaire Foundation for the implementation of the 'La Arquería' Exhibition Hall.

Commemoration of national and international days:

Aena promotes their celebration through its weekly newsletter and different activities, such as the celebration of UNESCO Day where 77 employees from Adolfo Suárez Madrid-Barajas Airport participated in a competition related to cinema, or Book Day, where several airports organised a series of activities with the aim of promoting reading, publishing and copyright of literary works.

Moreover, César Manrique-Lanzarote Airport and La Gomera Airport have set up a book exchange point.



Vulnerable and Socially Problematic Groups

Aena with society:

In 2023, Aena has presented the first call for applications to the 'Aena with society' programme. The aim of this social aid is to promote social action projects with a positive and direct impact on the environment in which the company operates, endorsed by Aena employees.

The programme is allocated a maximum amount of €460,000 for a total duration of 2 years, to be distributed over up to 15 projects.

Community Trust Fund (+€213,000):

In the United Kingdom, London-Luton Airport supports 23 local organisations through grants with an impact on more than 6,000 beneficiaries in health, wellness, training, access to employment, poverty relief and inclusive development.

Greener Future Fund (+€102,000):

In the United Kingdom, London-Luton Airport supports 10 local organisations through grants with an impact on more than 9,500 beneficiaries through projects that promote biodiversity, environmental education and carbon reduction.

At João Pessoa Airport in Brazil, land has been transferred for agricultural use, contributing directly to local and economic development, and an agreement has been signed for the donation of recyclable waste, generating value for the regional circular economy.

"Alliance for Zero Child Poverty" by the High Commissioner against Child Poverty. Aena joins this initiative aimed at changing the situation of child poverty in Spain by promoting joint participation with government bodies, businesses, foundations, and the tertiary sector to achieve a country that provides equal opportunities for all citizens and break the cycle of child poverty.

Aid in emergency situations: support for groups affected by emergency and vulnerability situations, such as, for example, the collaboration with the Spanish Red Cross, which amounts to €150,000.

This aid is intended for humanitarian emergencies, such as those caused by the earthquakes that shook Turkey, Syria and Morocco in 2023, or the huge floods caused by Storm Daniel in north-eastern Libya.



Vulnerable and Socially Problematic Groups

Social environmental and sporting initiatives:

Aena combines sport and charitable causes by supporting sports and events for social purposes:

- Support for sporting events: several airports in the network have participated in charity runs such as the Loiu Family Run, the Zubiri-Pamplona/Iruña Half Marathon, the XIV Martxa Subida Artxanda, the X Martxa Green (Green Ring) and the UH Night Run (Binter NightRun), among others, as well as charity walks and mountain hikes.

- Saving the Amazon: with the aim of contributing to the restoration and protection of the Amazon and the fight against climate change, Aena has planted more than 10,000 trees in the region of Porto Extrema (Brazil). Local indigenous communities have been responsible for planting and caring for the trees.

- In the United Kingdom, London-Luton Airport raises** more than €40,000 for its beneficiary partners (East Anglian Air Ambulance and Luton Food Bank) by organising fundraising events such as the LLA Golf Day, the Runway Run charity run and a Christmas carol event, among others.

Assignment of spaces for social purposes:

- Solidarity spaces: more than fifteen Aena airports provide social organisations with a place in their terminals free of charge, giving them the possibility to disseminate among airport users the social causes they defend thanks to awareness-raising, information and public awareness campaigns. Passengers and users can find out about the activities and services provided by more than twenty organisations and associations such as the Spanish Association Against Cancer, the Las Palmas Provincial Multiple Sclerosis Association (APEM), Save the Children, the Association for the Fight Against Kidney Diseases (ALCER) and the National Transplant Organisation (ONT), among others.

- In March, Sevilla Airport hosted an exhibition by the association ACCU to raise awareness of the reality of ostomised persons.

- Newsletters: In Spain and Brazil, 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.

- More than fifteen airports have lit up their facilities and buildings to commemorate international days such as World Cancer Day, Rare Diseases Day, International Women's Day, World Autism Awareness Day, International Breast Cancer Day and the International Day for the Elimination of Violence against Women, among others.

- Aena Brasil subsidiaries** showed their support for the breast cancer prevention campaign in October by lighting up their buildings. 'Pink October' is a reminder of the importance of prevention and early detection of the disease.

- Holidays in Peace Programme: several airports in the network, including Palma de Mallorca Airport, Sevilla Airport, Bilbao Airport, Alicante-Elche Airport, Málaga-Costa del Sol Airport and Vigo Airport have received Sahrawi children up to 12 years of age, activating their mechanisms to help the organisations promoting the initiative (providing space, etc.). At these last two airports alone, they have collaborated with social organisations in the arrival of more than 500 children.

- Charity markets: Aena has organised charity markets for social organisations to sell fair trade products. In 2023, these took place both at Adolfo Suárez Madrid-Barajas Airport and at Aena's corporate headquarters, where more than ten organisations took part.

Blood donation: several airports in the network, such as Málaga-Costa del Sol Airport and Sevilla Airport have participated in blood donation days at their facilities.

Humanitarian flights:

Our airport network is available for emergency situations and for the transportation of medical organs and equipment. In Spain, a total of 13.614 ambulance flights have been carried out (compared to 13,902 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.

Donations:

- Collaboration between Valencia Airport and Manises City Council to donate lost suitcases at the airport to various local associations in a charity market.

- Vigo Airport collaborates with the Comedor de la Esperanza soup kitchen in a campaign to collect bottle caps to transform them into food and clothing for charity.

- More than €210,000 in the United Kingdom, at London-Luton Airport, thanks to donations from passengers at different points in the airport, the donation of amounts collected through noise and traffic fines, shopping vouchers and tickets to visit Marston Vale forest, as well as through the sponsorship of different awards and events such as Love Luton, SME Luton and EVOLVE.**



Vulnerable and Socially Problematic Groups

Volunteering:

Aena has promoted the participation of its employees in volunteer activities, organized by different organizations.

- Employees of the Federico García Lorca Granada-Jaén Airport, for example, participate in the “Flying together” initiative, collaborating with the children's ward of the University Hospital of Granada to make the stay of children in the hospital more friendly.
- MareNostrum Day: a group of employees from Palma de Mallorca Airport collaborated with waste collection, microplastic sampling, photographic snorkeling and observation underwater, within the framework of the Mare Nostrum awareness campaign.
- In the United Kingdom, at London-Luton Airport, more than 70 employees have carried out more than 375 hours of volunteering, organizing a waste collection day at Luton town centre, a tree planting day in Marston Vale forest, fire prevention courses and blood donation campaigns, among others.



Accessibility

Universal accessibility:

•Aena launches a badge aimed at people with invisible disabilities who have difficulties in environments that are stressful or have a lot of sensory stimulation. The badge indicates that the person may need support, help or simply understanding and a little more time for any airport process.

•Aena has been recognised as ‘Friend of Autism 2023’ by Autism Spain, a confederation of entities that work specifically with people with autism (ASD) and their families to improve their quality of life.

•It has also been recognised by Afanias, an organisation that promotes the employment of people with intellectual disabilities, through a four-year training cycle.

•Alicante-Elche Airport is building a sensory room for people on the autism spectrum disorder. Travellers with ASD will be able to wait for their flight in a safe, orderly environment with stimuli suitable for people with heightened sensory sensitivity.

•Throughout 2023, Aena continues to work, through the FAPOE (Federation of Associations of Ostomised Persons of Spain) Agreement, on installing new bathrooms for people with ostomies at different airports in the network.

•Pamplona Airport has been the setting for a music video, which, in collaboration with different associations, aims to raise awareness of autism spectrum disorders (ASD).

Promoting the employment of people with disabilities:

Aena collaborates with €90,000 within the framework of a call for proposals aimed at entities working on labour insertion, distributing the funds among various projects and organisations.



Promotion of education and research

Aena with research:

Aena has presented the call for the 'Aena with research' programme to promote research and technology transfer projects in the airport field. The projects will be developed by research groups, teams or departments of renowned recognition in their area.

The research aid programme is allocated a maximum amount of €840,000 to be distributed among three projects that will be developed within 4 years.

Guided tours and open days:

Through company employees, Aena carries out guided tours at almost twenty of its Spanish airports and in the United Kingdom, at London-Luton Airport, aimed at different groups. These include high school, vocational and university students, young people in employment programmes and children with special needs, as well as professionals from various sectors or entrepreneurs participating in local forums, from more than fifty different organisations.

Likewise, in 2023, the open days for Aena staff members and their families have continued.

At the Maceió - Zumbi dos Palmares International Airport in Brazil, several of the Company's employees collaborated in the organisation of a guided tour for family members and minors from a shelter in the region.

Amateur aeronautical photography days:

In 2023, the days for 'spotters' have resumed. Seven airports in the network, in collaboration with different associations, have set up special areas with privileged views for these amateurs, who have even had the opportunity to meet the birds of prey that ensure the operational safety of the airport, as is the case at Almería Airport.

Campina Grande Airport, in Brazil, celebrated Spotter's Day in April, where it was visited by a group of enthusiasts who were able to capture images and meet airport staff.

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 201-1; 203-1; 203-2)

Generation of resources in the community (social cash flow) (GRI 201-1)



Creating jobs

10,111 employees

more than 87.7 million jobs worldwide generated by the air transport sector.

28 current agreements: 19 with universities (public and private), with 4 study, training or business centres and 5 vocational training centres, allowing 71 students from undergraduate degrees and master's degrees and 9 from vocational training to complete curricular or extracurricular internships in Spain during 2023. ^(A)



Improving social integration

1.56% people with functional diversity on the workforce.

Support sessions for organisations that carry out integration into the labour market initiatives and job creation campaigns for people with disabilities: €900,000 per year.

Collaboration with third sector organisations to promote the integration of people with special needs (CERMI, etc.). Services for people with reduced mobility at airports (almost 2,230,359 people assisted in 2023).



Promoting local business

Aena Ventures: programme for accelerating ideas for financing and implementing pilot projects.

Contracting local suppliers (local employment):

99.8% in Spain

53% in United Kingdom

100% in Brazil



Economic value generated and distributed

€5,141.80 million in economic value generated (revenue) (€4,237.50 in 2022)

€565.50 million staff costs (€514.59 in 2022)



Tax contributions

This has amounted to 902.20 M€.

834.9 M€ in Spain (92.5%).

37.4 M€ of taxes paid in the United Kingdom (4.1% of the total).

29.9 in Brazil (3.3%).

Tax borne: 735.7 M€.

^(A) 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 Aena's Group activity generates important 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:

- The generation of direct and indirect jobs, derived from the activity carried out by the company, the infrastructure and transportation sector, or by third parties. In this regard, and specifically, in terms of promoting employment locally, it is worth noting the participation of Aena and its subsidiaries, in both Spain and the United Kingdom at local job fairs and in the work of disseminating vacant positions through various platforms. Likewise, Adolfo Suárez Madrid-Barajas Airport also participates in the 4th Eso +Company programme. CAM, through which students carry out a week's internship at the airport's facilities, thus getting closer to the reality of work.
- Creation of positive impact generated through responsible tax contributions.¹¹⁸
- The training of future professionals in the sector, through the International Cooperation Programme, guided tours, etc.
- Promoting social innovation initiatives and supporting pilot project development.

Luton Borough Council 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.

- Collaboration in the promotion of the tourism sector, as well as the improvement of 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.
- Aena is also actively present at events that promote transport, specifically in the aeronautical field, participating as a protective partner of the Spanish Transport Association and through participation in events such as the European Funds III - Spain, for global leadership in the green and digital economy, AeroSpaceDay (an event related to sustainability and innovation), the Sustainable Mobility Event, and as a founding institution of the Barcelona Metropolitan Strategic Plan, among others.
- Aena also supports sustainable transport and economic development through the presence of company employees at events and round tables, such as its participation in the round table debate on the Catalan airport model at the Diario Sustainable Mobility Conference, or the round table on 'Connectivity and maritime and air infrastructures', organised by the Club Diario de Mallorca, among others.

- Promotion of aeronautical culture among aviation enthusiasts. For example, by holding spotters' days, an open day for enthusiasts of this activity to capture images, for which Aena provides strategically located spaces.
- Facilitation of territorial cohesion and connection, offering services for all groups, especially those with difficulties¹¹⁹.
- Generation of wealth through responsible procurement and the acquisition of supplies, services and works, mostly from local suppliers.
- Boosting female leadership in the industry and promoting the presence of women in management bodies by collaborating with associations such as 'Ellas Vuelan Alto', in training sessions or attending specialised forums and promoting female talent through projects such as the Women in Retail Club, for example.

¹¹⁸ See section 'Tax strategy' in Chapter 1. Business Model.

¹¹⁹ See section 6.6.2, regarding 'Infrastructures for all'.

Social Impact indicators (GRI 201-1)	2022 (Millions of €)	2023 (Millions of €)	Observations
A. Direct economic value generated (revenue)	4,237.5	5,141.8	
B. Distributed economic value	3,632.52	3,910.50	
- Operational costs	2,439.23	2,374.9	Total expenses, excluding personnel expenses
- Employee salaries and benefits	514.59	565.5	Personnel expenses
- Payments to capital providers	149	64.1	Financial result and dividend payments
- Payments to government (by country)	526.5	902.2	Tax contribution
- Spain	469	834.9	
- United Kingdom	32.5	37.4	
- Brazil	24.9	29.9	
- Investments in the community	3.2	3.8	Contributions to foundations and non-profit organizations
C. Retained economic value	604.98	1,231.3	C=A-B

3.2.2. Impact on local populations and on the territory

(GRI 2-29; 203-1; 203-2)

Aena Group 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.

- Promotion of 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 bodies, it continue to advance and promote infrastructures that have fast, efficient and sustainable access and that integrate with other modes of transport, especially public transport, improving access, urban planning and the combination with other infrastructures. In the last decade, airport access by private vehicle has gradually been reduced, increasing the use of public transportation.

In this regard, Girona-Costa Brava Airport, Jerez Airport and Fuerteventura Airport have opened bicycle parking spaces with the aim of promoting sustainable mobility, reaffirming Aena's commitment to the fight against climate change and making it easier for passengers to use the airport facilities. Moreover, Zaragoza Airport has collaborated with Zaragoza City Council and the Government of Aragon to set up new hydrogen-powered bus lines.

A service station has also been installed at Girona-Costa Brava Airport for the repair of bicycles, which is available to employees and passengers.

For its part, in Brazil, at the Recife Airport, in 2023 a pilot project has been developed for the use of an electric bus, promoting sustainable mobility in the infrastructure.

Finally, in line with the progress towards intermodality in different parts of the globe, at the beginning of 2023 and in conjunction with Luton City Council, the autonomous train (DART) was inaugurated at London-Luton Airport, in the United Kingdom. This connects Luton Airport Parkway station with the passenger station. At the same time, the operation of Luton Airport Express began, a train service that connects London-Luton Airport with the Saint Pancras metro station located in the center of the city in 32 minutes. The focus of this project is to improve and simplify airport connectivity and user experience.

- Conduct periodic air mobility surveys (EMMAs), aimed at passengers, to know the type of user, reasons for travel and mode of transport taken to the airport.
- Application of insularity criteria for airport charges, which promote territorial cohesion and guarantee access to a fundamental means of transport for inhabitants of island areas such as the Canary Islands and Balearic Islands.
- Establishment of new discounted routes and development of hub airports, to enhance the connectivity of the aviation sector between the main cities of the world.
- Master plans and environmental impact studies.¹²⁰ In Spain, environmental impact studies are conducted on projects, the results of which are publicly accessible. These reports are available to different stakeholders, allowing them to review and express their opinions, thus ensuring their participation in decision-making. In this way, care for the environment and the expectations of local communities are prioritised. Specific analyses are conducted on how infrastructures and airport activity affect the environmental and social environment. Appropriate channels for information and public participation are also ensured. Sustainable coexistence with society and the environment involves considering specific measures and proposals for urban regeneration, when necessary, in order to avoid negative impacts arising from the execution of works or the development of new projects (for example, the environmental resolutions of the Environmental Master Plans can be consulted¹²¹).
- Encouraging collaboration with third parties to improve the airport environment. In the United Kingdom, the implementation projects with direct benefits are promoted locally¹²², led by non-profit organisations and community groups, thus contributing to the sustainable development of the surrounding area and their communities. In Spain, the 'Aena with society' initiative has been launched to support social action projects with a positive and direct impact on the environment where the Company operates, also developed by local organisations.

Regarding Aena subsidiaries in Brazil, at the João Pessoa Airport fifty families have been able to benefit from the transfer of land for agricultural use, directly contributing to local and economic development.

- Promote SmartCities & SmartAirports in property developments, in collaboration with various municipalities. The objective is to facilitate the exchange of information between airports and cities, thereby improving the traveller experience and enhancing synergies through their information systems. This seeks to maximise the contribution to the economic and social development of the areas in which the company operates, generating a significant impact in terms of connectivity, sustainability and efficiency. In this context, Aena is making progress in the development of the Adolfo Suárez Madrid-Barajas Airport City, relaunching the area through a consultation process with the real estate and logistics sector. This project will stimulate the development of new services, with a priority focus on environmental, social and economic sustainability, as well as Aena's commitment to the territory, guaranteeing the harmony of the project with its surroundings.

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 2021-2030 in place, or the corresponding one in the Responsible Business Strategy of London-Luton Airport.

Chapter 2 of this report describes the short- and medium-term objectives, the resources and mechanisms used and the actions carried out in the area of Sound Insulation Plans (SIP).

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.

The National Museum of Airports and Air Transport at Málaga-Costa del Sol Airport and the Aeronautical Museum at César Manrique-Lanzarote Airport organise visits that promote the dissemination of knowledge about the technology of the aeronautical world, the history of airports and air transport, and their future projects.

¹²⁰ 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.

¹²¹ See chapter 'Links of interest'.

¹²² See chapter 'Links of interest'.



In this way, knowledge of aeronautical history is promoted in these two cities and, in the case of César Manrique-Lanzarote Airport, it also contributes to the conservation of a historic and symbolic building, as the Museum is located in the first building intended for passengers, built in the early 1940s.

Moreover, several airports in the network have organised open days for aeronautical photography enthusiasts (spotter days). These days, which involve the collaboration of the airport and various amateur associations, have a great impact on aeronautical forums and social networks, disseminating aeronautical culture and the hobby of photography.

On the other hand, thanks to the archaeological work carried out by Aena at Ibiza Airport between 2017 and 2022, replicas of the archaeological finds can be visited. These replicas reveal the customs and lifestyles of the civilisations that inhabited the territory now occupied by the airport more than 2,000 years ago in the permanent exhibition 'Ibiza: a meeting point since ancient times'.

A total of 33 temporary art installations have also been exhibited at 13 Aena airports throughout 2023. These exhibitions of painting, photography, tapestries and sculpture showcase the work of local and international artists while making the journey of passengers through the airport more pleasant.

In Brazil, Juazeiro do Norte - Orlando Bezerra de Menezes Airport received a visit from UNESCO in order to revalidate the green seal of the Araripe Geopark, where the airport is located. This collaboration is of great relevance for the conservation of geological heritage.

International cooperation

In terms of international cooperation, in addition to collaboration with the Saving the Amazon¹²³ foundation, it is worth mentioning the International Cooperation Program, through which Aena, by developing a series of training activities, contributes to improving the training of aeronautical professionals, mainly from the public sector in Ibero-America, promoting the development of their countries. At the same time, it strengthens the reputation of the air transport sector industry in Spain and promotes Aena's best practices abroad.

During the year 2023, the virtual format of the Specific Training Courses of the Master's Degree in Aeronautical Systems Management, taught by the Universidad Politécnica de Madrid, has been maintained. Additionally, the organization of in-person training events in Ibero-America has been resumed through three Seminars held at the AECID Training Centers, one in Cartagena de Indias (Colombia) and two in Montevideo (Uruguay). These seminars addressed topics such as optimizing non-airport revenues, real-time network control and communication, and the air transport strategy in the fight against climate change, respectively.

Additionally, online courses focusing on various airport-related subjects have been conducted.

As a result, in 2023, the International Cooperation activities involved the participation of 234 aviation transportation professionals from various countries (compared to 170 in 2022), with over €89,000 allocated (compared to over €52,000 in 2022).

Over the past five years, through the International Cooperation Program, 938 aviation professionals from 19 different countries have been trained, with approximately €478,000 allocated for this purpose.

This program is developed in collaboration with nationally and internationally renowned organizations and institutions such as the Spanish Agency for International Development Cooperation (AECID), an agency under the Ministry of Foreign Affairs, European Union and Cooperation, the Capacity Building and Implementation Directorate of the International Civil Aviation Organization (ICAO), and the Technical School of Aeronautical Engineering and Space of the Polytechnic University of Madrid (UPM), among others.

¹²³ See section "3.1.1. Social action".

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

Adhesion to the Principles of the United Nations Global Compact

United Nations Guiding Principles on Business and Human Rights

Sustainable development goals

Convention on the Rights of the Child

Convention on the Rights of Persons with Disabilities

Declaration on the Rights of Indigenous Peoples

UN Human Rights Council Resolution 48/13 on the human right to a safe, clean, healthy and sustainable environment

Declaration of the International Labour Organization (ILO) regarding the Declaration on Fundamental Principles and Rights at Work, and the eight fundamental conventions that supplement it

Tripartite Statement of Principles for Multinational Enterprises

ILO Social Policy

Lines and Guidelines for Multinational Enterprises

National constitutions and laws that recognise or enforce human rights

Aena's commitments to human rights

Commitments to labour practices:

- Respectful and dignified work
- Equal opportunities, diversity and non-discrimination
- Forced labour, illegal trafficking, human trafficking or modern slavery
- Labour unions and freedom of association and collective bargaining
- Development of people
- Fair and Equal Remuneration
- Relaxation and free time
- Occupational health and safety of people
- Rights of minors and rejection of the use of child labour
- Freedom of opinion, information and expression

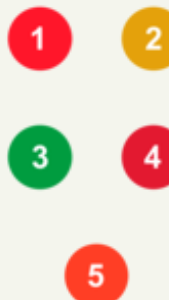
Service commitments:

- Secure, excellent and quality service
- Transparency, privacy, confidentiality, freedom of expression and non-discrimination with customers

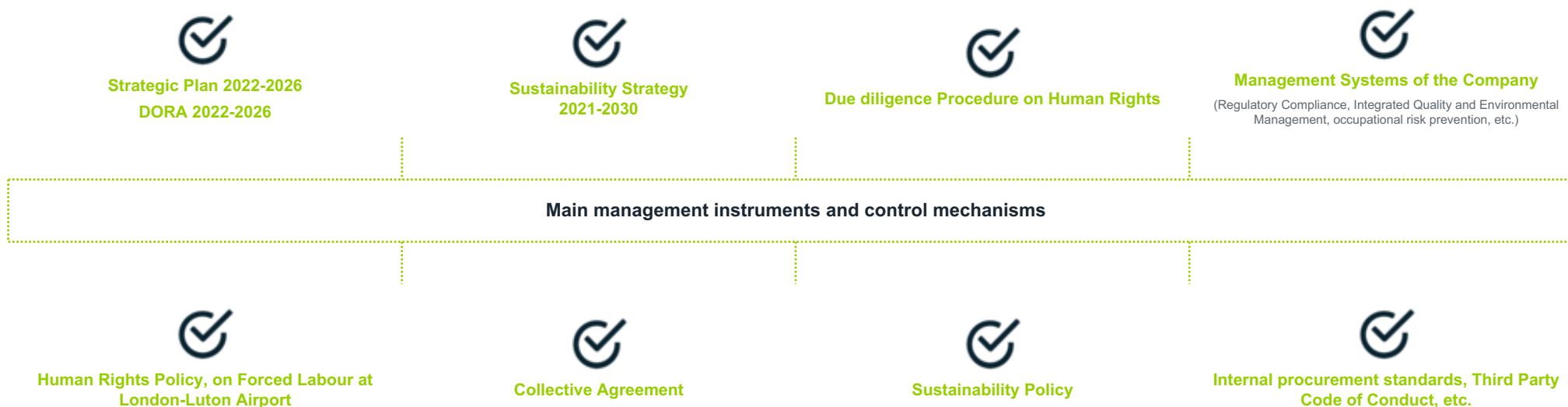
Commitments to the environment and community

- Safety and rights in communities
- Protection of the environment and reduction of the environmental footprint
- Honesty and integrity, ethical relationships and good tax practices, and rejection of corruption and anti-competitive practices

Principles of the UN Global Compact



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.



The Aena Group's commitment to human rights is set out in the Human Rights Policy, approved at the highest level of the organisation.

In 2023, Aena has updated its Human Rights Policy, in line with the main frameworks.

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, Declaration on the Rights of Indigenous Peoples, UN Human Rights Council Resolution 48/13 on the human right to a safe, clean, healthy and sustainable environment, 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, the ILO Social Policy, the Lines and Guidelines for Multinational Enterprises, and the national constitutions and laws that recognise or apply Human Rights.

With it, the Aena Group 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.
- 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.
- Mechanisms to ensure the effective development of the Policy, as well as for any third party to express concerns or address, report, denounce, and communicate conduct or facts relating to non-compliance with Human Rights principles.
- 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 Aena's subsidiaries in the UK.



Aena principles and commitments to Human Rights established in the Human Rights Policy

Employ and promote a respectful and dignified work environment	Employ and promote a respectful and dignified work environment
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 reducing the environmental footprint
Contribute to maintaining honesty and integrity, ethical relationships and good tax practices, and rejection of corruption and anti-competitive practices	

Through the Third Party Code of Conduct, the commitment extends to those with whom Aena contracts¹²⁴

Some internal rules that reflect Aena's 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.



The Code of Conduct, which includes among its principles of action compliance with human and collective rights and, in particular, the commitment to human rights and public freedoms recognised in national and international legislation, and especially with the principles set out in the Universal Declaration of Human Rights.



The Policy on Human Rights of Aena, is applicable to those companies in which Aena has a majority stake. It also contemplates the dissemination among its suppliers, contractors, business partners and other collaborating companies of its commitment to Human Rights and that, in the event that it does not have its own policy, they adhere to that of Aena.



The Third Party Code of Conduct includes, among its principles, that Third Parties, regardless of the country in which they carry out their activity, act diligently and responsibly to prevent, detect or mitigate situations that may compromise Human Rights, as well as nationally or internationally recognised labour rights.

3.3.2. Human Rights due diligence procedure

(GRI 3-3; 2-23; 2-25)

Aena has its own human rights due diligence procedure through which it 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.

Aena has a human rights due diligence procedure.

This procedure is based on the 'protect, respect and remedy' pillars of the UN Guiding Principles and aligned with relevant frameworks and standards. In it, the following are defined:

- The roles, responsibility and actions of the different areas of the Company involved. Specifically, the role of the Sustainability and Climate Action Committee should be highlighted in this respect, whose competencies include those 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 the principles, commitments, objectives and strategy regarding the respect of human rights, among other issues.
- The methodology for identifying potential risks of violation.
- The adoption of appropriate prevention and/or mitigation measures, if necessary.
- The provision of mechanisms for reporting possible violations.

Through this procedure, Aena reinforces the tools already available to the Company that contribute, directly and indirectly, to avoiding possible risks of human rights or environmental violations, and developed within the framework of its regulatory compliance system¹²⁵, risk management and control, integrated management of quality and environment and energy efficiency, health and safety, information security, and operational security, among others.¹²⁶

¹²⁴ Internal policies and standards are available on the Company's website. See section 'Links of interest' in the section 'About this report'.

¹²⁵ Among the control, prevention and monitoring mechanisms contemplated by the Compliance System, the following can be cited: Prevention, such as all the Company's internal regulations and policies, both general (e.g., Code of Conduct) and specific (e.g., Internal Regulations for Conduct in the Securities Markets), which contribute to mitigating the risk of offences, unethical practices or breaches of regulations in the course of our business. In this regard, all Aena's divisions must ensure compliance with the Company's internal policies or regulations, and identify areas for improvement to implement or correct the procedures deemed appropriate to prevent the risks of regulatory breaches in the organisation.

Detection or action procedures, which determine the information required and the way to act in situations involving regulatory breaches and/or practices contrary to the values and principles set out in the applicable Code of Conduct.

¹²⁶ 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 non-compliance, and seeking solutions to eradicate it.



Commitments

Established in the Human Rights Policy and endorsed by other internal standards



Due diligence

Identify, prevent, mitigate and respond to possible risks in the area of Human Rights and the environment



Communication Mechanisms

Internal and external complaints channel



Training and communication

Through employee awareness actions



Commitments transferred to the value chain, which must adhere to Aena's human rights policy, if it does not have its own



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, and risk prevention and mitigation measures

(GRI 3-3; 407-1; 408-1; 409-1)

The methodology for assessing potential risks of human rights and environmental violations¹²⁷ is set out in the human rights and environmental due diligence procedure of Aena. In accordance with the above, and taking into consideration the commitments assumed in the Policy, possible risks of violation associated with labour practices, the services offered, the impact on the environment and society, and the activity of suppliers are identified, based on the assessment of:

- 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.

The analysis of risks of human rights violations shows that the risk of possible violations of human rights (including collective bargaining, forced labour or child labour) and the environment by Aena and its subsidiaries, both in Spain and in the United Kingdom and Brazil, and its suppliers, is generally 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).

In order to reinforce control over suppliers, a clause on human rights (social sustainability) has been introduced in all Aena's procurement specifications during 2023, in line with the planned objective. Through this clause, bidders and the subsequent successful bidder of the contract assume that their participation in the tender implies compliance with the highest national and international standards in terms of human rights and ethics. Likewise, in the event of not having a code of conduct, ethics or similar and a human rights policy, the bidding companies and the successful bidder undertake to comply with the highest standards in this area, adhering to the principles and values of action defined respectively in the Aena Code of Conduct and in the Aena Human Rights Policy.

Furthermore, the Third Party Code of Conduct, which is applicable to:

- All third parties with which Aena and its subsidiaries wholly or majority owned by Aena, domiciled in Spain, contract.

- Third parties with which companies that are not domiciled in Spain contract, provided that it is compatible with the local regulations applicable to them and they do not have their own Code with a similar scope.
- Those subcontractors with whom third parties may subcontract, who must in turn ensure that said subcontractors comply with the provisions of the Third Party Code.

It includes that Third Parties, regardless of the country in which they carry out their activity, must act diligently and responsibly to prevent, detect or mitigate situations that may compromise Human Rights, as well as nationally or internationally recognised labour rights.

¹²⁷ The analysis has been carried out at a national level.



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		<p>The Aena Group guarantees stability and quality in employment, as stated in:</p> <ul style="list-style-type: none"> • Internal policies, standards and procedures. • Collective Agreements. <p>All of this is materialised through specific actions such as the 2nd Equality Plan, which contains specific actions and objectives, the Procedure for the Management of the Internal Information System and Whistleblower Protection, the Aena Protocol for the Prohibition of Retaliation, the Protocol for Prevention and Action in Situations of Sexual Harassment, Gender-Based Harassment, Harassment Based on Sexual Orientation and Sexual Identity or Gender Expression, sending of frequent communiqués (Brazil), specific training in the different areas of human rights, adaptations to favour adequate participation in recruitment rounds and selection tests for all persons, measures to facilitate work-life balance (paternity/ maternity leave, etc.), representation of workers through joint bodies and committees, trade union organisations/elections, etc.</p>	Low probability and impact
Equal opportunity, diversity promotion and non-discrimination	<p>Mechanisms of prevention, detection or action 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:</p> <ul style="list-style-type: none"> • Prevention, such as all the Company's internal regulations and policies, both general (e.g., Code of Conduct) and specific (e.g., Internal Regulations for Conduct in the Securities Markets), which contribute to mitigating the risk of offences, unethical practices or breaches of regulations in the course of our business. In this regard, all Aena's divisions must ensure compliance with the Company's internal policies or regulations, and identify areas for improvement to implement or correct the procedures deemed appropriate to prevent the risks of regulatory breaches in the organisation. • Detection or action procedures, which determine the information required and the way to act in situations involving regulatory breaches and/or practices contrary to the values and principles set out in the applicable Code of Conduct. 	<p>Likewise, the Group 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.</p>	
No tolerance for forced labour, illegal trafficking and human trafficking or modern slavery			
Facilitate freedom to joint labour unions, associations		<p>The Aena Group facilitates freedom of association and collective bargaining, as set out in:</p> <ul style="list-style-type: none"> • Internal policies, standards and procedures. • The Collective Agreement, employee book, as applicable. <p>This is materialised through the representation of workers in joint committees and trade union organisations, regular meetings between the company and trade union organisations, etc. All this is done to promote and defend their economic and social interests, avoiding any kind of discrimination</p>	

Fair and Equal Remuneration	<p>Mechanisms of prevention, detection or action 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:</p>	<p>The Aena Group guarantees fair and equal remuneration through its remuneration model, based on the principles of remuneration transparency, equality and non-discrimination, as set out:</p> <ul style="list-style-type: none"> • In the Collective Agreement in Spain or the Collective Agreement in Brazil. • The measures included in the 2nd Equality Plan in Spain. • Internal policies, standards and procedures. <p>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.</p> <p>With regard to Aena's subsidiaries in the United Kingdom subsidiaries, 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.</p> <p>In all countries in which Aena operates, the minimum level of professional salaries is exceeded.</p>	Low probability and impact
Right to rest and take time off and to family and personal life	<ul style="list-style-type: none"> • Prevention, such as all the Company's internal regulations and policies, both general (e.g., Code of Conduct) and specific (e.g., Internal Regulations for Conduct in the Securities Markets), which contribute to mitigating the risk of offences, unethical practices or breaches of regulations in the course of our business. In this regard, all Aena's divisions must ensure compliance with the Company's internal policies or regulations, and identify areas for improvement to implement or correct the procedures deemed appropriate to prevent the risks of regulatory breaches in the organisation. 	<p>The commitment of the Aena Group to balancing family and personal life is set out in the Collective Agreement, where applicable, internal policies, standards and procedures, and strategic lines.</p> <p>In this regard, it 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.</p>	
Rejection of child labour	<ul style="list-style-type: none"> • Detection or action procedures, which determine the information required and the way to act in situations involving regulatory breaches and/or practices contrary to the values and principles set out in the applicable Code of Conduct. <p>Other control mechanisms included in the framework of the ICFR.</p>	<p>The Aena Group 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. In this way, it is included in internal policies/standards, etc.</p> <p>The fulfilment of this commitment, for example explicitly endorsed 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).</p>	
Right to freedom of opinion, information and expression, as well as data privacy and private life of the workers		<p>The Company's commitment to the right to freedom of expression and information, as well as data privacy, is reflected in internal systems, policies and standards. In this regard, and to make it effective, a set of tools and measures have been implemented and various clear and transparent internal communication channels have been established, as well as committees of workers' representatives.</p> <p>In Spain, as well as in the United Kingdom and Brazil, training activities are carried out in this regard.</p>	



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, Health Safety Measures, among others.	<p>The Company's strategic objectives include offering a quality and safe service, aligned with the best standards and the expectations of users, highlighting, among other things, the improvement of airport accessibility.</p> <p>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. Services are also offered for all types of users, regardless of their situation and capabilities. On the other hand, mechanisms and channels for making complaints and claims are available and, where appropriate, the corresponding financial compensation derived from pecuniary claims is made.</p>	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	<p>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. Additionally, actions are being carried out in different areas focused on ensuring inclusive communication, such as training in non-discrimination, development of a Guide for inclusive communication (in Spain), etc. On the other hand, mechanisms and channels for making complaints and claims are available and, where appropriate, the corresponding financial compensation derived from pecuniary claims is made.</p>	
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, or those corresponding to the subsidiaries.	<p>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 correct implementation of appropriate procedures, mechanisms and tools to minimise the environmental impact on the environment.</p> <p>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.</p> <p>In Brazil, due to its possible greater impact on the community, some measures must be reinforced both in social and environmental matters. To this end, work will be carried out in 2024 to develop a strategy on the subject.</p>	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 Internal Information System and Whistleblower Protection, etc.

The measures implemented include:

- Prevention, such as all the Company's internal regulations and policies, both general (e.g., Code of Conduct) and specific (e.g., Internal Regulations for Conduct in the Securities Markets), which contribute to mitigating the risk of offences, unethical practices or breaches of regulations in the course of our business. In this regard, all Aena's divisions must ensure compliance with the Company's internal policies or regulations, and identify areas for improvement to implement or correct the procedures deemed appropriate to prevent the risks of regulatory breaches in the organisation.
- Detection or action procedures, which determine the information required and the way to act in situations involving regulatory breaches and/or practices contrary to the values and principles set out in the applicable Code of Conduct.

The formal commitment to ethical, good governance and compliance practices, including those on competition, 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. With regard to tax practices, Aena has a Tax Strategy.

Low probability and impact

Commitment to Human Rights by suppliers (employment, environmental and service practices)

Third Party Code of Conduct, which includes that Third Parties, regardless of the country in which they operate, must:

- Act diligently and responsibly to prevent, detect or mitigate situations that may compromise Human Rights, as well as nationally or internationally recognised labour rights.
- Be committed to providing a safe, affordable and quality service for all.
- Be committed to caring for the environment.
- Maintain ethical, honest, complete and transparent behaviour in its activity at all times.
- Fight against any kind of corruption, influence peddling and defence of competition.
- Fulfil its responsibilities with loyalty, honesty and independence when faced with any situation of conflict of interest.
- Oblige to preserve the integrity and confidentiality of the information and the duty to act clearly and transparently and convey the information truthfully and completely.
- Ensure the rights of the local communities in which its business operates.

Internal contracting standards, aligned for example in the case of Spain with the applicable regulations that incorporate ESG issues throughout the contracting process.

Mandatory social sustainability clause in all tenders

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). Among them is that relating to social sustainability, through which bidders and the subsequent successful bidder of the contract assume that their participation in the tender implies compliance with the highest national and international standards in terms of human rights and ethics. Likewise, in the event of not having a code of conduct, ethics or similar and a human rights policy, the bidding companies and the successful bidder undertake to comply with the highest standards in this area, adhering to the principles and values of action defined respectively in the Aena Code of Conduct and in the Aena Human Rights Policy. 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.

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 in Human Rights

During 2023, the following specific communications and internal awareness-raising actions were implemented:

- In Spain, through the internal newsletter, several awareness-raising videos have been published about human rights, the duty of companies to adhere to them, and good practices.
- In Brazil, specific internal communication and awareness-raising actions have been developed that cover different aspects related to the protection and promotion of human rights.
- 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.

These measures endorse the provisions of the Human Rights Policy and the Sustainability Strategy, with regard to promoting a culture of respect for human rights among its employees in all the areas in which it operates. It also includes the promotion of alliances with reference institutions within the framework of 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.

Mechanisms for making complaints: reporting human rights violations

(GRI 2-26; 406-1; 411-1)

As stated in the Human Rights Policy, the Aena Group is committed to establishing effective complaint mechanisms in its operations from the start of its economic activity, so that individuals whose Human Rights may potentially be violated have the ability to bring this situation to the company's attention.

For these purposes, the Complaints Channel (or its counterpart in subsidiary companies: ethics channel, whistleblower channel, etc.) becomes the main tool for any third party to express their concerns or deal with, report, denounce, and communicate conduct or facts relating to non-compliance with the Human Rights principles contained in this Policy, as well as the other regulations in force, at any company of the Aena Group and/or its value chain. These communications will be managed by the competent bodies, in accordance with the procedure established for this purpose.

For its part, Aena guarantees the management of all communications received under the principles of legality and ethics, independence and impartiality, transparency and accessibility, traceability and security, confidentiality and anonymity, secrecy, diligence and speed, good faith, respect and protection of the communicating party, and fundamental rights.

During 2023, 0 complaints referring to human rights violations were recorded (same as in the previous year) (for more information about complaints see section 1.2.10. Complaints channel).

4- Responsible management of the supply chain

→ (GRI 2-22; 3-3)



Commitment to SDGs



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 bidding processes and in their implementation.
Inclusion of ESG issues in the processes.

Continuous improvement: actions and results

01

Acquisition planning

02

Internal approval.

03

Tendering and publication on the contracting portal.

04

Receipt of offers and evaluation.

05

Selection of the successful bidder and signing of the contract.

06

Supply of the good or service.

07

Systematic consideration of environmental and social matters throughout the bidding process

08

Payment of the invoice

Principles

Equal treatment
Non-discrimination
Transparency
Proportionality
Competition
Advertising
Confidentiality
Integrity

Local suppliers

Spain	99.8% (99.5% in 2022)
United Kingdom	53% (53% in 20022)
Brazil	100% (100% in 2022)

The value chain at Aena

Necessary infrastructure.
Optimising operations
Customer service
Marketing, communication and relationships with the environment.
Cross-divisional and support activities.

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.

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.

Internal management framework

Aena Group follows a procurement strategy that aims to work together with 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 the applicable internal and external regulations. In this regard, responsible management of the value chain strives for:

- Compliance with business criteria.
- Full technical compliance with the requested scope.
- Highest quality of services to meet needs.
- Best possible economic conditions, contributing to the business result.
- Compliance with all legal obligations, including labour, environmental, and those specific to the activity.

In 2023, the Board of Directors of Aena approved the Third Party Code of Conduct, available on the corporate website, which aims to define the minimum standards of ethical and responsible behaviour that must be observed by suppliers, customers and professionals with whom Aena contracts in the development of its business in accordance with the Company's corporate culture, firmly based on respect for human and labour rights, a commitment to care for the environment and the communities in which it operates, and under the principle of zero tolerance for any type of unlawful behaviour. In this regard, Aena undertakes to provide the necessary resources so that third parties are aware of and understand this Code and are able to comply with it.

The Third Party Code of Conduct applies to Aena companies wholly or majority owned by Aena and domiciled in Spain. The Third Party Code of Conduct is applicable to third parties with which companies not domiciled in Spain contract, provided that it is compatible with the local regulations applicable to them and they do not have their own Code with a similar scope. In this regard, Aena's subsidiaries in Brazil and the United Kingdom have their Code of Conduct for third parties, adapted to their own context.

In 2023, Aena has approved the Third Party Code of Conduct, based on respect for human and labour rights, a commitment to care for the environment and the communities in which it operates, and under the principle of zero tolerance for any type of unlawful behaviour.

Apart from the above, Aena, and its subsidiaries in Brazil and the United Kingdom, have other tools that enhance the correct internal management of supplier and commercial procurement.

Highlights in Aena include:

- Internal Manual of Supplier Procurement Procedures, the purpose of which, with respect to contracts subject to the legislation applicable to Aena in Spain, is to complement, in a procedural and mandatory manner, certain aspects of the procurement process that require more detailed regulation at a procedural level in order to specify how they are to be applied.
- Guide for the technical evaluation of supplier contracts, the purpose of which is to serve as a framework for the various Aena proposing units in terms of the choice of technical evaluation criteria for contracts of any nature.
- Other internal circulars and procedures regarding related transactions and expense validation.
- The Internal Contracting Instructions, which apply to the Concessionaire Company of AIRM and ADI.
- Aena's Internal Commercial Procurement Standard, in accordance with the criteria and regulations in force, regulate the tender procedures for commercial space at the Spanish network's airports, with full respect for the principles.
- The 2021-2030 Sustainability Strategy, which incorporates objectives related to the incorporation of environmental and social criteria in procurement. These include:
 - The inclusion of human rights clauses in agreements with suppliers to ensure joint responsibility between Aena and its ecosystem. In this regard, by 2023, mandatory clauses have been included in 100% of contracts.
 - The definition and application of quantified sustainability requirements for 100% of contracts.
 - The establishment of selection criteria and requirements, as well as their monitoring and penalties, in the area of sustainability for Aena's suppliers and lessees.
 - The definition of quantified water consumption requirements for contracts with suppliers.
 - The strengthening of environmental requirements for suppliers in the area of the circular economy.

- The creation of noise management working groups with the main air traffic service providers. As well as under the Eurocontrol EMF framework with airlines and air traffic service providers at the main airports.
- The 2nd Equality Plan, which includes among its objectives the inclusion of tie-breaker criteria aimed at favouring the contracting of those companies with a higher percentage of female employees in the workforce.

In particular, in the United Kingdom, London-Luton Airport has a Responsible Purchasing Strategy (Supplier Strategy 2022-2025), designed to provide a clear framework for the Airport's own procurement activities. This strategy underpins the effective delivery of services and revolves around five key pillars: recovery, expansion, people, customer experience and sustainability. Likewise, the Responsible Business Strategy also includes specific objectives regarding suppliers.

For their part, Aena subsidiaries in Brazil are governed by their local Procurement 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. During 2023, specific procurement rules applicable to the new company BOAB, aligned with those of ANB, have been created.

In all cases, the principles of action that govern the aforementioned internal procedures are compliance with human rights and labour rights, guaranteeing safety and quality of service, environmental commitment, ensuring integrity and respect for legality and ethical behaviour, the fight against corruption, influence peddling and the defence of competition, avoiding conflicts of interest in any form, protecting the confidentiality of information and the transparency and reliability of information, protecting the rights of communities, and absolute rejection of child labour and modern slavery.

External regulatory framework

In addition to its own internal regulatory framework, Aena is subject to the regulations applicable in the countries in which it operates regarding the contracting of suppliers¹²⁸.

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.

- Act 7/2021, of 20 May, on climate change and the energy transition, in force since 22 May 2021, contemplates the inclusion in procurement specifications of award criteria linked to the fight against climate change and energy efficiency, highlighting Article 31, on public procurement, which, in accordance with the provisions of Act 9/2017, indicates that in all public procurement, environmental and energy sustainability criteria will be incorporated in a cross-divisional and mandatory manner when they are related to the purpose of the contract.
- 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. The purpose of this Act is to regulate public sector procurement in order to ensure that it complies with the principles of freedom of access to tenders, publicity and transparency of procedures, and non-discrimination and equal treatment among bidders. Additionally, both Act 9/2017 and RDL 3/2020 establish a series of premises that must be taken into account. For example, assessment in the awarding of contracts whose execution may have a significant impact on the environment, measurable environmental conditions, such as the lowest environmental impact, saving and efficient use of water and energy and materials, the environmental cost of the life cycle, ecological procedures and production methods, the generation and management of waste in accordance with the principle of hierarchy or the use of recycled materials, reusable or recyclable products or ecological materials, among others.
- Act 31/2007, of 30 October, on procurement procedures in the water, energy, transport and postal service industries. The purpose of this Act is to regulate the procedure for awarding contracts for works, supplies and services when contracting public and private entities.

In the United Kingdom, Aena subsidiaries are subject to 'Find a Tender' obligations, which replace those corresponding to the European Union Public Service Contracts Regulations from 2016 due to the materialisation of Brexit. Likewise, it ensures its actions by adhering to the Modern Slavery Act of the United Kingdom, guaranteeing labour and social safeguards for itself and third parties that carry out activities in the airport facilities.

¹²⁸ Aena's subsidiaries in Brazil are not subject to any external regulation governing the contracting process.



4.1 Criteria applicable to procurement at Aena

(GRI 3-3)

In accordance with the applicable regulations, for all of its procurement processes, Aena Group demands both of its suppliers and agents, efficiency and respect for the principles of equal treatment, non-discrimination, transparency, proportionality and integrity, with the aim of ensuring that contracts are awarded to the bidder who submits the best bid.

4.1.1. Description of the supply chain

(GRI 2-6; 2-8; 204-1)

The Company continues, year after year, to ensure its efforts to increase the consideration of ESG issues in procurement processes.

In Spain, milestones in 2023 included the approval of the Third Party Code of Conduct by the Board of Directors, and the inclusion of a clause on compliance with the highest human rights standards in supplier procurement specifications, thus conveying Aena's commitment to ensure that these rights are not violated by its third parties.

In the United Kingdom, at London-Luton Airport, specific actions have been developed to especially encourage the contracting of local suppliers, based on the principles mentioned above and guaranteeing, in any case, non-discrimination and equal participation in the procurement process¹²⁹ including all types of companies, regardless of their size.

For their part, Aena subsidiaries in Brazil continue to guarantee compliance with legal, financial, employment, social and environmental requirements, among others, related to applicable regulations. In 2023, these requirements have been passed on to the suppliers of the new company, BOAB.

With regard to Aena's supply chain, the types of suppliers comprising it respond to the purpose of the contract in question 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 activities¹³⁰.

In any case, the correct performance of the work assigned, regardless of its type and geographical location, has significant repercussions and generates major impacts on the local production sector.

Thus, the financial contribution that the Company generates is maximised in the communities where it operates, helping to strengthen the industrial fabric and local labour, as well as 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 5 years). In Brazil, these tend to be mostly between 2 and 3 years, while in the United Kingdom at London-Luton Airport they vary mainly between 3 and 5 years.

In the case of services, they generally require a significant amount of labour from suppliers. Moreover, all supplies required to perform the services are the responsibility of the suppliers, who must include the associated costs in their price prior to contracting. The impact that suppliers have on the quality of the service offered by Aena is direct, which is why all signed contracts include clauses stating that suppliers may be penalised if they fail to comply with their obligations.

Broadly speaking, the supply chain includes suppliers of materials and services required for the operation of the airports and central offices, including suppliers of maintenance services, security (AVSEC), cleaning and those responsible for performing works to expand the units, among others.

¹²⁹ This is reflected in the inclusion of a specific issue on social aspects in the tender specifications, as well as in the organisation of seminars on 'how to bid for contracts' that we organise for local companies.

¹³⁰ In the case of Brazil, the types of suppliers are divided into: contractors, wholesalers and consultancies

In 2023, the amount awarded in tenders has increased compared to that of the 2022 fiscal year, primarily for two reasons: the recovery of traffic volumes and the commencement of operations at Aena's subsidiary in Brazil, BOAB.

	Spain ^(A)		United Kingdom ^(B)		Brazil	
	2022	2023	2022	2023	2022	2023
Suppliers (number)	2,350	2,469	3,039	-	1,358	1,225
New (number)	397	458	173	-	-	660
Local (number)	2,313	2,435	157	-	1,358	1,226
Tenders managed (number)	1,145	1,652	607	6,948	617	236
Amount awarded to tenders (€m)	1,601.16	2,753.19	89.66	115.30	18.43	128.99
Corresponding to services and works (%)	84.74%	68.35%	—%	—%	71.20%	94.10%
Corresponding to materials and equipment (%)	15.26%	31.65%	—%	—%	28.80%	5.90%
Total volume of procurement allotted associated with leases for commercial activity (€m)	96.16	581.28	-	-	3.74	4.30
Allotment of minor contracts (€m)	15.40	18.63	0.24	0.59	0.01	0.01

(A) The data is extracted from the DISCOVERER application. As it is a live tool, the information varies according to its updates. Once extracted, the information is analyzed manually.

(B) In the case of London-Luton Airport, in the United Kingdom, supplier information is not available due to the manual nature of the process. However, it is planned to implement a system in the coming fiscal years to obtain the information.

Closing exchange rates as of 31/12/2023 used for Balance Sheet accounts:

EUR/GBP = 0.86905

EUR/BRL = 5.3618



In relation to the geographical location of the suppliers, this varies according to the country in which the Aena member companies operate. In 2023, the percentage of local suppliers¹³¹ in Aena was 98.62% in Spain (98,70% in 2022), 29.7% in the United Kingdom (25,86% in 2022) and 100% in Brazil (100% in 2022).

Likewise, the proportion of spending on local Aena suppliers has been 99.8% in Spain (99,54% in 2022), 53% in United Kingdom (53% en 2022) and 100% in Brazil (the same as in 2022).

Moreover, in 2023, 46,633 non-employees have been counted: 43,267 in Spain, 103 in the United Kingdom, and 3,263 in Brazil (48,536 in Spain and 6,897 in Brazil, totalling 55,433 in 2022¹³²). These would be employees of Aena's service providers who have carried out work at its facilities¹³³.

4.1.2. Main procurement milestones in 2023

At Aena, following the updating of certain internal rules regarding procurement in 2022, continuity has been given to the implementation in 2023 of the Guide for the technical evaluation of supplier tenders, which aims to serve as a reference for the various tendering units in the selection of technical evaluation criteria for tenders of any nature. These technical evaluation criteria include both exclusion criteria and criteria for the technical evaluation of bids, from a twofold perspective: setting a minimum threshold whose non-compliance would lead to exclusion and, at the same time, scoring the degree of compliance with this criterion by the bidders. This document includes practical guidelines and parameters, the most common technical solvency criteria, a catalogue of objective technical evaluation criteria, depending on the nature of the contracts. All of this is to facilitate the consultation work of the technicians drafting the specifications, so that they have a single document available to establish the conditions and technical criteria for the selection of bids.

This Guide aims to promote the standardisation of evaluation criteria, which is part of a larger process of modernising procurement; supported, on the one hand, by the provisions that the regulations introduce in this regard, without undermining objectivity, transparency and equal opportunities for bidders, and on the other hand, by the possibilities offered by the digitisation and automation of processes in such a clearly procedural matter as Procurement.

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.

It is also worth mentioning milestones such as the approval of the Third Party Code of Conduct by the Board of Directors, and the inclusion of a clause on compliance with the highest human rights standards in supplier procurement specifications, thus conveying the company's commitment to ensure that these rights are not violated by its third parties.

In terms of Brazil, Aena's subsidiaries 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.

Finally, it is worth noting that the London-Luton Airport Procurement team in the United Kingdom has maintained CIPS accreditation for the fiscal year 2023 and received a Social Value ESG award at the UK Public UK Public Procurement Excellence Awards 2023.

Training

(GRI 3-3)

In line with the contractual procedures, all centralised procurement contracts are reviewed for compliance with these conditions. To reinforce this, a first phase of training in the methodology of the new Guide has been carried out for all Aena employees.

In Spain, in order to ensure the implementation and correct use of the aforementioned Guide and other specific tools, the focus has been on the development of specific training courses, 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.

With regard to supplier training, the technical specifications of some specific specifications, specifically those related to services, include a clause on diversity and airport culture, through which the successful bidder must carry out a training course with the aim of raising awareness and educating on airport culture, diversity and equality, as principles that must be applied at all times when dealing with passengers, from any Aena airport.

¹³¹ 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 at a maximum distance of 25 miles from the London-Luton Airport.

¹³² No data available for London-Luton Airport in the United Kingdom for 2022.

¹³³ Significant operational locations are established for all countries where the Aena Group is present, namely, Spain, Brazil, and the United Kingdom.



In any case, a culture of zero tolerance for any discriminatory behaviour should be fostered, and the detection and reporting of such behaviour by staff towards any member of the airport community should be encouraged.

In Brazil, since the implementation of SAP Ariba as a purchasing tool, the team has been regularly trained, seeking an understanding and proper use of the tool, especially with regard to the new functionalities that have been developed, such as electronic auctions.

In 2023, 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 procurement process in Spain and Brazil.

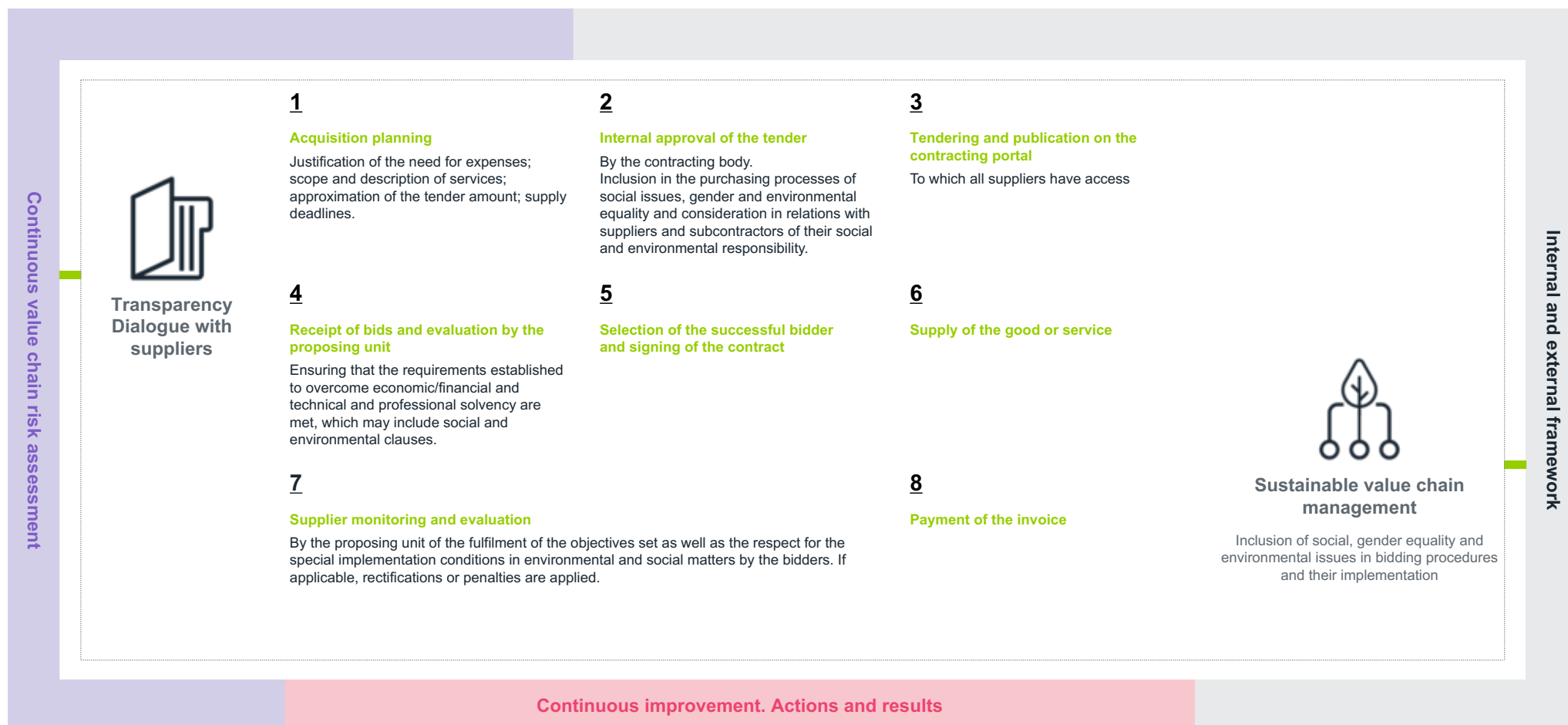
In the United Kingdom, London-Luton Airport has a procurement training scheme, conducted in several sessions over the course of the year. For example, airport staff working in the procurement area must be members of the Chartered Institute of Procurement (CIPS) or be studying for it.

4.2. Sustainable value chain management

(GRI 3-3)

Sustainable acquisition and purchasing process

Transparency, competition, efficiency, legality, advertising, confidentiality, sustainability and respect for external and internal regulations



4.2.1. General aspects

Transparency and dialogue¹³⁴

(GRI 2-29)

Aena continues to work on the continuous improvement of its procurement systems. The Company periodically updates the relevant information on contractual processes on the Company's website, adapting the procurement system to the digitisation requirements. It also makes the specifications and all associated documentation available to bidders, processing practically all the tenders electronically.

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, there are two specific landing pages, the Aena Supplier Procurement Portal and the Aena Companies Portal, where retail tenders and contracts, specifications, commercial tenders, awards and other additional information related to tenders are published¹³⁵. Likewise, the Public Sector Procurement 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 supplier tenders, and its counterparts comercial@aena.es or facturacion@aena.es for commercial procurements.
- 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 rmufturacion@aena.es.

In the United Kingdom, there is a dedicated electronic tender portal (In-Tend Procurement Portal). After contracting the supplier, it offers the possibility to establish communication with the supplier through online or in-person meetings. The London-Luton Airport website, as well as specific e-mail addresses (such as those of the purchasing team), are existing portals and tools to facilitate communication with internal and external stakeholders.

On the other hand, in Brazil, at the Company's airports, suppliers have e-mail addresses and sites on Sharepoint for resolving queries. Moreover, since 2022, the SAP Ariba Tool is also available to facilitate communication with suppliers in addition to the central e-mail address of the procurement team.

Continuous value chain risk assessment

Risks associated with the contracting of third parties, the procurement process itself, or the execution of the contract are identified through the Company's risk management and control model¹³⁶.

¹³⁴ See chapter 'Links of interest'.

¹³⁵ 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.

¹³⁶ Furthermore, there are 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	Tools for their control, monitoring and mitigation	Main mitigation and control measures adopted
Human rights and labour rights Prohibition of child and forced labour. Prohibition of discrimination With respect to freedom of association and collective bargaining Prohibition of abuse or inhumane treatment or any form of modern slavery Occupational health and safety Payment of wages and fair compensation Working hours Regular work	Code of Conduct for Suppliers in Spain, the United Kingdom and Brazil Human rights policy	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 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.
Safety and quality of services	Code of Conduct for Suppliers in the UK and Brazil	
Environmental commitment Mitigation and adaptation to climate change, minimisation and consumption of resources (energy consumption, air quality, water footprint), reduction of noise pollution and waste management, promotion of the circular economy in its activities and protection of biodiversity).	Sustainability policy	
Integrity, respect for legality and ethical behaviour Fight against corruption, influence peddling and defence of competition Conflicts of interest	Anti-corruption and fraud policy	
Confidentiality of information Transparency and reliability of information Safety and rights in communities	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:

- Protection of human rights. Participation in any tender implies the assumption by bidders, and the subsequent awardee of the Contract, to comply with the highest national and international human rights and ethical standards. In the event of the above not having a code of conduct, ethics or similar and a human rights policy, the bidding companies and the successful bidder undertake to comply with the highest standards in this area, adhering to the principles and values of action defined respectively in the Aena Code of Conduct and in the Aena Human Rights Policy.
- Staff privacy: in monitoring the policy established for this purpose, and in accordance with current legislation¹³⁷ 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).
- Protection of 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, serves to mitigate this risk associated with the value chain (see Chapter 5).
- 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, the corresponding clauses are also included in the specifications (see Chapter 6).
- 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. Also, in the event of non-compliance by third parties, these same specifications include penalties. Likewise, through the European Single Procurement Document (ESPD), the successful bidder is obliged to provide information and certifications regarding the payment of social security contributions and taxes.
- Grounds for exclusion. The ESPD includes grounds for exclusion for bidders.
- These include:
 - Participation in a criminal organisation, a conviction in a final judgement handed down within the previous five years at the latest.

- If the economic operator itself, or any person who is a member of its Board of Directors, has been convicted of corruption, fraud, terrorist offences, offences linked to terrorist activities, money laundering or terrorist financing, child labour and other forms of trafficking of human beings
- Due to a breach with obligations relating to the payment of taxes.
- Due to a breach of obligations relating to social security contributions.
- Due to a breach of obligations in the field of environmental, social and labour law.

All of the above are included in the various tenders, albeit adapted to the type of contract and the nature of the suppliers. Thus, by way of example, in relation to these aspects, by type of contract (works, supplies, services), criteria such as the following are included:

In works:

- Use of construction materials/products/equipment with regulatory eco-labels (Type I and III).
- Reuse of materials/products and/or recycling of non-hazardous construction and demolition waste in the work itself or elsewhere.
- Use of work vehicles with 'Zero Emission' environmental labels and 'Zero Emission' construction machinery/equipment.
- Efficient use of water in the work - Calculation of water footprint according to the ISO 14046 standard: Calculation of the water consumed to obtain as a result the finished work (m3).
- Commitment to submit a 'Verified Water Footprint' certification audited in accordance with the ISO 14046 Standard upon completion of the work.
- Submission of a low-emission mobility plan for employees in the work.
- Commitment to be an authorised site waste manager.

In supplies:

- Use of materials for the manufacture or supply of products/equipment with regulatory eco-labels (Type I and III).
- Product or equipment with regulatory eco-labels (Type I and III).
- Proven use of recycled materials in the manufacture of the product/equipment.

¹³⁷ 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.

- Percentage by weight of the product/equipment or parts thereof that can be recycled (% by weight) at the end of its useful life.
- Calculated carbon footprint for the manufacture of the product/equipment from 'cradle-to-gate' or 'cradle-to-grave' (in kg CO2 equivalent).
- Calculated carbon footprint of the product/equipment during its annual use (in kg CO2 equivalent).
- Verification by an independent entity of the carbon footprint calculation of the entire product life cycle according to ISO 14067.
- Efficient use of water in the manufacture of the product - Calculation of water footprint according to the ISO 14046 standard: Calculation of the water consumed to obtain as a result the finished product (m3).
- Submission of a 'Verified Water Footprint' certification audited in accordance with the ISO 14046 Standard.

In services: General or staff-intensive services

- EE (European Ecolabel) certification for cleaning services.
- Use of service vehicles with ECO environmental or 'Zero Emission' labels and 'Zero Emission' machinery/equipment.
- Environmental awareness sessions for employees given by the company itself, appropriate to the environment in which they carry out their activity at Aena.
- Criteria to reduce food waste in food and beverage services (airport canteens/Central Services/food and beverage services as suppliers).

In line with the above, Aena has included appendices and clauses in the Specifications of Specific Clauses according to the type of contract, with the purpose of mitigating possible risks associated with contracting third parties. Detailed below are the appendices by contract type:

Service Contracts:

- Appendix IV: Occupational Risk Prevention.
- Appendix V: Environmental Protection:

- Appendix VI: Operational safety, referring to full compliance with the obligations imposed on its users by the Apron Safety Regulations, the rules and instructions that complement them and any others that, at local level, have been established by the airport management in compliance with the obligations set out in Regulation (EC) No. 1108/2009, of 21 October.
- Appendix XV: Confidentiality Clause.
- Appendix XVI: Anti-Corruption and Fraud Clause.
- Appendix XVIII: Social Sustainability. Aena Code of Conduct and Human Rights Policy.
- Appendix XXI: Cybersecurity and Information Security.

Construction contracts:

- Clause 43. Occupational Risk Prevention.
- Clause 44. Environmental Protection: Costs of measures to comply with environmental obligations; General and incident reporting and communication; Pre-activity requirements and monitoring mechanisms; Access to facilities and documentation for compliance with environmental requirements; Waste management; Storage of hazardous materials and substances; Conditions of use of vehicles/machinery; Emissions into the atmosphere; Discharges; Completion of activity; Breaches and penalties.
- Clause 45. Operational Safety.
- Clause 46. Airport Security.
- Appendix XI: Confidentiality Clause
- Appendix XIV: Anti-Corruption and Fraud Clause
- Appendix XVI: Verification of social security registrations
- Appendix XIX: Declaration of confidentiality of data and documents.
- Appendix XX: Cybersecurity and Information Security
- Appendix XXI: Social Sustainability

Similarly, at London-Luton Airport in the United Kingdom, contracts are individually reviewed to identify potential risks, which are registered in the Procurement Risk Register. In order to mitigate these risks, a set of criteria, including ESG-related criteria, are incorporated into the procurement documents. Also, while the contract is in force, the service areas follow up and monitor potential risks in order to prevent them from materialising.



Moreover, during the acquisition process, potential suppliers are asked questions about their environmental and sustainability practices.

For its part, in Brazil, an analysis of the economic, financial and labour solvency of suppliers is conducted, taking into account representative indicators, in order to ensure the correct execution of the works. Specifically, with regard to the evaluation of legal/labour 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.

The legal framework applicable to the geographical areas where Aena Group operates makes it less likely for significant risks to be identified regarding violations of the rights of freedom of association and collective bargaining. Furthermore, due to the nature of the services provided by suppliers, the risk associated with child labour is negligible (see Chapter 3).

For ongoing services provided at the units or central offices, the supplier risk management process is applied, which includes monitoring compliance with suppliers' labour obligations.



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 consideration 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 that improve 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. In Spain, for example, the Specifications for the procurement of handling agent services include sustainability requirements that include a maximum age for equipment (10 years for planters, for example), a minimum percentage of sustainable vehicles and a commitment to carry out a gradual increase in the future. These requirements are related to the objectives of the Climate Action Plan, which envisages that the sustainable handling fleet will be 23% by 2023, 40% by 2025 and 78% by 2030 (see Chapter 2).

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 procurement 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 respect can be accredited by requesting management certificates from the bidding companies, certificate of implementation of the Environmental Management System or Quality Management System (ISO 4001, ISO 9001 or similar), or issued or approved by an entity accredited for this purpose by Spanish or Community legislation. For procurement 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 Control 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 procurement specifications include technical solvency requirements in social and environmental matters, which must be accredited by means of certificates, references, etc. After receiving these accreditations, suppliers will be subject to analysis and evaluation.
- Aena airports in Brazil have the Template of Specific Administrative Clauses ('PCAP'), which describes the legal and economic solvency requirements to be met by the suppliers. These are determined by the requesting area. For example, some aspects that are requested are those related to ESG matters. 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, through which records and their previous performance are assessed, with possible claims due to corruption, slavery practices, or breaches of employment obligations (where these are materialised in a high number of processes and convictions, etc.). Finally, the mobilisation process is implemented, through which it is verified whether the employment links between employer and worker are regular and comply with current legislation.

Technical evaluation of offers

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.

At Aena, with the entry into force of the 'Guide for technical evaluation' during the fiscal year 2023, the application of criteria that take into account social, innovation and environmental aspects has been encouraged. These are aligned with the strategic objectives set out in Sustainability Strategy 2021-2030.

As an example, it is worth highlighting the 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 the year 2023 in Spain, 39 suppliers of construction and centralized management files were evaluated based on environmental criteria, and 37 based on social criteria, representing 5.6% and 6.1% respectively of the total number of awarded file suppliers (839 suppliers).

The awarded amount for construction and centralized management tenders evaluated based on social criteria (€149.13 million) represents 5.4% of the total awarded amount for tenders (€2,753.2 million), while the awarded amount for construction and centralized management tenders evaluated based on environmental criteria (€175.4 million) represents 6.4% of the total awarded amount for tenders. In the United Kingdom, 100% of them have been filtered by these criteria. In Aena's airports in Brazil, one supplier was evaluated based on environmental criteria, representing 0.1% of the total amount awarded to tenders, and 60 based on compliance with social criteria (60.4% of the awarded amount)¹³⁸.

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 Health and Safety 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)¹³⁹.

In the United Kingdom, London-Luton Airport also includes ESG criteria for evaluating bids, the weight of which can be instrumental when choosing a supplier.

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.

There are also tie-breaker clauses in the United Kingdom, which are also incorporated into the procurement specifications. These clauses are included in the social clause evaluating ESG criteria.

In Brazil, there are no tie-breaker clauses in contracts with suppliers.

The new Equality Plan contemplates the introduction in the specifications of Act 9/2017 and Royal Decree-Law 3/2020 of the following tie-breaker criterion: higher percentage of female employees in the workforce at each company.

¹³⁸ During 2022, in Spain, 29 suppliers, representing 25% of the total awarded, were evaluated based on environmental and social criteria. In Aena's airports in Brazil in 2022, no supplier was selected based on these criteria.

¹³⁹ Contracts are awarded based on the best quality-price ratio (financial and qualitative criteria).

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 especially affected, as are contracts dedicated to the provision of social services or to the social and labour inclusion of persons 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 protection¹⁴⁰. 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:

- 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.
- Occupational risk prevention: compliance with current legislation on prevention¹⁴¹, aimed at ensuring that suppliers guarantee the protection of their health and safety when developing their works, supplies and services.

- Airport and operational security¹⁴²: 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.
- Social sustainability and human rights. Assumption by bidders, and the subsequent awardee of the Contract, to comply with the highest national and international human rights and ethical standards. In the event of the above not having a code of conduct, ethics or similar and a human rights policy, the bidding companies and the successful bidder undertake to comply with the highest standards in this area, adhering to the principles and values of action defined respectively in the Aena Code of Conduct and in the Aena Human Rights Policy.

On the other hand, all suppliers in the United Kingdom must comply with local applicable regulations in matters of employment (slavery, minimum wage, equality, etc.) and the environment. In the event of a breach of the ESG criteria indicated in the contract, 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 a possible solution and establish corrective action plans for any violation.

Meanwhile, 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 Health and Safety, ensuring that professionals work with all protective equipment appropriate to the type of work. The commencement of their work is only authorised when the mobilisation process of each individual professional is approved. Finally, for some types of services it is mandatory to submit government certificates 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 Control 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.

¹⁴⁰ 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.

¹⁴¹ Act 31/1995, of 8 November, on the Prevention of Occupational Risks, and other standards and regulations applicable within the scope of this Prevention.

¹⁴² See Chapter 6: Safe, Quality Services.

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 submit an Environmental Control Plan 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 monitoring 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 specifications¹⁴³ 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 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 bidding announcement and in the PCP, 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 procurement contracts.

The applicable controls related to compliance with the terms and conditions of public procurement contracts are set out in the procurement regulations, as is the opportunity to establish financial penalties that can even lead to the termination of the contract in the event of non-compliance.

This mechanism stands out as one of the tools through which compliance with ESG standards and criteria included in the procurement documents can be ensured.

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.

The responsibility of supervising the correct performance of the contract, in accordance with the provisions of the special conditions of performance, rests with the proposing unit.

¹⁴³ 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.

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 risk prevention obligations

Compliance with mandatory aspects in the prevention of occupational risks in accordance with current legislation, in order to ensure occupational health and safety 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

Labour and social obligations

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 companies and technical study offices, etc.

The contractor must be up to date with the payment of subcontractors or suppliers participating in the contracts.

Occupational risk prevention obligations

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.

In Brazil, all occupational health and safety documentation must be submitted before the employee enters the site where the work will be performed. This documentation is evaluated in the supplier risk management process.

Environmental obligations

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

At Aena, the mechanisms for monitoring compliance with the clauses of contracts for suppliers and lessees are determined in the procurement 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 evaluated by the Services Department 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 performed by the supplier after the termination of the contract. Any potential incidents with suppliers are addressed by setting up meetings or visits.

In Brazil, monthly inspections of the performance of the work execution are conducted. To do so, the contractor must submit, digitally, the documentation required to prove compliance with the obligations included in the contract, as well as certificates demonstrating that they are up to date with the payment of taxes. In the event of non-compliance or if the supplier fails to demonstrate compliance with these obligations by more than 90%, withholdings may be applied to their payments until they have regularised the sending of the documentation proving compliance with these obligations.

Failure to comply with ESG clauses may result in termination of the contract.

Negative impacts on 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 the Complaints Channel, 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 United Kingdom 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 (such as, for example, excess energy usage, non-renewable energy usage or pollution).

In fiscal year 2023, no suppliers have been detected whose activity has resulted in a significant negative environmental impact. Nor have any incidents been reported through the different channels, resulting in the agreement of improvements, 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.

Finally, during the fiscal year 2023, 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 study¹⁴⁴

Aena's customer 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. Through 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.

¹⁴⁴ Actions not yet carried out to date in Brazil and the United Kingdom. However, at London-Luton Airport, they do hold regular meetings with local suppliers to address questions and assist them in the contracting processes

5-



Commitment to SDGs



Staff and social issues



(GRI 2-22; 3-3)

Promotion. Diversity and Inclusion

Job stability and professional development.
Fair employment conditions and remuneration model.
Work-life balance and motivation.
Talent attraction and retention.
Continuous training and education.
Two-way and continuous communication.
New technologies and collaborative tools.
Equality and sustainability.

Health and well-being

Comprehensive occupational well-being and flexibility.
Occupational health and safety model, promoted at the highest level of the Company.
Proactive approach to maintain the highest levels of security and minimise 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.

Stable and quality employment

Aena is committed to employability and professional development:

10,111 workers.
1,377 new recruits
90% fixed contracts.
95% work on a full-time basis.

Organisation of work time and disconnection

Teleworking Policy
Digital Disconnection Policy

Promotion of Diversity and Inclusion

Gender diversity:

Women represent: **37.7%** of the workforce and 50.0% of the Board of Directors.

II Equality Plan**Generational diversity:**

Encouragement of training among the youngest through participation in job fairs, agreements with universities, etc.

Promotion and development of talent, skills and knowledge

Employer Branding Strategy
Responsible Business Strategy of London-Luton Airport.
Promotion of employment in the local environment.
Development programmes
•'Leaders creating leaders' Mentoring programme.
•Coaching programme.
•Digital and cultural transformation programme.
100% of workforce participate in the Performance Management System

Remuneration system

Promotes equal treatment of male and female employees, and does not differentiate on the basis of gender, personal or any other grounds.

1.6% pay gap in 2023, in Spain. (2.2% in 2022)

€2,600,631 investment in training programmes (€3,163,757.05 in 2022).

100% employees have received training (99.8% in 2022).

114 hours of training per year (47 hours for women and 67 for men). In 2022, 130 hours of training per year (56 hours for women and 74 for men).



Achievements 2023

1	Obtaining the Equality in the Company (DIE) distinction, awarded by the Ministry of Equality, for standing out in a relevant and significant way in the application of policies of equal treatment and opportunities with its workers.
2	Award for 'Best Public Sector HR Project', distinguished by SAP at the annual HR Connect event.
3	Achievement of 16th place among the 50 companies in the '1st Ranking of Companies for Equality' by the Woman Forward Foundation.
4	Award for contribution to Training. Faculty of Economics and Business Sciences of the Universidad Autónoma de Madrid
5	Recognition of the commitment to disability, awarded by the organisation AFANIAS.
6	United Kingdom: Living wage accreditation

Introduction

(GRI 2-23; 3-3)

During the 2023 exercise, the recovery of air traffic to pre-pandemic levels has posed a new challenge for the Organisation, especially for its professionals, who have been dedicated to ensuring the best service. At the same time, the commencement of operations at new airports in Brazil has also presented a challenge for the Company, which has focused on attracting the best talent to address these new challenges.

In this context, Aena acknowledges effective human resource management as a fundamental factor for the proper progress of the company's operations, as established within the framework of the 2022-2026 Strategic Plan. This is a key enabler to make the network airports the safest, most efficient, sustainable, and welcoming in the world, catalysts for the economy and tourism, and generators of value for all stakeholders, while simultaneously addressing the needs of an increasingly changing and demanding work environment.

Therefore, in Spain, the Strategic Plan 2022-2026 includes the main lines of action in terms of People:

- Cultural and organisational change: evolution to a more sustainable culture and a more streamlined and collaborative organisation through technology and new ways of working. Additionally, this line seeks to increase the focus on the customer and innovation and to foster a culture oriented towards data and decision-making. Among the measures that have been initiated in 2023 to achieve the objectives of this line are: the incorporation of new technical profiles and the reinforcement of the organisation's management capacity.
- 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.

Along this same line, in the United Kingdom, London-Luton Airport's Responsible Business Strategy includes among its commitments that of 'growing with its people', and its main lines of action include the attraction and comprehensive development of its professionals, strengthening their skills, supporting equity, diversity, inclusion and fair remuneration.

In Brazil, the strategic priorities focus on attracting and retaining talent, especially to cover new needs, and on adapting human resources to the changing environment. Thus, in 2023, efforts have focused on personnel recruitment, the commencement of operations of Aena's new subsidiary in the country, BOAB, and the integration of the two companies concerning people management.

All these commitments are set out in the existing staff management policies applicable to employees in Spain, the United Kingdom and Brazil, which are available for consultation on the corresponding internal portals.

Personnel management risks

(GRI 3-3)

The legal nature of Aena, as a state-owned commercial company and a publicly traded corporation, entails the application of certain regulations, among other matters, regarding the contracting of staff. The risks inherent to people management are recorded in Aena's risk map and are assessed annually through Key Risk Indicators. Moreover, various measures and action plans detailed in the Strategic Plan 2022-2026 and the Sustainability Strategy 2021-2030 have been implemented with the aim of mitigating and/or reducing the level of risk associated with these challenges.

Action plans and mitigating measures include the Succession Plan, participation in Remuneration Studies, potential detection programmes and the Employer Branding strategy. These measures are focused on fostering the identification, recruitment and development of top talent, providing employees with the tools and knowledge needed to adapt to a constantly changing environment.

In the United Kingdom, at London-Luton Airport, some identified aspects include potential employee strikes, the development of specific actions to exert pressure in negotiations, issues in management and processes, as well as legal claims. These risks may arise due to a lack of extensive training for managers in people management or reactions under operational pressure. To mitigate these risks, a series of measures have been implemented, including:

- Continuous training of the human resources team and management.
- Full review of processes annually.
- Retention of legal advisors and access to sound legal advice.
- Introduction of the complaints channel of irregularities about the supplier's support and product (Whistleblower channel).

- Review of a formal agreement for open participation in various matters, such as wage issues.
- Development of an informal agreement to work within the 'spirit of the agreement', that is, to foster a constructive relationship and dialogue; which takes into consideration a revised operating model, for example, for ground handling services, avoiding or eliminating the risk of service disruptions.

In terms of staff management opportunities, the following are found:

- Opportunity to enhance visibility and collaboration between departments and managers: develop effective leadership through programs focusing on development and training in core skills.
- Internal communications: opportunity to consolidate employee input and feedback through internal channels; promote content between departments, promote and recognise individual efforts.
- Adopt an inclusive culture: ensure that all employees feel safe and accepted through networking, leadership collaboration and diversity and inclusion initiatives, in partnership with health and safety.
- Improve working conditions: £1 million invested throughout the Airport to improve various working areas. Also, the hybrid working model is analysed periodically to facilitate a higher flexibility.

With regard to Brazil, the main risk identified at Aena's subsidiaries is related to the attraction and retention of talent, together with the consolidation of its corporate culture.

During the last fiscal year, no significant risk has materialised in the area of staff management.



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.
Health and safety.
New technologies and collaborative tools.
Equality and sustainability.

United Kingdom

Facilitate talent
Diversity and inclusion
Wellbeing
Fair pay
Internal commitment
Collaboration
Work environment

Brazil

Retention and uptake
Fostering a feeling of belonging.
Unique and homogeneous management model in both companies.

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.
Board of Directors member selection policy.

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

Counter Terrorism Checks | Code of Conduct | Anti-Bribery, Corruption & Conflicts of Interest | Insider Dealing | Disciplinary Procedure | Grievance Procedure | Hybrid Working Policy | Social Media Policy | Recruitment and Vetting Policy | Resignation and Termination Policy | Retirement Policy | Study Leave and Sponsorship Policy | Flexible Working Policy | Equal Opportunities Policy | Whistleblowing Policy | Maternity Policy | Menopause Policy & Guidance | Paternity Policy | Training and Development Policy | Volunteering and Charitable Work | Refer A Friend Policy | Internal Privacy Notice | Performance Management Procedure | Shared Parental Leave Policy | Sickness and Absence Policy | Unpaid Parental Leave Guide.

Brazil

Staff recruitment regulations
Travel policy
Flexitime policy
Holiday policy
Third-party mobilization procedure
Hybrid work policy
Corporate language program procedure
Directors' vehicle and fuel expense policy
Representation expenses procedure



Human resources 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 (centered in investments in sustainable companies).
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

Facilitating talent, through the responsible business strategy that offers partnerships with local schools and the Get into Airports programme, which is run by the Princes Trust programme .

Talent recognition, through the implementation of Annual Achievement Reviews

Diversity and Inclusion Strategy Wellbusiness Awareness Plan, with monthly implementations
Fair pay: Real-Time Living Wage Accreditation and Profit Sharing Participation Guide. Internal communication of objectives and values, in relation to the results of the Employee Net Promoter Score (eNPS).

Brazil

Move forward in transferring the people management model implemented in ANB to BOAB.

Objectives ^(A)**Spain**

Reach at least 45% of female Directors in Central Services by 2026
Achieve at least 25% of female airport directors by 2026
Maintain or exceed 40% of women on the Board of Directors in 2023 and subsequent years
771.00 accident incidence rate in 2023. (771 for 2022)
Creation of an Aena Campus as its own training center

United Kingdom

The LLAOL Sustainability Report 2022 contains the following:
Agree on an improvement to the Parental Remuneration Policy
Relaunch the Seniority Award in 2023
Implement Electric Vehicle Plan
Greater commitment to employees, integrating ideas and suggestions
The Wellbeing Advisor is now part of the Health and Safety team to implement the Wellbeing Strategy
Compare salaries for the annual salary review
56% of 70% of the workforce feel committed to work, exceeding the 47% of the previous year. Employee Net Promoter Score (eNPS)

(A) They have not been implemented in the Aena subsidiaries in Brazil as of the closing date of this report.

5.1. Stable and quality employment¹⁴⁵

5.1.1. Main details about the workforce

(GRI 3-3)

In 2023, there have been more than 880 new hires in the Aena Group. These variations in the number of employees, at the end of the fiscal year compared to the previous fiscal year, are primarily due to the recovery of activity to pre-pandemic traffic levels. Additionally, the commencement of operations at Aena's new subsidiary in Brazil (BOAB) has resulted in the hiring of 408 employees.

Aena maintains stable and quality employment with high percentages of permanent and full-time contracts.

10,111 workers, 881 more than 2022 (9.230)^(A)

Spain

United Kingdom

Brazil

8,502

(8,196 in 2022)

814

(685 in 2022)

795

(349 in 2022)

(A)Data posted in terms of headcount (staffing)

Women



37.7%

(37.2% in 2022)

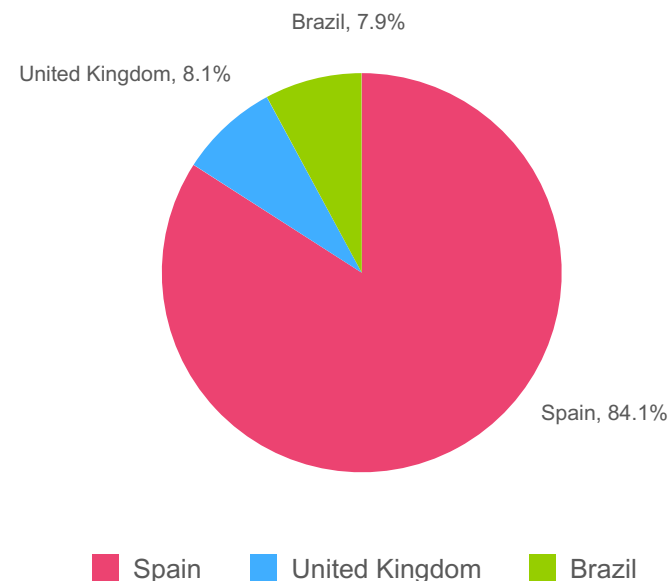
Men



62.3%

(62.8% in 2022)

Workforce year 2023



¹⁴⁵ All the data presented corresponds to the end of the fiscal year, 31 December 2023, 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.



Contract type

Permanent

90% (91.4% in 2022)

Temporary

10% (8.6% in 2022)

Part-time

5.0% (4,5% in 2022)

Full-time

95.0% (95,5% in 2022)

Total number and distribution of employment contract types by sex and region (as of December 31) (GRI 2-7)

	2022									2023								
	Total	Permanent				Temporary				Total	Permanent				Temporary			
		Part-time		Full-time		Part-time		Full-time			Part-time		Full-time		Part-time		Full-time	
		F	M	F	M	F	M	F	M		F	M	F	M	F	M	F	M
Spain	8,196	152	103	2,567	4,617	40	19	278	420	8,502	182	135	2,581	4,583	47	32	403	539
United Kingdom ^(A)	685	58	31	216	380	0	0	0	0	814	65	30	256	463	0	0	0	0
Brazil	349	0	0	103	208	10	5	11	12	795	0	0	259	512	9	5	5	5
Total	9,230	210	134	2,886	5,205	50	24	289	432	10,111	247	165	3,096	5,558	56	37	408	544

^(A) Of the 95 permanent part-time employees in the United Kingdom (89 in 2022), 13 have a "Non-Guaranteed Hours" contract type, of which 6 are women and 7 are men (11 employees, 6 women and 5 men in 2022 respectively).

Total number and distribution of employees by gender, age, region and professional category (as of 31 December) (GRI 2-7)

	2023																										
	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				
	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	
Senior Management	0	0	1	1	5	5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1	5	5	6	6
Executives and graduates	0	1	374	462	613	720	2	2	39	40	22	25	0	0	13	29	4	14	2	3	426	531	639	759	1,067	1,293	
Coordinators	0	0	41	113	326	754	2	4	19	3	10	2	0	0	41	63	6	9	2	4	101	179	342	765	445	948	
Technicians	1	17	391	1,072	1,159	1,922	0	3	0	32	0	23	6	12	44	173	11	42	7	32	435	1,277	1,170	1,987	1,612	3,296	
Support staff	1	3	110	65	191	154	10	20	134	216	83	123	14	18	125	147	9	15	25	41	369	428	283	292	677	761	
Total	2	21	917	1,713	2,294	3,555	14	29	192	291	115	173	20	30	223	412	30	80	36	80	1,332	2,416	2,439	3,808	3,807	6,304	
	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				
	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	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	

Annual average of contracts according to their type* by gender, age, and professional category (consolidated) (GRI 2-7)

	2022						2023					
	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
Male	5,233	96	357	21	5,590	117	5,370	146	514	29	5,884	175
Female	2,880	187	244	43	3,124	230	2,985	226	356	56	3,341	282
Total by gender	8,113	283	601	64	8,714	347	8,355	372	870	85	9,225	457
Senior Management	12	0	0	0	12	0	12	0	0	0	12	0
Other executives and graduates	2,105	29	46	0	2,151	29	2,185	40	67	1	2,252	41
Coordinators	1,277	26	9	0	1,286	26	1,301	51	6	0	1,307	51
Technicians	3,865	116	470	44	4,335	160	3,854	160	681	53	4,535	213
Support staff	854	112	76	20	930	132	1,003	121	116	31	1,119	152
Total by professional category	8,113	283	601	64	8,714	347	8,355	372	870	85	9,225	457
Over 45 years old	5,217	150	247	26	5,464	176	5,428	252	320	30	5,748	282
25–45 years old	2,867	129	346	29	3,213	158	2,870	118	533	41	3,403	159
Under 25 years old	29	4	8	9	37	13	57	2	17	14	74	16
Total by age	8,113	283	601	64	8,714	347	8,355	372	870	85	9,225	457

(A) Note: aggregated data of the total consolidated workforce.

Recruitments

(GRI 401-1)

In 2023, there have been a total of 1,377 new recruits (926 in 2022), of which 554 were women and 823 were men (370 and 556 respectively in 2022). In relation to the distribution of recruits by professional category and age, 49% focus on technician positions (51% in 2022). With regard to the percentage of job openings filled by employees internally, this amounted to 29.9% (38.4% in 2022).

In Aena, the contracting of employees is governed by the fundamental principles of equal opportunities, merit, capacity and publicity¹⁴⁶.

In order to ensure adequate control, quality and homogeneity in the selection processes in Spain, the main mission of the Joint Promotion and Selection Committee, made up of representatives of the Company and trade union representatives, is to guarantee compliance with the applicable regulations, as well as the correct application of the corresponding principles.

At Aena's subsidiaries in the United Kingdom, the People Council is the body responsible for reviewing and approving vacancies and the specific needs of each area.

Regarding Aena subsidiaries in Brazil, it is the governing bodies that approve new vacancies. In 2023, hiring efforts have been focused mainly on recruiting the workers necessary to fill new vacancies in Aena Brazil's subsidiary, BOAB.

2023		
Men	Women	Total new recruitments
823 (556 in 2022)	554 (370 in 2022)	1,377 new recruitments (926 in 2022 y 489 in 2021)

Technical positions	Vacancies covered by internal employees
49% (51% in 2022)	29.9% (38.4% in 2022)

¹⁴⁶ As stated in the Code of Conduct and Sustainability Policy that applies to all Group companies, and in local internal rules, such as the Collective Agreement in Spain, Recruitment and Vetting Policy, at London-Luton Airport in the United Kingdom.

Recruits by gender, age, professional category and region

	2023																							
	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	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F
Senior Management	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0
Executives and graduates	1	0	41	43	12	15	1	1	9	10	2	3	0	0	18	7	9	2	2	1	68	60	23	20
Coordinators	0	0	0	0	2	2	3	2	2	4	0	1	0	0	33	26	5	6	3	2	35	30	7	9
Technicians	10	1	198	89	80	90	2	0	8	0	0	0	9	3	106	34	35	11	21	4	312	123	115	101
Support staff	3	1	16	38	8	32	16	5	54	27	16	11	16	10	101	73	6	7	35	16	171	138	30	50
Total	14	2	255	170	103	139	22	8	73	41	18	15	25	13	258	140	55	26	61	23	586	351	176	180
	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	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F
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

Opportunities for internal mobility

Internal recruitment processes enable the promotion of employees and their career development within the Company.

In Spain, the 1st Collective Agreement establishes the internal selection process, addressing crucial aspects such as the reinstatement of surplus staff, internal recruitment, criteria and requirements to participate in such processes, among others.

Internal mobility opportunities are announced regularly (monthly for structural posts) via e-mail and the corporate intranet to the entire workforce. These announcements detail the number of vacancies, the characteristics of the position and the behavioural, technical and qualification requirements. Information on the vacancies is defined in job descriptions, which specify the functions, mission and requirements for the job¹⁴⁷.

Specifically, during 2023, in Spain the process of internal provision of CF levels called on March 22, 2023 has been completed, making an offer of 52 positions available to employees¹⁴⁸. In addition, more than 60 Aena workers have been promoted to level A and B positions which were included in the job board. Regarding positions of responsibility, in 2023 Aena employees have had the opportunity to apply for 58 vacancies (35 in 2022).

In the United Kingdom, at London-Luton airport, with the aim of filling vacancies with internal staff wherever possible, vacancies are advertised internally before being made public, followed by briefings and advertising in the internal communication system. This approach is aligned with the promotion of equal opportunities and professional development of staff.

In 2023, a total of 88 vacancies were published, of which 21 were offered internally¹⁴⁹. This accounts for 24% of vacancies filled internally, showing an ongoing commitment to internal development and mobility within the organisation.

In Brazil, at Aena's subsidiaries, filling vacancies is primarily done through the promotion of internal staff, following an appropriate selection process. The Human Resources Department plays a fundamental role in this process by evaluating all internal promotions and selections. The main objective of this involvement is to ensure effective control, ensure quality, and maintain consistency in selection processes, ensuring the application of a fair and transparent approach in the internal development and mobility of employees.

Dismissals¹⁵⁰

(GRI 401-1)

During 2023, there were a total of 25 dismissals, 3 less than in 2022 (28 dismissals in 2022 and 23 dismissals in 2021).

The number of women who make up the total figure of dismissals amounts to 11, that is, 44.0% (9 women, corresponding to 32.1% of dismissals in 2022), compared to 14 men, which additionally represents 56.0% (19 men and 67.9% in 2022). Regarding the distribution of dismissals by professional category and age, 44.0% are concentrated in support staff positions (50% in 2022).

¹⁴⁷ The processes are supervised in Spain by the Joint Promotion and Selection Committee, in the United Kingdom by the People Council and in Brazil In Aena's subsidiaries in Brazil there is currently no body that carries out this supervision. Companies have the autonomy to define their labour and salary policies and apply them under the conditions defined by this internal process.

¹⁴⁸ See details of the selection process launched in 2022 in the Statement of Non-Financial Information-Sustainability Report 2022, available on the Aena website.

¹⁴⁹ Information first reported for the United Kingdom in 2023. Data from 2022 not available.

¹⁵⁰ Labour force adjustment plans: In 2023, like in 2022, no dismissals were made under the Labour Force Adjustment Plan (ERE [Expediente de Regulación de Empleo]), neither permanent nor temporary, which reinforces the Company's willingness to maintain working conditions and stability in employment.

Dismissals by gender, age, professional category and region

	2023																							
	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	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F
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	2	1	2	0	0	1	2	1	2
Coordinators	0	0	0	0	1	0	0	0	0	0	0	0	0	0	1	1	0	0	0	0	1	1	1	0
Technicians	0	0	0	0	1	0	0	0	0	0	1	0	0	0	3	0	0	0	0	0	3	0	2	0
Support staff	0	0	0	0	0	0	0	2	2	1	0	0	0	0	2	3	1	0	0	2	4	4	1	0
Total	0	0	0	0	2	0	0	2	2	1	1	0	0	0	7	6	2	2	0	2	9	7	5	2

	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	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F
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

Turnover rate

(GRI 401-1)

The low turnover rate, both voluntary and total, reflects Aena's excellent performance within the framework of its commitment to human capital, which in 2023 has been 3.30% (4.28% in 2022).

Turnover rate of staff by age, gender and region

	2023											
Turnover rate (%)	Spain			United Kingdom			Brazil			Total		
	F	M	Total	F	M	Total	F	M	Total	F	M	Total
Over 45	1.94%	3.22%	2.73%	2.04%	7.79%	5.56%	25.00%	11.11%	14.29%	2.03%	3.48%	2.92%
Between 25 and 45 years old	1.84%	2.55%	2.31%	5.66%	7.38%	6.70%	14.85%	8.99%	11.03%	3.46%	3.64%	3.58%
Under 25	—%	—%	—%	35.29%	7.69%	23.33%	33.33%	33.33%	33.33%	34.38%	10.81%	21.74%
Total	1.91%	2.99%	2.59%	6.20%	7.54%	7.01%	17.74%	10.22%	12.89%	2.82%	3.59%	3.30%

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 a turnover criterion during a fiscal year/Total number of employees from the previous fiscal year).*

*In the EINF 2022, an explanation of the calculation formula was incorrectly included by mistake.

Turnover rate of staff by age, gender and region

	2022											
Turnover rate (%)	Spain			United Kingdom			Brazil			Total		
	F	M	Total	F	M	Total	F	M	Total	F	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%
Between 25 and 45 years old	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 a turnover criterion during a fiscal year/Total number of employees from the previous fiscal year)*

*In the EINF 2022, an explanation of the calculation formula was incorrectly included by mistake.

Voluntary turnover rate of staff by age, gender and region^(A)

2023

Turnover rate (%)	Spain			United Kingdom			Brazil			Total		
	F	M	Total	F	M	Total	F	M	Total	F	M	Total
Over 45	0.80%	0.38%	0.55%	1.02%	4.55%	3.17%	—%	3.70%	2.86%	0.81%	0.59%	0.67%
Between 25 and 45 years old	1.73%	2.44%	2.20%	5.03%	6.15%	5.71%	8.91%	5.29%	6.55%	2.78%	3.10%	2.99%
Under 25	—%	—%	—%	23.53%	7.69%	16.67%	33.33%	33.33%	33.33%	28.13%	10.81%	18.84%
Total	1.09%	1.09%	1.09%	4.74%	5.60%	5.26%	11.29%	6.22%	8.02%	1.75%	1.60%	1.66%

Voluntary turnover rate: Number of employees who leave the organisation voluntarily.

Voluntary Turnover Rate % = (Employees who leave the company voluntarily during a fiscal year/Total number of employees from the previous fiscal year) *

* In the 2022 NFIS, an incorrect calculation formula was mistakenly included.

Voluntary turnover rate of staff by age, gender and region^(A)

2022

Turnover rate (%)	Spain			United Kingdom			Brazil			Total		
	F	M	Total	F	M	Total	F	M	Total	F	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%
Between 25 and 45 years old	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 voluntarily during a fiscal year/Total number of employees from the previous fiscal year) *

* In the 2022 NFIS, an incorrect calculation formula was mistakenly included.

5.1.2. Remuneration model

(GRI 2-20; 2-21; 401-2; 3-3)

The Aena Groups's Remuneration Model is defined by the principles of remuneration transparency, equality and non-discrimination, in the broadest sense (nationality, gender, age, etc.), maximum compliance with the applicable legal regulations, and the incorporation of the best national and international standards, principles and practices in this area¹⁵¹.

With regard to Aena employees in Spain and Brazil, the remuneration model follows a similar scheme for all employees whereas the total salary amount varies based on their level of responsibility as well as the achievement of previously defined objectives, combining the following:

- Fixed remuneration¹⁵²: determined by professional level, occupation or individual level of responsibility. Other applicable allowances (night shifts, working hours, etc.) are included in this remuneration.
- Variable Remuneration: this is based on a certain percentage of the fixed salary, which depends on the results of the performance appraisal and achievements accomplished by employees. In Aena's subsidiaries in Brazil, variable compensation is also defined by the profit-sharing and results participation program approved in the collective agreement¹⁵³.

Among the Company Objectives, which apply to the entire organisation, an objective linked to sustainability has been included. Specifically, the achievement of the strategic objectives included in the Climate Action Plan (CAP) defined for the year 2023 will be evaluated. Given the importance for Aena of making its activity compatible with development and sustainability, this objective has been given a weighting of 25% of the company's objectives.

In the United Kingdom, London-Luton Airport 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. Moreover, during the fiscal year 2023, the last agreed commitments in terms of salary review have been implemented, which have taken into account the increase in cost of living and inflation for the workers¹⁵⁴.

In 2023, the salary increase for Aena employees was as follows:

- In Spain, 3,0%¹⁵⁵ (3,5% in 2022).
- In the United Kingdom, 6%, the same as in 2022. Additionally, employees received a profit share of £7,208.52 (8,294.17 €) per full-time employee with no absences and a number of other remuneration benefits have been agreed, such as an increase in salary and the length of paternity and maternity leave, among others.
- Brazil, 3% (7% in 2022).

¹⁵¹ Aena's remuneration in Spain is included in Appendix II of the 1st Collective Agreement of Aena, and is reviewed annually in accordance with the General State Budget Law in force. The Organisation and People Division and employee representatives sign the annual salary tables, in accordance with the provisions of the applicable legislation and regulations.

In Brazil, salary tables are updated annually by the Human Resources department in accordance with the local collective agreement, with this department being responsible for defining the initial and its modifications, under the direction's approval.

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's Human Resources management division.

¹⁵² The salary tables included in Appendix II of the 1st Collective Agreement of Aena are public and the remuneration by professional category for both AENA S.M.E. SA and SCAIRM can be consulted in them. On the other hand, in the case of Aena Desarrollo Internacional, this is also public information and can be accessed through the salary tables included in the Collective Bargaining Agreement for Offices and Workshops in the Community of Madrid. Along this same line, the salary published in Appendix I of the Collective Agreement is complemented by applicable supplements such as activity or availability, among others. In Brazil, the reference document is the First Collective Agreement, signed on 23 July 2020.

In the United Kingdom, all information is made available to employees, which is communicated once collective bargaining is finalised.

¹⁵³ As of the closing date of this report, the collective agreement for the BOAB subsidiary has not been defined, pending completion in the 2024 fiscal year.

¹⁵⁴ The latest pay review (Pay Review final offer) considers the possibility of bonuses and improvements in family benefits. In order to reach an agreement, the direct participation of workers, trade union representatives, or the carrying out of a comparative remuneration study, among others, has been taken into account. This approach ensures informed decision-making aligned with industry pay practices.

In addition to the above, it should be noted that there is no specific policy related to salary reviews, suggesting that the process and specific terms of salary review may be determined on a case-by-case basis, based on specific agreements reached during bargaining with the union. This flexible approach allows for adaptation to the particular circumstances and needs of the organisation and its employees.

¹⁵⁵ For Spain, a 3.0% increase has been applied (2.5% + 0.5% additional increase linked to the IPCA). An additional 0.5% increase linked to the GDP is pending implementation, in case of fulfillment, as established in the General State Budget Law 2023.

Aena, through its Remuneration Model, guarantees equal treatment without discrimination in:



Living wages and making social contributions



Seamless and transparent communication in the review of remuneration, with the participation of workers' representatives



Incentivising achievement and results, both individually and in teams

In addition to the above, Aena provides various benefits to its professionals, including life insurance, pension plans, health insurance and restaurant vouchers.

Additionally, in Spain, through the Social Aid Programme, aid is granted to cover study expenses, work-life balance (summer camps and nursery schools), health, births, disability, etc. Thus, a total of €1.5 million has been allocated in 2023 (€1.4 million in 2022).

Moreover, there exists the Work-Life Balance Programme (PAC [Programa de Atención a la Conciliación]), through which offers basic and specialised resources to help employees and their first-degree family members balance work and family life. These benefits not only reflect Aena's commitment to the wellbeing of its employees, but also support quality of life and equity in the workplace.

Aena ensures that benefits for full-time employees are the same as those for part-time employees.

Supervision and control mechanisms:

Within the framework of exercising the prevention of money laundering, the Auditors of Accounts carry out the review of contracts, transfers, social security contributions and other relevant documents at Aena.

Additionally, in Spain, the company prepares a Retribution Registry and a Retribution Audit, in accordance with the provisions of Royal Decree 902/2020, of October 13, on pay equality between men and women, available to the legal representation of the workers. The validity of this audit is defined in the II Equality Plan, which aims to verify the effective, transversal, and complete application of the principle of equality between women and men in terms of compensation. In this sense, the Equality Parity Commission is established as the body responsible for monitoring any deviations that may be detected in this matter, as well as proposing necessary measures to remedy the situation.

Likewise, the Organisation and People Division supervises the correct application of the remuneration model.

Similarly, in the United Kingdom, London-Luton Airport produces the gender pay gap report. In this case, the human resources department is responsible for its management and oversight.

Finally, in Brazil, the Human Resources area defines the remuneration model together with the President Director and the General Director and the salary tables. These remunerations are reviewed annually, according to the updates provided for in the collective agreement negotiated with the union and, if necessary, through a remuneration survey carried out in the Brazilian market.

Average remuneration and pay gap ¹⁵⁶

In Spain, under Royal Decree 902/2020, of 13 October, on equal remuneration between women and men, a Pay Registry has been set up that allows for guaranteeing equal pay and ensuring its transparency and monitoring.

For the analysis of the remuneration model, the total pay has been used, 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 this, the standardised remuneration is calculated, 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.

¹⁵⁶ 'Location with significant operations' is considered the same as in the rest of the Report. For more information see section 'About this report'.

As a result, in 2023, gender pay parity has been verified, with a gender pay gap of 1.6% for the pay gap in Spain (compared to 2.2% in 2022). This wage gap primarily occurs due to the weight of salaries received by groups (such as the Firefighting Service, Maintenance, and Information Systems) where there is under-representation of women, having a high percentage of representation in the overall workforce, and to which female candidates do not apply. Additionally, the improvement compared to 2022 is primarily due to reduced spending on overtime hours in those groups with greater under-representation of women.

In the United Kingdom, at the London-Luton Airport, the pay gap in 2023 was 18.4%, (23.3% in 2022), due primarily to the nature and characteristics of the sector and the difficulty of attracting and retaining female talent. Additionally, as part of transparency efforts, the Gender Pay Gap Report 2022 is published annually, responding to regulatory requirements in terms of reporting the gender pay gap, all in accordance with the Gender Pay Gap Reporting Guidance. In order to reduce these figures, various actions have been taken, including the decrease to 77.9% of men in the highest salary quartile compared to 84.4% in 2020; as well as efforts made to attract and retain women in senior positions in the aviation industry, as they are the main reason for the gender pay gap.

In the case of Aena’s subsidiaries in Brazil, the salary tables defined without gender distinction are applied, giving effect to the right to equal treatment and non-discrimination between women and men in terms of remuneration. In this regard, the pay gap in Brazil, as shown by the average remuneration figures for men and women, is 14.6% (el 17.3% in 2022), mainly due to the low representation of women in the sector.

Aena recognizes the right to decent remuneration, in accordance with applicable legislation and the current socioeconomic context.

Average remuneration and its evolution disaggregated by gender, age and professional categories or equal value (fixed + variable salary) ^{(A)(B)} (GRI 405-2)

		2022								2023 ^(C)							
		< 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	
		F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M
Spain ^(C)	Executives and graduates	0	0	49,333	50,625	58,023	60,693	54,871	56,945	0	(*)	51,989	52,966	60,482	63,453	57,555	59,642
	Coordinators	0	0	39,900	43,088	43,764	46,122	43,359	45,750	0	0	41,487	44,280	45,095	47,166	44,846	46,905
	Technicians	0	30,803	34,642	36,453	37,271	39,978	36,634	38,732	(*)	32,783	35,126	36,310	37,855	40,172	37,227	38,887
	Support staff	0	0	31,785	32,398	32,384	34,222	32,216	33,754	(*)	29,068	31,382	32,407	33,118	34,443	32,508	33,860
	Total	0	30,803	40,799	40,502	43,474	45,222	42,764	43,726	29,444	32,519	41,632	41,092	44,599	46,024	43,827	44,534
United Kingdom	Executives and graduates	(*)	(*)	59,897	71,434	65,540	108,746	61,762	86,584	39,114	36,232	66,061	85,816	81,618	148,049	69,614	107,047
	Coordinators	0	0	36,677	41,624	48,056	36,139	40,024	38,882	28,337	34,878	44,843	44,440	44,143	56,359	43,552	42,999
	Technicians	0	33,328	43,812	57,180	0	62,191	43,812	58,891		37,038		65,149		72,057		66,289
	Support staff	31,156	30,878	34,203	41,536	36,894	39,904	34,944	40,591	36,999	34,906	43,221	49,789	45,793	52,268	43,622	49,759
	Total	31,917	32,349	39,378	49,091	43,017	59,396	40,217	52,422	36,658	35,250	47,828	56,429	52,223	68,624	48,503	59,467
Brazil	Executives and graduates	0	0	70,509	76,498	121,940	120,920	85,938	94,670			76,822	86,343	92,116	131,847	80,993	103,295
	Coordinators	0	0	30,164	31,297	0	30,521	30,164	31,205			35,323	37,533	34,373	34,826	35,209	37,226
	Technicians	5,848	5,848	5,848	5,848	0	5,848	5,848	5,848	6,738	6,676	7,061	7,021	7,413	7,174	7,102	7,031
	Support staff	3,218	4,012	10,370	12,371	11,443	16,344	9,377	12,109	4,218	7,029	12,004	14,996	13,283	20,721	11,235	14,623
	Total	3,744	4,624	16,806	17,623	52,880	51,884	17,554	21,214	4,800	6,901	19,466	20,423	26,045	37,729	19,110	22,378

^(A) 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.

^(B) 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.

^(C) For Spain, a 3.0% increase has been applied (2.5% + 0.5% additional increase linked to the IPCA). An additional 0.5% increase linked to the GDP is pending application, in case of fulfillment, as established in the General State Budget Law 2023 (3.5% in 2022). In the United Kingdom, 6% (6% in 2022) and in Brazil, 3% (7% in 2022).

Pay Gap ^(A) (GRI 405-2)				
		2021	2022	2023
		Average remuneration	Average remuneration	Average remuneration
Spain	Executives and graduates	3.6%	3.6%	3.5%
	Coordinators	4.2%	5.2%	4.4%
	Technicians	4.8%	5.4%	4.3%
	Support staff	2.8%	4.6%	4.0%
	Total	1.7%	2.2%	1.6%
United Kingdom	Executives and graduates	22.9%	28.7%	35.0%
	Coordinators	21.8%	(2.9)%	(1.3)%
	Technicians	8.1%	25.6%	100.0%
	Support staff	6.9%	13.9%	12.3%
	Total	22.1%	23.3%	18.4%
Brazil	Executives and graduates	12.9%	9.2%	21.6%
	Coordinators	5.5%	3.3%	5.4%
	Technicians	1.8%	—%	(1.0)%
	Support staff	16.1%	22.6%	23.2%
	Total	8.3%	17.3%	14.6%

(A) Pay gap = (Average men's remuneration – Average women's remuneration)/Average men's remuneration.

Comparison with the inter-professional minimum wage ¹⁵⁷ (GRI 202-1)

The standard entry level has a salary remuneration that is determined by the occupation, according to the nature of the job function, without gender distinction.

At the end of the fiscal year 2023, Aena's minimum wage is higher than the minimum wage in all countries in which it operates.

- In Spain, as stipulated by Royal Decree 99/2023, of February 14, which establishes the minimum interprofessional wage for 2023, a minimum wage of €1,080 per month (equivalent to €15,120 annually) is set. Specifically, the lowest equivalent wage received in Aena companies in Spain has been €24,943 for men (€25,090 in 2022) and €24,179 for women (€23,549 in 2022). Therefore, the lowest equivalent wage for men represents 65% (79% in 2022) of the Minimum Interprofessional Wage, and the lowest equivalent wage for women represents 60% (68% in 2022) of the Minimum Interprofessional Wage.
- In the United Kingdom, the minimum compensation exceeds national minimum wages, established by the National Minimum Wage, which as of April 2023 is €11.99 per hour (£10.42 per hour); the minimum wage at the airport has been €28.92 per hour (£25.13 per hour). In this regard, among other issues, the airport's strategic lines include fair compensation as one of the key aspects. As a demonstration of this commitment, in 2023, they have received Real-Time Living Wage Accreditation.
- In Brazil ¹⁵⁸, the lowest salary was €256.89 per month (€224.3 per month in 2022) for both men and women, exceeding the legal minimum established at €246.19 (€214.9 per month in 2021) by 4.3% for 2023 (4.4% in 2022). Minimum wages by category are established in the Collective Agreement of Aena Brazil.

Aena exceeds the minimum interprofessional wage in all countries where it operates.

Annual total pay ratio ¹⁵⁹ (GRI 2-21)

In 2023, the annual total pay ratio is

- 5.2 in Spain (4.6 in 2022).
- 12.79 in the United Kingdom (8.5 in 2022)
- 42.6 in Brazil (29.5 in 2022).

¹⁵⁷ Except for best paid person.

¹⁵⁸ In 2022, at Aena airports in Brazil, the average monthly salary is R\$1,265 and the minimum established by the government is R\$1,212. In 2023, R\$1,320, respectively.

¹⁵⁹ Locations with significant operations are considered the same as in the rest of the report. For more information see section 'About this report'. This indicator is calculated as the ratio of the annual total pay of the company's best paid person compared to the median annual total pay of all employees (excluding the company's best paid person).

Regarding the ratio of the percentage increase in total annual compensation of the highest-paid person in the organization compared to the median percentage increase in total annual compensation of all employees (excluding the highest-paid person), in Spain it is 11.55%, and in the United Kingdom, it is 3.37%¹⁶⁰.

5.1.3. Organisation of work time and disconnection

(GRI 3-3)

Working day

In Spain, in the cases of Aena and its subsidiary SCAIRM, it is the current labour legislation that regulates working time, together with the provisions of the collective agreement:

- With regard to the duration of the workday, shift workers have an annual working time of 1,711 hours. Likewise, the normal working day for workers who are not subject to any other working day regime will be continuous and in the morning, with a weekly duration of thirty-seven hours and thirty minutes, and will be carried out from Monday to Friday.
- In terms of flexible start times, with a margin of up to one and a half hours, between 7:00 am and 9:00 am.
- Finally, with regard to holidays, it is established that staff will be entitled to twenty-three working days of paid annual leave, and in the case of staff working shifts or special shifts, they will be entitled to thirty calendar days. Additionally, the worker, with adequate justification and prior notice, will be entitled to paid leave for times and causes such as marriage, accident or illness, death of a spouse, birth of a child, moving home, among others.

Regarding the organization of working time at ADI, it is regulated according to the guidelines of the Collective Agreement for Workshops and Offices of the Community of Madrid, which stipulates a maximum effective annual working time of 1,765 hours (contained in Article 28).

In order to guarantee compliance with working hours and ensure that working time, breaks and overtime limits are respected, Aena keeps a daily record of its employees' working hours. To this end, it has set up a system for recording working hours, available both in the physical offices and on the intranet¹⁶¹. This system allows workers to view their daily movements and extract a detailed history.

In the United Kingdom, during the year 2023, efforts have been made to provide greater flexibility to employees at London-Luton Airport, including the option of a hybrid working model that they can adopt based on their needs to balance work and personal life. Additionally, although there is no Human Resources Information System, the recording of workers' overtime hours is captured in the payroll.

The right to holidays and time off is guaranteed both by law and by employee contracts, ensuring 25 days of paid holidays, exceeding the legal minimum of 23 days, as well as 8 days of public holidays.

In Aena's subsidiaries at Brazil, working time is regulated by Brazilian legislation, which is complemented by the Collective Agreement, establishing a weekly working time of 44 hours or a monthly working time of 220 hours. In turn, for employees who have a shift working day, there is the possibility to modify their working day to a 12-hour shift pattern for 2 consecutive days, followed by 2 days off. They are also offered the possibility to work overtime, with the corresponding salary payment. On the other hand, those employees governed by the 44-hour administrative working week may receive compensation such as days off, overtime pay or separate pay slips on a half-yearly basis. In order to keep a record and control of working days, these are entered into an external electronic system, which is supervised by the Organisation and Human Resources Management units.

Digital disconnection

The Aena Group adapts its rules on disconnection to the different contexts in which it operates.

In Spain, Aena's and its subsidiaries Digital Disconnection Policy is aimed at strengthening the right to a balance between work, personal and family life. This policy includes fundamental guidelines and recommendations, including:

- Recognition of the right to digital disconnection through measures that contribute to a work-life balance.
- Establishment of limits for meetings, both face-to-face and remotely, outside working hours, except in cases of force majeure or urgent need.
- Promotion of the responsible sending of e-mails or any other type of communication, avoiding their use outside working hours unless absolutely necessary.
- Promoting responsible use of digital tools.
- Promotion and guarantee of the right to digital disconnection during holidays and other days off, based on the provisions of the policy.

¹⁶⁰ Information reported for the first time in 2023

This information regarding the subsidiaries of Aena in Brazil is not available due to the recent incorporation of the new company BOAB.

¹⁶¹ In compliance with the provisions of Royal Decree-Law 8/2019, of 8 March, which establishes urgent measures for social protection and combating job insecurity

Among other issues, it is ensured that the practice of digital disconnection will not result in negative consequences for promotion or in the imposition of disciplinary sanctions. Moreover, digital disconnection is promoted through training and awareness-raising activities aimed at promoting the protection and respect of this fundamental right.

At Aena's subsidiaries in the United Kingdom and Brazil, they do not have a specific digital disconnection policy. However, in the case of London-Luton Airport, the IT department has published guides that address various aspects, such as what to do in case of disconnection or frequent issues when working remotely. In addition to the above, employees are encouraged not to check their phones and e-mails outside of working hours.

In Brazil, at the central services office, there is the possibility of opting for a hybrid work arrangement, with remote work once a week, for eligible individuals.

Aena's Code of Conduct sets out the Company's commitment to promoting a balance between professional and personal life.

Teleworking Policy

The consolidation of the Teleworking Policy in Aena and its subsidiaries in Spain reflects the Company's commitment to the modernisation of work organisation, providing employees with greater autonomy in the planning and execution of their activities. At the same time, it contributes to the balance between work, personal and family life.

This policy establishes the requirements for accessing teleworking, focusing on aspects such as job/occupation, technical requirements, material resources, and the workplace. Likewise, it defines the conditions for carrying out work under this modality, while maintaining labour quality standards. Since its implementation, 81.8% of workers who can telework according to their job/occupation have opted for this modality, representing an increase compared to the previous year (approximately 80%), demonstrating the success of its implementation.

All workers affected by this Policy have received the necessary information and training in this respect. This has been done with the aim of guaranteeing the prevention of occupational risks for the people who enjoy this type of work, and to ensure that the work activity is carried out under optimum health and safety conditions.

In the United Kingdom, London-Luton Airport employees also have the option of a hybrid working arrangement (2 to 3 days in the office per week), depending on operational needs. In addition to the above, employees have the possibility to work remotely from abroad for a maximum period of one month. This measure aims to improve security and flexibility in managing work-life balance, taking into account the diversity of the workforce. In 2023, approximately 21% of the workforce is working in a hybrid format. Although the figure has decreased compared to last year (24% in 2022), this is due to the fact that some units, which work in predominantly face-to-face positions, have seen their workforce strengthened.

5.2. Diversity and Inclusion

(GRI 3-3)

The Company sets out its commitment to the promotion of equality and diversity in a number of internal policies and ensures their deployment by establishing specific objectives and including them in the corresponding strategies¹⁶².

In the United Kingdom, London-Luton Airport is part of partnerships to promote diversity and local employment with LBC through Luton Rising, as well as the Employers Network for Equality and Inclusion.

The supervision of measures against discrimination in Brazil is carried out based on the provisions of the current regulations and the terms of the Collective Agreement, with the participation of governing bodies, if necessary.

Aena understands 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 form of discrimination and zero tolerance for any form of discrimination, harassment, bullying or hostile situation
Respect, promotion of diversity and equal opportunities among all the Company's employees, regardless of the development of their employment relationship.
Training to prevent any type of discrimination or harassment in the workplace.
Inclusive culture ensuring access to work and the elimination of barriers.
Diverse teams (skills, experiences, knowledge, values and attitudes).
Equal opportunities: selection and promotion of talent based on objective criteria of merit and ability.
Equal development conditions for workers with any type of disability.
Communication channels to report any type of irregular conduct.
Sanctions in case of non-compliance.



Supply Chain

Principle of transparency. Non-discrimination and equal treatment for male and female bidders.
Equality and diversity as a basis for selection and award criteria.
Mandatory health and safety practices.
Monitoring of compliance with current labour legislation to ensure fair and dignified treatment, a working environment that promotes respect for human rights, diversity, inclusion and non-discrimination.
Communication channels to report any type of irregular conduct.



Customers

Accessible and adapted airport facilities for all.
Development of specific measures at airport facilities.
Ensure that all people can enjoy air transportation through a quality service, adapted to the different types of functional diversity.
Use of inclusive language.
Communication channels to report any type of irregular conduct.



Society

Development of plans and actions to promote economic, social and cultural rights, diversity, inclusion, equal opportunities and non-discrimination, as well as initiatives and programmes that contribute to the respect of human rights and the achievement of the SDGs.
Support for groups in vulnerable situations (for example, integration of young people into the labour market, links with special employment centres, etc.).

¹⁶² In Brazil, Aena airports do not yet have specific objectives for this.

...which is made effective through a set of standards and tools.



Workers

Strategic Plan 2022-2026 with Inclusion of Specific Equality Objectives.

I Collective Agreement: Aena undertakes the commitment to provide equal opportunities for access to employment and professional promotion for all its staff in Brazil, rejecting discrimination of any kind.

Aena Brazil's Collective Agreement highlights clauses protecting women from situations of sexual harassment and domestic violence. It also includes provisions related to gender, medical conditions, free affiliation, or union activities, non-discrimination in employment decisions (hiring/promotion/termination), non-discrimination in working conditions (working hours/training/remuneration/social security), race/ethnicity/nationality, social origin, religion, sexual orientation, family responsibilities (including pregnancy), disabilities, political opinion, and age, subject to sanctions if applicable.

Sustainability Strategy 2021-2030 and Responsible Business Strategy of London-Luton Airport: The specific objectives in terms of inclusion, non-discrimination, and promotion of equality formalize the organization's commitment to diversity.

II Equality Plan: The following measures stand out in this year:

- New Protocol for the prevention and action against situations of sexual harassment, based on sex, sexual orientation, and gender identity or expression.
- Increase in specific equality training (in-person and online).
- Facilitation of job changes for pregnant women.
- Increase in presence at forums, institutes, universities, and fairs to promote the incorporation of women into the company.
- Effective dissemination of reconciliation and co-responsibility measures.
- Increase the visibility of women role models in groups or positions with low representation.

Equality, Diversity, and Inclusion Strategy of London-Luton Airport: The goal of the Equality, Diversity, and Inclusion Strategy of London-Luton Airport is to promote a workplace where the objective is to be oneself.

Protocol for the prevention and action against situations of sexual harassment, based on sex, sexual orientation, and gender identity or expression: It establishes measures to prevent and avoid situations of harassment, as well as the procedure to follow in case of a complaint or accusation of sexual harassment or based on sex, now including the LGBTQ+ community. Brazilian law also establishes equal rights for men and women (as mentioned in the previous point).

Code of Conduct of Aena and Aena Brazil: It commits to ensuring equal opportunities in access to work and professional promotion, avoiding all types of discrimination, as well as prohibiting any form of harassment in the workplace, promoting an environment and working climate compatible with the personal and family life of workers.

Aena Board of Directors Regulations: It brings the discussion in terms of diversity and non-discrimination to the highest level of the Company, explicitly assuming the commitment to set a representation target for the less represented gender and report on it. It establishes diversity as the basis for the selection and proper functioning of the Board, considering gender and age diversity as differentiating factors.

Sustainability Policy: Within its scope of action, it aims to provide a safe and healthy working environment characterized by equal opportunities and non-discrimination, promoting diversity, talent management, and work-life balance, with special attention to the difficulties faced by individuals with special needs.

Human Rights Policy: It commits to rejecting all forms of discrimination and ensuring equal opportunities, as well as respecting and promoting diversity among workers. This commitment extends to the relationship with the entire value chain.

In Brazil, work is underway on the development of a local Diversity and Inclusion Policy. However, the Human Rights Policy and the People Hiring Policy reject discrimination both in the workforce and towards customers.

Stakeholder Relations Policy: Safeguards the interests and rights of stakeholders, ensuring equal treatment in terms of information, participation, and exercise of rights.

Disability Policy (Spain) and Disability Policy Statement (Luton): Demonstrates the Company's commitment to contribute to a society where people with disabilities have their place, aiming to build an inclusive society. This policy commits to safeguarding the interests of individuals with special needs and ensuring employment for anyone regardless of their condition, whether they are a user, visitor, employee, or other stakeholders.

Strict compliance with the Equal Opportunity Act 2010, a legal framework that provides specific guidelines in these areas and is aligned with ILO conventions.



Supply Chain and service

The Regulatory Compliance System includes tools for reporting incidents and supervision mechanisms, due diligence procedures, internal procedures to ensure compliance with diversity and equality clauses in procurement specifications. Additionally, the protocol for addressing sexual harassment and the Code of Conduct consider corrective and disciplinary actions in cases of discrimination or harassment, as well as sanctions for non-compliance.

Applicable contracting regulations (Law 9/2017): It considers the inclusion of diversity clauses in tenders and mechanisms for monitoring their compliance (with possible sanctions).

Communication and reporting: through the Whistleblowing Channel.

Training activities focused on diversity, equality, and non-discrimination are conducted.

Flexibility, equality, and work-life balance are promoted through effective measures such as childcare support, parental leave beyond legal requirements, among others.

In the United Kingdom, the mechanisms include: LLA Grievance Procedure and LLA Disciplinary Procedure (internal disciplinary and claims procedures), Whistleblowing Channel (open to external stakeholders), Whistleblowing Policy, and a Screenshot of the whistleblowing helpline, the Modern Slavery Statement.



Supervision mechanisms

Nomination, Remuneration, and Corporate Governance Committee: It undertakes the commitment to establish representation targets for the underrepresented gender on the Board of Directors.

Additionally, it develops informative material to achieve this objective and keeps the Board informed in terms of gender diversity, ensuring that it is communicated in the Annual Corporate Governance Report.

Sustainability and Climate Change Committee: Its function is based on understanding, promoting, guiding, and supervising objectives, action plans, practices, and policies related to diversity, among other topics.

There are also specialized committees, such as the Equality Committee, which is responsible for monitoring and ensuring compliance with the Equality Plan. It analyzes best practices for possible implementation and carries out awareness and information campaigns.

5.2.1. Gender diversity

(GRI 3-3)

Main objectives of the 2nd Equality Plan



Increase the number of female employees in areas where they have low representation (mainly maintenance groups and the firefighting service)



Create a culture based on equal treatment and opportunities, driven by training and awareness-raising actions.



Promote and internalize the protocol for prevention and action against situations of sexual harassment, based on gender, sexual orientation, and gender identity or expression, to the entire workforce.



Maintain compliance with equal treatment and opportunity in the selection and contracting processes



Prioritise and strengthen the measures of balance between personal, family and work life.



Maintain equality in the remuneration system between women and men.



Strengthen awareness and communication processes in terms of equality.



Consolidate gender dimension in the management of occupational risk prevention.



Boost non-sexist and inclusive communication and, in turn, promote initiatives that pursue this objective.

Principales objetivos específicos de Aena en materia de igualdad

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.

In the United Kingdom, the London-Luton Airport Equality, Diversity and Inclusion Strategy, 'At work it is easy to be me', includes, among others, the following general objectives:

- Attract, recruit and retain a diverse workforce.
- Ensure employees are included, heard and treated fairly.
- Create a more diverse senior team when roles are available.
- Incorporate ED&I into company newsletters and updates.
- Create an inclusion calendar that hosts cultural and religious events.

With regard to gender equality, in Spain, based on the objectives outlined in the Sustainability Strategy 2021-2030, the deployment of the commitment is implemented through the 2nd Equality Plan, in force until fiscal year 2025.

This Plan, cross-divisional in nature, includes an organised set of objectives and more than 40 measures in areas such as professional promotion, education and training and working conditions, among others.

During 2023, progress has continued to be made in the development of the planned measures, including, among others:

- Conducting equality opinion surveys for the entire workforce. This action was carried out to gather the opinions of employees on various aspects related to equal opportunities in the company, anonymously and confidentially. The information will be analyzed within the Equality Parity Commission, with the aim of improving any areas that may be in need of enhancement.

- New Protocol for the prevention of and action against situations of sexual harassment, gender-based harassment, harassment on grounds of sexual orientation and sexual identity or gender expression.
- Continuation of the 'Contamos por Igual' (We All Count Equally) space in the newsletter to give visibility, mainly to women in under-represented groups or positions.
- Online training for the prevention of and action against sexual and/or gender-based harassment for the entire workforce.
- Annual review and report on the Pay Registry.
- Creation of a course on inclusive and non-sexist language, for the entire workforce, to raise awareness among all staff.
- Promotion of the effective dissemination of current measures for work-life balance and co-responsibility.
- Promotion of existing social measures of care and support for possible victims of gender-based violence.
- Dissemination of job vacancy announcements in associations supporting women victims of gender-based violence.
- Presence in forums, institutes, universities, fairs to promote the incorporation of women into the Company, mainly in STEM (Science, Technology, Engineering and Mathematics) careers.

The Plan is supervised by the Joint Equality Commission, made up of representatives of Aena in Spain and the trade union organisations present in the State Trade Union Coordinator (CSE [Coordinadora Sindical Estatal]). Thus, with regard to the main powers related to the 2nd Equality Plan, this Committee is responsible for:

- Ensuring that the entity complies with the principle of equal treatment and opportunities between women and men.
- Raising awareness of the importance of driving equality.
- Boosting the dissemination of the Equality Plan and promoting its implementation.
- Overseeing, evaluating and reviewing the Plan.

For its part, in the United Kingdom, London-Luton Airport has approved its Equality, Diversity and Inclusion Strategy, whose degree of achievement is supervised by the area of human resources. Among its main objectives in terms of equality are:

- To attract, recruit and retain a diverse workforce.
- To ensure employees feel included, heard and treated fairly.


- To create a more diverse management team.
- To include aspects related to equality, diversity and inclusion in the Company's newsletters and updates.
- To implement different types of events focused on promoting equality.

On the progress of these objectives, during 2023:

- Detailed reviews have been carried out to identify gaps, and improvements have been implemented in policies and processes, including parental leave, complaints and equal opportunities.
- Periodic surveys have been introduced that include questions related to aspects of equality, diversity and inclusion.
- Specific training on equality, diversity and inclusion has been provided to managers.

With regard to Aena's subsidiaries in Brazil, to date they do not have an independent equality plan. However, their management in this area responds to the commitments assumed in the Human Rights Policy, the Sustainability Policy and the Code of Conduct.

Gender diversity in the Company's organisational structures

 Representativeness of the female gender	
	37.7% of the Group's workforce (37.2% in 2022)
	50.0% of the Board (40% in 2022)
	45.2% in executive or graduate categories (44% in 2022)
	33.2% hold STEM positions (33.1% in 2022)
	40.3% those who directly contribute to the generation of the Company's revenue (39.5% in 2022).

Cases of discrimination and corrective actions

(GRI 2-26; 3-3; 406-1)

During 2023, there were 6 reports of harassment at Aena and its subsidiaries in Spain (compared to 3 in 2022), 0 reports at subsidiaries in the United Kingdom (0 in 2022), and 15 reports at subsidiaries in Brazil (3 in 2022).

Of those received in Spain, 1 has been dismissed, 1 is in the pre-investigation phase, 3 are in the investigation process, and 1 has been closed due to withdrawal by the informant. Therefore, there were 0 reports of harassment closed after appropriate investigation in 2023 (see section 1.2.10. Reporting Channel for more information).

Regarding reports received through the channels available in Aena's subsidiaries in Brazil, two have been closed as inconclusive, one as partially substantiated, eleven considered unsubstantiated, and one closed due to insufficient data (and not attributable to Aena) (see section 1.2.10. Complaints Channel for more information).

In this respect, in Spain¹⁶³, in 2023 the Joint Equality Committee agreed on the new Protocol for the prevention of and action against situations of sexual harassment, gender-based harassment, harassment on grounds of sexual orientation and sexual identity or gender expression, with the aim of preventing any act that might arise of this nature and, where appropriate, resolving them in a guaranteed and agile¹⁶⁴ manner. The main objectives of this new protocol are to:

- Respond to the need to prevent, raise awareness and, where appropriate, eradicate these forms of violence and discrimination in the workplace with all guarantees.
- Achieve rapid attention in the intervention and management of possible situations of this type.
- Defend tolerance and respect for diversity, equality and inclusion of the LGBTI group.
- Contemplate the legislation in force in this area.
- Comply with the measures agreed in the 2nd Equality Plan.

Based on this new procedure, any irregular conduct may be reported through the Complaints Channel, by post, or by requesting a face-to-face meeting, in both cases with the natural person responsible for the Aena Compliance System. The evaluation and follow-up will be carried out in accordance with the provisions of the procedure, which in any case is governed by the principles of diligence, confidentiality, guarantee and protection of the privacy and dignity of the victims of sexual harassment, gender-based harassment, harassment on grounds of sexual orientation, gender identity or expression; as well as by the principles of contradiction and impartiality, and respect for the rights of all persons involved in the procedure.

In the United Kingdom, London-Luton Airport has a complaints procedure in place, according to which:

- Reports must be resolved at the earliest possible stage and dealt with as reasonably and promptly as possible.
- They will be investigated and employees will be informed of the outcome, including any delays that may occur in resolving them.
- Advice may be obtained from the human resources area for any doubts or queries.

Situations in which potential irregularities may be reported include terms and conditions of employment, health and safety issues, industrial relations, bullying and harassment, new working practices, working environment and organisational changes. The Whistleblowing channel can be used to do this.

Likewise, in Brazil, the Collective Agreement of Aena Brazil rejects any irregular conduct in this matter, allowing the adoption of disciplinary measures where appropriate. For these purposes, employees have the possibility to make such communications through the Ethics Channel, among others.

Equality training

- In the case of Spain, 1,586 individuals have participated in training programs on gender equality. Among them, 1,361 have completed the "Equal Opportunities between Women and Men" course. All individuals joining Aena receive an invitation to attend this course.
- Communication and People staff, as well as intranet editors, have received training in inclusive and non-sexist communication. Additionally, an online course on inclusive and non-sexist language has been developed for the entire staff with the goal of raising awareness and promoting this language within the organization. All staff members have been invited to participate in this training.
- Training has been conducted for the prevention and response to sexual harassment and gender-based harassment, targeting the entire workforce.
- Participation in the "Promociona" program, which promotes increased representation of women in senior management.
- Continuous training for the elimination of biases is available on the learning platform for all employees.
- In the United Kingdom, London-Luton Airport has developed specific training programs on equality, diversity, and inclusion, especially targeted at individuals in positions of responsibility (managers).

¹⁶³ Aena S.M.E., S.A. and AIRM

¹⁶⁴ Both the Workplace Harassment Protocol and the Sexual Harassment Protocol have been adapted in 2023 to comply with the requirements of Law 2/2023, of February 20, regulating the protection of individuals who report regulatory violations and fight against corruption.

- For its part, in Brazil, Aena's airports have carried out awareness-raising actions on the matter.

	2022	2023	Target
Women in the workforce (%)	37.2%	37.7%	—%
Women on the Board (%) ^(A)	40.0%	50.0%	Maintain or exceed 40% in 2023 and subsequent years
Women in positions of executive or graduate positions (%)	44.5%	45.2%	
Women in pre-management positions in careers in management (%)	44.5%	42.9%	
Women in organisational positions regarded as STEM	33.1%	33.2%	
Women in positions that directly contribute to revenue generation (%)	39.5%	40.3%	
Consolidated calculation, carried out on the total number of men and women in each group/class. (A) Aena Board of Directors' Member Selection Policy. Organic Law project on gender-balanced representation and equal presence of women and men.			

Percentages of workforce by gender, age and professional category (as of 31 December) (GRI 405-1)

	2023																							
	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	
	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M
Senior Management	—%	—%	0.01%	0.01%	0.05%	0.05%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	0.01%	0.01%	0.05%	0.05%
Executives and graduates	—%	0.01%	3.70%	4.57%	6.06%	7.12%	0.02%	0.02%	0.39%	0.40%	0.22%	0.25%	—%	—%	0.13%	0.29%	0.04%	0.14%	0.02%	0.03%	4.22%	5.26%	6.32%	7.51%
Coordinators	—%	—%	0.41%	1.12%	3.22%	7.46%	0.02%	0.04%	0.19%	0.03%	0.10%	0.02%	—%	—%	0.41%	0.62%	0.06%	0.09%	0.02%	0.04%	1.01%	1.77%	3.38%	7.57%
Technicians	0.01%	0.17%	3.87%	10.60%	11.46%	19.01%	—%	0.03%	—%	0.32%	—%	0.23%	0.06%	0.12%	0.44%	1.71%	0.11%	0.42%	0.07%	0.32%	4.31%	12.63%	11.57%	19.66%
Support staff	0.01%	0.03%	1.09%	0.64%	1.89%	1.52%	0.10%	0.20%	1.33%	2.14%	0.82%	1.22%	0.14%	0.18%	1.24%	1.45%	0.09%	0.15%	0.25%	0.41%	3.66%	4.23%	2.80%	2.89%
Total	0.02%	0.21%	9.08%	16.94%	22.68%	35.16%	0.14%	0.29%	1.91%	2.89%	1.14%	1.72%	0.20%	0.30%	2.22%	4.07%	0.30%	0.80%	0.36%	0.80%	13.21%	23.90%	24.12%	37.68%
	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	
	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	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%	4.5%	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%

Most relevant actions carried out in the area of gender diversity in 2023

In Spain, it is worth highlighting:

- Achievement of the Equality in the Company (DIE) certification, awarded by the Ministry of Equality, for the implementation of policies promoting equal treatment and opportunities for its employees. This involves the implementation of equality plans and measures in areas such as employment access, working conditions, including reconciliation and shared responsibility measures, gender-focused remuneration policies, inclusive communication, aspects related to the organizational model, Corporate Social Responsibility, etc.
- Mentoring Program "Leaders Developing Leaders," in which 117 women participated until 2023 (102 in 2022), representing 42% (41% in 2022). Among them, 43% assume the role of mentors (42% in 2022).
- Inclusion for the second year in the Sustainability Year Book, the sustainability annual that recognizes and ranks the world's leading companies based on their sustainable and socially responsible business practices, including issues related to diversity.
- Aena has been included in the "I Ranking of Companies for Equality" by the Woman Forward Foundation, ranking 16 out of 50. This foundation is dedicated to promoting female leadership in the business environment.
- Highly specialised training programmes, mainly aimed at positions of responsibility and taught by prestigious business schools such as IESE, ESADE, IE and at different Universities. In 2023, 6 managers have attended this type of specialisation programme or course, focused on the development of managerial skills.
- Development of a specific section in the internal magazine called 'Contamos por igual' (We All Count Equally), a space dedicated to experiences, stories and opinions on equality.
- 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, International Women's Day.
 - Interview with the Managing Director of Commercial and Real Estate Business.
 - Participation of the Director of Organisation and People in the Europa Press forum, 'Generation of Opportunities'.
 - Interview-colloquium with Lara Diloy and Elena Mayoral, Managing Director of Airports.
 - Women executives and senior managers visit the airport.

- Participation in the video produced by the Ministry of Transport, Mobility and Urban Agenda for Women's Day, in which the work of professionals from MITMA group companies is highlighted.

- Performance of a flash mob for Women's Day.
- Lighting of some of the airports in the network in celebration of 'Women's Day'.
- Display of exhibitions at airports to support different commemorations, such as at La Gomera Airport, on the occasion of the commemoration of International Rural Women's Day, an exhibition of photographs of women entrepreneurs.
- Aena ratifies its inclusion in the IBEX Gender Equality Index, which recognises and promotes gender equality, led by the Spanish Exchanges and Markets company (BME). 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.

For its part, in the United Kingdom at London-Luton Airport:

- During 2023, the Employers Network For Equality & Inclusion membership has been maintained.
- Like in the previous fiscal year, work has continued on the development of an internal report on Equality, Diversity and Inclusion, in order to ensure the rights of all employees.
- Achievement of the objectives set out in the Equality, Diversity and Inclusion Strategy.

Finally, with regard to Aena's subsidiaries in Brazil, various awareness actions have been developed.

5.2.2. Universal accessibility to employment for people with disabilities

(GRI 3-3)

In all the countries in which Aena Group operates, accessibility to employment opportunities is guaranteed, eliminating any type of difficulty that may arise in this regard and promoting equal opportunities. In this regard, an inclusive access model has been implemented in recruitment rounds and selection tests, making all the necessary adaptations to favour the adequate participation of all people, regardless of their condition. Special attention is paid to those who have a disability in any of its forms.

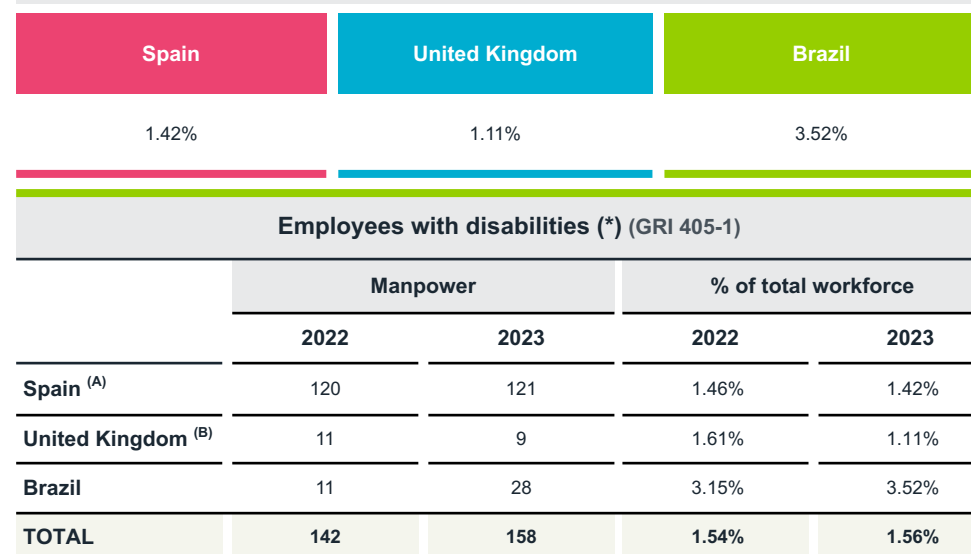
- The job offers expressly include the provision of adaptations that may be necessary in the event of disability. Additionally, special employment centres are contracted by Aena¹⁶⁵.
- In the United Kingdom, London-Luton Airport participates in employment promotion activities such as accessible job fairs. It also publishes job opportunities on different local platforms such as Connect 2 Luton, the airport's own employment page (Careers Page), etc. In the event of a face-to-face interview, the correct adaptation of the facilities is guaranteed.
- For their part, Aena's subsidiaries in Brazil publish specific job vacancies for people with disabilities on the local website. Other specific adaptations are also carried out, such as those developed to meet the needs of people with hearing problems in selection processes.

Likewise, in 2023, ANB has collaborated with the Centre for Business-School Integration to provide support to young people with intellectual disabilities, facilitating their integration into the labour market through assistance in selection processes.



At the end of fiscal year 2023

1.56% of the workforce has a functional diversity



(A) Data corresponding to the effective number of employees with disabilities on the payroll as of December 31, without considering the equivalent number resulting from compensatory measures.

In accordance with current legislation in Spain, the percentage of employees with disabilities is calculated based on the effective number of individuals with disabilities on the payroll as of December 31, and the equivalent number of individuals resulting from compensatory measures approved by the Resolution of the General Directorate of the Public Employment Service (SEPE) regarding the Declaration of Exceptionality and adoption of alternative measures to meet the quota reserved for disabled workers.

As of the publication date of this report, the data for the declaration of exceptional circumstances up to 2021 have been updated, with those for the years 2022 and 2023 pending, which will be updated during the first quarter of 2024 in the new IT tool set up for this purpose by the SEPE.

(B) Confidentiality restrictions: In the UK, disability is considered a protected characteristic under the Equal Opportunity Act 2010 (covering all local employees). Information is only available from employees who voluntarily provide such information. Based on the above, in 2023, 9 employees with functional diversity have worked at London Luton Airport (information not reported in 2022, but reported in this report).

¹⁶⁵ In this way, the quota of jobs reserved for people with disabilities is addressed, contributing to compliance with article 42 of Royal Legislative Decree 1/2013, of 29 November, which approves the Consolidated Text of the General Act on the Rights of People with Disabilities and their Social Inclusion.

5.2.3. Accessibility of the services

(GRI 3-3)

In order to ensure unrestricted access for all individuals who pass through the airports (employees, customers, suppliers, and users), the Aena Group has implemented facilities and workplaces that incorporate objectively necessary adaptations in the work environment. In this regard, Aena has actively collaborated with reference organizations, such as CERMI or the Autism Confederation of Spain, to guarantee universal accessibility. The service for people with reduced mobility is also offered at all Group airports (see Chapter 6 for more information).

In the United Kingdom, management at London-Luton Airport remains focused on collaborating with occupational health providers so that employees who require it have the best care. The Disability Policy Statement includes the interests of individuals with disabilities, whether they are users, visitors or employees.

In Brazil, at Aena's subsidiaries, there is an Operation Manual for Persons with Special Assistance Needs (PNAE [Personas con Necesidades de Asistencia Especial]), which aims to define the procedures and data controls related to attending to people in need of special assistance.

5.2.4. Diverse and inclusive work environment

In Spain, the Company, aligned with the other public companies belonging to the MITMA group and the Business Network for LGTBI Diversity and Inclusion (REDI [Red Empresarial por la Diversidad e Inclusión]), actively promotes LGTBI diversity and inclusion in the State Public Sector. REDI focuses on raising awareness and creating a work environment conducive to the proper performance of its members.

In the United Kingdom, in addition to the Code of Conduct, sexual orientation and gender assignment are protected from discrimination, harassment and bullying under the Equality Act 2010 and the equal Opportunities, Inclusion and Dignity Policy.

As part of the Equality, Diversity and Inclusion (ED&I) strategy, employees are given the opportunity to join or create support groups and networks, including members of the LGTBI community. Pride Month has also been commemorated through a series of publications in the internal newsletter and awareness-raising talks.

For its part, in Brazil, awareness-raising actions are carried out at Aena subsidiaries through Inclusion Reports on the matter.

Aena reaffirms its commitment against discrimination and promotes awareness and the appropriate environment for the effective inclusion of the LGTBI group in the work environment.

5.2.5. Cultural diversity in governing bodies and employees

The Aena Group recognises and positively values the contribution of cultural diversity and the convergence of different cultures and nationalities within the Company.

In 2023, the Group has employees from 46 different nationalities, 18 from the European Union, and 28 from non-European countries (compared to 38 in 2022, with 16 from the European Union and 22 from non-European countries).

Distribution of employees in the workforce by nationality				
	% of the workforce		% in managerial and director positions	
	2022	2023	2022	2023
Spanish	88.39%	83.61%	92.68%	91.78%
Brazilian	3.74%	7.80%	1.19%	2.36%
Italian	6.09%	6.28%	5.29%	4.68%
French	0.42%	0.54%	0.04%	0.13%
German	0.29%	0.49%	—%	0.08%
Venezuelan	0.14%	0.16%	0.13%	0.13%
British	0.11%	0.10%	0.09%	0.08%
Swedish	0.10%	0.09%	0.04%	0.04%
Others	0.73%	0.92%	0.53%	0.72%
TOTAL	100%	100%	100%	100%

5.2.6. Generational diversity, age management and the promotion of the integration of young people in the workplace

(GRI 3-3)

The mean age of the workforce in 2023

47.49 years



Men



Women

47.23 years vs 47.63 years in 2022

47.92 years vs 48.00 years in 2022

The Aena Group also highlights generational diversity as an added value to the work environment, which is why it drives the employment and training of different generations. In this regard, the following initiatives developed in 2023 stand out:

- In Spain:
 - 28 current agreements: Aena, in Spain, maintains strategic collaborations with 19 universities (public and private), as well as with 4 study, training or business centres, and 5 professional training centres. These agreements have provided opportunities for 71 undergraduate and master's students, as well as 9 vocational training students, to pursue curricular or extracurricular internships.
 - Job Fairs: participation in these types of events has increased, both in person and telematically, contributing to positively promoting the Aena brand. In total, more than 20 fairs have been held in different parts of Spain. Also in the United Kingdom.

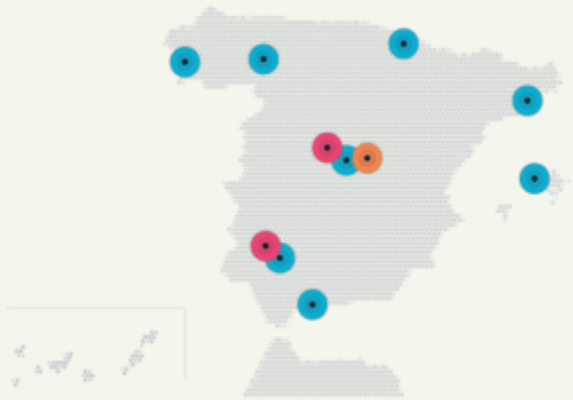
- Employer Branding Strategy: As part of this strategy, the Brand and Diversity Ambassadors network has been continued. Its aim is to convey the image of Aena as an employer both internally and externally. This initiative seeks to strengthen the commitment and loyalty of the employees themselves, as well as to increase the interest of potential candidates in joining the company. The 2nd Brand and Diversity Ambassadors' Day, which has been managed during 2023, will reach its climax when it is held in January 2024. It will help to increase both the number of Ambassadors and the presence at those sites that were not able to participate in the previous call. In the formation of the network of Ambassadors, priority has been given to equity and diversity, considering aspects such as age, gender, occupation, professional level, seniority and place of work.




- In the UK at London-Luton Airport:
 - The activities have been consolidated in collaboration with the 'Princes Trust Programme' and The Launch Group, with the aim of providing young people in the surrounding areas with the opportunity to enjoy an approximately five-week airport experience, thus promoting the youth work experience.
 - The Menopause Policy and Guidance has been approved, which aims to raise awareness of the transition to the menopause among women and to provide information and support to those directly or indirectly affected.
 - Moreover, specific objectives have been established in this area, such as encouraging senior members to share their work experience and guiding young people in their respective fields. With a view to the coming fiscal year, we are evaluating the implementation of programmes and agreements with universities and business schools.

In Brazil, efforts to promote youth employment are maintained through specific initiatives such as "Jovem Aprendiz".

Distribution of the workforce by age ranges (%) (Consolidated)

	2022	2023
< 30 years old (%)	3.77%	4.62%
30-50 years old (%)	55.36%	54.78%
> 50 years old (%)	40.87%	40.60%



	 Agreement with Universities	 Agreements with business schools	 Agreements with professional training centres
Andalucía	University of Cadiz University of Malaga University of Sevilla	Cajasol Study Centre	
Balearic Islands	University of the Balearic Islands		IFP Pau Casesnoves
Catalonia	Polytechnic University of Catalonia		
Galicia	University of Vigo		
León	University of Leon		
Madrid	Antonio Nebrija University Rey Juan Carlos University CUNEF Carlos III University Polytechnic University of Madrid Autonomous University Complutense University Rey Juan Carlos University University of Alcalá de Henares Pontifical University of Comillas Puerta de Hierro Hospital	Garrigues Study Centre CIS (The College for International studies) IESE	IFP Claudio Galeno IFP Francisco Tomás y Valiente IFP Vigiles IFP Virgen de la Paloma
Rioja	UNIR		
Valencia	Alicante University		

5.3. Promotion and development of talent, skills and knowledge

(GRI 3-3)

5.3.1. Commitment to talent attraction, development and retention

The Strategic Plan 2022-2026 recognises culture and talent as key enablers for the achievement of the objectives set by the Company and the optimal performance of the Plan. This is also stated in Spain, in the Sustainability Strategy 2021-2030, in the line of 'Career Development', which focuses on the training of workers and attracting talent in order to detect and promote high performance, motivation and engagement. All of the above results in the improvement of the Aena brand image.

In the United Kingdom, attracting the best talent and supporting employees to successfully develop their careers is set out in the Responsible Business Strategy. In this respect, specific initiatives have been developed, such as the Get Into Airport programme, focused on generating talent in the future.

At Aena's subsidiaries In Brazil, like in previous years, the human resources strategy is focused on the development and internal promotion of employees, the retention of talent, and the improvement of the Company's work environment.

5.3.2. Attracting, developing and retaining talent

(GRI 404-2)

The Aena Group proposes the development of specific actions to implement and make effective its commitment to attracting, developing and retaining talent.

Among them, in Spain:

- Employee Branding strategy: with the aim of fostering a sense and pride of belonging, as well as attracting and retaining the best talent to face future challenges, by strengthening the brand image as an employer. Within this framework, in 2023, 20 job fairs have been attended in different geographical locations.

- Brand and diversity ambassadors involve the organisation's employees who embody the corporate identity and identify with its culture, purpose and value proposition, helping to disseminate them in order to make the Company's strengths visible and enhance its appeal in the field of professional development. During 2023, brand ambassadors have participated in several initiatives, held in various geographical locations, disseminating the value proposition as Aena employees. Moreover, a new Brand Ambassadors Day has been managed during 2023, held in January 2024.
- Potential management programmes: development of Career Plans and improvement of the Succession Plan for Key Positions. In this regard, during 2023, the 'People 4.0' potential management programme is being developed and the virtual assessments planned for 1,200 workers have started to be carried out, during 2023 it has performed 205.

In the United Kingdom, at London-Luton Airport, the commitment to the Equality, Diversity and Inclusion Strategy stands out¹⁶⁶, through which a specific focus on talent development and succession planning is provided. Additionally, the Annual Achievement Reviews process, which aims to strengthen and promote the internal development of employees. In addition to the above, it is working on:

- Developing a Talent Strategy to be deployed in the next fiscal year.
- Implementing programmes for the development of future talent. As an example, during 2023, 4 students received the Exploring the Aviation Industry certification.
- Participating in job fairs, during the course of 2023, it participated in 7 different events.
- Shadowing Policy: work is underway to develop this shadowing policy in order to enhance the development of workers.¹⁶⁷
- Finally, employees in positions of responsibility have participated in the Leadership Development Programme 2023, strengthening their leadership skills. There are also Core Skills modules to strengthen personal and professional development, according to individual interests and characteristics.

In Brazil, during 2023, work has been carried out on the evaluation and definition of profiles that, in a cross-divisional manner and based on their previous experience, can contribute value to the start-up of the new eleven airports managed by Aena. In terms of development, like in the previous year, an analysis of employees in key positions at the Company is conducted in order to monitor their development.

On the other hand, the feedback culture is governed as a useful tool in attracting and developing internal talent. To ensure that procurement processes meet the necessary quality standards, an external consultancy has been used to advertise new vacancies.

¹⁶⁶ See also section 5.2, regarding diversity and inclusion.

¹⁶⁷ Within the framework of the Equality, Diversity and Inclusion Strategy.

Aena promotes employability, the attraction and retention of talent and professional career development



Internal and external employment



Technical and skills training



Career development and growth



Knowledge management and leadership



Relying on talent

With actions such as:

Employer Branding Strategy, brand ambassadors, career development and succession plans, collaborations with organisations pursuing specific objectives:

Strengthening the sense of pride and belonging

Achieving a higher attraction of talent and locating the most appropriate profiles, both externally and internally.

Identifying the potential of the Company, 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.

Personal Potential and Career Planning Management Programme.

Mentoring and/or coaching programmes (see Training section).

Evaluation of opportunities to develop new approaches to the Mentoring Programme.

In the United Kingdom, during 2023, the development of a Talent Management Strategy has been launched and is expected to be implemented next year. Initiatives have also been implemented to foster the growth and development of talent, together with a policy to monitor this development.

In Brazil, in 2023, the objective has been to respond to the demand derived from the new eleven airports through the most suitable profiles.

Assessment of internal talent: Aena's foundation

The Aena Group has a performance management system that evaluates the performance of professionals at least every six months and applies to 100% of the workforce. The aim is to identify areas for improvement, and to evaluate the degree of achievement of annual objectives, as well as the skills and behaviour of each employee. This is done through three types of objectives:

1

2

3

Company goals,

which link employees to the results of the Company's overall activity, thus fostering a common vision. The objectives are defined based on the strategic lines, the previous year's performance, economic and market recommendations, which are included in the Strategic Plan 2022-2026 determined by the Management Committee.

Team goals,

defined according to the activity carried out by each area, they are always aligned with the Company's objectives, taking into account the Strategic Plan and the Operating Plans of the different units as the basis for their selection and measurement.

Personal goals,

related to the performance of each professional and are structured based on the position, values and training, in order to enhance the development of each talent based on their own skills and characteristics.

Every year, the Management Committee has the possibility to modify the weighting of the different groups of objectives, adjusting them according to the specific strategic priorities for that fiscal year. In this process, two key elements are considered: the organisational level of the professional and their ability to influence the achievement of these objectives. These factors play a crucial role in the allocation and weighting of objectives, which are periodically evaluated through the indicators defined for this purpose.

The monitoring of business and team objectives is done through the Operational Plans, thus ensuring effective follow-up and alignment with the strategic direction of the company. This comprehensive approach allows it not only to set clear goals, but also to continuously evaluate and adjust their progress according to the changing dynamics of the business environment.

The performance management evaluation system also includes behavioural skills and alignment with the company's values.

In Spain, the performance of workers is evaluated annually. The results of these evaluations are linked to remuneration and allow their performance to be oriented by identifying possible training actions¹⁶⁸. Specifically, in 2023, 1,219 workers (1,151 in 2022) have participated in these types of interviews.

¹⁶⁸ 100% of Aena's workforce participate in the Performance Management System.

Percentage of workforce that has received a performance appraisal by region, gender and professional category (%) (GRI 404-3)

	2022						2023							
	Spain		Brazil		Total		Spain		United Kingdom		Brazil		Total	
	F	M	F	M	F	M	F	M	F	M	F	M	F	M
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%	100%	100%
Coordinators	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
Technicians	100%	100%	100%	100%	100%	100%	100%	100%	—%	100%	100%	100%	100%	100%
Support staff	100%	100%	87.65%	92.86%	97.01%	98.21%	100%	100%	100%	100%	93.92%	97.22%	100%	99.34%
Total	100%	100%	91.94%	97.78%	99.68%	99.91%	100%	100%	100%	100%	96.7%	99.04%	98.67%	99.92%

Note: as indicated in the Sustainability Report - EINF 2022, the data related to London-Luton Airport in 2022 was not available.

In the United Kingdom, at London Luton Airport, the Annual Achievement Reviews (AAR), an annual evaluation process that applies to all employees and focuses on setting SMART (Specific, Measurable, Achievable, Relevant and Time-Bound) objectives, which are aligned with the objectives defined at the Airport, has been implemented during 2023.

The evaluation process runs throughout the year, starting with an inaugural meeting to document and measure progress. This meeting not only provides a structured opportunity to evaluate performance, but also becomes a space for employees to share their work experiences, express their career ambitions, identify opportunities for improvement and celebrate their achievements.

It is important to note that the coverage of this evaluation process has been extended to all employees, regardless of their hierarchical level. In addition to the above, senior management and sales professionals participate in a special programme consisting of four incentive plans specifically designed to address the unique complexities and challenges of their roles.

To ensure the successful implementation of these plans, employees in positions of responsibility have been trained to track objectives by providing them with

tools to manage long-term performance. In this line, the tracking of these objectives also has an impact on their evaluation.

In specific terms, the following development objectives are proposed:

- Objectives that contribute to team building.
- Objectives that help with the development of the Airport.
- Objectives that contribute to one's own career development.
- Individual contribution percentage multiplied by EBITDA, creating an overall incentive average for the following plans:



Leadership Incentive Plan



Management Incentive Plan



Sales Management Incentive Plan



Sales Incentive Plan

Other tools to improve internal management

In Spain, 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 People.

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 digitising 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 other 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)

Staff training and development is a strategic objective for the Company. This allows the skills of Aena's workforce to be oriented towards the new needs of the business and to address emerging risks.

In 2023, the technical training centre at Adolfo Suárez Madrid-Barajas Airport was launched, increasing the offer and training capacity for staff.

In Aena, the commitment to training is contained in:



I Collective Agreement

It establishes training and professional development of the staff as a strategic tool to enhance their performance, achieve an appropriate level of specialization, and improve employability. Additionally, it emphasizes the need for a Training Plan focused on professional development and staff training, which is supervised by the Joint Training Committee (Chapter VIII of the I Collective Agreement).



Training Policy

It reflects the company's commitment to the training of its staff, establishing guidelines and the availability of human and material resources necessary to achieve them.

Sustainability strategy
2021-2030

Specifically, in the career development line, it expands its commitment by incorporating new training paths as objectives, aiming to contribute to cultural and digital transformation.

Specifically, the pillars of the Training Policy are focused on:

Developing the technical, professional and human skills of staff in order to promote and ensure the correct performance of their job.	Facilitating updating the knowledge of staff based on the regulatory, technological and organisational changes that occur.	Promoting the professional and human development of workers	Increase the productivity, efficacy and efficiency levels.	Contribute to projecting an excellent image of Aena through its professionals.
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These pillars contribute to the fulfilment of the training and skill requirements that AESA and EASA regulations establish for staff providing services at an airport.

There is also a Skills Verification Programme, which defines tests and aspects to be evaluated.

In the United Kingdom, London-Luton Airport has an LLA Study Leave and Sponsorship Policy, reflecting its commitment to the personal and professional development of its employees and its support for the achievement of professional qualifications. Through this, it is established that each department is responsible for designing and proposing its own specific training plans. Training actions are deployed cross-divisionally to offer the necessary training to airport workers, depending on the areas where they perform their activity.

In the case of Aena subsidiaries in Brazil, 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 staff for retention, in line with succession plans.
- Train leaders for a better professional performance by acquiring theoretical and practical knowledge in soft skills.

Special attention is given to training in Operational Safety, for which prominent professionals are provided with AVSEC training for Aerodrome Operators, as a way to develop future managers in this area. Additionally, the Information Security area has performance KPIs, training, and awareness regarding information security.

Moreover, as a complement, reference is made to compliance policies, as well as other external documents that highlight the relevance of workforce training in the different specific areas¹⁶⁹.

Significant training actions in 2023

(GRI 404-2)

In Spain, the Training Plan¹⁷⁰ includes specific training actions for the different sites and units of Aena. These actions take the form of courses and seminars that are designed after dialogue with each of the areas and the people to whom the training is addressed, who participate in their preparation by means of periodic surveys to detect training needs. The new needs detected are incorporated into the mandatory, strategic and agreed-upon training with the areas, thus configuring the Training Plan scheduled for the coming years, which includes:

- Main business development: in relation to maintaining leadership in safety and efficiency, a catalogue of courses is available that contribute to airport and operational safety.
- Compliance: implementation of new courses to ensure compliance with current legislation, internal regulations and the observance of best ethical and business practices in the development of Aena's activities and business.
- Sustainability: Courses have been developed focused on:
 - Improving energy efficiency.
 - Minimising the impact on the environment, highlighting carbon footprint reduction, waste management and BREEAM training, a method for assessing and certifying sustainability in buildings.
 - Improving equality (in opportunities, selection processes and non-sexist communication), with the aim of establishing a culture based on equal treatment and opportunities through training and awareness-raising actions.
- Innovation, technology and digitisation: focused on the importance of making data-driven decisions, through Data Experts and Power BI training.
- Customer focus: Training actions aimed at contributing to improving the passenger and user experience, and to the knowledge of the airport culture.
- Development of behavioural skills: through training to improve team skills, focusing on communication, proactivity, emotional intelligence and teamwork.
- Likewise, in the context of the 2nd Equality Plan, one of the objectives set is to establish a culture based on equal treatment and opportunities through training and awareness-raising actions. In this respect, training has been given on equal opportunities, elimination of biases, inclusive communication and non-sexist language, as well as specific training on the prevention of sexual and gender-based harassment.

In addition to the training actions included in the Training Plan, in Spain there is a procedure for authorising non-scheduled training actions that facilitates the organisation of courses and seminars for the different areas in order to keep up to date in their areas of activity. Based on the needs of key staff, the Organisation and People Division authorises, on an ad hoc basis, various highly specialised programmes to improve management skills.

¹⁶⁹ For example:

- Anti-Corruption and Fraud Policy: It includes the commitment to disseminate knowledge about corruption and fraud prevention through training sessions;
- Compliance Policy: Similar to the previous policy, one of its objectives is training and dissemination of compliance.

¹⁷⁰ This Plan is drawn up, developed and supervised by the Joint Training Committee (JTC).

To complete the training offer, the entire workforce can access a self-learning platform that contains courses on subjects related to the strategic axes (innovation, digital transformation and sustainability), languages, skills, wellbeing, etc. This platform has an extensive training catalogue, available in different languages. All employees can take training courses in the subjects of interest to them and thus boost their self-development. The Organisation and People Division also promotes the voluntary implementation of a training action on this platform on a monthly basis.

Until 2023, 8,585 people have shown interest in the open-access learning platform available to all employees. The number of units viewed in 2023 has been 50.08% higher than the previous year. A total of 1,483 people have participated in some form of training, resulting in a total of 11,305 study hours and the completion of 794 courses.

In addition to the above, 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 2023:

- Implementation of the latest driving simulators for the movement area.
- Completion of the drafting of the fire simulator project at Sevilla Airport, for tender.
- Completion of the construction and commissioning of the new technical training centre at Adolfo Suárez Madrid-Barajas Airport, which has increased the training offer and capacity for staff.
- Tender for the works to improve and extend the technical training centre at Barcelona-El Prat Josep Tarradellas Airport.

Another milestone in training was the award received from the Autonomous University of Madrid for Aena's contribution to the training and learning of students at the aforementioned university.

In terms of specific training actions, the following should be highlighted, among others:

- Continuity of language training. During the fiscal year 2023, the number of people taking English language training through online courses has increased.
- A pilot test of the specialised online course in aeronautical English is planned for staff operating in the manoeuvring area. This will facilitate compliance with the language proficiency requirement set by EASA regulations. The training will be carried out on the new SuccessFactors online training platform, which will make it possible to manage the call scheduled for 2024 for all staff involved.
- Start of training associated with the strategy for the removal of unused aircraft, including both theoretical and specialised practical training for the staff involved.

- The training specified in the different itineraries for each position or occupation has been carried out and new itineraries have been implemented for Engineering and Maintenance staff and for Operations staff.
- Start of training for interventions on electric vehicles
- Development of specific training on photovoltaic plants, in line with the objectives of Aena's Photovoltaic Plan.
- The entire workforce has been offered the possibility of training in energy efficiency, specifically in energy saving in the workplace and in the efficient use of cars.
- Training continued in connection with the Strategic Information Systems Plan (SISP), aimed at the digital and cultural transformation of Aena. Training has also been conducted aimed at better data-driven decision-making.
- Training for spokespersons and protocol training for airport network management staff.

On the other hand, the provision of regulated training is facilitated through the granting of individual training permits to attend final exams, release exams and other final aptitude and/or assessment tests at official training centres, during the days they are held, regardless of the time they are held.

Finally, within the framework of the Annual Social Aid Programme, planned, developed and supervised by the Joint Social Action Committee, there is financial aid for official studies carried out by workers and/or their descendants.

At London-Luton Airport in the United Kingdom, departments and management have continued to be supported in the development of their training plans. These have focused on people development and compliance with regulatory requirements:

- A mandatory training module on compliance with the Competition Act.
- Diversity and inclusion workshops for line managers and supervisory staff.
- Menopause awareness training.

Moreover, like in Spain, staff can be considered for formal training (degrees, masters, etc.).

In Brazil, the following internal and external training initiatives will be implemented in 2023:

- Training programme on the General Data Protection Regulation for all Compliance Department employees.
- Information Security training for all employees, as well as support activities for the ICT area.
- Compliance procedures for specific areas such as Human Resources, Sales, and Procurement.

- Harassment prevention activities (in all its forms).
- Access to scholarships through the agreement with the Polytechnic University of Madrid, which applies to all employees, through the International Cooperation Programme.
- The development of the leadership training programme, offered for managers, coordinators and specialists.
- Updating of AVSEC training for airport operators.
- Various training courses have been developed in terms of ethics and internal policies.



Training hours

An average of 60 hours of training (67.09 in 2022) per year per employee.



Training programmes

€2,600,631 in training programmes (€563,127 more/less than 2022).

Main training data (GRI 404-1)

		2022				2023			
		Spain	United Kingdom	Brazil	Total	Spain	United Kingdom	Brazil	Total
Investment in employee training and education programmes (€)		2,417,951	702,784.21	43,021.99	3,163,757.05	2,318,890.5	203,223.62	78,516.38	2,600,630.5
Investment in training per employee (€)		295.02	1,025.96	123.27	342.77	272.75	249.66	98.76	257.21
Employees who have received training (%)	Female	100%	98%	100%	99,8%	100%	100%	100%	100%
	Male	100%	97%	100%	99,8%	100%	100%	100%	100%
	Total	100%	97%	100%	99,8%	100%	100%	100%	100%
Average training hours per year per employee (by gender) ^(A)	Female	57.36	47.78	31.42	55.66	51.34	8.00	36.43	46.62
	Male	78.98	28.76	39.18	73.87	74.47	7.56	52.05	67.38
Average hours of training per year per employee (by professional category)	Senior Management	29.77	-	-	29.77	52.13	-	-	52.13
	Executives and graduates	52.51	9.87	18.99	49.56	50.36	4.07	32.80	47.36
	Coordinators	61.38	10.61	32.83	59.36	62.08	3.33	49.09	59.28
	Technicians	78.95	9.16	44.36	77.12	75.97	4.03	64.83	74.47
	Support staff	105.94	48.71	35.75	71.39	49.10	9.22	32.42	29.04
Average training hours per year per employee	Total	70.97	36.36	36.43	67.09	65.73	7.73	46.69	59.56

^(A) 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)

	2023											
	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
Male	256,150.23	137,703.23	393,853.46	1,034.50	2,692.00	3,726.50	20,718.90	6,452.00	27,170.90	277,903.63	146,847.23	424,750.86
Female	116,719.61	48,250.79	164,970.40	545.00	2,024.50	2,569.50	7,365.00	2,580.00	9,945.00	124,629.61	52,855.29	177,484.90
Total by gender	372,869.84	185,954.02	558,823.86	1,579.50	4,716.50	6,296.00	28,083.90	9,032.00	37,115.90	402,533.24	199,702.52	602,235.76
Senior Management	76.00	549.50	625.50	-	-	-	-	-	-	76.00	549.50	625.50
Executives and graduates	67,678.13	41,601.96	109,280.09	341.50	187.50	529.00	1,681.10	287.00	1,968.10	69,700.73	42,076.46	111,777.19
Coordinators	52,098.14	24,509.28	76,607.42	102.50	30.50	133.00	3,402.95	2,439.00	5,841.95	55,603.59	26,978.78	82,582.37
Technicians	233,430.37	113,154.28	346,584.65	187.50	46.50	234.00	15,613.65	3,057.00	18,670.65	249,231.52	116,257.78	365,489.30
Support staff	19,587.20	6,139.00	25,726.20	948.00	4,452.00	5,400.00	7,386.20	3,249.00	10,635.20	27,921.40	13,840.00	41,761.40
Total by professional category	372,869.84	185,954.02	558,823.86	1,579.50	4,716.50	6,296.00	28,083.90	9,032.00	37,115.90	402,533.24	199,702.52	602,235.76

	2022											
	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
Male	258,033.44	149,413.41	407,446.85	1,127.00	10,692.00	11,819.00	7,524.46	1,292.00	8,816.46	266,684.90	161,397.41	428,082.31
Female	122,021.79	52,192.94	174,214.73	678.00	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	1,805.00	23,105.00	24,910.00	10,970.14	1,743.00	12,713.14	392,830.37	226,454.35	619,284.72
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	349.00	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	62.00	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	178.00	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	1,216.00	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

Other development programmes

Programme: 'Leaders Creating Leaders' mentoring programme

Programme description	Description of objectives and business benefits	Quantitative impacts
<p>Development programme that is incorporated at Aena as a strategy of: Knowledge management, Cultural Transformation and Organisational Networking that generates support networks.</p> <p>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, promoting the career development of the mentee, the knowledge of the informal culture and the enhancement of skills that are considered critical in the organisation.</p> <p>The Programme has been evolving and expanding its field of action. 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.</p> <p>The programme remains active and maintains its structure and objectives. In 2023, editions 9 and 10 were closed, respectively, launched in 2021 and 2022, and a new edition, the 11th, with 24 processes (24 mentor-mentee pairs) was initiated.</p>	<p>Efficiently manage the knowledge accumulated in the company, with the aim of promoting the dissemination of experience and know-how.</p> <ul style="list-style-type: none"> • Encourage interconnection, collaboration and mutual understanding between people, centres and functional areas of the Company. • Develop the talent identified. • Facilitate adaptation in transitions to positions of greater responsibility. • Develop mentees' critical skills. 	<p>Cumulative mentee turnover rate since 2014: 3.0% *</p> <p>Mentee turnover rate for the year 2023: 0.5% *</p> <p>Level of learning achievement: 3.69 on a scale of 1 to 4 (Average mentee rating in each process). Overall assessment of the usefulness of each process: 3.81 on a scale of 1 to 4 (Average mentee rating in each process). Overall program rating: 3.85 on a scale of 1 to 4 (Average mentee rating from the first 8 editions).</p> <p>Talent/career development: 37% vertical promotion and 15% horizontal promotion of mentees from the 1st to the 11th edition (difference in position since the start of the process until December 2023).</p> <p>Development of critical competencies: Percentage of processes specifically addressed according to the evaluation questionnaire: Leadership: 79% - Communication: 86% - Negotiation and conflict management: 85% - Flexibility and Change Management: 60%.</p> <p>Interrelation/mutual knowledge between individuals, centers, and functional areas of the company: Percentage of mentor/mentee pairs from different workplaces or areas of activity: 100%.</p> <p>*Voluntary and involuntary departures due to leaves of absence, retirements, or incapacity are included in the turnover calculation.</p> <p>*The difference in the cumulative turnover rate between 2022 and 2023 is due to the re-entry of a mentee into the company.</p>
Cumulative number of participants as of 2023: 278 (251 in 2022).		

Programme: Coaching

Programme description

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 with individual coaching programmes aimed at directors through external coaches. Internal coaches have been incorporated since 2011, with common methodologies and procedures. And the scope of the programme has been extended to other levels of the company. In 2023, the training of internal coaches in team coaching has been extended and an internal team process has been carried out.

Description of objectives and business benefits

Facilitate the involvement of customers to contribute to the achievement of objectives and improve professional performance.

Boost self-knowledge, self-confidence, self-motivation, independence and responsibility.

In individual coaching: improve the behavioural skills of social interaction (communication and impact, conflict management, negotiation and teamwork), leadership (team and people management) and personal self-management mainly.

Promote the development of the potential to adapt to new challenges and positions of greater responsibility.

In team coaching: improve cohesion and unity among team members, improving communication, trust and leadership; as well as aligning and combining roles and efforts to improve team performance.

Quantitative impacts

In 2023: a total of 289.75 coaching hours (16 coaching processes: 15 individual and one team coaching, involving a total of 14 men and 5 women as coachees or clients; 11 of these processes are internal, including the team coaching).

Individual coaching processes: 248.75 hours accumulated in 2023.

Satisfaction ratio: an average of 7.91 (on a scale of 0-8).

From 2007 to 2023: a total of 2,785.25 accumulated coaching hours in individual processes.

Number of participants: 143 people have participated in individual coaching processes (3 team coaching processes have also been performed) since 2007

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)

The Aena Group reflects its commitment to the rights of freedom of association, unionisation, representation and collective bargaining in the Code of Conduct, the Sustainability Policy and the Human Rights Policy, which is based, among other documents, on the ILO Declaration on Fundamental Principles and Rights at Work. These principles are applicable to Aena companies in Spain, the United Kingdom and Brazil.

Moreover, in Spain, the Collective Agreement establishes the necessary mechanisms to ensure proper compliance with said principles, guaranteeing working conditions and stable employment for all workers. In this respect, during the fiscal years 2022 and 2023, negotiations are underway for the new Collective Agreement, for which successive meetings are being held with the workers' representatives.

In the context of the United Kingdom, workers' rights at Aena's subsidiaries are supported by the Trade Unions Act 2016. On the other hand, within the framework of Human Resources processes, any employee may join and request the collaboration of a union representative through Unite the Union. In this regard, regular consultations are held, addressing issues such as collective bargaining, training, health and safety, complaints and disciplinary measures, environment and equality, among others matters. Ultimately, employees are informed of their rights to union representation as established by the independent public body ACAS.

A number of specific actions are implemented to guarantee labour rights, including a rigorous recruitment and vetting policy, which includes the obligation to verify the age of employees as an integral part of the recruitment process. Complaints channels to report situations of forced labour have also been established and are an integral part of the on-boarding process for new employees. Periodic ad-hoc consultations are also conducted.

Additionally, all employees are offered access to a Bob online business module focused on modern slavery. On the other hand, the working time regulations allow individuals to determine the maximum number of hours they are willing to work. There is also an annual review of the National Minimum Wage (NMW), and ACAS guidelines stipulate that trade union representatives must be involved in any consultations related to large-scale changes in employment. These specific measures are part of ongoing efforts to secure and protect labour rights.

In the case of Aena's subsidiaries in Brazil, the Internal Standards Manual is the document that embodies 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. In turn, the Collective Agreement of ANB recognises the right of assembly as a fundamental principle of the workers. The supervision of compliance with these commitments is the responsibility of the compliance and human resources areas, and any changes to the Collective Agreement must be subject to negotiation with the corresponding trade union¹⁷¹.

2023		
99.85%	100%	99.65%
employees covered by the collective agreement*	employees may join a union recognised by the Company, or any other union for representation purposes	employees covered by the collective agreement ^(B)
99.87% (Aena SME, S.A. más AIRM), 100% ADI in 2022	100% in 2022	98.56% in 2022
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.

^(A) Senior Management is not subject to the Collective Agreement.

^(B) Excludes Aena airport managers in Brazil.

99.85% of Aena employees are represented by worker representatives.¹⁷²

¹⁷¹ It should be noted that during 2023, work has been underway on the preparation of the Collective Agreement applicable to BOAB, which is still in the negotiation process.

¹⁷² Data reported for the first time in 2023.

5.4.1. Collective bargaining

In Spain, within the framework of the 1st Collective Agreement, there are several joint committees¹⁷³, responsible for overseeing compliance with the commitment to freedom of association, union representation and collective bargaining, with which meetings are held periodically. Specifically:

- State Trade Union Coordinator¹⁷⁴
- Joint Training Committee
- Joint Committee on Promotion and Recruitment
- Joint Equality Committee
- State Health and Safety Committee
- Joint Committee on Social Action

- Committee on the interpretation, monitoring, reconciliation and arbitration, and voluntary resolution of conflicts.

Within the framework of the negotiation of the new collective agreement, the review of the conventional standard is being carried out in the search for consensus.

In the United Kingdom, there is no collective agreement as such. However, during 2023, a number of actions were carried out in collaboration with Unite the Union to ensure the exercise of the right to collective bargaining. These actions included:

- Meet the LLA Leadership sessions organised quarterly.
- Preparation of training documents on Company policies and processes in case the need for collective consultation arises.
- Promotion of dialogue with workers through discussion with the aforementioned union on specific aspects.

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.

¹⁷³ These committees aim to address specific issues affecting employees, as well as to carry out and ensure the implementation and review of the agreements adopted within the framework of the Collective Agreement.

¹⁷⁴ It plays the leading role in representing workers in dialogues with Aena in Spain. This body is composed of twelve members appointed by the trade unions that have obtained at least 10% of the total number of staff representatives or members of the Centre Committee in the corresponding elections, which implies being part of the Regulatory Committee.

- Announcement of union communications on electronic boards or the details agreement to be communicated through London-Luton Airport, among other initiatives.
- Summary of agreements reached in terms of salary through the Pay Review final offer. In this respect, salary reviews for employees are carried out after negotiation with workers' representatives.
- Moreover, an ongoing relationship is maintained with concessions and suppliers, and there is a continuous review of the industrial relations environment in the United Kingdom and on-site relations with concessions.

Finally, in Brazil, the Collective Agreement of Aena Brazil, mutually agreed upon by the company's representatives and the workers through the National Union of Airport Managers (SINA), addresses issues related to compensation, such as overtime pay, special working hours, night shift premium, social benefits, or job stability for union representatives, among other matters. Regarding Aena's subsidiary in Brazil, at Aena's subsidiary, BOAB, in 2023, efforts have been made towards the development and signing of the corresponding Collective Agreement, covering the same aspects mentioned and adapting them to the reality of the subsidiary.

It is important to highlight that the Collective Agreement in Spain and the Collective Agreement in Brazil are available online for all employees through the local intranet.

5.4.2. Communication with workers

(GRI 2-29; 3-3)

At the Aena Group, there has been implemented various specific communication channels with the aim of facilitating the transmission of objectives, encouraging employee commitment and participation, and disseminating corporate policies and standards.

In the case of Spain, the following tools stand out:

- SAP SuccessFactors employee portal: this portal, accessible from any web browser or mobile device, is focused on fostering communication and interaction between workers. In 2023, it has been enhanced with additional functions related to worker management.
- Digital Desktop: during 2023, a comprehensive market analysis has been conducted to evaluate the different digital desktop offerings available. The objective is to implement a cloud solution that offers a single, highly personalised, intuitive and people-centric access space. This collaborative environment will not only provide access to all essential tools for day-to-day business, both from the manager's and employee's perspective, but will also ensure seamless access to all relevant corporate information. In order to achieve optimal personalisation, the implementation of this tool is planned to be carried out gradually, segmented by groups over the course of 2024.

- Intranet: during 2023 it has been renewed to make it more navigable and practical for staff. It has more than 30 thematic portals, including the Communication and the Organisation and People portals. The new intranet structure offers, from the home page, relevant company news and useful information, as well as direct access to the most frequent tools for the workforce.
- E-mail: this is used to inform about campaigns that affect all staff or specific sites to which the communication is addressed.
- Aena 360º: this weekly magazine compiles all the news about the company and the people who work at it. It is an open channel that includes a mailbox to receive proposals and contributions from staff.
- Independent local channels: several airports have their own local channels to communicate with workers at their sites through publications and, in some cases, their own intranets.

In addition to these digital tools, Aena promotes a spirit of open communication through its culture of involvement, visible in physical spaces such as the central office, designed to foster teamwork, energise the environment and promote creativity and innovation.

In the case of the United Kingdom, London-Luton Airport has introduced a new platform as an internal social network for communication. This platform is complemented by weekly newsletters that focus on delivering key messages, news and surveys. The Human Resources team also has the ability to send communications when necessary. It is also worth highlighting the project 'Engage Co: Lab', through which effective solutions are sought to improve communication between employees and the Company, fostering a sense of pride of belonging and employee participation in different areas.

In the case of Brazil, Aena's subsidiaries in the network have 'Aena Brazil Comunica', the 'Estamos Conectados' (We Are Connected) programme, and the monthly Aena Brazil 360º magazine. These channels help strengthen internal communication and provide relevant information for employees in different formats and frequencies.



Internal Communication Spain

Intranet

SAP SuccessFactors

Internal publications – Aena 360º

Conecta2 Programme

Bienestar360º

Suggestion box

State Union Coordinator

Joint committees

Mailboxes and emails

Complaints Channel

Working groups



Internal Communication United Kingdom

Intranet

Yammer

Suggestion box

State Union Coordination

E-mails

Complaints Channel

Work groups

Bulletins

Informative QR Codes

Webinar



Internal Communication Brazil

Aena Brazil Comunica

'Estamos Conectados' Programme

Aena Brazil 360º monthly magazine

5.4.3. Satisfaction and motivation of Aena professionals

In Spain, the identification and assessment of psychosocial risks is carried out on a regular basis, the results of which are used as input for implementing possible improvements or proposals for action plans aimed at guaranteeing the wellbeing of workers, as well as promoting their satisfaction and motivation.

The responsibility for conducting these assessments lies with the Occupational Risk Prevention Service, by means of anonymous surveys. This service follows the F-PSICO 4.1 method provided by the National Institute of Occupational Health and Safety. Assessments address topics such as workload, autonomy, psychological demands, and social support.

Additionally, through the commitment index, calculated based on the percentages of workers classified at moderate risk level and in an adequate situation for the psychosocial factors of 'Variety/job content' and 'Interest in work/compensation', information can be obtained on the level of commitment of the workers¹⁷⁵.

	2021	2022	2023
Engagement Index (%) ^(A)	82.43	84.75	80.50
% of Workforce covered	36.78	29.56	7.94

(A) 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]).

¹⁷⁵ This variable is reviewed periodically.

During the fiscal year 2023, psychosocial risk assessments have been maintained, addressing aspects related to satisfaction, task design and content, job functions, interpersonal relationships at work, and other areas of the organisation, such as internal communication and leadership.

Likewise, within the framework of the objectives of the Sustainability Strategy 2021-2030, it is envisaged that work climate surveys will be carried out in the future.

For the United Kingdom, the unit responsible for these measures is Human Resources and Health and Safety. This unit is working to increase the visibility of multi-functional leaders, managers and colleagues, with the aim of:



These initiatives are complemented by regular communications and sessions with managers to discuss their role and professional progression.

One of the key instruments for obtaining information on the status of employees is the Employee Net Promoter Score (eNPS), an annual survey that measures whether employees would recommend the Company, providing an indicator of the work culture and experience. In fiscal year 2023, 70% of workers participated, obtaining a score of 8.1 points (out of 10) on the question related to engagement with the Airport¹⁷⁶.

Finally, in 2023, the Stress Risk Assessment has continued to be developed, supported by the training of managers. These assessments aim to systematically measure organisational stress levels according to the workload or work climate, in compliance with ISO 45003.

In this regard, at Aena subsidiaries in Brazil, no measures have been implemented in this regard to date.

5.4.4. Restructuring

(GRI 402-1)

In 2023, no workforce restructuring has taken place at Group level.

In the case of Aena and its subsidiaries in Spain, should any restructuring measures arise, the legislation provides protection for workers, which implies the need to negotiate with the relevant representative bodies. Substantial modifications of working conditions, both at individual and group level, are carried out in accordance with the provisions of the Workers' Statute Act.

On the other hand, in the United Kingdom, a compliance system has been established with the objective of preventing regulatory risks or irregular practices, reflecting the commitment to responsibly conduct a business model in the face of possible restructuring situations. In this context, British law 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 transfer.

This process involves the participation of employee representatives and the submission of proposals for alternative measures, such as the modification of working hours, relocation of employees or the suspension of the contracting of new employees, in accordance with local regulations.

In any case, priority is given to employees undergoing restructuring or with a medical disability.

Finally, with regard to Aena's subsidiaries in Brazil, the tenth clause of the ANB Collective Agreement establishes that, in the event of a change of workplace location, Aena must assume the expenses associated with the transfer and transportation of employees and their dependents. This complies with the provisions of the country's legal authorities.

¹⁷⁶ Data from 2022 not available.

5.5. Occupational health and safety

(GRI 3-3)

Commitment at all levels of the company, 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

Promoting 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.

Having 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.

Ensuring ongoing training and education of the Company's personnel through training and awareness programmes of subjects on quality control, the environment and occupational health and safety.

Providing 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.

Ensuring the consultation and participation of all Aena staff and their representatives, as well as having access to information on the means and measures to be adopted for the prevention of health risks.

Communicating this Policy to all staff 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.

Ensuring compliance with the legal requirements applicable to Aena's scope of action, as well as other requirements that the Company subscribes in terms of quality control, the environment, energy efficiency and occupational health and safety.

For which the following is available:



Occupational Risk Prevention Plan



Integrated Management System of Quality, the Environment and Occupational Health and Safety



They cover **100%** of the workers.

Continuous review and improvement to minimise and/or eradicate possible risks, incidents and fatalities

And specific actions are carried out:

Training.

Monitoring and external audits on a periodic basis (every 4 years) by health and safety experts.

Risk assessment.

Active and two-way communication on a regular basis between the different areas involved (committees, people department, etc.).

Quarterly meetings of the Health and Safety committees, both State and Local in the different centres.

5.5.1. Aena Health and Safety Model

(GRI 3-3; 403-1; 403-8)

The Aena Group promotes best practices in safety, health (both physical and mental) and well-being to safeguard the health of employees and users of the facilities.

This commitment is clearly established in the Integrated Quality, Environmental, Energy Efficiency and Occupational Health and Safety Management Policy, approved by the Board of Directors. This policy, applicable to the Group, advocates the systematic integration of health and safety management into the Company's regular operations. It ensures compliance with the relevant legal requirements and other commitments made in this area, including the involvement of employees and their representatives in health and safety management. It also establishes measures to increase the awareness of key stakeholders and the commitment to inform employees and companies operating at Aena about their rights and obligations.

The Policy includes a series of specific objectives and actions, supported by the principle of continuous improvement, which is based on the participation and commitment of Senior Management, taking as reference the values and strategies of the Company.

In Spain, the commitments are set out in the Sustainability Strategy 2021-2030, which includes comprehensive occupational wellbeing as a key area of action (Wellbeing). It is implemented through the Occupational Risk Prevention Plan and associated procedures, which have been reviewed and updated in recent years. As a result of this review, the Occupational Risk Prevention Plan has been modified in order to integrate it into the Integrated Quality and Environmental Management System (IMS), in accordance with ISO 45001.

With regard to the System¹⁷⁷, it is externally audited every 4 years, with the last audit being carried out in fiscal year 2023, 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 Occupational Risk Prevention Plan covers the organisational and preventive measures to be implemented, both during the construction of new infrastructures and during the operation of existing infrastructures. At the same time, possible crises and operations by third parties (contractors, concessions, etc.) are taken into account.

In line with the preventive measures, several information campaigns are planned for 2023, which will run from 2023 to the beginning of 2024:

- Musculoskeletal disorders.
- Bone marrow donation.
- Heat protection.
- Prevention of skin cancer.
- Development of a road safety course, aimed at raising awareness and reducing the number of traffic and 'in itinere' occupational accidents¹⁷⁸.

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 Company's activity.

In the United Kingdom, Aena's subsidiaries assume the Integrated Quality, Environmental, Energy Efficiency and Occupational Health and Safety Management Policy and adapts it to its local context¹⁷⁹ through the Health, Safety and Well-being Policy, updated and signed by the CEO in January 2023, which complies with the requirements of ISO 45001 and the applicable regulations¹⁸⁰. This policy reflects the commitment to promoting the culture of health and safety by airport management, as well as promoting security management for both employees and for users of airport facilities.

Aligned with the policy, the Health and Safety Management System at London-Luton Airport in the United Kingdom 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, ensures effective health and safety management based on:

- Identifying hazards.

¹⁷⁷ 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).

¹⁷⁸ Accident suffered by a worker when travelling to or from their workplace.

¹⁷⁹ See chapter 'Links of interest'.

¹⁸⁰ Health and Safety at Work Act of 1974 and Management of Safety at Work Regulations of 1999.

- 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 is externally audited every 3 years by the British Standards Institution (BSI) and internally twice a year. Demonstrating the good maintenance of the system and commitment to continuous improvement.

Likewise, the Responsible Business Strategy 2020-2025 in the United Kingdom defines health and safety objectives with the aim of implementing an excellent safety and risk management culture throughout the Airport (employees, customers and suppliers).

In the case of Aena's subsidiaries in Brazil, the aforementioned Integrated Quality, Environmental, Energy Efficiency and Occupational Health and Safety Management Policy, as well as the Collective Agreement of ANB, reflects its commitment to the safety and health of employees, which focuses on preventing occupational accidents and diseases by minimising potential risks, adopting preventive practices and continuously monitoring the health of workers and suppliers. To do this, it has:

- The Occupational Risk Management Programme, adapted to each of Aena's airports in Brazil, and the Occupational Risk Plan¹⁸¹ that establishes the general terms, application limits, deadlines and additional requirements, all in accordance with the relevant regulations.
- The Hearing Conservation Programme¹⁸².
- The Occupational Health Medical Control Programme.
- Ergonomic analysis of the work.

It is important to highlight the campaigns created by the Internal Accident Prevention Committee¹⁸³, the conducting of inspections and audits by the regional directorate for Occupational Health and Safety, and the creation of awareness-raising campaigns.

Consequently, all airports and corporate offices remained at acceptable levels of risk exposure during 2023, in accordance with the tolerance levels established by the occupational risk regulations of the Ministry of Labour and Social Economy.

The Health and Safety Management System covers 100% of Aena employees in the Aena Group¹⁸⁴.

¹⁸¹ In the process of implementation at BOAB airports, the programme has only been developed at Congonhas Airport to date.

¹⁸² At date, only applicable at ANB subsidiary airports.

¹⁸³ Campaigns developed by the Internal Accident Prevention Committee.

¹⁸⁴ Third parties are not covered by the health and safety management system.

Occupational health and safety management bodies

Spain	Board of Directors	Approve the Integrated Quality, Environmental, Energy Efficiency and Occupational Health and Safety Management Policy.
	Sustainability and Climate Action Committee	Responsible for overseeing compliance with the Integrated Quality, Environmental, Energy Efficiency and Occupational Health and Safety Management Policy, ensuring its correct application and compliance.
	Management Committee	Most senior body responsible for the operation and management of occupational risk prevention.
	Management and workplaces	Responsible for establishing the appropriate means and organisation to comply with the Integrated Quality, Environmental, Energy Efficiency and Occupational Health and Safety Management Policy.
	Joint Prevention Service	Monitor the safety and health of workers in relation to work-related risks. Investigate occupational accidents and accident rate 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 bodies for participation and consensus, intended for regular and periodic consultation of the company's actions in the area of occupational risk prevention, made up of employee representatives and 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	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	They 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	They 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)

Through the implementation of specialised programmes and actions and collaboration with various organisations, the Aena Group ensures the prevention of occupational risks and the promotion of occupational health and safety.

In Spain, Aena has an Integrated Management System Manual that establishes, among other things, the procedures for providing safe and healthy workplaces, as well as the use of the system as a tool for continuous improvement in all areas included in its scope. This manual includes the development of a specific procedure focused on analysing the risks and opportunities of the occupational health and safety management system, from identifying to monitoring the action plans defined in each case, with the objectives of ensuring that the OHS management system can achieve its expected results, prevent or reduce undesirable effects, achieving an environment of continuous improvement. This procedure covers the identification, recording and monitoring of regulatory requirements, as well as the analysis, identification, evaluation and assessment of risk in terms of type and severity. In this context, the adoption of preventive measures aimed at detecting possible effects on the health of staff is considered, together with the implementation of immediate control measures necessary to reduce any possible consequences.

The Risk Assessment and Control Procedure, approved by the State Health and Safety Committee, covers the identification, recording and monitoring of existing risks, including subsequent communications, as well as the analysis, identification, assessment, evaluation and estimation of risk in terms of type and severity. In this context, the adoption of preventive measures aimed at detecting possible effects on the health of staff is considered, together with the implementation of immediate control measures necessary to reduce any possible consequences. This comprehensive structure ensures the effective management of occupational risks, thus supporting a safe and healthy environment for Aena's workforce.

In 2023, the following have taken place:

- 87 general assessments
- 115 specific assessments
- 148 occupational risk studies
- 1,755 measurements have been executed, equivalent to 42% of the total measurements.
- 58% of the risks evaluated are considered tolerable, focusing the main preventive measures on the risks deemed to be important (0.26%)¹⁸⁵.

In general terms, the Aena Joint Risk Prevention Service (SPMA) provides advice and support to the Company, employees, their representatives and specialised representative bodies in carrying out preventive activities. The main objective is to guarantee effective protection of people's health and safety. In this context, the SPMA participates in the design, implementation and monitoring of prevention and health protection plans and programmes such as:

- Assisting with the design, application and coordination of preventive activity.
- Assessing risk factors that may affect the health and safety of workers, and proposing actions for their elimination or reduction.
- Planning, developing and monitoring health programmes for staff.
- Proposing, to the corresponding bodies, actions to improve aspects related to the prevention of occupational risks.

With regard to the monitoring of the preventive measures proposed to eliminate hazards and minimise risks, any changes must be communicated to the occupational risk prevention area. If necessary, the SPMA will evaluate the change in accordance with the procedures of the management system in force. This comprehensive approach ensures the effective implementation of preventive measures to maintain a safe and healthy working environment¹⁸⁶.

Aena maintains the highest levels of security and minimises the exposure of its staff to risk by taking a proactive approach.

In the United Kingdom, occupational health and safety risks are identified and managed at London-Luton Airport based on a governance structure designed to make the implementation of the aforementioned management framework effective.

¹⁸⁵ In 2022, 76 general assessments, 140 specific assessments, 252 occupational risk studies and 1,283 measures were carried out, 15% of the total, with 97% being tolerable risks and 7% important risks.

¹⁸⁶ In Spain, the occupational accident investigation procedure applies to occupational diseases.

This occupational risk assessment is conducted on an ongoing basis, both on a general level (by reviewing the documentation associated with strategic risk management and its recording and review), as well as specifically¹⁸⁷. In addition, these assessments are conducted in response to legislative changes, changes in processes or locations of staff, or before undertaking a new task or work activity for the first time. The quality of risk assessments is assessed through an internal audit process, as well as after an unplanned event (for example, accident/incident). This helps to understand and identify where improvements are needed.

As an additional measure, COSHH (Control of Substances Hazardous to Health Regulations) risk assessments for hazardous substances used are done, including associated emergency controls and procedures.

In Brazil, at Aena's subsidiaries, there are committees that act as representatives of the Company and employees with regard to hazard identification, risk assessment and accident investigation. Employees are also informed of relevant information through health and safety bulletins.

A number of programmes have also been established in accordance with local regulations in order to identify occupational hazards and assess risks, notable examples being the Risk Management and Occupational Medicine Control Programmes¹⁸⁸. Situations with the potential to cause serious accidents are assessed through the Occupational Risk Management Programme¹⁸⁹. Measures taken to eliminate occupational hazards and minimise risks are subject to continuous assessment.

Likewise, the assessment of possible risks that may affect the health of workers is carried out, incorporating specific physical tests for monitoring and prevention. Special programmes are also implemented, such as the Hearing Conservation Programme, designed to prevent problems arising from aircraft noise.

Finally, at Aena's airports in Brazil, health and safety risk assessments are carried out in works projects and facility improvements, ensuring the application of appropriate preventive measures in accordance with local regulations.

Communication, dialogue and participation of employees in occupational safety

(GRI 3-3; 403-4; 413-1)

The consultation and participation of workers in matters of risk prevention is carried out through:

- Representation bodies in Spain, through safety and health committees (at both national and local levels in various centers), joint advisory and collegial bodies, periodically advise on actions related to risk prevention as part of workplace measures, ensuring the participation of personnel in the process. These bodies are comprised of representatives appointed by the company's management and worker representatives. Their functions include:
 - Identification of hazards, risk assessment, and determination of controls.
 - Investigation of accidents.
 - Development and review of occupational health and safety policies and objectives.
 - Consultation on any changes affecting occupational health and safety.
 - Representation on occupational health and safety issues.

At least quarterly, the Safety and Health Committees meet to discuss agreed-upon matters. Conclusions and agreements are made available to all employees through publication on the corporate intranet. Through these committees, and with guidance from the prevention service members, the management informs, discusses, and encourages the participation and consultation of workers through their representatives.

100% of Aena's personnel are represented through the corresponding health and safety committees or, for those centers with fewer than 50 workers, through prevention delegates.

- Communication tools such as the organization and people portal on the intranet, newsletters, informational notes, or mailboxes of the prevention service in each geographical area contribute to maintaining active and reciprocal communication with employees. They also help highlight the importance of fulfilling commitments and identifying employees' concerns regarding health and safety issues (see "Notification, Recording, and Investigation of Accidents" section).

¹⁸⁷ 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.

¹⁸⁸ The identification of occupational hazards or unsafe conditions is carried out through the processing of reports by employees.

¹⁸⁹ Reportedly no accidents have occurred so far.

- In the United Kingdom, at London-Luton Airport, although there is no formal workers' representation committee as such, there are adequate mechanisms in place to ensure the establishment, implementation, and maintenance of processes for consulting and involving workers at all levels and applicable functions in the development, planning, implementation, performance evaluation, and improvement opportunities of the occupational health and safety management system. Specifically, aspects related to health and safety, related documentation, and all relevant information are appropriately communicated and shared. Worker representatives also participate in relevant meetings, and specific visits are conducted as needed. Additionally, meetings are held to discuss the subject, attended by all employees - and other stakeholders - to ensure proper and effective communication and collaboration. Employees, if necessary, also participate in the risk assessment process. There is also an internal and external communication procedure regarding their management systems and performance in health and safety, environment, and energy matters:
 - Internally: through risk governance meetings, department meetings, training courses, and the distribution of procedures.
 - Externally: through the website and the organization of meetings with stakeholders.
- In Brazil, the Internal Accident Prevention Committee (CIPA), composed of Company and worker representatives, aims to prevent occupational accidents and diseases that could, arise. Moreover, the communication of news regarding occupational safety, addressed to all employees, is carried out through newsletters.

Reporting , recording and investigation of accidents

(GRI 403-2)

The reporting of incidents, accidents or potential threats related to occupational safety is carried out through various channels:

- In Spain, employees have the option of making notifications in person, either by e-mail addressed to the head of the area at the site or to the Aena Joint Risk Prevention Service in the corresponding area. They can also use 'Mi Portal'¹⁹⁰, or contact Prevention Officers.
 - In the case of occupational accidents, whether minor or serious, there is a system for notifying the Prevention Area (SPMA) through 'Mi Portal' or in person.

Once the accident is recorded in the system (all occupational accidents and injuries are recorded, regardless of whether they generate sick leave, including accidents during commuting), an investigation is carried out to identify the cause and prevent similar situations in the future. As a result of the process, corrective and/or preventive actions are proposed. Internal monitoring of the accident rate is carried out through the preparation of periodic accident reports, which detail the list of accidents/incidents that have occurred. The labour and health protection authorities are also informed.

- Any communication on deficiencies or improvements must be channelled through the corresponding manager and/or the Aena Joint Risk Prevention Service (SPMA). All these channels ensure the confidentiality of the data and of the person making the notification.

In accordance with applicable regulations, Aena respects the right of employees to stop their activities and leave the workplace if they consider that there is a serious and imminent risk to their life or health.

During 2023, no cases were recorded that threatened the life or health of workers at Aena's work sites in Spain.

In the United Kingdom, at London-Luton Airport, the reporting of all incidents (injuries, near misses, and hazards) is carried out through the corresponding platform of the management system, and a descriptive report is generated and made available to employees through the corporate Sharepoint.

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, at Aena's subsidiaries airports, accidents are reported to an internal accident prevention committee and to other company departments that may be involved.

¹⁹⁰Specific site available on the intranet for the reporting of accidents or incidents, through the Human Resources and Occupational Risk Prevention portal.

At consolidated level, in 2023 there have been:¹⁹¹

- 166 occupational accidents (10 more than in 2022)
- 46.4% accidents with medical leave (47.4% in 2022)
- 100% of accidents have been investigated

In Spain, out of the 104 recorded accidents, 103 have been classified as minor and only one as serious. The majority of the minor incidents were related to surfaces or areas at the same level (22%) and involved vehicles (12%). All events have been documented within the continuous improvement system. Each event has been analyzed, identified, and evaluated in terms of type and severity, with their findings incorporated into preventive measures aimed at eliminating or mitigating these risks.

In Brazil, a total of 16 accidents have been reported, with 12 classified as minor and 4 as serious. To mitigate and prevent such accidents in the future, measures taken include conducting tests and analyses to anticipate the proper functioning of machinery and equipment, improving procedures, implementing a greater number of measures, and enhancing training and dissemination efforts among employees of Aena subsidiaries in Brazil.

Finally, in the United Kingdom, at London-Luton Airport, 46 accidents have been recorded, all minor except one (45 of them minor, with 36 of those not resulting in medical leave, yielding a severity index of 0.09). In most cases, employees were assisted or treated within the facility itself. All events were subject to analysis and a descriptive report, with opportunities for improvement shared with employees through the corporate Sharepoint platform.

¹⁹¹ The information regarding this matter for the year 2022 can be found in the Sustainability Report - Non-Financial Information State 2022, on page 217.

Accidents (own staff) (GRI 403-9)

	Spain			United Kingdom			Brazil ^(E)			Total Consolidated	
	2021	2022	2023	2021	2022	2023	2021	2022	2023	2022	2023
Accidents (number)	99	107	104	24	45	46	11	4	16	156	166
Male	75	80	72	14	23	18	10	4	10	107	100
Female	24	27	32	10	22	28	1	0	6	49	66
With medical leave	43	60	55	8	10	10	6	4	12	74	77
Male	35	51	44	5	7	5	6	4	7	62	56
Female	8	9	11	3	3	5	0	0	5	12	21
Without medical leave	56	47	49	16	35	36	5	0	4	82	89
Male	40	29	28	9	16	13	4	0	3	45	44
Female	16	18	21	7	19	23	1	0	1	37	45
With death	0	0	0	0	0	0	0	0	0	0	0
Male	0	0	0	0	0	0	0	0	0	0	0
Female	0	0	0	0	0	0	0	0	0	0	0
Minor accidents	99	105	103	17	40	45	11	2	12	147	160
Male	75	78	71	9	20	17	10	2	7	100	95
Female	24	27	32	8	20	28	1	0	5	47	65
Serious^(A)	0	2	1	7	5	1	0	2	4	9	6
Male	0	2	1	5	3	1	0	2	3	7	5
Female	0	0	0	2	2	0	0	0	1	2	1
Rate of occupational accident injuries with major consequences^(B)	0.00	0.17	0.08	24.00	3.86	0.66	0.00	2.70	3.60	0.64	0.40
Recordable occupational accident injury rate^(C)	3.72	5.03	4.43	27.43	7.72	6.59	12.48	5.40	10.81	5.30	5.12
Death rate^(D)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

(A) Any accidents that have had major consequences, not including deaths, are considered serious.

(B) Rate of occupational accident injuries with major consequences = (Number of occupational accident injuries with major consequences (not including death)/Number of hours worked) * 10⁶

(C) Recordable occupational accident injury rate = (Number of accidents with medical leave * 106)/(Total number of hours actually worked). Its calculation is equal to the Frequency Index.

(D) Death rate = (Number of deaths resulting from an occupational accident injury * 10⁶)/Number of hours worked.

(E) The region of Brazil also includes information related to the Aena subsidiary BOAB.

Accidents (own staff) (GRI 403-9)

	Spain			United Kingdom			Brazil ^(E)			Total Consolidated	
	2021	2022	2023	2021	2022	2023	2021	2022	2023	2022	2023
No. of days lost	896	2,060	2,494	174.7	84	133	54	292	241	2,435.56	2,868
Male	674	1,840	2,228	160	59	83	47	292	166	2,191.08	2,477
Female	222	220	266	14.7	24	50	7	0	75	244.48	391
Rate of days lost ^(A)	77.53	172.62	201.05	598.98	64.49	87.70	127.21	394.53	217.08	174.35	190.80
Male	92.42	246.63	289.37	854.80	73.13	86.99	166.18	597.81	227.72	250.21	264.00
Female	52.05	49.18	56.53	140.69	50.18	88.92	49.41	0.00	196.74	46.90	69.22
Incidence rate of occupational accidents ^(B)	551.00	745.00	654.00	1,192.00	1,484.00	1,285.00	2,091.00	1,220.00	2,439.00	817.00	795
Male	703.00	1,002.00	836.00	1,205.00	1,733.00	1,057.00	3,061.00	1,860.00	2,188.00	1,086.00	924.00
Female	283.00	303.00	350.00	1,172.00	1,111.00	1,639.00	0.00	0.00	2,907.00	358.00	580.00
Frequency rate ^(C)	3.72	5.03	4.43	27.43	7.72	6.59	12.48	5.40	10.81	5.30	5.12
Male	4.80	6.84	5.71	26.71	8.66	5.24	17.89	8.19	9.60	7.08	5.97
Female	1.88	2.01	2.34	28.71	6.15	8.89	0.00	0.00	13.12	2.30	3.72
Severity rate ^(D)	0.08	0.17	0.20	0.60	0.06	0.09	0.66	0.39	0.22	0.17	0.19
Male	0.09	0.25	0.29	0.85	0.07	0.09	0.84	0.60	0.23	0.25	0.26
Female	0.05	0.05	0.06	0.14	0.05	0.09	0.00	0.00	0.20	0.05	0.07
Hours worked	11,557,187.22	11,933,931.20	12,404,759.10	291,660.23	1,295,675.97	1,516,500.78	424,508.00	740,113.20	1,110,169.80	13,969,720.37	15,031,429.68
Male	7,292,448.23	7,460,499.54	7,699,431.08	187,177.42	807,870.97	954,172.61	282,824.00	488,448.00	728,951.40	8,756,818.51	9,382,555.09
Female	4,264,738.99	4,473,431.66	4,705,328.02	104,482.81	487,805.00	562,328.17	141,684.00	251,665.20	381,218.40	5,212,901.86	5,648,874.59

^(A) Rate of days lost = (Total number of cases of days lost by own personnel * 10⁶) / Total hours worked.

^(B) Incidence rate of occupational accidents = (Number of accidents with medical leave * 10³) / Average accumulated workforce. Values updated((Number of accidents x 1,000 workers) / Average accumulated workforce)); now formulated according to the doctrine of the National Institute for Health and Safety, a body belonging to the Spanish Ministry of Labour and Social Economy; as Number of accidents x 100,000 workers) / Average accumulated workforce.

^(C) Frequency rate = (Number of accidents with medical leave * 10³) / (Total number of hours actually worked).

^(D) Severity rate = (No. of working days not worked due to an occupational accident with medical leave * 10³)/(No. of hours actually worked) or Rate of days lost/1000.

^(E) Region of Brazil. The incorporation of BOAB into the region in 2023. The calculation of worked hours in the region is based on the estimation of the Collective Agreement, using the standard amount of working hours while deducting the time for paid leaves.

Monitoring of the objectives set in terms of health and safety

The Aena Group is committed to reducing accident rates and developing a risk-preventive culture by establishing objectives, which are reviewed and updated annually according to best practices in the sector and/or the latest trends.

In Spain, within the parent company, a series of goals are established to achieve continuous improvement based on historical data. The following objectives were set for the year 2023, based on the data from the year 2022:

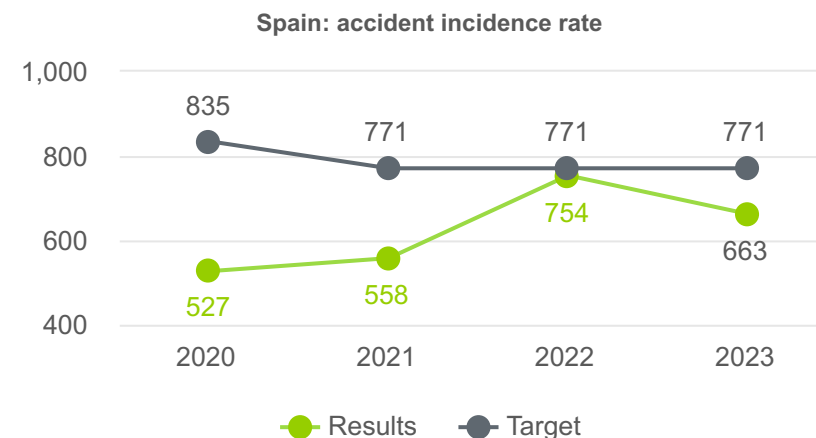
- Number of accidents: 58
- Accident incidence rate¹⁹²: 771

The chart below shows the targets established versus the results obtained between 2020 and 2023, for the accident incidence rate and the number of accidents.

As a result, the previously set objectives have been achieved. In 2024, the target set is to maintain the same levels as in the previous year for the accident incidence rate and number.

Likewise, among the objectives established for Brazil for the year 2024 is the implementation of all health and safety programs required by Brazilian legislation in compliance with corrective action plans.

In Spain, Aena has managed to meet the objectives proposed in the last 4 years with regard to the accident incidence rate.



		2020	2021	2022	2023
Incidence rate of accidents	Target	835	771	771	771
	Results	527	558	754	663
Number of accidents	Target	62	60	55	58
	Results	41	43	60	55

¹⁹² Workplace Accident Incidence Rate. Values updated((Number of accidents x 1,000 workers) / Average accumulated workforce)); now calculated according to the doctrine of the National Institute of Safety and Health, an entity belonging to the Ministry of Labor and Social Economy; as (Number of accidents x 100,000 workers) / Average accumulated workforce.

With regard to London-Luton Airport in the United Kingdom, the objectives set for the 2023 fiscal year include:

- 90% of level 2 accidents have a shared learning communicated.
- 100% of workers in positions of responsibility have completed learning in this regard.
- 80% of continuous improvement opportunities completed on schedule.

In the case of Brazil, to complement the accident management tools, use is made of the Heinrich Pyramid, which serves to quantify safety anomalies and allows these events to be monitored by level of severity and compared over time. In turn, direct communication with employees is available through Aena Comunica.

An occupational disease is considered to be that contracted as a result of exposure to risk factors inherent to the work activity and provided that it is included in RD1299/2006, of 10 November, which approves the table of occupational diseases in the Social Security system and establishes criteria for their notification and registration.

During 2023, in Spain, the occupational medicine speciality of the Prevention Service did not detect any cases of occupational disease according to RD 1299/2006.

Number of occupational diseases by region reported by the private insurance company (own staff) (GRI 403-10)

	Spain			United Kingdom			Brazil			Total	
	2021	2022	2023	2021	2022	2023	2021	2022	2023	2022	2023
Number of deaths due to occupational disease or illness	0	0	0	0	0	0	0	0	0	0	0
Male	0	0	0	0	0	0	0	0	0	0	0
Female	0	0	0	0	0	0	0	0	0	0	0
Number of cases of occupational diseases or illnesses	0	0	0	0	0	0	0	0	0	0	0
Male	0	0	0	0	0	0	0	0	0	0	0
Female	0	0	0	0	0	0	0	0	0	0	0

Aena Spain includes all of its own workers.

Health and safety emergency preparedness procedures

The Aena Group's facilities have emergency protocols (see Chapter 6 'Safe and quality services'), which are available to staff at each site via the intranet and are updated periodically. For this purpose, in Spain, the area of occupational risk prevention collaborates with other areas (security, operations, etc.), to achieve greater involvement and commitment in this regard. In this way, emergency drills are carried out at all Aena sites

As previously indicated, in the United Kingdom, London-Luton Airport carries out COSHH ('Control of Substances Hazardous to Health Regulations') risk assessments for all hazardous substances used within the departments.

Similarly:

- There are procedures in place to deal with emergencies, such as emergency orders, accidents/incidents/near misses/first aid procedures, fire safety, etc.
- They have an emergency planning manager responsible for ensuring that emergency orders are relevant, up-to-date, and communicated to stakeholders.

- Emergency exercises are organized to test various types of emergencies in collaboration with internal and external stakeholders at the airport, as needed.
- Fire drills are conducted, and all staff has received fire safety training. There are also first intervention fire teams in all departments.
- Finally, there are first aid responders in all departments at the airport to ensure adequate coverage in this regard.

At some airports of Aena's subsidiaries in Brazil, on the other hand, has continuously developed and updated an airport emergency plan, which addresses airport evacuation procedures (verified in annual assessment exercises). In addition to the Emergency Plan, all contracted staff and service providers are made aware of emergency assembly points during initial health and safety training.

Absenteeism (own personnel) (GRI 403-9)									
	Spain			United Kingdom			Brazil		
	2021	2022	2023	2021	2022	2023	2021	2022	2023
No. of hours lost due to absenteeism ^(A)	840,999.30	975,787.19	927,946.25	57,130.22	71,347.20	67,086.93	3,572.00	24,320.00	33,423.00
Male	475,488.93	549,472.90	513,019.21	39,338.15	43,616.88	37,700.85	2,445.75	15,328.00	17,290.00
Female	365,510.37	426,314.29	414,927.04	17,792.07	27,730.32	29,386.08	1,126.25	8,992.00	16,133.00
Absenteeism rate ^(B)	7.28	8.18	7.48	4.36	5.51	4.42	0.84	3.29	3.01
Male	6.52	7.37	6.66	4.66	5.40	3.95	0.86	3.14	2.37
Female	8.57	9.53	8.82	3.82	5.68	5.23	0.79	3.57	4.23

(A) 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

(B) Absenteeism rate = (Total number of absenteeism hours / Total number of hours worked) x 100

Occupational health and safety training

(GRI 403-5)

Training, communication and information activities are considered essential to ensure compliance with current regulations and to obtain the commitment of all employees in health and safety matters. In Aena Group ensures that each employee receives complete and appropriate training, both theoretical and practical, in preventive matters from the moment they are hired and throughout the duration of their contract. This applies regardless of the type of contract (permanent or indefinite), the responsibilities performed, any organisational changes or changes in work teams, as well as the introduction of new technologies.

As a result of the risk assessment review of each employee's activities, health and safety training needs are identified. These courses are mandatory, count towards the annual variable salary and are held on working days.

In Brazil, at Aena's subsidiaries airports, at the date closing this report a specialised company is currently in the process of being hired to provide occupational health and safety courses specially designed for certain occupations. This approach ensures that employees acquire the knowledge and skills necessary to perform their duties in a safe and healthy manner.

Worker training on occupational health and safety

	Spain		Brazil		United Kingdom		Total
	2022	2023	2022	2023	2022	2023	2023
Training activities (no.) ^(A)	73	47	0	32	0	23	102
Employees (number)	5,500	3,132	170	537	604	437	4,106
Training hours ^(B)	44,070	45,409	0	6,637	0	2,531	54,576

(A) In 2022, no training hours or number of UK activities have been recorded on this specific subject.

(B) Brazil: It is reported that, during 2022, 170 employees have received 'Training in health and safety issues', as part of 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 develops preventive and health promotion measures for employees to improve their condition and identify risk factors that may affect their health status. These include physical examinations, prevention programmes, dissemination of the culture of wellbeing, monitoring of occupational illnesses, etc.

In Spain, these measures are developed by specialised technicians and are subject to consultation and participation in the State Health and Safety Committee.

Main actions:

In Spain, the following measures have been adopted during 2023:

- A total of 1,241 trivalent vaccines have been made available to employees.
- A total of 5,937 health check-ups (medical examinations) have been conducted to assess the health status.
- Blood donation campaigns.
- Bone marrow donation campaign (January 2024).
- Wellness 360° Project: Led by expert technicians from the Organization and People Department, this initiative promotes a preventive culture and health promotion, focusing on the care and emotional well-being of employees. Each week, a different topic is addressed, and a set of resources related to that topic is made available simultaneously. It is distributed within the company's weekly magazine via email and offers various multimedia materials on the intranet.
- Implementation of work-life balance measures and social benefits contained in the Work-Life Balance Programme (PAC [Programa de Atención a la Conciliación]).
- Programme for the prevention and treatment of addictive behaviour and emotional support.
- Management protocol in situations of personnel conflict¹⁹³.
- Adaptation of the occupational health and safety management system to the integrated management of quality, the environment and energy efficiency.
- Information campaigns: musculoskeletal disorders, protection against the summer heat, prevention of skin cancer.

In Brazil¹⁹⁴, all workers at Aena's subsidiaries are entitled to private medical insurance and have received information on the benefits included. Specifically, dental services are also available to workers at Aena airports in Brazil. Likewise, as set forth in the agreement, awareness-raising and guidance programmes on the prevention of musculoskeletal disorders arising from the working environment, as well as other occupational diseases, are carried out in accordance with current regulations. Moreover, regular medical examinations are also planned. Finally, specific flu vaccination campaigns have been conducted.

For its part, in the United Kingdom, London-Luton Airport has its own strategy to promote and support the wellbeing of workers, with the support of its occupational health providers, the employee assistance programme and private medical insurance, available to all employees.

Measures to reduce stress

Aena has a procedure for identifying and evaluating psychosocial factors and risks that may pose a risk to the health and wellbeing of workers, including stress.

In this regard, in Spain, a series of actions and resources have been implemented to help improve the emotional state of staff and stress management, among which we can highlight:

- Awareness-raising actions, through internal newsletters and specific webinars.
- Stress support instruments, for example, through the Aena Work-Life Balance Programme (PAC) and the 360° Wellbeing team.
- Training about stress for employees through the 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.). Likewise, for the case of teleworking positions, 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 working arrangement.

¹⁹³ 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.

¹⁹⁴ The benefits contained in the Collective Agreement promote the preservation of health and well-being.

- Evaluation of psychosocial factors through anonymous surveys, following the procedure approved by the State Health and Safety Committee, as well as subsequent analysis of results, staff surveys and proposal of preventive measures at the various facilities¹⁹⁵.

In the United Kingdom, London-Luton Airport carries out activities to reduce stress levels and their consequences, among which we can highlight:

- Stress risk assessments.
- Absence monitoring.
- Conducting of 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 awareness programme delivered through events/seminars, webinars/lunches and learning sessions on a variety of topics, including stress and mental health.

In Brazil, an analysis is conducted to identify and avoid possible work overload and stress situations. Moreover, specific training has been provided aimed at improving ergonomics at work.

Specific work-life balance and well-being measures

(GRI 3-3; 401-2; 401-3)

The Aena Group promotes specific actions aimed at facilitating work-life balance aimed at employees, related to working hours, leave, family reconciliation, etc.

In Spain, this commitment is included in Aena's Sustainability Strategy 2021-2030, within the 'People Management' line of action, which includes objectives aimed at promoting the work-life balance of employees. For this purpose, in addition to those already included in internal regulations, the following measures have been developed:

- Development of a flexible remuneration programme.
- Establishment of an integration and coordination plan, providing wellbeing and prevention resources for employees.
- Implementation of the Teleworking and Digital Disconnection policies.

In the UK, complies with the Flexible Working Regulations and the Employment Rights Act 1996 in this regard. This commitment is reflected, among others, through the Flexible Working Policy and enacted through the establishment of measures such as:

- Limitation on holiday changes, 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.

It is worth mentioning the additional measures available to support employees at the London-Luton Airport:

- 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 Aena's subsidiaries airports at Brazil are provided for in the Collective Agreement of ANB. The most noteworthy are:

- 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.

¹⁹⁵ 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.



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.
Improved paid breastfeeding leave, which can be accumulated.

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 Work-Life Balance Programme (PAC): 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.

United Kingdom

Possibility to request flexible working, which may include the possibility to telework from home up to three days a week.

Annual holidays that include 5 days above the minimum established by the government.

Paid maternity, paternity or adoption leave (4 weeks' leave with full pay and up to 28 weeks' paid leave).
Paid parental leave of up to 5 days, plus compliance with the parental leave required by the government.

Where appropriate, this is treated in the strictest of confidence and adapted to each individual situation. Possible measures include adaptation of working hours, parking in a safe place, etc. The Employee Assistance Programme also offers counselling by trained counsellors for anyone at risk of gender-based violence.

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.
Occupational health service including physiotherapy and neuro-linguistic coaching.
Access to the on-site gym.
Menopause policy / awareness training.

Brazil

Work-life balance measures set out in the Collective Agreement. They highlight: maternity leave, paternity leave, leave to accompany children, etc.

Main data for 2023¹⁹⁶

The return-to-work rate of employees who took parental leave in 2023 amounted to 97.6% (79,7% in 2022).

Parental leave (GRI 401-3)

	2022							2023						
	Spain		United Kingdom		Brazil		Total	Spain		United Kingdom		Brazil		Total
	M	F	M	F	M	F		M	F	M	F	M	F	
Employees who are on maternity/paternity or adoption/fostering leave	136	41	11	10	6	3	207	133	30	18	11	11	2	205
Maternity	0	41	0	10	0	3	54	0	30	0	11	0	2	43
Paternity	136	0	11	0	6	0	153	133	0	18	0	11	0	162
Adoption/ foster care	0	0	0	0	0	0	0	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 maternity/paternity or adoption/fostering leave	117	28	11	1	6	2	165	124	36	18	10	10	2	200
Maternity	0	28	0	1	0	2	31	0	36	0	10	0	2	48
Paternity	117	0	11	0	6	0	134	124	0	18	0	10	0	152
Adoption/ foster care	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Parental leave	0	0	0	0	0	0	0	0	0	0	0	0	0	0

¹⁹⁶ In accordance with current legislation and applicable internal regulations, all Aena employees are entitled to paternity/maternity leave.

Number of employees who have returned to work after completing parental leave and remain employed 12 months later (2023)^(A)

	Spain		United Kingdom		Brazil		Total
	M	F	M	F	M	F	
Maternity	0	39	0	1	0	0	40
Paternity	133	0	11	0	6	0	150
Adoption/ foster care	0	1	0	0	0	0	1
Parental leave	0	0	0	0	0	0	0
Total	133	40	11	1	6	0	191

(A) In Spain as of 31/12/2023, there are four employees on voluntary leave for childcare, one on another parental leave, and two on inactive status (the latter two have employment contracts in Spain under the indefinite full-time fixed-discontinuous mode).

Number of employees who have returned to work after completing parental leave and remain employed 12 months later (2022)^(A)

	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

(A) In Spain, as at 31/12/22, there were three employees on leave of absence.

Return-to-work rate 2023

	Number of employees who have returned to work			Number of employees yet to return to work			Return-to-work rate ^(A)		
	M	F	Total	M	F	Total	M	F	Total
Maternity	0	23	23	0	43	43	-	53.5%	53.5%
Paternity	137	0	137	164	0	164	83.5%	-	83.5%
Adoption/ foster care	0	0	0	0	0	0	-	-	-
Parental leave	0	0	0	0	0	0	-	-	-
Total	137	23	160	164	43	207	83.5%	53.5%	77.3%

(A) Return-to-work rate: (Total figure of employees who returned to work after parental leave/Total figure of employees who must return to work after parental leave) x 100.

Return-to-work rate 2022

	Number of employees who have returned to work			Number of employees yet to return to work			Return-to-work rate ^(A)		
	M	F	Total	M	F	Total	M	F	Total
Maternity	0	23	23	0	43	43		53.5%	53.5%
Paternity	137	0	137	162	0	162	84.6%	-	84.6%
Adoption/ foster care	0	0	0	0	0	0	-	-	0%
Parental leave	0	0	0	0	0	0	-	-	0%
Total	137	23	160	162	43	205	84.6%	53.5%	78.0%

(A) Return-to-work rate: (Total figure of employees who returned to work after parental leave/Total figure 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 is committed to establishing requirements and mechanisms for coordination in the area of Occupational Risk Prevention between Aena and all companies that carry out activities in the facilities managed by the Company, as established in the Procedure for the Coordination of Business Activities (CAE- Coordinación de Actividades Empresariales).

Thus, through the CAE Procedure, the requirements and coordination mechanisms regarding Occupational Health and Safety are established between Aena and all companies conducting activities within the Company's facilities. This procedure aims to enhance actions in this area and ensure compliance with obligations established for sharing information about risks generated by the activity of concurrent companies to third parties. This is reflected in the Integrated Management Policy for Quality, Environment, Energy Efficiency, and Occupational Health and Safety.

Based on this procedure, Aena commits to:

- Monitor compliance with occupational risk prevention regulations by third parties and ensure the presence of preventive resources at each workplace.
- Demand the execution of the corresponding risk assessments and planning of preventive activities, as well as compliance with the obligations of third parties regarding information and training.
- Verify that contracted companies and their subcontractors have established the necessary coordination means.

In this way, Aena has a system for the Coordination of Business Activities (CAE) with third parties¹⁹⁷ that operates in all work sites. Through this system, the risks of the companies that perform their activities at the facilities (external/competing companies) are communicated, promoting coordination between all of them.

Specifically, the companies that perform their works at Aena's sites have the duty to fill out and/or update declarations of own risks and risks to third parties,¹⁹⁸ to subsequently inform them to both their workers and to those of Aena through periodic meetings. This information is reported on a risk map that is provided to companies together with the corresponding manual and the link to the Aena website for the Coordination of Business Activities (CAE).

Throughout 2023, the website has continued to be improved with the aim of simplifying the process of coordinating external companies as much as possible. It is particularly worth highlighting the incorporation of the record of accidents involving workers from all external companies that have occurred at Aena's facilities. This progress implies a greater capacity to design and maintain spaces where the safety of all those who access the facilities is a priority.

It highlights that contracts with external suppliers include detailed clauses specifying the lines of action in health and safety matters. Consequently, the coordination of business activities is the integral mechanism for promoting the healthcare of all employees, taking into account the considerable number of people involved in the Company's operations.

Protecting the health and safety of its employees, suppliers, external staff and passengers is a priority for Aena.

Additionally, regular meetings have continued to be held with the competing companies, adapted to the nature of their activities or the areas in which they operate. As part of the management of external suppliers, contracts include detailed clauses specifying health and safety performance guidelines.

In the United Kingdom, London-Luton Airport carries out pre-employment evaluations of suppliers, requesting, evaluating and rating health and safety-related information. Once the contract is formalised, suppliers adhere to the airport's health and safety policy and the Code of Contractors Management System.

Prior to the authorisation and commencement of works, all health and safety information is checked and risk assessments/safe work systems and training are carried out. Meetings with third parties are periodically called to ensure collaboration and open communication, especially in the case of assessments of risks and opportunities. Notices related to airport management, including those related to health and safety, are formally transmitted.

¹⁹⁷ The relationship between Aena and the external companies may be the result of a direct link, resulting from a contractual relationship between the parties (contracts of employment, lease, assignment of facilities, etc.) or an indirect link (when the external company carries out its business activity in whole or in part at Aena's facilities).

¹⁹⁸ Access the link to the website for Business Activities Coordination with third parties – Occupational risk prevention. See chapter 'Links of interest'.

In Brazil, service providers undergo an initial evaluation to check compliance with Brazilian health and safety legislation. They also include third-party health and safety procedures that describe the contractor’s actions to prevent or reduce risks in the work environment, establish incident reporting channels and facilitate mitigation actions. Moreover, all third-party accidents in the workplace must be properly reported and investigated¹⁹⁹

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 are also included in the Third-Party Health and Safety and Procedure.

¹⁹⁹ In terms of procedures for the management of contracted employees, which demonstrates management’s commitment to the protection of the health and safety of employees: Mobility Procedure.

6-

Safe, quality services



(GRI 2-22; 3-3)



Commitment to SDGs



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.
Development of an Automatic Air Traffic Control System (ATCAS) interface with any visual Remote Tower / Digital Tower system for basic functionalities, in coordination with ENAIRE.
70 internal inspections (+90 in 2022)
30 external operational safety audits (30 in 2022)

7,750 employees trained in operational safety in (+8500 in 2022)

Excellent management

Strategic Plan 2022-2026
Strategic Airport Maintenance Plan
Responsible Business Strategy 2020-2025.
Quality of Service Plan (QSP).
Airport Exploration Plan (AEP) 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

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 (0 in 2022)

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 3,428 employees trained in airport security (3,929 in 2022)

Health safety

ACI recognises two Aena airports with the "Cleanest Airport in Europe" award:

- Región de Murcia International Airport
- Pamplona Airport

Introduction

One of the three pillars of the Aena Group is to maintain a leadership position in operational efficiency, while simultaneously ensuring the required levels of safety and quality.

In a year where a historical record of passengers has been registered, the Aena Group maintains its commitment to safety, in all its aspects, and the quality of its services at all its airports, including the airports of the new subsidiary in Brazil, BOAB, which, through its subsidiary Aena Desarrollo Internacional, have been incorporated into the network in 2023.

Aena is focused on the prevention of eventualities and contingencies that affect the development of its activities, trying to mitigate the possible existing risks, continuously assessing its processes in terms of safety and risks, adapting them and providing the necessary human resources, mechanisms and materials to face the challenges to which airport activity is subject

Health and Safety Assurance at Aena (GRI 3-3) ^(A)



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

A state in which risks associated with aviation activities related to, or directly supporting, the operation of aircraft are reduced and controlled to an acceptable level.



Health safety

With the aim of health controls due to COVID-19, the focus is on lessons learned and the application of health measures that guarantee the safety of users at all times.



Cybersecurity or information security

Safety measures to prevent and detect the unauthorised use of computer systems.

(A) Applicable to all services offered at Aena Group airports

6.1. Operational Safety

(GRI 3-3)

6.1.1. Management framework

(GRI 2-23)

Aena Group prioritises operational safety at its facilities, with a focus on prevention and a commitment to comply with all applicable legal requirements and regulations²⁰⁰ in this area. To do this, it takes into account the best practices in the sector, and provides the necessary resources to place operational safety, including crisis situations, as one of the main responsibilities of all members, at all levels, of the organization and of all personnel within the airport community.

Aena is committed to ensuring the highest levels of operational safety necessary to reduce risks to a reasonably achievable level²⁰¹.

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 and Airport Network and the Executive Vice-President signs his agreement with it



Addresses operational safety at airport facilities, adopting a preventive attitude, with the commitment to comply with legal requirements and applicable regulations on the matter, taking 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 staff 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), to ensure that the appropriate levels of operational safety are achieved and maintained and which are adapted to each airport in the network. It is a systematic approach that includes the organic structure, lines of responsibility, policies and procedures for:

²⁰⁰ Operational Safety is a priority at airports around the world. There are national and international regulations on the subject, as well as sectoral guidelines:

- 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.
- 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.
- 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.
- In Brazil, the requirements of Annex 19 of the ICAO are included in the Regulations determined by ANAC (RBAC 139, 153 and 154).

²⁰¹ 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. In each country, the governing bodies are responsible for ensuring compliance with operational safety requirements.



Proactively identifying the Company's weaknesses, classifying its risk level and taking measures to reduce it: hazard identification, risk analysis and risk mitigation. As well as identifying 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 minimise their consequences and avoid their repetition.



Creating and promoting 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 the definition of objectives

The SGSO Manual is the document where the principles of Aena's Operational Safety Policy are developed for each airport. This document describes all the processes that are part of the Operational Safety management at the airport, from the risk management process to the control of all generated documentation, Airport Emergency Plans, as well as the profile and responsibilities of the Operational Safety Management System Manager (RSGSO).

Operational Safety Programme

It includes the objectives set annually to achieve the principle of continuous improvement at each airport in terms of operational safety.

All airports operated by Aena in Spain, the United Kingdom, and Brazil have an Operational Safety Program



Measurable through indicators and indices, adapted to each airport, which are regularly re-evaluated and reviewed. It describes the actions, resources and deadlines needed to achieve the objectives for the continuous improvement of operational safety and the correct implementation of the Operational Safety Management System.



These indicators are related to weather, maintenance, the environment, vehicles/drivers or incidents, among others

6.1.2. Operational Safety Objectives

For each of its airports, Aena Group establishes operational safety objectives that guarantee and reflect the commitment to achieve, maintain and promote operational safety. It also incorporates potential updates based on the organisation's experience, lessons learned and a thorough analysis to confirm their level of effectiveness.

In Aena, some of the main objectives include the modification and adaptation of infrastructures, the establishment of more effective procedures for the identification of risks and the improvement of the operational safety culture through the promotion of notifications and the application of the principles of fair culture. The independent Compliance Monitoring unit is responsible for monitoring the operational safety management compliance processes on a cross-divisional level.

In the United Kingdom, London-Luton Airport sets objectives to prevent any incident or accident, paying special attention to training, adding value from lessons learned, organising meetings and workshops, or reinforcing the programme of visits for employees. For their measurement and monitoring, the objectives are set internally.

In Brazil, the airports of Aena's subsidiaries have the main objective of implementing all necessary measures to improve and maintain an acceptable level of operational safety, including actions resulting from hazard identification and risk management. Moreover, coordination between the different activities is strengthened, as well as training actions and the promotion of an operational safety culture.

The Company seeks to continuously improve its operations and ensures an excellent level of operational safety.

6.1.3. Main actions focused on improving operational safety in 2023

In the 2023 fiscal year, the procedure for notifying the status and conditions of the runways has continued to be developed, aiming to detect pavement conditions in the event of adverse weather conditions, at airports in Spain, the United Kingdom, and Brazil.

Also in 2023:

- In Spain, a Central Change Management Unit was created to provide support and unify criteria to maintain the highest levels of operational safety during the processes and commissioning of changes in the airport environment (works, procedures, equipment, organisation).
- In the United Kingdom, efforts have been made to strengthen collaboration, and thereby the performance of third parties, especially ground handling service providers.

- In Brazil, the Monitoring Indicators Project has been implemented to track performance indicators in operational safety for all airports of Aena's subsidiaries in Brazil. In case of deviations, immediate actions are taken to reduce potential incidents. Additionally, regular inspections of airport infrastructures related to infrastructure or operational procedures have been carried out to identify any non-conformities in their maintenance.

6.1.4. General aeronautical audits, checks and drills of operational safety

(GRI 3-3; 416-1)

Aena has various control mechanisms in place to establish a process of continuous improvement, which in turn serve as tools for evaluating the Operational Safety Management System.

Internal inspections

In order to verify regulatory compliance and the implementation, suitability and adequate effectiveness of the operational safety systems, as well as to avoid the detection of possible non-conformities in external inspections, internal inspections are carried out at all airports in the Group Aena network, including the Air Base aprons open to Civil Traffic.

Also in 2023:

- In the United Kingdom, a compliance monitoring programme is in place, implemented to audit the internal procedures and tasks performed by the operations department of London-Luton Airport.
- In Brazil, internal audits are conducted to verify compliance with regulatory requirements by measuring the effectiveness in implementing procedures outlined in the Operations Manuals.

External audits

- In Spain, external audits are conducted by the State Aviation Safety Agency (AESA) to verify the proper implementation of the Operational Safety Management System (SGSO) at each airport. Generally, airports in the network receive an average of 25 visits per year. These audits carried out by the Spanish aeronautical authority periodically cover each and every operational safety requirement derived from Spanish and European regulations.
- In the United Kingdom, the Civil Aviation Authority (CAA) and the British Aviation Institution (BSI) are the authorities responsible for conducting these audits.
- In Brazil, external audits are conducted by the National Civil Aviation Agency (ANAC) and have a scope similar to that applied in internal audits.

Drills

- In Spain, in compliance with the ICAO and associated national regulations, the Spanish airports and heliports of the Aena network carry out general aeronautical drills at intervals not exceeding two years. These drills are intended to achieve:
 - Proper coordination between the organisations and agencies involved in the emergency response to emergencies involving aircraft.
 - The performance of the material and human resources belonging to these organisations.
 - The improvement of the emergency procedures of airports and other organisations involved.
 - The training of staff who would have to intervene in the event of a real emergency.
- In the United Kingdom, at London Luton Airport, emergency response is trialled on a modular basis, with a 10-module program completed over a four-year period. In 2023, the drills that have been carried out have covered the evacuation and care of passengers. Various airport departments and external agents (security agents, airlines, etc.) have participated in these drills.
- In Brazil, emergencies are addressed within the Airport Emergency Response System, which reflects the leadership and commitment of Aena's subsidiaries' top management in Brazil to establishing processes and procedures for airport emergencies, as well as allocating the necessary resources for the implementation and maintenance of the system, ensuring compliance with applicable requirements and continuous improvement of developed processes. In 2023, a simulation of removing an inoperative aircraft from the runway was conducted.

	2021				2022				2023			
	Spain	United Kingdom	Brazil	Total	Spain	United Kingdom	Brazil	Total	Spain	United Kingdom	Brazil	Total
Internal inspections (number)	66	36	6	108	49	41	2	92	55	11	4	70
External audits (number)	29	7	12	48	28	1	2	31	25	1	4	30
Drills (number)	28	-	0	28	20	3	25	48	29	1	17	47



Operational Safety

In Aena, airports in accordance with:

- **Regulation (EU) no. 139/2014: 83%.**
- **Royal Decree 862/2009: 17%** ^(A)

In the United Kingdom, Luton-London Airport is also certified according to EU Regulation 139/2014 and in Brazil according to ANAC RBAC 139.

In addition to strict regulatory compliance, various initiatives for continuous improvement and the universalisation of the operational safety culture are promoted, such as:

- The Proactive Risk Detection methodology.
- The establishment of criteria agreed with the aeronautical authority in those aspects where the standard is not sufficiently defined.
- The incorporation of new technologies.

^(A) 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.

6.1.5. Other mechanisms to maintain excellent levels of Operational Safety

(GRI 2-25)

Emergency Plan

In all airports and heliports of the Aena Group²⁰², there is an Emergency Plan (self-protection)²⁰³ that allows them to react to emergencies related to aircraft operations, as well as those that occur in airport buildings and facilities.

The plan director is responsible for these plans, which 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 into which the airport plan is integrated²⁰⁴.

The Airport Emergency Plan responds to all types of emergencies, including those related to meteorological phenomena.

These plans include situations that may lead to emergencies and critical dependencies with a service continuity perspective, as well as procedures for coordinating activities to ensure an effective response. In this way, potential risks (natural, technological or man-made hazards, etc.) are assessed and a series of mitigating measures are associated with them.

These plans reflect the mechanisms that alert emergency teams and the channels for informing passengers or other airport users. When an Emergency Plan is activated, users who are part of the emergency teams are alerted during the actual activation of the plan. The rest of the users are informed through different procedures, depending on whether it is an emergency situation in a building or related to aviation.

These plans are living documents under continuous review. In the airports of the Aena network, for example, corrective action plans are implemented based on the analysis of emergency drills, real situations, as well as the results of internal and external audits. In general, whenever they are updated, they are sent to all internal and external organisations involved in or impacted by the Plan, except in cases where they contain information on security procedures, in which case they are sent in a restricted format.

Airports have an operational safety culture that includes emergency response.

The airports draw up an annual schedule and calendar of drills in accordance with the regulations in force, with the aim of improving the level of security. This allows all parties involved to regularly practise elements related to the Emergency Plan.

In the United Kingdom, at London-Luton airport, all stakeholders, emergency services, airlines, local authorities, governments and professional experts work together to develop procedures containing all instructions in the event of an air accident or emergency.

The document is updated, at least annually. In addition, it is reviewed after each drill or activation of the Emergency Plan and contains an iterative system of reports that capture new developments and create actions to improve the system.

All security incidents and plan activations are recorded by airport staff and reviewed by the teams involved. The results of incidents are entered into the OSMS and/or the Risk Management programme.

²⁰² The airports of Aena's subsidiaries in Brazil have the Airport Emergency Response System (SREA), updated and structured in accordance with the relevant regulations. This system includes mechanisms and communication systems for alerting and communicating with users. In this regard, airports have, for example, emergency phones to ensure immediate communication of potential incidents to relevant parties such as the fire service or the operations control center, among others.

²⁰³ The Emergency Plan (self-protection) has been updated and structured in accordance with European sectoral regulations (Regulation 139/2014), with Royal Decree 862/2009, for the airports in the verified Spanish network, 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.

²⁰⁴ 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.

Aena's airports in Brazil have an Aerodrome Emergency Plan (PLEM), as part of the Airport Emergency Response System (AERS)²⁰⁵ updated and structured in accordance with the applicable regulations and which includes the mechanism and system for alerts and communication with users. In this regard, the airports have, for example, emergency telephones to guarantee immediate communication of possible incidents to the fire service or the operations control centre, among others.

In Brazil, there are also other procedures available that are reviewed in the event of a simulation exercise or activation of the Emergency Response System, significant changes in the operational characteristics of the aerodrome, or the occurrence of transmissible diseases at regional, national, and/or international levels.

In the event of a nuclear accident or serious radiological emergency, specialised teams (Radiological Control and Decontamination) are available anywhere in the National Territory, which must be activated by the Second Air Command (II COMAR), although their support has not been required to date.

Investigation, handling of accidents and incidents, and corrective actions

The Aena airport network has an investigation and notification process for incidents that occur on the airside of the airport or that affect operational safety. This process facilitates the establishment of preventive measures that take into account previous errors and lessons learned.

In the event of any incident or accident, the data relating to each event must be communicated to the control unit set up for this purpose.

In this regard, Aena has a 24-hour Network Management Centre for operational incidents (CGRH24), which continuously monitors the operational status of the entire Airport Network in coordination with SYSRED (ENAIRE) and the incidents affecting flight operations, as well as preparing the corresponding monitoring reports.

Airports follow a best practice model for reporting and investigating accidents, with the aim of learning from mistakes and establishing new learning opportunities.

Each airport identifies the possible hazards that may affect operational safety, analyses the potential risks and implements the corresponding mitigation measures, according to its specific characteristics.

A system is implemented, which allows it to receive, document and respond to communications, queries and complaints in this area from both internal and external sources, and have a specific internal communication channel. Likewise, lessons learned are shared within Aena through Operational Safety Conferences, Operational Safety Bulletins and the creation or improvement of particular procedures if necessary.

At London-Luton Airport, in the United Kingdom, all incidents are recorded through the Opscom platform of the Operational Safety Management System, according to the Manual de Aeródromo, where:

- Weekly:
 - Data are reviewed and the top 5 or 6 issues of concern from a safety perspective are identified and prioritised through actions, commitments and other means to help promote safety.
 - A report is produced and published for all airside users.
- Daily:
 - Incidents/accidents are reviewed, investigations are carried out and mitigating measures are implemented.

Additionally, London-Luton Airport has progressed in key aspects of operational safety, such as:

- The introduction of shared learning among work teams.
- The creation of partnerships between managers of different units.
- The continuation of the skills retention programme for staff on leave of absence.

In Brazil, the airports of Aena's subsidiaries investigate safety-related incidents and accidents in order to correct and prevent them in the future. The investigation process for these events and the persons responsible for the investigation are described in each airport's Manual de Gerenciamento da Segurança Operacional (MGSO).

²⁰⁵ 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:

- 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;
 - Weapons, ammunition, war products in general; and
 - Radioactive, corrosive, toxic, bacteriological and other similar products. .

Indicators of total airport incidents segregated by country and year

	Spain	United Kingdom	Brazil
2021	718	96	16
2022	1,426	148	6
2023	1,726	153	ND

*Runway incursions and excursions are considered.

Indicators of equipment accidents (ACI TYPE D) segregated by country and year

	Spain	United Kingdom	Brazil
2021	372	26	14
2022	756	52	12
2023	966	60	23

Indicators of incidents during movement (ACI TYPE B) segregated by country and year

	Spain	United Kingdom	Brazil
2021	134	0	4
2022	261	0	0
2023	339	0	3

Ensuring third-party operational safety

Aena Group has an Operational Safety Management System that establishes coordination and third-party oversight, and incorporates requirements into the contracts and agreements that are established. The OSMS is the reference framework to guarantee the operational safety of third parties that perform their activity at airport facilities²⁰⁶. 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.
- 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 related to operational safety, which are also detailed in the specifications and contracts with third parties through specific clauses.
- Participation of suppliers in expert sessions to identify risks and changes affecting their activity.

Such requirements include:

- Having and designating a person in charge of Operational Safety.
- Ensuring the knowledge and application of regulations in the matter through the mandatory training of workers and providing the airport with the necessary information regarding its activity.
- Maintaining continuous collaboration with the Contract Manager, as well as communicating accidents/incidents.

Aena has an Apron Safety Regulation, operating instructions and specific procedures that include the safety mechanisms to be applied by all agents participating in the operation. All workers with access to the airside must pass training and a prior examination required by the aviation authority.

Third-party contracts articulate the requirements contained in the OSMS procedures on third-party control and security, safety communications, and regulate what type of information is to be exchanged and how it is transmitted between its representatives.

²⁰⁶ The OSMS provides for the control, supervision and direction of the work of those services in its area of activity that are developed by third parties in the airport movement area and other areas that may affect its operation. In addition, it carries out and analyses supervisions of external suppliers and communicates irregularities to the airport's OSMSR.



These third-party contracts also require the establishment of operational safety indicators, including those objectives related to the control of the operational safety of third parties in the OSMS. In the mandatory documentation to be submitted (surveillance plans, inspections, records, etc.), companies must propose and provide evidence of the control of the operational safety objectives committed to for each period, both those required by Aena and others that they may have proposed as their own initiative for improvement.

On the other hand, there is a procedure for training personnel in Operational Safety, which ensures that airport workers have the appropriate training to carry out their assigned tasks and functions. These procedures identify the training needs by category, occupation and requirements associated with the position (content, duration, etc.), proposing different training itineraries. Contracts and agreements with third parties include the necessary requirements that third parties must meet in terms of training and competencies, always according to their activity.

In Brazil, operational safety requirements apply to all service providers and activities on the airside of Aena's subsidiary airports. Contracts and agreements include the necessary requirements that third parties must meet in terms of training and competencies, related to their activity²⁰⁷. The mandatory operational safety clause includes, among other aspects, the requirements for third party training, including all training itineraries and the frequency of competence checks, in accordance with their activity.

In this same line, various training actions (on the OSMS, 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 both Spain and Brazil, there are specific procedures and instructions that set out the safety mechanisms to be applied by all persons involved in operations. The performance of third parties in operational safety matters is also monitored within the framework of the OSMS.

Likewise, the airports of Aena's subsidiaries in Brazil has a reporting mechanism addressed to the person responsible for operational safety and which applies to air operations, so that they are properly addressed and corrective and/or preventive measures are duly implemented to mitigate the risks related to them.

At London-Luton Airport, in the United Kingdom, the requirements to be met by the third party are set out in the tender documents and in the contract with the third party.

All third-party contracts also include operational safety training for suppliers, monitoring mechanisms for compliance with the above requirements, related goals and objectives, communication and reporting channels for safety management, and rule descriptions.

For this purpose, all service suppliers have access to safety-related documentation through the Opscom management platform. Additionally, those workers who carry out activities on the airside must have authorization and possess a specific license. All stakeholders conducting activities on the airside, as well as their employees, must comply with and participate in the development of the operational safety program requirements. This includes participation in scheduled sessions, drafting reports related to operational safety, and implementing all actions and measures adopted by management.

On the other hand, close collaboration with third parties is maintained to establish and monitor the agreed KPIs in the contracts and to annually review the main risks associated with different activities. These risks are published in a weekly report which also includes improvement proposals.

Lastly, at London-Luton Airport, daily operational safety checks are conducted on third parties operating on the airside of the airport by the Operations team. Any findings are addressed at the time or, if deemed necessary, transmitted to the team responsible for the stakeholder. Safety Oversight Audits are also conducted by the compliance monitoring team and AirDat, contracted by LLA to conduct these audits.

Staff training

Aena has an operational safety training procedure that guarantees the correct training of staff to perform the tasks and functions associated with their occupation.

All the aforementioned procedures identify training needs by category, occupation and requirements according to the position, thus proposing different training itineraries.

Along this same line, in Brazil, Aena's subsidiaries carry out training actions are carried out related to the OSMS, aeronautical accident prevention and the transportation of dangerous goods, among others, with the aim of ensuring that people working in activities that are directly or indirectly related to operational safety have the necessary training and qualifications.

²⁰⁷ Similar ones in Spain and Brazil.

On the other hand, at London-Luton Airport in the United Kingdom, employee safety training ranges from annual internal refresher training, such as specific summer and winter operations training, to basic and advanced ground operations training. Training is also provided to third parties.

Additionally, employees of London-Luton Airport in the United Kingdom have participated in the 'Safety differently' training (tours and visits), which promotes a proactive methodology focused on opportunity-based learning.

Number of employees trained per year				
2023				
	Spain	United Kingdom	Brazil	Total
Number of employees	7,321	45	384	7,750
2022				
	Spain	United Kingdom	Brazil	Total
Number of employees	8,221	604	273	8,553

Innovation

With regard to innovative practices and aspects that have contributed to the progress and improvement of operational safety at airports, the following lines of work stand out in 2023:

- In Aena:
 - An app supported by mobile devices created to obtain data, communicate said 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).
 - Acquisition of winter pollutant thickness detection equipment.
 - 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 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, Aena's subsidiary airports have a risk prevention report regarding potential safety hazards. These reports are used to assist in the analysis of events as well as in defining the mitigating actions adopted. This system is available online and via QR codes.
- In the case of the United Kingdom, London-Luton Airport has launched the Safety Stack project, where all representatives work together to develop joint regulations and policies and adopt new methods to facilitate the flow of safety information and guidance. Among other things, this initiative has led to the development of an application for the airport community, greater cooperation between teams on operational incidents, a reduction in the number of incidents, a reduction in the severity of incidents and an increase in both the number and quality of reports.

6.2. Airport security

(GRI 3-3)

The Aena Group prioritizes ensuring, above the minimum established by the corresponding authority, the safety and protection of passengers and the general public, crews, ground personnel, aircraft, and airports along with their facilities in general.

The objective of all the staff involved is to comply with the regulations and control the risk with the least possible inconvenience.

To this end, various surveillance systems are implemented throughout the airport environment that, complemented by the implementation of specific measures, prevent acts of unlawful interference and ensure best practices in this area.

6.2.1. Airport Security Objectives in 2023

Throughout 2023, the general objectives of Aena, which guarantee the highest levels of safety for people and goods, are as follows:

- Security Equipment: supply of inspection equipment, access control systems, CCTV and stand-alone border control equipment, in accordance with the applicable regulations and the specific needs of the airports²⁰⁸.
- Analysis and monitoring of the private security service: internal and external audits. In the United Kingdom, these audits of private security companies are conducted by the Civil Aviation Authority (CAA).
- Quality Control: tests and verifications of security procedures, from which reports are drawn up and corrective action plans are monitored.
- Training: courses aimed at Aena airport security managers, both in the Aena network in Spain and in the United Kingdom.
- Regulations: participation with the AESA, in the case of Spanish airports, and with the ANAC in the case of Brazil, in different working groups and in the permanent committees of the National Safety Committees.

In Brazil, the main objectives of airport security are to provide technical support to the implementation plan agreed with the concession authority and to provide and manage resources for the airport's AVSEC activities.

6.2.2. Main actions focused on improving airport security in 2023

The most important actions carried out in the area of airport security in Aena's airport network are as follows:

- Tender of a new Framework Agreement for the supply and installation of automated explosive detection systems for cabin baggage screening and automated systems for security filters.
- Tender for a new Framework Agreement for the supply and installation of autonomous border equipment, within the framework of the future entry into force of the new European automated passport control project (Entry Exit System).

- Tender for a new centralised dossier of support staff for the Spanish State Security Forces and Corps (FFCCSE in Spanish) at border controls, aimed at standardising the service and providing the necessary human resources for the new European Entry Exit System project.
- Tender for new private security files adapted to the post-pandemic operational reality, with requirements in accordance with DORA II and taking into account the development of new infrastructures and equipment.
- Collaboration with AESA's new Airport Security Officers Certification programme.
- Collaboration with AESA's new Security Guards Certification programme.
- Implementation of the Drone Threat Protocol.

In the United Kingdom, at London-Luton Airport, internal audits have continued to be conducted to ensure maximum airport security throughout the airport environment. This has improved the results obtained in the external audit conducted by the CAA.

In Aena's subsidiary ANB in Brazil, various security equipment has been acquired, including: CCTV cameras, electronic access control equipment, Bar Coded Boarding Pass (BCBP) systems, and totems. Additionally, improvement works have been carried out at access control points, specifically in surveillance booths. Furthermore, the trained AVSEC personnel have been expanded, thus strengthening the security culture at their airports.

Aena's priority is to guarantee the safety and protection of passengers, the general public, crews, ground staff, aircraft and airports and their facilities in general.

²⁰⁸ 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

Regulations (contains guidelines for the structural design of airport infrastructures with the aim of defending against and preventing acts of illicit interference)	Spain	ICAO Regulation: 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 Regulation (EU) No. 2017/2226: establishes an Entry-Exit System (EES) for recording entry and exit data and refusal of entry data of third-country nationals crossing the external borders of the Member States, determines the conditions for access to the EES for law enforcement purposes, and amends the Convention implementing the Schengen Agreement and Regulations (EC) No. 767/2008 and (EU) No. 1077/2011.	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. Single Consolidated Direction 1/2023.
			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 Programme against Acts of Illicit Interference (PNAVSEC).	NATIONAL: Decree No. 11,195, of 8 September 2022 - National Civil Aviation Security Programme against Acts of Illicit Interference (PNAVSEC).	

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.

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 Corps.	Private Security Personnel, hired by Aena.	Staff from the airport's own Local Security Office (LSO).	Aena coordinates and collaborates with all groups involved in security to ensure its effectiveness and efficacy.
	United Kingdom	Security Services and Counter-terrorism Police of the United Kingdom, Department of Transport, National Protective Services Authority (NPSA).	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, as well as manual and automated border control systems.	Inspection equipment for people and screening machines for baggage, packages or bags.	Procedures (employee inspection, accreditation of individuals, vehicle authorisation, etc.).
	United Kingdom	CCTV System.	Access Control System, vehicle access regime and ANPR.	Security systems to control access of people, transported objects, vehicles and cargo (screening).	Airport security plan, employee inspection, CAA-accredited training, general awareness, 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.	

Aena works to offer a safe stay and a quality experience in the facilities of all its airports.

To this end, a series of measures have been implemented over the course of 2023, which can be divided into:

- Communication and collaboration of all the agencies and parties involved.
- Surveillance of possible vulnerable areas of the airport.
- Control of the movement of vehicles and persons at the accesses to restricted security areas.
- Inspection of persons and property through security.
- Creation and update of the new measures of the Airport Security Programme²⁰⁹.

The National Security Programme contains the specific measures to be applied by all the representatives in the event of any act of unlawful interference, such as threats of aircraft hijacking or bomb threats. The airport is also required to have the necessary resources to manage its resources correctly (also included in the airport's Emergency Plan).

In the case of the United Kingdom, London-Luton Airport has working groups specialised in airport security management (Authority and airport partners), whose function is to assess potential vulnerabilities and risks and recommend measures to mitigate them. This group receives support from the Security Executive Group, which recommends and authorizes additional measures beyond those proposed by these working groups.

In Brazil, measures taken by Aena's subsidiary airports to reduce to reduce possible situations of unlawful interference include the implementation of contingency plans for the orderly management and standardisation of crises, as well as reporting to stakeholders.

Likewise, it continues to participate actively in the Brazilian Aviation Safety Group (BAsE), with the following objectives:

- promoting national civil aviation security activities and projects against unlawful interference to help manage the civil aviation industry.
- cooperation between national civil aviation authorities (ANAC), preparation of technical material.
- facilitating the collection and sharing of information, data and metrics between departmental agents to provide better analyses, diagnostics and target setting for the AVSEC system.

²⁰⁹ 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.

²¹⁰ 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.

²¹¹ Aena's airports in Brazil do not have regulatory certificates in Airport Security. However, the activity is based on the Airport Security Program (PSA), duly approved by the Regulatory Authority.

6.2.3. Excellent Airport Security Levels²¹⁰

The security measures applied at the airports in the Aena network comply with both national and Community standards and compliance with them is mandatory.

Airport Security Training

In order to promote airport security at all airports in the network, Aena carries out training and awareness-raising activities for all employees whose work is carried out within the airport facilities.

Number of employees trained	2022	2023
Spain	2,790	3012
United Kingdom	604	45
Brazil	786	371
Total	3,929	3,428

Airport security audits, inspections and drills²¹¹ (GRI 416-1)

In order to verify compliance with current regulations, the European Commission and AESA carry out various internal and airport safety audits at the airports in Aena's network every year.

This is also the case in the United Kingdom, where London-Luton Airport is audited by the CAA and external providers, and at airports in Brazil, audited by ANAC.

- Spain: in 2023, 30 external audits were conducted by AESA (35 in 2022) and 30 internal verifications (27 in 2022).
- United Kingdom: Unannounced visits are conducted annually by its aviation security authority, the CAA, to verify certain aspects of its regulations. Additionally, in 2023, audits covering various aspects of airport security have been carried out. Furthermore, internal audits are conducted on security activity and processes, including third parties.

- Brazil: audits are conducted on all aspects foreseen in the PNAVSEC and ANAC regulations to determine the level of compliance with the applicable regulations. Alongside this, the ANAC conducts external audits on a periodic basis on the facilities. In 2023, 33 internal audits were conducted (29 more than the previous year) and 3 external audits by ANAC (1 more than in 2022), and for both types of reviews, compliance levels higher than those of the previous year were achieved.

The applicable regulations also define the carrying out of drills with the intention that all airport security-related staff have the necessary training and experience in the event of an emergency²¹².

In this regard, 2 Airport Security drills have been carried out during the fiscal year 2023 (2 in 2022) in Spain.

Likewise, in the United Kingdom, at London-Luton Airport, drills are not conducted as they are not required by the aviation authority.

In 2023, at Aena's subsidiary airports in Brazil, 9 drills were conducted (1 more than in 2022), including Full-Scale Simulated Exercises and Tabletop Simulated Exercises, following applicable regulations according to each airport, aiming to train all stakeholders involved in the Airport Contingency Plan.

6.2.4. Ensuring airport security for third parties

All staff working in the airport environment must ensure compliance with airport security.

Airport Security RE 2017/458

100% of Aena international airports with Schengen border (the border security force is complying with this RE on behalf of London-Luton Airport)

Airport Security RE 300/2018, 2015/1998 and the National Security Programme for Civil Aviation (PNS)

100% of Aena airports in Spain (London-Luton Airport with RE 300/2008 and SCD 2/2019)

Airport security RE 2017/458

²¹² 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.



In Spain, in order to guarantee that airport security regulations are complied with by all agents operating at airports, a specific clause is included in all works and supply contracts, whether or not they directly affect security. In this way, the contractor undertakes to take measures to guarantee knowledge of and compliance with the applicable airport security regulations, having a person responsible for this matter. There are possible penalties in these clauses in the event of violation or non-compliance. In the United Kingdom, London-Luton Airport carries out an initial assessment of all services prior to implementation. Moreover, all contractors providing airport security products and services must be approved by the CAA. This aspect is also defined in the contract²¹³ and the provider must follow the same objectives and audits (see section 'Airport security audits, checks and drills'). Contractors are also subject to internal audits to verify ongoing compliance with established guidelines.

In Brazil, airport providers of Aena subsidiaries must comply with airport security requirements, set out in the contractual objectives, which have clauses relating to accreditations as well as the obligation to submit a Security Plan of the Auxiliary Services Company or Airport Area Scout. Moreover, all employees of the airport community will be required to complete specific trainings.

Contracts define the criteria and indicators for monitoring the performance of service providers to ensure compliance with regulations and service levels.

²¹³ Clause 10 of the Charges & Conditions of Use document.

6.3. Cybersecurity or information security

(GRI 3-3)

The complexity associated with the use of new technologies and information systems means that their use exposes one of the most valuable assets of any company: information.

In order to guarantee the efficient and dynamic protection of information through a preventive, detective and reactive approach²¹⁴, Aena Group define its Information Security Policy for Spain, whose guidelines have been defined in accordance with the UNE-ISO/IEC 27001 standard²¹⁵, a security framework based on a set of security processes, standards, procedures and tools.

Through this Policy, Aena develops an Information Security Management System has been developed and audited by AENOR during the fiscal year 2023. This system allows for the effective protection of information assets, guarantees their security and prevents the materialisation of possible incidents and potential threats from cyber-attacks.

The Information Security Management System 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.

Aena's subsidiaries in the United Kingdom have developed cybersecurity policies based on the NIS (Security of Network & Information Systems) regulations and the controls required by the UK Civil Aviation Authority, applied through security standards and guidelines. Additionally, they are currently developing an Information Security Management System based on the ISO 27001 standard to enhance the effectiveness of controls applied to critical systems.

Additionally, cybersecurity monitoring has been implemented on all critical systems to ensure the security of the airport's infrastructure, systems, and information. These include:

- Next-generation content filtering on the firewall to detect, analyse, and protect all incoming and outgoing traffic.
- Enhanced detection and response on all end-user devices to protect the infrastructure against the horizontal and vertical flow of malware or ransomware attacks.
- Protection on internet-facing services ensuring monitoring of all activities and the implementation of the best security protection.

Lastly, vulnerability assessments are conducted periodically on all critical infrastructures to maintain the level of security assurance within accepted limits.

In Brazil, it deploys its commitment to information security protection through specific projects, such as the identity management project, which is expected to be completed in the first quarter of 2024. Additionally, Pentest and Retest have been conducted on infrastructure environments, and Falcon Complete Mobile has been deployed for mobile devices. Furthermore, phishing campaigns are conducted quarterly.

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 Piquero²¹⁶ – is the body responsible for approving the updating of the Information Security Policy.

Aena also has an Information Security Governing Body, which is made up of three committees with different functions in information security and allows for a global perspective on three differentiated levels:

- Strategic or corporate: ensures adherence to the interests of the Board of Directors of Aena and the continuous development of safety principles and policies. Describes the organisation's information security strategy.
- Description of the tactical facets of information security: transfers instructions from the Strategic Security Committee.
- Technical-Operational: with a focus on more operational tasks and the ability to handle more technical problems.

Moreover, Aena is currently governed by the 2022-2026 Strategic Information Security Plan, which is supervised by the Audit Committee and sets out actions in key processes to achieve the target level of security.

²¹⁴ 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.).

²¹⁵ In the United Kingdom, London-Luton Airport is in the process of implementing ISO 27001, scheduled for 2023 or 2024, and moving towards compliance with the NIS Information Security Directive. In Spain, the planned renewal date is May 2025.

²¹⁶ Independent Director and Managing Director of Meta Spain and Portugal since 2012 (see Chapter 1).



Bodies responsible for the implementation and operation of the Cybersecurity Plan

The Board of Directors, the Management Committee and the Audit Committee are periodically informed of the evolution of the Cybersecurity Plan²¹⁷.

- The Management Committee, which assists the Director of Technologies and Digitisation²¹⁸, is the body 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 at its disposal the role of the CISO and the Information Security Manager (ISM). The CISO is also the highest responsible body for the supervision of cybersecurity at Aena.
- In Aena's subsidiaries in the United Kingdom, at London-Luton Airport, this responsibility falls to the IT Director (acting as CIO), who reports directly to the local Finance Director. The cybersecurity consultant was also appointed during 2023. Moreover, a robust cyber monitoring system and the implementation of the Information Security Management System (ISMS) is being established.
- In Brazil, at the airports of Aena's subsidiaries, the primary responsibility for cybersecurity oversight lies with the CISO (Chief Information Security Officer) and the CSO (Chief Security Officer). Their work is supported by the Information Security Committee.

6.3.2. Measures to ensure the effectiveness of the Cybersecurity Plan

Aena has a Cybersecurity Plan, approved by the Board of Directors, to adequately manage the risk associated with the mass use of information and communications systems.

In order to guarantee the achievement of the Plan's objectives and the transformation processes, operating models and ICT services by all those involved, Aena develops different measures based on the following:

Training

Part of the transition towards a new operating model and the responsible use of new technological tools is based on the creation of an awareness and training plan to develop new managerial and technological skills.

Among the achievements of the year, the participation of 8,550 employees in cybersecurity training and information security regulations stands out (compared to 6,247 in 2022), with a pass rate of 92%. Additionally, 12 awareness-raising talks on the subject were conducted during routine airport²¹⁹ inspections (compared to 17 in 2022). Similarly, periodic awareness activities are carried out, sharing information about current information security risks in the corporate newsletter or via mass-distributed monthly emails.

In the United Kingdom, at London Luton Airport, cybersecurity training and awareness courses are mandatory for all new employees upon their onboarding and subsequently for all employees on an annual basis. In 2023, several courses related to cybersecurity and data privacy were conducted. A total of 281 users underwent cybersecurity training in 2023 (161 users in 2022). Additionally, the Airport is enhancing its training program in 2024 to align its requirements with the development of the Information Security Management System based on the ISO 27001 standard.

In Brazil, 358 employees have received training 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.

²¹⁷At the Board level, the independent director Leticia Iglesias is responsible for these matters; she also has experience in the matter.

²¹⁸Specifically, the Head of the Cybersecurity Division.

²¹⁹According to the cybersecurity training plan, 100% of employees will receive training in the subject at least every four years.

Procedure to follow in the event of an incident

The Information Security Policy establishes the action procedure for all employees, whether internal or external, and companies (contracted or collaborating), in the event of any cybersecurity event or incident. In this case, they must report this to the support centres or Computer Security Incident Response Team (CSIRT). 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.

Once an incident is detected, the CSIRT maintains communication with all stakeholders and informs the management of the results and lessons learned so that necessary measures can be taken to prevent the incident from recurring. If a security breach or violation of established rules is discovered, the matter may be escalated to the responsible department for necessary disciplinary measures²²⁰.

In Brazil, employees of Aena's subsidiary airports who detect a cyberattack must report it to ICT through official channels (phone, chatbot or e-mail).

Contingency plans and incident response procedures

Aena has different business continuity and disaster recovery plans, with the latter being tested and updated at least annually. It also has:

- A Cybersecurity Operations Centre, which provides services for the operation of cybersecurity platforms, monitoring of corporate systems, implementation of security rules and controls implemented in the systems that manage cybersecurity 24x7x365.
- A Computer Security Incident Response Team, 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 well as in the Cybersecurity Plan mentioned in the previous section.

The ICT and Cybersecurity Department carries out periodic audits of compliance, IT hacking, OT hacking and Physical Security Systems, applications and penetration tests (Pentesting), in order to check the security of ICT infrastructure and information security management systems, as well as to assess the level of maturity in the security systems in Spain.

Moreover, compromise reviews and exercises are conducted by simulating targeted attacks using various hybrid methods to compromise the infrastructure in order to correct any identified cracks in the system.

On the other hand, in the United Kingdom, London-Luton Airport is developing comprehensive incident response and disaster recovery plans for all critical systems and services, based on NIST and ISO 27001 standards. Plans are underway to expand coverage to other systems and processes based on their risk profile.

In Brazil, there is a procedure for responding to information security incidents in this regard.

External verification and vulnerability analysis

At Aena, in order to verify compliance with the standards, as required in the Plans mentioned in the previous sections, Aena's ICT and Cybersecurity Department carries out periodic audits of compliance, hacking (IT, OT) and Physical Security Systems, applications, and penetration testing, to check the security of the ICT infrastructure and the Information Security Management Systems, as well as to assess the level of security maturity in Spain.

Moreover, compromise reviews and Red Team²²¹ exercises (both internal and external) are developed, simulating targeted Hacking-Ethics attacks in which different hybrid methods are used with the aim of compromising the infrastructure and thus being able to correct any weaknesses that may be identified.

In the United Kingdom, an external company conducts two penetration tests annually on the internal and external IT infrastructure, as well as on the airport's websites. Based on the result of these verifications, corrective actions are recommended and implemented.

²²⁰ Described in the Aena Code of Conduct as well as in the HR Manual in the UK.

²²¹ Four cybersecurity "Red Team" exercises are conducted annually at Aena. Additionally, within the framework of the ISO 27001 standard, information security reviews are conducted annually at the largest airports.



In 2023, no cybersecurity breaches were reported within the Aena group.

Aena's subsidiary airports in Brazil conduct vulnerability assessments and intrusion tests on their infrastructures to identify and address risk points, aiming to ensure the security of technological environments.

Cybersecurity gaps								
	Spain		United Kingdom		Brazil		Total	
	2022	2023	2022	2023	2022	2023	2022	2023
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)

Aena collaborates with the health authorities so that they can perform their function properly, taking into account the applicable regulations and reference documentation.

Airports are points of entry into a country and as such, the competent health authorities perform health control activities on passengers, baggage, goods and animals at airports.

Both on the Aena website and at airports, in the form of posters and leaflets, information is available on the health control carried out on goods, passenger baggage and pets, and the necessary spaces are provided so that the competent authorities can perform their controls.

In 2023, in order to guarantee Health Safety, the necessary measures were taken in the Aena airport network in Spain, established by the General Directorate of Public Health in its Resolution of 30 December 2022 due to the deterioration of the epidemiological situation with regard to COVID-19 in the People's Republic of China. In particular, the necessary measures were taken to ensure the implementation of health controls at the airports of the Aena network for flights from China until the end of the validity of the measures established by the General Directorate of Public Health. In this line, procedures have been permitted and established for the sampling of wastewater by health authorities from flights arriving from China. Information campaigns have also been conducted, especially targeting passengers from this country, to increase awareness of the implemented measures and the necessary requirements for traveling to Spain (via website, signage, social media, etc.), with the priority of minimizing the possibility of contagion²²².

Moreover, throughout 2023, Aena has been working in collaboration with the General Directorate of Public Health on the development of a Lessons Learned document regarding the emergence of a global health emergency about the need to implement health controls. The aim of this document is to capture all the knowledge acquired by the agents involved so that it can be used on future occasions when similar situations arise.

In this regard, the efforts made by Aena have continued to be recognised internationally with the following ACI awards:

- Pamplona Airport: Cleanest airport in Europe
- Region de Murcia International Airport: Cleanest airport in Europe.

Finally, in Spain following the outbreak of the global health emergency caused by COVID-19, it has become necessary to establish criteria to determine when a risk situation may arise for Aena S.M.E., S.A. in terms of cleaning and sanitary hygiene. For this reason, the definition of risk indicators (KRI) was established for these issues, and depending on the values they take, certain measures are established, including reinforcements of the cleaning service at the network's airports.

Similarly, in the United Kingdom, at London Luton Airport, the mandatory use of masks has been eliminated. In Aena's subsidiary airports in Brazil, communications and some preventive measures have been maintained, such as disembarking by rows, the prohibition of travel in confirmed cases of Covid-19, and the cleaning and disinfection of air conditioning equipment.

²²² These health controls were implemented at Adolfo Suárez Madrid-Barajas Airport during the months of January and February, as it was the only airport receiving flights from China during the period when this resolution was in effect.

6.5. Dedication to service

Throughout 2023, Aena Group has continued to recover its traffic without operational disruptions and to provide all services with the highest quality expected by passengers, always in collaboration with its entire value chain.

Aena Group focuses on its customers, transforming the way in which it relates to them, personalising both 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.





6.6. Quality management

(GRI 3-3)

In its pursuit of excellence, the Aena Group seeks to maintain the highest standards of service quality, guaranteeing satisfaction and the best possible service for all users.

These objectives are embodied in the company's main planning instruments, which are:

- The Strategic Plan 2022-2026 of Aena: 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.
- The Strategic Plan and the Responsible Business Strategy 2020-2025 at London-Luton Airport in the United Kingdom. Additionally, the Airport plans to update its commercial area strategy, airport access, and parking zone management with the aim of improving service quality.
- The Service Quality Plan (PQS) and the Airport Exploration Plan (PEA) in Brazil.

Actions



Strategic Plan 2022-2026

To continue to be the leading company in terms of safety and operational efficiency, achieving the required levels of quality and sustainability.



Strategic Airport Maintenance Plan of Aena

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 of 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 contain 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

Based on these values and objectives, these instruments have been developed, which are defined taking into account the regulations in force and the reference frameworks for decision-making (management systems, corporate policies and procedures).

Aena defines the guidelines to be implemented each year to improve the facilities and their maintenance, as well as to continuously optimise its processes.

As a result, Aena has been recognised for its efforts in obtaining awards and acknowledgements, highlighting the inclusion of Adolfo Suárez Madrid-Barajas Airport in Skytrax's list of the 'World's Top 20 Airports for 2023'.

6.6.1 Main applicable regulations and measures developed to improve the quality of the services

(GRI 2-23)

Aena focuses on its passengers, customers and users, working to make their journey through its airports as positive an experience as possible, facilitating accessibility for all groups.

Airport Regulation Document 2022–2026 (DORA II)

The DORA II²²³ guarantees compliance with the conditions for offering a quality service with sufficient capacity to meet demand, developing an efficient, competitive and sustainable service in the long-term.

Thus, the conditions and tariff path that the airports in Aena's network in Spain must comply with over the next 4 years regarding quality, environment, capacity, and investments are established. Some of the strategic objectives for this period 2022-2026 include:

- The recovery of traffic together with an efficient management of the airport network in terms of safety and quality.
- Environmental sustainability as the backbone of actions.

To achieve this, the Quality Plans for each airport include goals and objectives, both qualitative and quantitative. The actions carried out and planned are also included.

Aligned with the strategic objectives outlined in DORA II, among the qualitative objectives are:

- Efficient management of the airport network in terms of safety and quality.
- Having environmental sustainability as the backbone of the actions.
- Maintaining innovation as a key element in achieving quality and efficiency in the provision of services.

Regarding the quantitative aspect, in the Spanish airport network, 17 quality indicators are established, which collect data such as²²⁴:

- 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.
- Waiting times at bag drop and security checks.
- Waiting times in responses to claims.
- The availability of facilities in the terminal and in the airside.

Moreover, six environmental sustainability indicators have been included, whose objectives include the reduction of CO2 emissions, the efficient use of resources, waste recycling, etc.

The AESA produces a report verifying compliance with the objectives set²²⁵. Depending on the degree of compliance with these objectives, bonuses or penalties will be established on the charges paid for 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. In 2024, this program is expected to be a mandatory component in order to obtain accreditation for access to the airport premises for any employee.

²²³ 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.

²²⁴ Aena establishes certain quantitative goals to encourage continuous improvement. In the case of passenger satisfaction indicators, measured through surveys, annual goals are set based on the type of airport and results from the previous year. For example, in airports with more than 100,000 passengers, if the survey results for 2023 are greater than 4 (out of 5), the goal for 2024 is set to achieve an increase of +0.5% compared to the defined goal for 2023. If the goal for 2023 is not achieved, the goal for 2024 is set as the higher value between the 2023 goal or the 2022 result plus 1%.

²²⁵ 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.



In Aena's subsidiary airports in Brazil,, the Service Quality Plans (SQP) 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.

The performance results of the services offered to passengers, measured through the Service Quality Indicators (IQS) defined by ANAC. And monthly, the Service Quality Report is published, which also presents passengers' perceptions of the services provided at these airports. Likewise, there is systematic monitoring of these indicators, evaluating the services offered to users. Based on them, actions are planned and implemented to continuously improve their operation.

The Service Quality Indicators (IQSs) 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.

Moreover, over the course of 2023, it is evident that following the improvement works at various Aena airports in Brazil, passenger satisfaction is on an upward trend.

Integrated Quality, Environmental and Energy Efficiency Management Policy

Aena promotes the systematic integration of quality management and periodic evaluation of the performance of the management system in accordance with the needs and expectations of the stakeholders.

For this purpose, the Aena Group applies the Integrated Quality, Environment, Energy Efficiency, and Occupational Health and Safety Management Policy. Approved by the highest level of the organization, this Policy was last updated in December 2023. Senior Management is also involved and committed to achieving the objectives set out in this policy, which uses Aena's values and strategies as a foundation for all members of the company.

Aena's Integrated Quality and Environmental Management System

In order to comply with the commitments acquired in the Quality Policy and the Environmental and Energy Policy, Aena has promoted the implementation and certification of the Integrated Quality and Environmental Management System (IMS), certified in accordance with international standards ISO 9001 and ISO 14001²²⁶.

Aena's Safety and Services Department is responsible for guaranteeing the quality of airport services through its airport maintenance, ground handling, passenger services and experience, safety and air navigation services divisions.

The purpose of the monthly Quality Committees is to monitor both the qualitative (Quality Plans) and quantitative (DORA objectives) objectives of the airports in the network, as well as to present and debate new developments and strategies in the field of quality.

On the other hand, London-Luton Airport quality standards in the United Kingdom are designed with best practices in mind. The Airport has been certified by the Airport Service Quality programme of Airport Council International (ACI), reaching Level 1, and is currently in the process of being accredited at Level 2.

²²⁶ The airports of Aena's subsidiaries in Brazil anticipate ISO certification in 2025. 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.



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 service²²⁷.

In Aena, these selection criteria must obligatorily include criteria related to performance through Service Level Agreements (SLA), according to which those who provide commitments aimed at achieving certain levels of service score more points.

This perspective 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 the instruments needed to satisfy the demands that have been detected, but for which a clear response has not been identified on the market.

Furthermore, the clause on training in airport culture and diversity has continued to be included with the aim of promoting a culture of excellence in passenger experience. This training should be encouraged among all personnel assigned to the service and, therefore, who are part of the community.

Taken together, the established mechanisms promote innovation among suppliers, as well as ensuring a quick and effective response to customer and user demands.

The monitoring of the quality of service is carried out through the monthly certification process, by tracking indicators that aim to ensure compliance with minimum quality standards.

In the United Kingdom, quality is also a key element in the selection criteria for tenders. During 2023, some modifications have been proposed in the tender requirements for commercial partners to ensure the best quality of services offered, such as the required level of quality in environmental reports and the quality of measures determining contract extensions.

At Aena's subsidiary airports in Brazil, Service Level Agreements (SLAs) stipulate the monthly conduct of passenger satisfaction surveys by third parties. These surveys are defined and audited by ANAC.

Finally, it is important to note that based on the above, collaboration agreements have been established with some suppliers in order to develop tools to improve satisfaction and demand detection.

Training

Throughout 2023, Aena staff members have taken the online course 'Introduction to the passenger experience' with the aim of promoting an airport culture at the Company that focuses on attending to the needs of passengers and guaranteeing their satisfaction throughout the airport journey.

Additionally, a pilot course was conducted, in person and practical, with Aena personnel at Adolfo Suárez Madrid-Barajas Airport. During this course, employees were trained to provide passenger information, including both frontline staff and those who do not typically interact with the public (On Job Training). Following the success of the course at this airport, there are plans to extend it to others within the network. A similar course was already conducted at Palma de Mallorca Airport with the same level of satisfaction as the one in Madrid.

Furthermore, courses related to the quality and environmental management system have been provided, along with environmental awareness training. These courses cover topics such as energy saving, efficient resource usage, and waste management, among others.

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.

In the airports of Aena's subsidiaries in Brazil, work continues on detecting training needs, as well as on the management, evaluation and monitoring of training results to ensure the proper qualification of staff.

As a result of the above, in 2023 3,548 employees have received passenger experience training (6,492 in 2022), whereas 5,688 employees have received environmental awareness training (1,752 in 2022) and 219 employees have received Quality and Environmental Management System training (387 in 2022).

²²⁷ See Chapter 4

Training to improve the quality of services

	2022				2023			
	Spain	United Kingdom*	Brazil	Total	Spain	United Kingdom*	Brazil	Total
Passenger experience training (number of employees)	5,604	679	209	6,492	2,557	148	843	3,548
Training in environmental awareness (number of employees)	1,514	-	238	1,752	5,130	-	558	5,688
Training in the Quality and Environmental Management System (number of employees)	149	-	238	387	109	-	110	219

*Information not available for the United Kingdom.

6.6.2. Infrastructure accessible to everyone

The Aena Group pays special attention to meeting the needs of people with disabilities, helping to integrate them into daily activities and removing any obstacles that may hinder mobility, understanding, and communication.

The airports of the Aena Group work on the development of various measures and initiatives to ensure universal accessibility of the facilities.

Mobility and passenger assistance

Airports in the Aena network offer an assistance service for persons with reduced mobility (PMR)²²⁸. 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 on the aircraft, etc.).

The 'without barriers' service offers quality, personalised and free assistance to facilitate the stay of all passengers, before and after the flight.

In 2023, there has been a full recovery to the traffic and attendance levels reached in 2019, before the pandemic. The increase in the number of 'without barriers' service assistances is taking place at the same time as the average evaluation of the surveys carried out on passengers requesting the service is increasing, which demonstrates the good evolution of this service.

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 4.95 out of a maximum of 5.

²²⁸ 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.

In order to ensure the availability of the necessary resources and to promote the organisation of the resources available to perform the services with the highest possible quality, information messages to passengers have continued to be reinforced with the aim of making them aware of the need to request assistance sufficiently in advance.

It is essential that the passenger makes the request for the service at least 48 hours before their flight, specifying their needs, as well as coming at the indicated time (generally 2 and a half hours before their flight)²²⁹ in order to ensure that the assistance is provided with the appropriate levels of quality and hygiene and within the established timeframe. This is in compliance with Regulation (EC) No. 1107/2006, which indicates the need to accommodate persons with reduced mobility.

In this regard, successful bidders are required to comply with requirements regarding the assistance offered, the necessary technical and human resources available, response times, staff training, and attention and treatment.

In 2023, the PRM service has been tendered for 15 airports in the network, grouped into 2 files with a duration of 2 years.

The implementation of bathrooms for ostomised people has been kept a priority, and new bathrooms for people with ostomies have been opened.

At London Luton Airport, in the United Kingdom, significant efforts have been made in terms of awareness, such as including aspects related to accessibility in the airport staff's annual training and a specific course on quality and passenger service.

Other projects that are being developed are alternatives designed to free up the workload 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).

Aena is committed to universal accessibility and therefore works daily to raise awareness among its staff and adapt its facilities to the needs of passengers, their families and companions.

In order to ensure that going through the airport is not an effort or a negative experience, Aena is working to provide the best service for people on the Autism Spectrum Disorder (ASD) and other invisible disabilities.

The new invisible disabilities service, which can be requested through the Aena website, grants access to the disabled passenger to the security checkpoint dedicated to families/ PRM and allows airport staff to identify people through an Invisible Disabilities Badge, facilitating and improving their experience at the airport²³⁰. This system has been in operation since 20 April at the network's 17 busiest airports and the intention is to extend it progressively to the rest. In this way, those people with invisible disabilities who decide to travel through the airport on their own have at their disposal a multitude of tools that add to this distinctive feature, which can be found on the website, allowing them to find out about the entire airport process in advance.

The line of collaboration with entities such as CERMI and the Spanish Confederation of Autism²³¹ has been extended in Spain, to jointly analyse and evaluate the accessibility needs in public services, transport and tourism of this group. Additionally, Aena collaborates with other relevant social entities in the field, such as FASOCIDE and ONCE.

As in previous years, accessibility events continue to be held at the airports on an annual basis, aiming to share the status of services and exchange knowledge on best practices and service improvement. This year, the events took place on February 9th.

The collaboration with the Federation of Associations of Ostomized People of Spain (FAPOE) stands out, with the annual renewal of the FAPOE Agreement being a notable achievement.

²²⁹ 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 London-Luton Airport in the United Kingdom, the best way to request the service is through the airline or travel agency. Those users who request the service to receive assistance 36 hours in advance will also be required to arrive at the airport at least two hours in advance.

²³⁰ This measure has also been implemented in the UK.

²³¹ However, the agreement between Aena and the Confederation ended in March 2022.



In the United Kingdom, at London Luton Airport, passengers with hidden disabilities are provided with a 'sunflower lanyard'²³² 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.

Additionally, similar to Spain, in the United Kingdom, these types of collaborations and regular meetings are also maintained. For example, Alzheimer's Society, Hertfordshire Age UK, Action on Hearing Loss, Security Industry Association (SIA), Colostomy UK, Autism Bedfordshire, the Disability Resource Centre, the diabetes charity JDRF, and Guide Dogs.

During 2023, the aim is to maintain the improvement of the experience for different groups and new clauses have been included in the service specifications to raise awareness of accessibility. Specifically, the 'Airport Diversity and Culture Clause'. Moreover, a training programme on invisible disabilities is established for each of the airports that will start using this device this year.

	2022				2023			
	Spain	United Kingdom	Brazil	Total	Spain	United Kingdom	Brazil	Total
Requests PMR (no.)	1,714,398	92,543	19,923	1,826,864	2,100,410	123,477	6,472	2,230,359

Finally, the airports of Aena's subsidiaries in Brazil, have accessibility measures aimed at facilitating the stay of passengers with special difficulties, such as bathrooms, tactile paving, 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

Ensuring accessibility for all types of disabilities remains one of Aena's priorities. The information and chat line for people with hearing or speech disabilities is maintained. In turn, further progress will be made with the implementation of magnetic induction loops, a technology that allows users with hearing aids, cochlear implants or 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 addition, some Spanish airports, as well as London-Luton Airport in the UK, have magnetic induction loops or hearing loops²³³.

Likewise, the AenaMaps²³⁴ application offers the possibility of selecting the PRM configuration for indoor guiding by accessible routes throughout 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.

Signage is also kept up to date at all airports to make it understandable to the full spectrum of people who may have a disability.

Signage

The signage in all Aena's airports has been updated to ensure its comprehension by all groups, incorporating icons for hearing, mobility, and elderly people, among others.

In 2023, new versions of both the Aena public website and the corresponding mobile application were launched, both adapted to the possible accessibility needs.

Website accessibility

During 2023, the public website and the mobile app have been further developed through various updates. In the case of AenaMaps, it is kept updated and renewed so that it indicates the most optimal route for the passenger who needs to make use of accessible routes through any of the airports. There is also a chat available for hearing-impaired users, so that they can contact the Aena passenger helpline.

At London-Luton Airport in the UK, all website pages have been developed using HTML 5 and CSS language, to improve visualisation.

²³² 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.

²³³ 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.

²³⁴ 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.

6.6.3. Top recognitions received in 2023 for the quality of services

Aena's commitment to the quality of its services and their accessibility has been reflected in the obtaining of several awards in 2023. Both in terms of autism and accessibility in general.

The annual Airport Council International (ACI) ASQ Awards recognise airport excellence in customer experience based on passenger survey results. In 2023, 8 Aena airports have been awarded in different categories at European level:

- Palma de Mallorca Airport, recognised by Airports Council International as the Best Airport in Europe in the category of facilities for between 25 and 40 million passengers.
- Pamplona Airport, Región de Murcia International Airport, Asturias Airport, Reus Airport and El Hierro Airport have been recognised by Airports Council International as the Best Airport in Europe for less than 2 million passengers.
- Alicante-Elche Airport, recognised by Airports Council International as the Best Airport in Europe for between 15 and 25 million passengers. It has also been awarded Europe's 'Accessible Airport Award' by ACI Europe for its work and commitment to making the airport more accessible for people with disabilities and reduced mobility.
- Menorca Airport, recognised by Airports Council International Europe (ACI Europe) as the Best Airport in Europe for less than 5 million passengers.
- Adolfo Suárez Madrid-Barajas Airport and Barcelona-El Prat Josep Tarradellas Airport have been recognised by Airports Council International Europe (ACI Europe) with a special mention in the category of more than 40 million passengers, for their commitment to improving the user experience at their facilities. Their work in the areas of sustainability, innovation, operational efficiency and resilience has also been recognised.
- Other ASQ awards have also been presented: Pamplona Airport and Murcia Airport have been recognised as Europe's cleanest airports. Murcia Airport and Reus Airport have been recognised as the airports with the easiest journey in Europe. Finally, El Hierro Airport has been recognised as the airport with the most dedicated staff in Europe.

On the other hand, Adolfo Suárez Madrid-Barajas Airport has been chosen by users as the tenth Best Airport in the World in the Skytrax World Airport Awards 2023.

Adolfo Suárez Madrid-Barajas Airport has been chosen by users in the Skytrax World Airport Awards 2023 as the 2nd Best Airport in Southern Europe, 3rd Best Airport for between 50-60 million passengers in the world and 5th Best Airport in Europe.

Barcelona-El Prat Josep Tarradellas Airport has been chosen as the 3rd Best Airport for between 40-50 million passengers and the 4th Best Airport in Southern Europe. It is also worth mentioning Málaga-Costa del Sol Airport, which has been chosen as the 6th Best Airport in Southern Europe.

Other awards obtained that are not related to the quality of the services are:

- Capital Radio has recognised Aena with the Excellence in Sustainability Award for its commitment to the environment and its fight against climate change to achieve more sustainable airports.
- Aena has been recognised with the 'T for Transparent' seal, an award granted by the HAZ Foundation in recognition of the quality of the tax information published.
- Friend of Autism Award, given by the Spanish Autism Confederation.
- At the UK Airport, ACI CX accreditation (Level 1) has been obtained and nominations have been received to be finalists in the UK Customer Experience Awards. It has also been chosen as the best airport in the United Kingdom by Condé Nast Traveller magazine readers.
- In Brazil, five Aena airports were candidates for ANAC's 'Sustainable Airports' awards. Specifically, Campina Grande-Presidente João Suassuna Airport was third finalist in its category.



6.7 Communication and evaluation of customer satisfaction

6.7.1. Evaluation of customer satisfaction

In order to find out the satisfaction of passengers, customers, airlines and concessionary companies, as well as their expectations, Aena uses different tools to measure the quality of the services offered: Airport Service Quality (ASQ)²³⁵ surveys, Happy or Not devices, working groups, among others.

Based on the results obtained, work is carried out on continuous improvement and maximum efficiency of services, dialogue with stakeholders, implementation of recommendations and action plans aligned with Aena's commitment to constantly improving the customer experience.

Specifically, in relation to quality indicators, during 2023 the following results were obtained in the ASQ surveys answered by the users.

Quality assessment (scale of 1 to 5)						
	2022 ^(A)			2023		
	Quality of service to passengers Reference value: 4.12	Quality of commercial premises	Quality of food and beverage premises	Quality of service to passengers Reference value: 4.08	Quality of commercial premises	Quality of food and beverage premises
Spain ^(B)	4.08	3.49	3.63	4.13	3.56	3.68
United Kingdom ^(C)	3.96	3.59	3.69	4.03	3.82	3.89
Brazil	-	-	-	4.26	3.66	3.17
Objective for next fiscal year	4.00					

(A) In Brazil, aggregated data is not available. Each airport conducts its own quality assessments, obtaining the corresponding results using the standard defined by PEA.

(B) In Spain, the 34 busiest airports in the network participate in these surveys.

(C) Results from the ASQ surveys conducted in the third and fourth quarters. The Airport plans to set objectives in the coming year.

²³⁵ 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. The figure for London-Luton Airport in the United Kingdom is for the period January-November.



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 wait time (check-in, 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.
Entertainment and leisure options.

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, HappyOrNot): bathroom cleanliness, the courteousness of the security staff and baggage claim time at 33 airports in the network. Car parks and in 18 airports where VIP lounge services are offered, managed by Aena.
Complaints, suggestions and compliments tracking and management
Monitoring and management of passenger queries.
EMMA surveys.
Monitoring of process indicators.
DORA indicators: response times of the different airport processes, availability of equipment, baggage delivery times, etc.
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.
User committee and joint follow-up 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.
The Loyalty Club has surpassed 2.1 million in 2023.
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

United Kingdom

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 2023.
Collection of real-time customer feedback (FeedbackNow) at various points (security control, check-in, bathrooms, immigration and baggage claim).
The Mystery Shopper programme is back in the CX strategy
Quality walkarounds.

Airport operators' committee.

Brazil

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.
Workgroups for information exchange 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 monitoring of service quality agreement levels (SLAs) and their 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 Group informs all customers and suppliers of their rights and obligations, before the signing of the contract and during the execution thereof, through:

- The Aena website²³⁶ provides useful information for passengers regarding possible incidents during their journey and their rights, such as the right to information on departure and on the stages of the journey, rights to refunds, claims and compensation, the right not to be discriminated against, as well as the rights of people with disabilities or PRM and liability in the event of accidents.
- In the United Kingdom, there are information points specifically designed to facilitate communication on these topics directly or via digital media.
- In Brazil, airports have different communication channels to inform about passengers' rights and obligations, including airport information counters and screens, and the Customer Service desk.

6.7.3. Complaint mechanisms

(GRI 2-25; 2-26; 2-29; 3-3; 416-2; 417-1; 417-2; 417-3)

Complaints and claims management

Any passenger wishing to file a complaint or claim related to any Aena Group service can do so through different channels.

To facilitate the submission of these complaints or claims, passengers are provided with:

- On the Aena website, through the Telematic Services Portal, which contains a specific section for submitting complaints, suggestions and compliments²³⁷. Likewise, through complaint forms available at various points in the airports, users can submit their written complaints through official channels and organizations accepted according to Aena's procedure for this purpose.
- Social media: these are addressed in a generalised manner as they are not included in the Complaints and Claims Management Procedure. However, the Aena Group also tracks the comments received on social media profiles (X, formerly Twitter, and Facebook, as well as Instagram in the case of London-Luton Airport and Aena Brazil, and LinkedIn in the case of Aena Brazil).

- In the United Kingdom, London-Luton Airport makes available to users a specific website (London-Luton Airport feedback form) through which they can process claims through an online form. Complaint forms are also available for passengers at various points in the airports.
- The Ouvidoria 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. The e-mail address ouvidoria@aenabrasil.com.br²³⁸ is also available.

To do this:

- In Spain, all Aena airports have complaint handling procedures and departments specialised in passenger service and experience to guarantee the correct handling of complaints. The management of complaints is also monitored internally through assessments conducted by the director of each airport.
- In turn, specific assessments are conducted centrally based on compliance with the DORA, prior to an audit by AESA.
- In the United Kingdom, there is currently no complaints and claims handling procedure, although an attempt is made to respond to requests and complaints within 48 hours, which are handled through its 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.
- 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.

²³⁶ See chapter 'Links of interest'.

²³⁷ See section '2.1.4. Environmental queries' in the case of inquiries relating to environmental matters.

²³⁸ 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'.



In Spain, in 2023, the total number of complaints and claims received amounted to 14,760, a 14% decrease compared to the previous year. Meanwhile, at London Luton Airport in the United Kingdom, the total number of complaints and claims amounted to 8,343 (5,488 in 2022), and in Aena's airports in Brazil, there were 268 (192 in 2022).

Aena Spain responds, in the first instance, to complaints concerning its airport management in less than 5 days (4 working days for all practical purposes)²³⁹. In this regard, 99.6% of claims have been addressed and responded to within this timeframe.

In Brazil, the maximum deadline for responding to complaints received is 16 days (which has been met in fiscal year 2023).

Furthermore, whenever applicable, corresponding financial compensations are provided. As an example, in 2023, the financial compensations resulting from property-related claims in Spain, the United Kingdom, and Brazil amounted to a total of €35,065.72 (compared to €57,787.70 in 2022).²⁴⁰

The company also monitors complaints and claims received on social media profiles (Twitter and Facebook, as well as Instagram for London Luton Airport and Aena Brazil, and LinkedIn for Aena Brazil). Through these channels, Spanish airports collected a total of 2,379 complaints in 2023 (3,435 in 2022)²⁴¹, while in the United Kingdom, 5,768 notifications were received (5,747 in 2022), and in Brazil, 257 (498 in 2022).

Additionally, the Company provides airlines, handling agents, commercial activity concessionaires, or real estate clients with opinion collection tools in VIP Lounges, based on the Happy or Not²⁴² platform. Through this platform, continuous feedback from users is collected at each airport level. These ratings and comments from VIP Lounge users are taken into account in decision-making processes to improve the quality of the Lounges, which are carried out jointly with the companies managing them.

Other specific indicators

In 2023, Aena has been aware of a single case of non-compliance with regulations or voluntary codes related to impacts of product and service categories on health and safety (0 in 2022).

On the other hand, similar to the previous year, Aena has not been aware of any cases of non-compliance with regulations or voluntary codes related to:

- 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.

Regarding non-compliance with regulations or voluntary codes related to impacts on health and safety of services, 2 cases have been detected in Aena's subsidiaries in Brazil (the same as in 2022), which correspond to non-compliance with a voluntary code.

Finally, in Aena's subsidiaries in the United Kingdom, there is no record of non-compliance for the aforementioned reasons, the same as in 2022.

²³⁹ 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.

²⁴⁰ The amount includes possible expenses incurred by experts and/or attorneys. It includes both claims for personal injury liability and those for material damages exceeding €9,000. The resolution of personal injury claims does not occur until the claimant is discharged from medical care. In cases that end up in court, resolution does not occur until a final judgment is rendered.

²⁴¹ In Spain, complaints received through social media and mailboxes are addressed in a generalized manner since they are not included in the Complaints and Claims Management Procedure.

²⁴² In the UK, London-Luton Airport has replaced Happy or Not devices with FeedbackNow to measure customer satisfaction in real time.



Main data on complaints and claims

	Spain			United Kingdom			Brazil			Total		
Indicator	2021	2022	2023	2021	2022	2023	2021	2022	2023	2021	2022	2023
Transport agreement	587	1,129	1,256	0		0	3	0	0	590	1,129	1,256
Handling	248	349	411	255	717	355	0	0	11	503	1,066	777
Information systems	251	663	701	0		0	1	6	19	252	669	720
Facilities	319	554	978	35	96	163	150	63	85	504	713	1,226
Security services	1,035	2,000	2,442	147	354	501	52	29	28	1,234	2,396	2,971
Supplementary services	587	944	1,410	1,984	1,801	3,444	0	9	13	2,571	2,755	4,867
Access points	36	31	31	51	94	0	3	0	0	90	125	31
Damage and theft	138	271	357	28	136	291	0	1	0	166	408	648
Miscellaneous	163	151	185	48	124	1,486	198	75	106	409	337	1,777
Commercial and food and beverage services	123	216	251	90	1,725	1,169	12	8	6	225	1,951	1,426
Car parks	569	6,612	6,738	89	441	934	3	1	0	661	7,054	7,672
Total	4,056	12,920	14,760	2,727	5,488	8,343	422	192	268	7,205	18,603	23,371



7- Innovation → (GRI 2-22; 3-3)



Commitment to SDGs



Main advances in innovation in 2023

Execution of the Strategic Innovation Plan.
Deployment of digital identity systems.
Deployment of the first edition of Aena Ventures projects
Second edition of Aena Ventures
Pilot Projects.
Execution of SESAR 3 projects

Strategic Innovation Plan

3 programmes:
From passenger to customer.
Efficient use of resources.
Beyond the airport

Innovation ecosystem

Aena Ventures
INNOVA Programme
Technological Surveillance
SESAR 3
Working collaboratively with partners
International working groups

Includes more than 80 projects for the 2021–2026 period

Second edition of Aena Ventures



514 proposals from 40 countries,
5 of which are participating in the
acceleration phase

Training



428 employees with more than
6,000 specific hours of training in
innovation

Investment



More than €38.9 million in R&D&I
projects during fiscal year 2023



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 cross-divisional across 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 sets 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 strategic programme is materialised in a series of specific lines, areas and projects that allow for a detailed analysis of the different technologies and their adaptation to the sector and the Company.

Innovation is open, dynamic and cross-divisional. It seeks to have the participation of all the actors involved (users, customers, suppliers, partners, entrepreneurs, universities, research centres, employees, etc.), 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 favour channelling the talent of Aena workers. From the external point of view, tools such as collaboration with companies for the development of pilot projects, participation in projects with European organisations, and the Aena Ventures programme are used.

Aena's Strategic Innovation Plan strengthens Aena's commitment to Innovation

Strategic Programme		
From passenger to customer	Efficient use of resources	Beyond the airport
Use the data to achieve the individual knowledge of the passengers who use the airport in order to offer them a personalised experience.	Automate the airport management processes and evolve into as-a-service models.	Explore new business areas around sustainable mobility.
Indicators		
 Commercial revenue per customer	 Costs per passenger	 New revenue from additional businesses
	 Costs per operation	
 Customer NPS	 Aircraft rotation time	



To be a benchmark in the use of technology to optimise the customer experience, increase operational efficiency and develop business around sustainable mobility. Commercial revenue per sustainable customer.

7.1.2. Innovation ecosystem

To strengthen the development of advances and proposals, Aena works alongside different partners (employees, suppliers, start-ups, town councils or universities, etc.). As proof of this, the Company offers the possibility to carry out concept tests at our airports on new technologies and processes, in order to find innovative solutions and alternatives for the airport business. In this regard, the second call for start-ups of the 'Aena Ventures'²⁴³ programme was held in 2023, and received 514 proposals from 40 countries. Of all of them, 5 have been selected to participate in the acceleration programme, adapting their proposals to deploy a proof of concept with real customers, allowing the viability of the initiatives and their future implementation at Aena Airports to be analysed.

In the future, Aena is committed to continue this open innovation programme with the aim of attracting new ideas from agile and innovative companies.

Internally, the INNOVA Awards allow for the identification and sharing of good ideas and practices within the network. The fifth edition of the awards was held in 2023, in which employees from Aena Spain, the United Kingdom and Brazil were able to participate, and for which the following categories were proposed: best practices, transforming the customer experience, new businesses, smart use of resources, and environmental and social sustainability. 224 proposals have been received from central services and 30 airports in the network.

Training

As one of the main levers of innovation and cultural change, in 2023, Aena launched training activities that allow employees to acquire the necessary know-how to integrate innovation as a driving force of the company. To this end, different levels of training have been implemented in regard to innovation, digitisation, venture capital and 'agile' project management procedures. These include postgraduate master's degrees, seminars and internal technical training courses, among others.

Training in new cross-divisional work methods and new technologies has been in areas where special attention has been paid to foster innovation in the company.

The training data in specific areas of innovation in 2023 shows 428 people with more than 6,000 hours of training.

Effort and collaboration with specialized companies

The investment made in R&D&I projects during the fiscal year 2023 exceeded €38.9 million (€27.1 million in 2022).

In 2023, Aena initiated 16 new Collaboration Agreements with different entities and companies in the field of private innovation, and 4 project proposals have been submitted to national and international R&D&I grant calls in different consortiums.

7.2. Developments in 2023

In 2023, the main objective in terms of innovation was to execute the Strategic Innovation Plan, whose scope encompasses the 2021–2026 period.

The main advances made in innovation during 2023 include the following:

- Execution 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 coming years with the focus placed on the digitisation of passengers and infrastructures, seeking new opportunities in the airport business environment. The Plan includes more than 80 projects for the 2021-2026 period.
- Digital identity systems. In October 2023, the biometrics service went into production at several airports in the network. The service allows access to airport checkpoints (security screening and boarding) by facial recognition without the need to show identity documents or boarding passes. The biometrics service will initially be available with four airlines, with plans to add more airports to the network during 2024.
- Drones and Advance Air Mobility. In 2023, Aena has continued with the strategy of analysing and testing the use of drones for maintenance and inspection tasks at airports, both with external collaboration and on its own, with Aena having registered as a drone operator in 2021. Collaboration has also begun with various stakeholders in the Advanced Air Mobility ecosystem, with the aim of analysing the integration of this new mobility concept into the airport environment.
- Aena Ventures 1. During 2023, three of the initiatives accelerated in the first edition of Aena Ventures, launched in 2021, have been developed. The initiatives that have been deployed at Adolfo Suárez Madrid-Barajas Airport and Barcelona-El Prat Josep Tarradellas Airport are:
 - Oli: Chatbot for communication with passengers, in 8 languages, which includes an AI module to improve communication with customers.
 - Aena Mobility: 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.

²⁴³ See chapter 'Links of interest'.

In parallel, the second edition of Aena Ventures has been launched in 2023, where the following start-ups have started to be accelerated: Stress Free Car Rental, Copenhagen Optimization, Bag ID, Deusens and Hovyu.

- 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:
 - Drone for detecting FODs (Foreign Object Debris) at San Sebastián Airport: The use of a drone with video analysis software and artificial intelligence for automatic detection of FODs on the runway has been tested. In turn, the drone has been connected to a 5G network deployed at the airport in order to monitor the detection results in real time.
 - Autonomous jetbridges: A project to analyse the possibilities of automating the operation of the jetbridges, improving their efficiency, safety and sustainability. The project is being carried out at Vigo Airport and consists of several lines of research, including the analysis of improvements in the pre-positioning of the jetbridge for the upcoming operation and the detection of obstacles with different technologies.
 - Smart climate control: Pilot project developed at Valencia Airport, based on the integration of an AI (Artificial Intelligence) module to current infrastructures to improve energy efficiency in the field of climate control, also favouring cost reduction, emissions reduction, guaranteeing air quality and improving the customer's experience in the terminal building by adapting the temperature and humidity of the air in the environment to people's needs.
 - Self-service kiosks: Pilot project developed at Málaga-Costa del Sol Airport, in which new self-service equipment is tested for passengers, so that they can issue the baggage conveyor belt and weigh it themselves. This pilot will enhance the customer experience by separating the weighing and issuing process at the baggage belt from the check-in areas, thus avoiding crowds at the check-in areas, while allowing a greater flow of passengers to be served at the baggage drop-off counters, reducing waiting times and therefore improving the customer experience.
- Financed projects. In 2023, some of the projects financed by both national and international programmes have been started, continued and completed. These include:
 - PRAETORIAN (H2020): It has aimed to increase the security and resilience of Europe's critical infrastructures by facilitating the coordinated protection of interrelated critical infrastructures against combined physical and cyber threats. To this end, the project has provided a set of multidimensional tools (economic, technological, political, social), specific to each facility.

- EUREKA(SESAR 3): aims to enable the inclusion of Innovative Air Mobility (IAM) in all types of airspace with a focus on Vertiports operations, taking into account the main ecosystem players. Validation flights will be made between Palma de Mallorca Airport and Menorca Airport.
- OPERA (SESAR 3): will allow safe and efficient Innovative Air Mobility (IAM) operations in all types of airspace and conditions by validating three different scenarios, taking into account piloted air taxi and unmanned cargo, including contingency and off-nominal situations. Validation flights will be made between Málaga-Costa del Sol Airport and F.G.L. Granada-Jaén Airport.
- ECONPAVE (MICIN Private Public Collaboration): It aims to develop a first experimental prototype to serve as a smart tool for airport tarmac management, capable of making its own decisions based on real-time data obtained from sensors embedded in the materials or placed in the tarmac during construction.

It is also worth highlighting Aena's active participation as a founding member of the SESAR 3 programme, an institutionalised European partnership between public and private sector partners that uses research and innovation to accelerate the realisation of the idea of the digital European sky.

- ACI Europe Innovation Forum: In 2023, ACI Europe created the Innovation Forum, a new international working group for European airports to collaborate on innovation-related issues. Aena, in its commitment to collaborating with international airports to promote innovation, is leading this working group for 2023 and 2024. The main aims of the group are:
 - To establish and promote an innovation agenda and strategy for the airport industry based on the key innovation initiatives or plans of the forum's member airports.
 - To identify and address political, regulatory and funding gaps related to airport innovation.
 - To facilitate the exchange of knowledge and experience on innovation between member airports.
- Airports For Innovation: In 2023, the airports in Dallas, Vancouver, Munich, Dubai and Oman will join the 'Airports for Innovation' network, founded by Aena and Aeroporti di Roma in 2021, which already includes Athens International Airport and Aéroports de la Côte d'Azur (joined in 2022). The aim of this working group is to jointly seek and test innovative and sustainable solutions for the development of the airport sector, with a continuous focus on improving the customer experience.



7.3. Future outlook

Aena is committed to consolidating innovation and digital transformation as key elements for driving change and gaining a competitive advantage that leads to the achievement of the organisation's strategic objectives.

The digitisation of passenger interaction and infrastructure management is a fundamental strategy to improve the quality of service offered to our customers, to be more sustainable and to be more efficient in the use of resources.

About this report



(GRI 2-2; 2-5; 2-14)



Commitment to SDGs



Reporting principles

Aena's Sustainability Report - Non-Financial Information Statement (NFIS) is part of the Aena's Group Consolidated Management Report for the fiscal year 2023. This Report is subject to the same criteria for approval, submission and publication as the other reports that make up the Consolidated Management Report, and has been verified by an independent provider of these services.

This Report has been prepared to comply with the reporting requirements of Act 11/2018, of 28 December, on Non-Financial Information and Diversity. For this reason, the information needed to understand the risks, business model, policies, strategy, evolution, results, situation of the Aena Group and the impact of its activity with respect to environmental and social issues, staff, respect for human rights and the fight against corruption and bribery can be found throughout the document.

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 (the Aena Group) – 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 in²⁴⁴:
 - United Kingdom;
 - Brazil.

Although, as explained throughout the report, unlike the previous year, the 2023 Sustainability Report - EINF includes information derived from the commencement of operations of Aena's new company in Brazil (BOAB) and its eleven new airports, which occurred progressively during the last quarter of the 2023²⁴⁵ financial year. Consequently, this report encompasses all necessary aspects related to social, environmental, and governance matters to understand its performance during the mentioned period.

Additionally, this report incorporates information regarding the supply chain to assess Aena's performance and its value chain, should it be significant.²⁴⁶

In those cases in which the indicators reported have referred to a specific part of the Group, this has been expressly mentioned. Also, where applicable, it has been indicated if the necessary information is not available (see also comments in the GRI table) or has been estimated.²⁴⁷

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.

The following recommendations, regulations and standards have been taken into account in the preparation of this report:

- Act 11/2018, of 28 December, on non-financial information and diversity, transposing Directive 2014/95/EU into the Spanish legal system. The selected GRI standards have been used to respond to this act.
- Act 5/2021, of 12 April, which amends the consolidated text of the 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.
- In accordance with GRI Universal Standards 2021 for the preparation of Sustainability Reports of the Global Reporting Initiative (GRI)²⁴⁸.
- Regulation (EU) 2020/852, of the European Parliament and of the Council, dated 18 June 2020, on the establishment of a framework to facilitate sustainable investment whereby information must be disclosed on how and to what extent the company's activities are associated with economic activities that are considered environmentally sustainable in relation to the objectives of climate change mitigation, adaptation to climate change, sustainable use and protection of water and marine resources, transition to a circular economy, prevention and control of pollution, protection and restoration of biodiversity and ecosystems.

²⁴⁴ Aena, through its subsidiary Aena Desarrollo Internacional (ADI), is present in:

- Brazil through the company Aeroportos do Nordeste do Brasil (ANB) and Bloque de Onze Aeroportos do Brasil (BOAB). Taking into account that the eleven new airports have been brought into operation progressively during the last quarter of the fiscal year 2023, this report covers all the necessary social, environmental and governance aspects to understand their performance during this period.
- the United Kingdom, through indirect involvement in the management of London-Luton Airport

²⁴⁵ In October, at three airports (Congonhas, Campo Grande, and Uberlândia). In November, at another eight airports (Ponta-Pora, Corumbá, Uberaba, Montes Claros, Marabá, Carajás, Santarém, Altamira).

²⁴⁶ For example, regarding environmental indicators (Scope 3 emissions, energy consumption, etc.) or certain social aspects (non-employee workers, number of accidents).

²⁴⁷ For instance, it has been necessary to estimate some indicators related to the environmental management and performance of the new airports belonging to Aena's subsidiary in Brazil, BOAB, in which case it has been explicitly explained on each occasion. Likewise, as the primary data for the month of December was not available for some environmental indicators at the closing date of this report, as a general rule these have been estimated taking into account the primary data corresponding to the previous months (January-November) or the corresponding months of the previous year, as the case may be.

²⁴⁸ The new universal standards (GRI 1, 2, 3) have been incorporated into this report and all GRI thematic standards have been followed in their most up-to-date version.



- In addition to the above, other reporting frameworks have been taken as a reference, such as the following: 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. Other references used include the Principles of the United Nations Global Compact, the United Nations Guiding Principles on Business and Human Rights, the United Nations Sustainable Development Goals, EU Guidelines 2017/C125/01 on non-financial reporting (Methodology for non-financial reporting), the TCFD (Task Force on Climate-Related Financial Disclosures) recommendations, the CDP (Carbon Disclosure Project), the CNMV and other requests for information from ESG providers.

The following information tables have been verified by an independent third party:

- Table containing the contents of Act 11/2018 (see section 'Index of contents Act 11/2018')
- Table with GRI indicators (section 'Index of contents GRI').

In both cases, 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, are indicated. Likewise, the table with the SASB indicators (section 'Index of contents Sustainability Accounting Standards Board (SASB)'), with the same information, is included.

In order to facilitate understanding of the Company's performance in recent years, the report provides data from previous fiscal years or, where appropriate, includes external references for ease of reference.

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 of information

During the fiscal year 2023, Aena has continued to work on the progressive implementation of the Internal Control System for Non-Financial Information (SCIINF) as a measure to reinforce the reliability of the information. In this respect, during this fiscal year, a series of procedures have been drawn up with information on the different indicators and work has begun on analysing the traceability of the information related to the calculation of the carbon footprint.

Reporting principles used

Quality of the Report






Precision | Balance | Clarity | Comparability | Reliability | Timeliness

Definition of the contents

Inclusion of stakeholders | Sustainability context | Materiality | Completeness

Reporting principles included in GRI Standard 1: 'Foundation 2021'

Phases for preparing the report and groups involved

1	 Materiality analysis	2	 Progressive preparation of the report	3	 Review and consolidation	4	 Formulation of the non-financial information statement	5	 Presentation and approval by the Annual General Meeting
	Internal Agents External Agents		All Units		All Divisions		Board of Directors		Annual General Meeting

Double Materiality

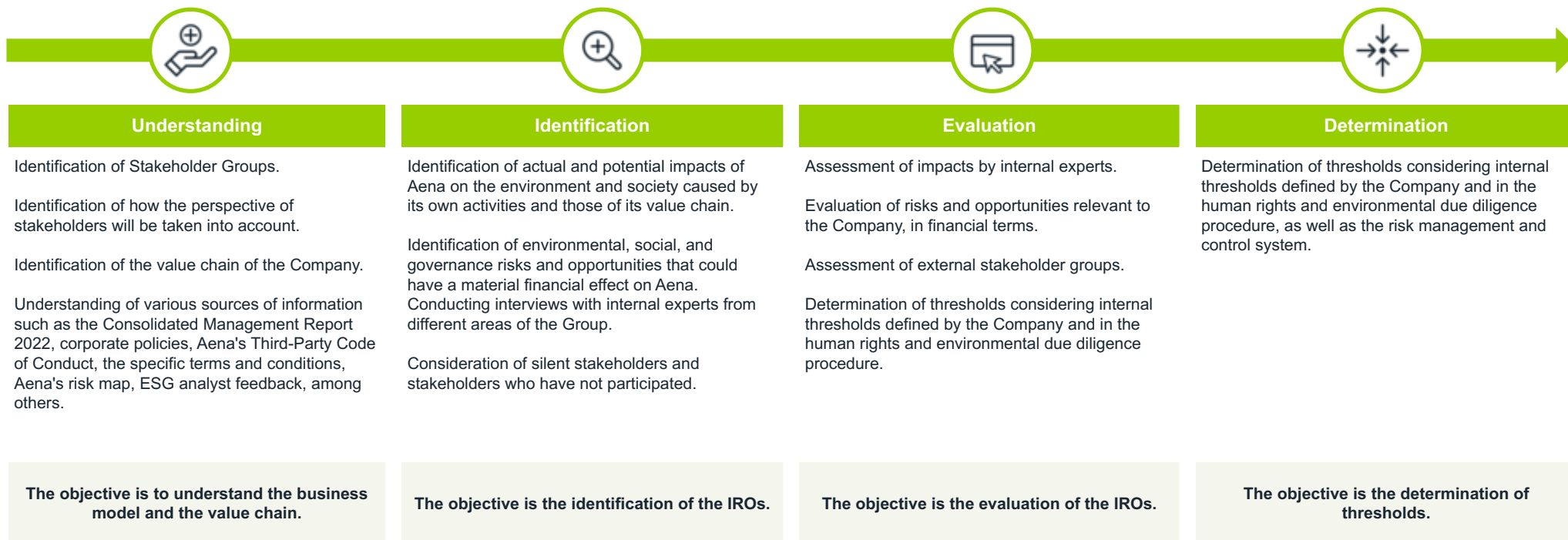
(GRI 2-14; 3-1; 3-2; 3-3)

In 2023, Aena updated its double materiality analysis in order to determine²⁴⁹:

- The impact materiality, i.e., the material impacts on environmental, social and corporate governance impacts through which Aena or its value chain affects or may affect, positively or negatively, people or the environment;
- The financial materiality, or the risks and opportunities of environmental, social or corporate governance aspects that could have a material financial effect on Aena, in the short, medium or long term.

The scope of this methodology has taken into account the activities carried out by the company, the implications of its value chain, the geographical scope in which it operates, as well as the commitments, objectives and performance in ESG matters in the short, medium and long term.

For this purpose, the following activities have been carried out:



²⁴⁹ Sources of reference taken for conducting the double materiality analysis include the following: the guidelines of the European Sustainability Reporting Standards (ESRS) contained in the Delegated Regulation (EU) 2023/2772 of the Commission of 31 July 2023; the Double Materiality Implementation Guidelines draft prepared by European Financial Advisory Group (EFRAG) in its version of 22/12/2023; and the GRI Standards 3-1 and 3-2.

1. Understanding -in this first stage, Aena's main stakeholders have been identified, as well as communication channels. In addition, various sources of information have been analysed, both internal and external – such as: the 2022 Consolidated Management Report, corporate policies, Aena's Code of Conduct for Third Parties, the specifications of particular clauses, Aena's risk map, Human Rights due diligence and feedback from ESG analysts, among others – in order to evaluate the Company's own activity, its value chain, the context of the sector, etc.

2. Identification - the objective of this phase has been to identify, on the one hand, the possible real and potential impacts of Aena on the environment and society caused by its own activity and that of its value chain and, on the other hand, the environmental, social and corporate governance risks and opportunities that could have a material financial effect for Aena. For the identification of impacts, risks and opportunities (IROs), the aforementioned references have been taken as a starting point as well as the material topics identified in the double materiality exercise carried out in the previous year and the list of topics, subtopics and sub-subtopics defined in Appendix A: Requirements for application of ESRS 1 – General Requirements, specifically in AR 16. Additionally, some entity-specific topics and subtopics have been identified (see topics and subtopics). In addition to the above, for these purposes, interviews have been conducted with internal experts from the various departments. Finally, input from silent stakeholders has been considered from an analysis of documentary sources.

3. Evaluation - in this phase, the IROs identified in the previous phase have been evaluated, taking into account the following:

- Impact materiality

The assessment of impact materiality, developed by internal experts, has been carried out through the assessment of:

- In the case of actual negative impacts, the magnitude, scope and irremediable nature of the identified impacts.
- For actual positive impacts, the magnitude and extent of the identified impacts.
- For both potential negative and positive impacts, in addition to the above, the probability of occurrence has also been evaluated.

On the other hand, a review of the perspective of incidents, complaints and claims received from consumers and end users has been carried out throughout the 2023 fiscal year.

Regarding the choice of scales, and the assessment methodology itself, Aena's human rights and environmental due diligence procedure has been taken as a starting point (see Chapter 3).

- Financial materiality (risks and opportunities)

For this purpose, an internal analysis has been carried out on the possibility that the risks or opportunities related to the defined topics and subtopics result in a potentially significant financial effect for Aena, based on the conclusions of the Company's risk map and the results of the climate risk analysis.

In addition to the above, the valuation of external stakeholders (shareholders/ investors) has been taken into account, integrating the results from scores of ESG analyst into the analysis.

4. Determination-in this phase, the internal thresholds already defined by the Company have been taken into account – both in the human rights and environmental due diligence procedure (impact materiality) and in the risk control and management system (financial materiality).

Material topics and sub-topics

On the basis of the foregoing, in the double materiality exercise for the fiscal year 2023, the number of material topics identified has been reduced as a consequence, mainly, of the elimination of some trans-divisional topics already indirectly integrated into the subtopics and sub-subtopics analysed²⁵⁰. On the other hand, other matters considered in the previous fiscal year have been broken down under a common umbrella, as a consequence of their relevance²⁵¹.

Each chapter of this report describes how Aena integrates these topics into its strategy and describes how they are managed.

²⁵⁰ For example, responsible value chain management, human rights and transparency, stakeholder reporting and communication. Additionally, it can be noted that Quality assurance and the accessibility of services and responsible services and Ensuring the health and safety of everybody, have been incorporated under the subject line 'consumers and end users'.

²⁵¹ Pollution, water consumption and water, circular economy and biodiversity, for now are included under 'environmental footprint' and value chain workers are included under 'responsible value chain management'.

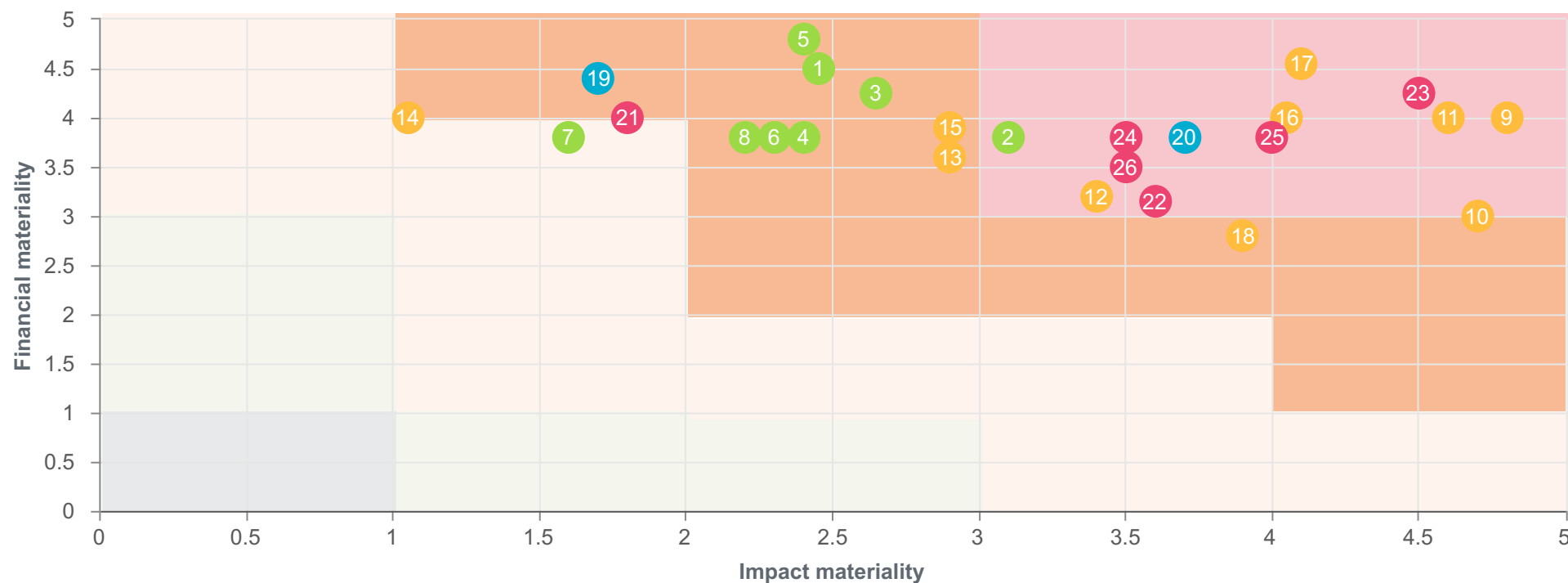
Topic an subtopic	IRO description ^(A) Time horizon short, medium an long term	Materiality		Management of the IRO
		Impact	Financial	
Climate change Mitigation of and adaptation to climate change Energy	<ul style="list-style-type: none"> Greenhouse gas emissions as a result of own and third-party activity. Reduction of own energy consumption and in the supply chain, as well as use of energy from renewable sources and implementation of energy efficiency measures. 	■		Implementation of mitigation measures (Climate Action Plan) and adaptation. Reduce its dependence on fossil fuels and consequently reduce greenhouse gas emissions. Chap. 2, Section '2.2. Aena and the climate emergency'.
	<ul style="list-style-type: none"> Risks arising from the effects of climate change (physical and transitional). Renewable electricity production in self-consumption. 		■	
Pollution Air pollution	<ul style="list-style-type: none"> Impact on the air quality of the environment in which the company operates, derived from its own activities and those of the value chain. Development of technologies that help improve air quality, with possible effect on cash flows, among others. 	■		Definition and implementation of strategic projects aimed at reducing CO ₂ emissions and other atmospheric pollutants (NOx, SOx and PM10) Chap. 2, Section 2.3. Pollution
Water and marine resources Water consumption	<ul style="list-style-type: none"> Water consumption derived from own and third-party activities, as the main natural resource consumed (human consumption, execution of works). Water resource efficiency. 	■		Development of key instruments for water resource management (Strategic Water Management Plan, etc.) and implementation of objectives in the subject matter. Chap. 2, Section '2.4. Sustainable use of resources: water'.
Biodiversity Impacts on the condition of species	<ul style="list-style-type: none"> Protection of biodiversity, flora and fauna within the environment in which the Company operates. Reduction of incidents related to birds. Need to increase protection and control measures derived from the change in the behavior of the species. 	■		Commitment to make airport activity compatible with the protection and conservation of natural habitats existing in the environment and their biodiversity, and effective action taken in following through on said commitment. Chap. 2, Section '2.5. Protecting the biodiversity'.
Circular economy Outflow of resources Waste	<ul style="list-style-type: none"> Generation of different types of waste, derived from both the activity carried out in the facilities themselves and that of the lessees. Restriction on use of plastics due to regulatory changes. Reduction in the generation of waste in airport facilities, derived from own and third-party operations. 	■		Development of a strategy for a circular economy in the airport environment to minimise the volume of waste generated, promote its proper segregation and contribute to maximising its valorisation. Chap. 2, Section '2.6 Waste management and circular economy in airport facilities'.



Own staff	<ul style="list-style-type: none"> •Fostering a respectful work environment, as well as respect for freedom of union association and collective bargaining at Aena. •Equal opportunity, diversity promotion and non-discrimination. •Guarantee the freedom of opinion and expression, and ensure the right of its professional staff to the protection of their personal data and their privacy. 	■	■	<p>Implementation of action plans and mitigation measure for fostering the identification, recruitment and development of talent, providing employees with the tools and knowledge needed to adapt to a constantly changing environment. The foregoing is supported by effective measures for the promotion of equality and diversity.</p> <p>Chap. 5, Section '5.4 Industrial Relations'.</p>
Working conditions Equal treatment and opportunities for all Other employment rights	<ul style="list-style-type: none"> • Application of regulations, in matters related to the recruitment of people, with the limitations that this entails. • Implementation of diversity and inclusion programmes. • Potential breach in the security of personal data. 	■	■	
Value chain workers	<ul style="list-style-type: none"> • Fair and equal remuneration. • Equal opportunity, diversity promotion and non-discrimination to third parties. 	■	■	<p>Inclusion of 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.</p> <p>Likewise, 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.</p> <p>Learn more in Cap. 4 'Responsible management'.</p>
Working conditions Equal treatment and opportunities for all Other employment rights	<ul style="list-style-type: none"> • Incorporate leading suppliers into the value chain for their sustainability performance. • Potential impact on the personal data and privacy of value chain workers. 	■	■	
Affected groups	<ul style="list-style-type: none"> • Acoustic impact derived from airport activity on the local environment, and implementation of measures focused on the measurement, control and minimisation of noise. 	■	■	<p>Strategic objective of limiting and reducing acoustic impact on local communities and protecting the quality of life for populations in the area and working on improving the control and minimisation of noise, through active and two-way communications with all stakeholders involved.</p> <p>Chap. 2, Section '2.3.3. Noise'.</p>
Noise - economic, social and cultural rights of groups	<ul style="list-style-type: none"> • Freedom of opinion, information and expression. • Accessible, inclusive and quality spaces. • Ensure the health and safety of passengers and users. 	■	■	<p>Extend the commitment to the safety and quality of its services across all its airports, have infrastructure accessible to all and improve the experience of passengers and other users at airports, by means of implementing new technology and efficiency initiatives in its processes.</p> <p>Chap. 6.</p>
Consumers and end users	<ul style="list-style-type: none"> • Improving the customer and end-user experience: airport connections to train/port stations and sustainable shuttle links between terminals. • Limitation in the sensitivity of treatment to individual users. <p>Gap in the protection of users in their transit through the airport.</p>	■	■	
Information-related impacts on consumers or end users Social inclusion of consumers or end users Personal security of consumers and end users				



Business conduct Corporate culture Corruption and bribery	<ul style="list-style-type: none"> Promote business ethics, regulatory compliance, ensure the effectiveness of standards and demonstrate due control over the activity. <hr/> <ul style="list-style-type: none"> Potential failures with the compliance system and implementation of anti-corruption measures. Leadership in sustainability: strengthen the image of Aena by maintaining and promoting certifications linked to climate change. 			<p>Guarantee compliance with all applicable regulations, as well as ensure compliance with the commitments and obligations acquired through internal policies or procedures, promote an ethical business culture of regulatory compliance, and guarantee – before third parties and before judicial and administrative bodies – that it exercises proper preventive control over employees, executives and management bodies.</p> <p>Likewise, having a solid and trustworthy, plural, diverse and financially sound governance model is part of the nature of the Group.</p> <p>Chap. 1, Sections '1.1.2. Governing bodies', and '1.4.2. Sustainable governance'.</p>
Airport capacity Passenger and cargo capacity	<ul style="list-style-type: none"> Control failures, operational issues with airlines or capacity problems at airports. 			<p>Aena develops different initiatives to ensure the accommodation of its airports as well as the health and safety of its passengers. It also implements specific measures that accompany these priorities. Chap. 7 'Innovation'.</p>
Research, innovation, design and digital transformation Research, innovation, design and digital transformation	<ul style="list-style-type: none"> 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. 			<p>Aena embodies its commitment to innovation in the Strategic Plan for innovation and digital transformation, and defines training and research as fundamental aspects for growth.</p> <p>Chap. 3, Section '3.1. Commitment to sustainable development and society'.</p> <p>Chap. 5, Section '5.3.3. Training'.</p> <p>Chap. 7, Section '7.1. Innovation management at Aena'.</p>
Growth Internationalisation Sustainability and economic profitability	<ul style="list-style-type: none"> Fostering connectivity with its impact on economic growth. <hr/> <ul style="list-style-type: none"> Improved results in virtue of increased traffic volume and internationalisation. Changes in consumer behaviour. New business opportunities. 			<p>The structured and sustainable development of the Aena Group and its various business lines (internationalisation, airport cities, etc.), as well as ensuring a rapid and effective response to the growing changes in consumer behaviour is part of Aena's strategic development.</p> <p>Introduction, section 1.2. Progress of the Strategic Plan 2022-2026.</p>
Legal form	<ul style="list-style-type: none"> Restrictions arising from the legal form. 			<p>The legal form of Aena, as a state-owned company, entails the application of certain regulations, in multiple matters that serve as guarantors of the Company's good conduct, while also requiring sufficient time to manage the various matters.</p> <p>Trans-divisional.</p>
Cybersecurity	<ul style="list-style-type: none"> Cyberattacks and information security breaches. 			<p>Cybersecurity is a priority in Aena's risk management. To do this, it has a strategy in the subject matter that is approved at the highest level and a system certified to the highest standards.</p> <p>Chap. 6, Section '6.3. Cybersecurity or information security'.</p>

**1** Adaptation to climate change**2** Mitigation to climate change**3** Energy**4** Air pollution**5** Water consumption**6** Impacts on the condition of species**7** Information-related impacts on consumers or end users**8** Waste**9** Working conditions (own staff)**10** Equal treatment and opportunities for all (own staff)**11** Other labour rights (own staff)**12** Working conditions (value chain workers)**13** Equal treatment and opportunities for all (value chain workers)**15** Noise - Economic, social, and cultural rights**16** Impacts related to information for consumers or end users**17** Personal safety of consumers or end users**18** Social inclusion of consumers or end-users**19** Corruption and bribery**20** Corporate culture**21** Legal nature**22** Research, innovation, design, and digital transformation**23** Sustainability and economic profitability**24** Internationalization**25** Cybersecurity**26** Passenger and cargo capacity

Integration with the Business Strategy and Model

Aena recognises the strategic relevance of all identified material impacts, risks and opportunities and considers them essential drivers for sustainable development.

In line with the commitment to responsible business practices, Aena has established specific key performance indicators, metrics, actions, policies and objectives to address the material aspects identified, as included in Aena's Sustainability Strategy 2021-2030 and Aena's Climate Action Plan 2021-2030. They aim to limit and reduce negative impacts, manage risks and take advantage of opportunities to foster positive results for both the environment and the company.

Challenges 2024

With the aim of refining the identification and assessment of IROs (Important Risk Opportunities), it is planned to strengthen engagement activities with the affected stakeholders during 2024. Based on this and other future improvements that may be implemented, the outcome of the current materiality analysis may be modified.

Relationship and dialogue with stakeholders

(GRI 2-25; 2-29; 3-3; 413-1; 413-2)

Proper management and communication with stakeholders is key to Aena and the achievement of its objectives, creating long-term value, 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.

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.

The Company's commitment to its stakeholders is formalised through the Stakeholder Relations Policy, the Code of Conduct and the Sustainability Policy.

This Policy is applicable to Aena and to any of the companies included in its group, under the terms established in Article 42 of the Code of Commerce, and its principles include:

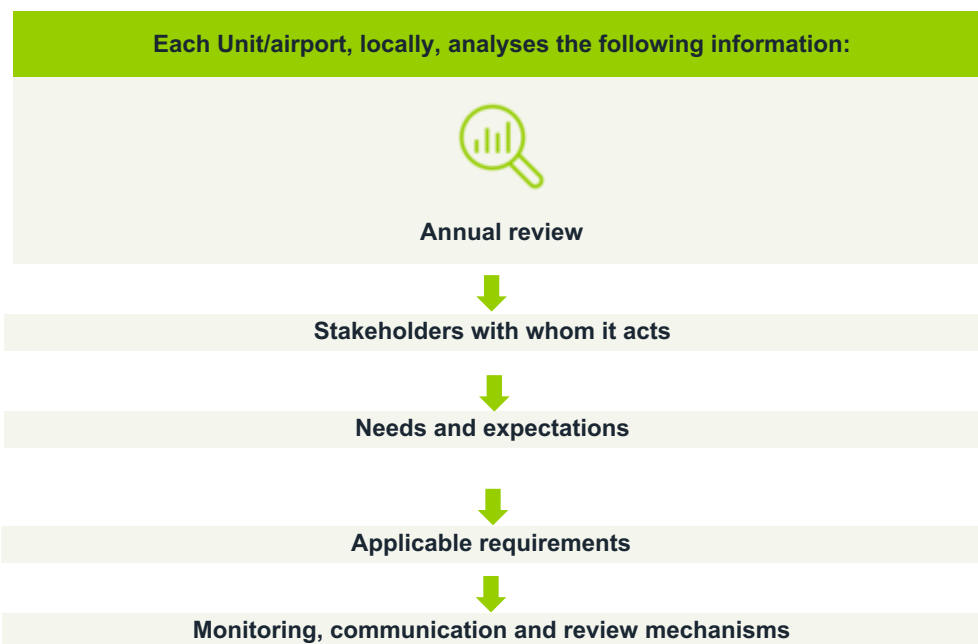
- Acting responsibly and building relationships based on ethics, integrity, sustainable development, respect for human rights and the communities affected by the Company's different activities.
- Ensuring compliance with the laws that are in force in Aena's relationships with third parties, respecting the principles of legality, efficiency, transparency and ethical behaviour with Stakeholders, and full submission to Aena's Policy against corruption and fraud.
- Protecting the rights 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.
- Applying the principles of cooperation and transparency in relations with the competent authorities, regulatory bodies and administrations.
- Working towards consensus with stakeholders, especially with local communities and the people in the territories where the Aena Group operates, taking into account their needs, points of view and expectations.
- Pursuing continuous improvement, periodically reviewing the mechanisms for relations with Stakeholders to ensure that they respond as efficiently as possible to the needs of each moment.
- 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.
- Responding 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.

Aena groups its stakeholders into a series of categories, which are in turn subdivided into other categories, made up of different groups and entities. Aena has various tools for identifying and correctly segmenting and prioritising these groups. Among them, through the Integrated Management System (IMS), the different Aena units and sites analyse possible changes that may exist in the needs and expectations of stakeholders, assessing the degree of satisfaction in order to improve the services provided.

In order to ensure effective communication with each stakeholder, a series of effective communication mechanisms are in place, aimed at facilitating proper communication and fluid dialogue with each stakeholder group identified, to identify their needs, expectations and, therefore, the main relevant issues.

Finally, to reinforce this system, Aena designs and implements different training and awareness-raising actions aimed at employees, especially in the areas directly involved.

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 to its different stakeholders



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 sites 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 (AAPUC).

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) 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 terms of stakeholder engagement, it is also worth highlighting the organisation of workshops that London-Luton Airport in the United Kingdom periodically offers to its suppliers. The objective is to exchange expectations and best practices and, with them, to facilitate the Airport's improvement and drive better sustainability performance together along its value chain.

In addition to the main stakeholders mentioned above, social entities and non-governmental organisations play a strategic stakeholder role for Aena. As a result, working together and implementing joint initiatives helps to nurture and strengthen its relationship with them, to meet common expectations, and to generate greater impact.

An example of this is the relations that the Company maintains with social entities aimed at improving accessibility and infrastructures, especially in the case of people with difficulties. For these purposes, both in Spain and the United Kingdom, Aena collaborates with these organisations to find out the needs of these groups and implement proposals at airport facilities. For example, in the fiscal year 2023, Aena has continued working with CERMI on analysing the accessibility requirements of public services, transport and tourism for people with difficulties, as well as in the development of tools that allow them to prepare for their journey through the airport. Also motivated, among other reasons, by the results of this collaboration, the Company has implemented new proposals in 2023, such as the Invisible Disabilities Badge. Finally, it is also 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').

Aena's communication with its stakeholders (GRI 2-29; 413-1; 413-2)



SM

Alliances

Web

Press

Dialogue

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	Absence of 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	International recognition Professional development Transparency and ethics Ease of providing ideas
Public administration, regulatory bodies and other bodies (ENAI, 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 Site-specific meetings/committees



Common Objectives

Ministry of Defence, Security Forces and Corps, 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 Site-specific meetings/committees
Society, local communities / nearby companies / NGOs / associations	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 Site-specific meetings/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
Communication media	Meetings Complaints, suggestions and compliments tracking and management Follow-up of news in the media	Meetings of the Board of Directors Annual General Meeting Publication of results Internal Control over Financial Reporting System (ICFR) Risk Management System Internal and external audits



Common Objectives



Suppliers, service partners and other lessees, 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)

To ensure effective two-way communication, the Company makes a series of communication channels available to all its stakeholders. These include the Company's website²⁵², and the different portals comprising it, and social networks.

For Aena, transparency is an essential factor for the credibility and trust of its stakeholders. Guaranteeing the right of citizens to know public information is of paramount importance to the Company.

In line with its improvement efforts, in 2023, 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. Including:

- Passengers and airports. Provide detailed information about everything the passenger/companion needs for their journey: flight information, parking reservation, transportation, airport services (shops, restaurants, companies, car rental, VIP services, accessibility, airport maps, etc.), procedures (check-in, customs, security checks, etc.). Additionally, there is the possibility to purchase VIP services available at the airports (lounges, fast lane, and meet & assist) and to explore and book through Aena's marketplaces (Food & Fly, Shop & Fly, and Aena Travel).
- Shareholders and investors. Provide clear, transparent, and continuously updated information to the market and shareholders about, among other matters, the evolution of Aena's stock (including information regarding stock prices, dividends, and share capital), financial and economic information, corporate governance, as well as strategic plans.
- Airlines. Gather the potential routes, incentives, rates and operational and commercial aspects that may interest airlines when expanding or consolidating their business model.
- Corporate. Presents the main data of the Company and its structure, as well as the commitments and performance of the Organization regarding sustainability, transparency, and employment.
- Business opportunities. Describes the business lines available for companies to become part of airports.

- Complaints and suggestions portal. Citizens can submit any request, including suggestions for improvements or expressing any dissatisfaction.
- Supplier contracting and commercial. Allows for monitoring the evolution of published minor contract files and contracts. The information is updated daily to ensure transparency and communication of all relevant aspects of the Company.

The information is updated daily to ensure transparency and communication of all relevant aspects of the Company.

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.

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 XHTML marking and CSS, with the exception of PDF documents, subtitling and the audio-description of all videos and the multimedia player used.

Aena has been recognised at the XXII AECA Awards for Corporate Transparency 2023, awarded by the Spanish Accounting and Business Administration Association (AECA) with the aim of recognising the efforts and results of Spanish companies in terms of transparency and disclosure of financial information, good governance and sustainability.

²⁵² The websites of Aena in Spain and in the UK (London-Luton Airport) and Brazil (ANB) can be consulted. See section 'Links of interest'



Corporate website and intranet

Through the Procedures and Complaints 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.

Aena App

Access to:

- Flight information.
- Parking reservations.
- Purchase of VIP services.
- Discounts and promotions.
- PRM Request.
- Aena Club.
- Guidance service.

Aena has made the chatbot, Oli, available to passengers to provide users with flight information, frequently asked questions and points of interest. Oli has assisted more than 750,000 passengers via text and voice in 9 languages since its launch in 2022.

Presence on networks

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 X, 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 X 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 X during the months of January, June, October, November and December of this year, according to an online monitoring report prepared by Deloitte.



43.5 M

page views to aena.es

54

publications

52 weekly and two specials
(8M and BOAB awarding)

More than

16.9 M

visits

Over

210

publications on environmental and
social sustainability

Specific information campaigns

Note: The data for 2022 can be found in the 2022 Sustainability Report (NFIS 2022).

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.

Over

5.8M*

interactions with network users

*Interactions with advertising investment corresponding to the "A day without airports" campaign are included.

Over

272k

social media followers

Social Media²⁵³



[@aena](#)
[@EnjoyAena](#)



[@aena](#)
[@enjoyaena](#)



[aena](#)



[@aena](#)



[aena](#)

²⁵³ Consult links to these sections in the "Annex - Links and links of interest" included in this document..



Communications with employees

The corporate intranet is configured as the main tool and documentation repository for all Aena employees.

Taking into account its relevance, in 2023, changes have been made to the intranet with the aim of facilitating the user experience, improving the browsing experience, avoiding duplication and simplifying its appearance, while giving more importance to the company's latest news.

Moreover, throughout 2023, Aena has organised various specific campaigns to promote initiatives related to strategic topics or areas such as the 2nd Equality Plan; internal initiatives for intra-entrepreneurship; energy efficiency; compliance or international expansion, among others.

Additionally, at the end of 2023, an analysis of internal communication channels has been carried out through the conduct of two dynamic descriptive and projective focus group sessions, in which participants have shared and reflected on the functioning of internal communication at Aena. The result of this analysis will be translated into an internal communication plan whose actions will be implemented throughout 2024.

Act 11/2018 Content Index

The 2023 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 2023 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 2023 where these contents can be found are specified in the table:

Subjects of Act 11/2018	Information included in Aena's Consolidated Management Report 2023		
Business model description	Location (page, section)	Framework used	Omissions
Business environment.	<p>With the end of the restrictions derived from COVID-19, the operation of the sector has recovered ground worldwide. The first estimates from the International Civil Aviation Organization (ICAO) positioned 2023 as the year in which pre-pandemic flows were reached, even projecting a 3% growth in the sector compared to 2019. At the beginning of 2023, the projections on the The evolution of traffic in the airport network in Spain prompted the Company to estimate closing this year with around 280 million passengers, equivalent to a 102% recovery in traffic compared to 2019. In fact, the numbers achieved in 2023 correspond to 283.2 million passengers. In this sense, various entities project that global passenger traffic will grow between 3.3% and 4.3% (CAGR) in the next 20 years driven by emerging markets.</p> <p>Likewise, it is worth highlighting Aena's growing leadership in global airport management. Proof of this has been the group's concession of 11 airports in Brazil, the largest international operation in the history of Aena which, under the Aena Brasil brand, has managed six other airports in the Northeast of the country since 2020 and has a presence in the United Kingdom, where it manages 51% of the London-Luton airport, and in Mexico, Colombia and Jamaica. In Brazil, Aena is immersed in an ambitious investment plan to increase the connectivity of the Northeast's infrastructure and, with the integration of BOAB airports, it will lead the largest network of concessioned airports in the country.</p> <p>Chap. "2023: Reactivation and new challenges", Section "Aena and its Value Chain" and "Activities performed by the Company and its value chain" (pp. 13 and 14).</p> <p>Chap. "2023: Reactivation and new challenges" Section "Context and strategy" (page 15). .</p> <p>Chap. 'About this Report' (p. 305).</p>	GRI 2-2 GRI 2-6	
Organisation and structure.	<p>Chap. "1, Sustainable Governance model" Section "1.1.1. Organizational details and ownership structure" (p. 3).</p> <p>Chap. "1, Sustainable Governance model" Section '1.1.2. Governing bodies' (p. 5), Infographics '2023 Annual General Meeting' (p. 7) and 'A Board of Directors that is diverse and balanced in skills, origins, experiences, age and gender (as of 31 December 2023)' (p. 11).</p> <p>Chap. "1, Sustainable Governance model" Section '1.1.2. Governance bodies,' Subsections 'Composition, leadership and Independence' (p. 10), 'Aena's selection, appointment, re-election and succession plan' (p. 12), 'Committees supporting the Board' (p. 16) and 'Executive Management Committee' (p. 17).</p> <p>Chap. "1, Sustainable Governance model" Section '1.4.2. Sustainability Governance' (p. 50).</p> <p>Chap. 'About this report' (p. 305).</p>	GRI 2-1 GRI 2-9 GRI 2-10 GRI 2-11 GRI 2-13 GRI 2-14	

Markets where it operates.

Aena SME, SA is a state-owned commercial company that manages 46 airports and 2 heliports in Spain, a leader due to its experience, capacity and professional team in the management of airport services.

It offers its clients - passengers, airlines, handling agents and users in general - a comprehensive service that includes a commercial offer, with guarantees of full accessibility and a service for people with reduced mobility that enjoys international recognition for its excellence.

Through its subsidiary Aena Desarrollo Internacional SME, SA (hereinafter, "Aena Internacional"), it also participates in the management of 34 airports in different countries in Europe and America (United Kingdom, Brazil, Mexico, Jamaica and Colombia).

Chap. "2023: Reactivation and new challenges"" Section "Business Model (page 11).

Chap. "2023: Reactivation and new challenges" Section "Aena and its Value Chain" (page 13).

Chap. "1. Sustainable Governance model" Section "1.1.1. Organizational details and ownership structure" (p. 3).

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

GRI 2-12
GRI 2-13
GRI 2-22

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. "2023: Reactivation and new challenges", Section "1.2. Progress of the 2022-2026 Strategic Plan" (page 19)

Chap. "1, Sustainable Governance model" Section '1.1.2. Governing bodies,' Infographic 'ESG issues present on the Board agenda during 2023' (p. 15).

Chap. "1, Sustainable Governance model" Section '1.1.2. Governing bodies,' Subsections "Committees supporting the Board" (p. 16) and 'Executive Management Committee' (p. 17).

Chap. "1, Sustainable Governance model", Section '1.4. Sustainability: Aena's management pillar' (p. 48).

Chap. "2 . Commitment to the environment" (p. 77), Section '2.1. Sustainable environmental management model,' Subsection 'Environmental governance' (p. 78).

Chap. "2. Commitment to the environment" (p. 77), Section '2.2.2. Supervision and monitoring of the Climate Action Plan' (p. 96).

Chap. "3. Commitment to society and human rights" (p. 142).

Chap. "4. Responsible management of the supply chain" (p. 169).

Chap. "5. Social and staff issues" (p. 190).

Chap. "6. Safe, quality services" (p. 262).

Chap. "7. Innovation" (p. 300).

Factors and trends that may affect its future evolution.	<p>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.</p> <p>The following sections can be consulted for more information:</p> <p>Chap. "2023: Reactivation and new challenges", Section "2. Risks and their management", section "2.1. Structure, control and risk management" (page 22).</p>	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.	<p>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.</p> <p>The following sections can be consulted for more information:</p> <p>Chap. '2023: Reactivation and new challenges', Section '2.1. Structure, control and risk management' (p. 22).</p> <p>Chap. "1, Sustainable Governance model" Sections '1.2.1. Regulatory Compliance System' (p. 22), '1.2.4. Prevention of fraud, corruption and bribery' (p. 29) and '1.4.2. Sustainability Governance' (p. 50).</p>	GRI 3-3	
Significant impacts, and verification and control. Measures taken.	<p>Chap. '2022: Reactivation and new challenges', Sections '2.1 Risks and their management' (p. 23) and '2.2. Risks in 2023' (p. 26).</p> <p>Chap. 'About this report,' Section 'Double Materiality' (p. 308).</p>	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.	<p>Chap. "1 Sustainable Governance model" (p. 2).</p> <p>Chap. "1, Sustainable Governance model" Section '1.1.2. Governing Bodies,' Subsection 'General Shareholders' Meeting', Infographic '2023 Annual General Meeting' (p. 7).</p> <p>Chap. 1, Section '1.1.2. Governing Bodies,' Subsection 'Committees supporting the Board' (p. 16).</p> <p>Chap. "2. Commitment to the environment" (p. 77).</p> <p>Chap. "3. Commitment to society and human rights" (p. 142).</p> <p>Chap. "4. Responsible management of the supply chain" (p. 169).</p> <p>Chap. "5. Staff and social issues" (p. 190).</p> <p>Chap. "6. Safe, quality services" (p. 262).</p> <p>Chap. "7. Innovation" (p. 300).</p> <p>Chap. 'About this report' (p. 304), Sections 'Double Materiality' (p. 308).</p>	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.	<p>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.</p> <p>The following sections can be consulted for more information:</p> <p>Chap. '2023: Reactivation and new challenges', Subsection 'Aena and its Value Chain' (p. 13). Chap. '2023: Reactivation and new challenges', Section '2.2. Risks in 2023' (p. 26).</p> <p>Chap. "2. Commitment to the environment", Section '2.3.1. Air pollution', Subsection 'Indicators on atmospheric pollution' (p. 116). Chap. "2. Commitment to the environment", Section '2.3.3. Noise' (p. 117). Chap. "3. Commitment to society and human rights", Section '3.2.2. Impact on local populations and on the territory', Subsection 'Operations with significant negative impacts' (p. 155). Chap. "4. Responsible management of the supply chain", Section '4.3.2. Contract execution processes', Subsection 'Negative impacts in the supply chain' (p. 189).</p>	GRI 2-6 GRI 2-12 GRI 3-3 GRI 305-7	
How the group manages these risks.	<p>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.</p> <p>The following sections can be consulted for more information:</p> <p>Chap. '2023: Reactivation and new challenges', Section '2.1. Structure, control and risk management' (p. 22).</p> <p>Chap. "1. Sustainable Governance model", Section '1.2.1. Regulatory Compliance System' (p. 22). Chap. "2. Commitment to the environment", Sections '2.1.3. Management of environmental risks and impacts' (p. 84) and '2.2.3. Risks and opportunities related to climate change' (p. 97). Chap. "3. Commitment to the society and human rights", 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. 162). Chap. "6. Safe, quality services" infographic "Health and Safety Assurance at Aena" (p.263)</p>	GRI 2-12 GRI 2-23 GRI 3-3	
Procedures used to detect them and evaluate them.	<p>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.</p> <p>The following sections can be consulted for more information:</p> <p>Chap. '2023: Reactivation and new challenges', Section '2.1. Structure, control and risk management' (p. 22).</p> <p>Chap. "1. Sustainable Governance model", Section '1.2.1. Regulatory Compliance System' (p. 22). Chap. "2. Commitment to the environment", Sections '2.1.3. Management of environmental risks and impacts' (p. 84) and '2.2.3. Risks and opportunities related to climate change' (p. 97). Chap. "3. Commitment to the society and human rights", 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. 162). Chap. "6. Safe, quality services" infographic "Health and Safety Assurance at Aena" (p.263)</p>	GRI 2-12 GRI 2-23 GRI 3-3	

The following sections can be consulted for more information:

Information on the impacts that have been detected and their breakdown, particularly the main short-, medium- and long-term risks.

Chap. '2023: Reactivation and new challenges', Section '2. The aviation sector', (p.15).
Chap. '2023: Reactivation and new challenges', Section '2.2. Risks in 2023' (p. 26).

Chap. "2. Commitment to the environment", Sections '2.1.3. Management of environmental risks and impacts' (p. 84) and '2.2.3. Risks and opportunities related to climate change' (p. 97).
Chap. "3. Commitment to society and human rights", 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. 162).

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. Commitment to the environment", Sections '2.1.3. Management of environmental risks and impacts' (p. 84) and '2.2.3. Risks and opportunities related to climate change' (p. 97).	GRI 3-3 GRI 201-2	
Current and foreseeable effects of the company's activities on health and safety.		Chap. "6. Safe, quality services", Infographic 'Health and Safety Assurance at Aena' (p. 263).	GRI 3-3	
Environmental evaluation or certification procedures.		Chap. "2. Commitment to the environment", Section '2.1.2. 'Environmental certifications' (p. 82).	GRI 3-3	
Resources dedicated to the prevention of environmental risks.		Chap. "2. Commitment to the environment", 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. 84).	GRI 3-3	
Principle of precaution.		Chap. "2. Commitment to the environment", Sections '2.1. Sustainable environmental management model' (p. 78) and '2.5.2. Protected spaces' (p. 132).	GRI 3-3	
Quantity of environmental risk provisions and guarantees.		Chap. "2. Commitment to the environment", 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. 84).	GRI 3-3	
Pollution	Measures to prevent, reduce or remedy carbon emissions that seriously affect the environment	Chap. "2. Commitment to the environment", Sections '2.2.1. Climate Action Plan' (p. 90), '2.2.4. Metrics. Carbon footprint' (p. 100), '2.2.5. Efficiency in the use of energy and use of renewable energy' (p. 104) and "2.2.6. Renewable energies" (p. 108).	GRI 3-3 GRI 305-5	
	Any form of air pollution specific to an activity, including noise and light pollution.	Chap. "2. Commitment to the environment", Section '2.3.1. Air pollution' (p. 114) and Subsection 'Indicators on atmospheric pollution' (p. 116), Section '2.3.2. Light pollution' (p. 117), Section '2.3.3. Noise' (p. 117), Subsection 'Measurement, reduction and control' (p. 119).	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. Commitment to the environment", Sections '2.6. Waste management and circular economy in airport facilities' (p. 135), '2.6.1. Waste management and circular economy model' (p. 135), '2.6.3. Initiatives for the reduction, reuse, recycling of waste and the correct treatment of hazardous waste' (p. 139) and '2.6.5. Waste Indicators' (p. 141), Table 'Generated waste, waste not intended for disposal, and waste for disposal' (p. 141).	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. Commitment to the environment", Section '2.4.2. Initiatives for responsible water consumption', Subsection 'Water consumption indicators', Tables 'Water Extraction/Consumption' and 'Water-stressed regions' (p. 128).	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. Commitment to the environment", Section '2.2.6. Renewable energies,' Table 'Renewable Energy Facilities at Aena' (p. 108), Infographic 'Energy Intensity' (p. 111) and Subsection 'Energy consumption scheme within the organisation' (p. 112).	GRI 302-1 GRI 302-3	
	Measures taken to improve energy efficiency.	Chap. "2. Commitment to the environment", Sections '2.2.5. Efficiency in energy use and renewable use', Infographic 'Energy efficiency in 2023' (p. 106) and '2.2.6. Renewable energies', Subsection 'Main energy consumption indicators' (p. 112).	GRI 3-3 GRI 302-4	
	Use of renewable energies.	Chap. "2. Commitment to the environment", Section '2.2.6. Renewable energies' (p. 108).	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. Commitment to the environment", Section '2.2.1. Climate Action Plan' (p. 90), Table 'Evolution and progress of established decarbonisation targets' (p. 95). Chap. "2. Commitment to the environment", Section '2.2.4. Metrics. Carbon footprint' (p. 100). Chap. "2. Commitment to the environment", Section '2.2.6. Renewable energies', Subsection 'Reduction of emissions thanks to renewable energy facilities and energy efficiency measures' (p. 109).	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. Commitment to the environment", Sections '2.2.1. Climate Action Plan' (p. 90) and '2.2.3. Risks and opportunities related to climate change' (p. 97).	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. Commitment to the environment", Section '2.2.1. Climate Action Plan' (p. 90), Subsection 'Specific decarbonisation targets' (p. 92) and Table 'Evolution and progress of the decarbonisation targets set' (p. 95). Chap. "2. Commitment to the environment", Section '2.2.4. Metrics. Carbon footprint' (p. 100). Chap. "2. Commitment to the environment", Section '2.2.6. Renewable energies', Subsection 'Reduction of emissions thanks to renewable energy facilities and energy efficiency measures' (p. 109).	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. Sustainable Governance model", Section '1.5. Sustainable financing. Taxonomy' (p. 57).	Company Criteria	
Protecting biodiversity	Measures to preserve or restore biodiversity.	Chap. "2. Commitment to the environment", Sections '2.5. Protecting biodiversity' (p. 131). '2.5.1. Biodiversity management and protection model' (p. 131), '2.5.2. Protected spaces' (p. 132) and '2.5.3. Studies on the fauna of the environment and control services' (p. 133).	GRI 3-3 GRI 304-1 GRI 304-3	
	Impacts caused by activities or operations in protected areas.	Chap. "2. Commitment to the environment", Section '2.5.3. Studies on the fauna of the environment and control services' (p. 133).	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. Staff and social issues", 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. 196).	GRI 2-7	
	Total number and distribution of employment contract types.	Chap. "5. Staff and social issues", 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. 195).	GRI 2-7	
	Annual average of open-ended contracts, temporary contracts and part-time contracts by gender, age and professional category.	Chap. "5. Staff and social issues", 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. 197).	GRI 2-7	
	Number of dismissals by gender, age and professional category.	Chap. "5. Staff and social issues", Section '5.1.1. Main details about the workforce,' Subsection 'Dismissals' (p. 200).	GRI 401-1	
	Average remuneration and its evolution broken down by gender, age and professional categories or equal value	Chap. "5. Staff and social issues", Section '5.1.2. Remuneration model', Table 'Average remuneration and its evolution disaggregated by gender, age and professional categories or equal value (fixed+variable salary)' (p. 207).	GRI 405-2	
	Wage gap.	Chap. "5. Staff and social issues", Section '5.1.2. Remuneration model', Table 'Pay gap' (p. 208).	GRI 405-2	
	The remuneration of equal or average jobs in the company.	Chap. "5. Staff and social issues", Section '5.1.2. Remuneration model' (p. 194), Table 'Average remuneration and its evolution disaggregated by gender, age and professional categories or equal value (fixed+variable salary)' (p. 207).	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. Sustainable Governance model", Section '1.1.2. Governing Bodies', Subsection 'Remuneration of the Board and Senior Management' (p. 18), Table 'Remuneration received by Directors and Senior Management' (p. 19). Chap. "5. Staff and social issues", Section '5.1.2. Remuneration model', Table 'Average remuneration and its evolution disaggregated by gender, age and professional categories or equal value (fixed+variable salary)' (p. 207). Chap. "5. Staff and social issues", Section '5.1.2. Remuneration model', Subsection 'Annual total pay ratio' (p. 208).	GRI 2-19 GRI 2-20 GRI 2-21 GRI 405-2	
	Implementation of right to disconnect policies for employees.	Chap. "5. Staff and social issues", Section '5.1.3. Organisation of work time and disconnection' (p. 209). Chap. 5, Section '5.5.2. Promoting the health and well-being of workers', Subsection 'Specific work-life balance and well-being measures' (p. 255).	GRI 3-3	
	Employees with disabilities	Chap. "5. Staff and social issues", Section '5.2.2. Universal accessibility to employment of persons with disabilities', Table 'Employees with disabilities' (p. 219).	GRI 405-1	



Organisation of work.	Organisation of working time	Chap. "5. Staff and social issues", Section '5.1.3. Organisation of work time and disconnection' (p. 209). Chap. 5, Section '5.5.2. Promoting the health and well-being of workers', Subsection 'Specific work-life balance and well-being measures' (p. 255).	GRI 3-3
	Number of absentee hours.	Chap. "5. Staff and social issues", Section '5.5.1. Aena's Health and Safety Model', Table 'Absenteeism (own staff)' (p. 252).	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. Staff and social issues", Section '5.5.2. Promoting the health and well-being of workers', Subsection 'Specific work-life balance and well-being measures' (p. 255).	GRI 3-3 GRI 401-2 GRI 401-3
Health and safety.	Health and safety conditions in the workplace.	Chap. "5. Staff and social issues", Section '5.5. Occupational health and safety' (p. 240). Chap. "5. Staff and social issues", Section '5.5.1. Aena's Health and Safety Model' (p. 241) and Subsections 'Identification of hazards, assessment of risks and investigation of accidents' (p. 244), 'Communication, dialogue and participation of employees in occupational safety' (p. 245), 'Reporting, recording and investigation of accidents' (p. 246) and 'Occupational health and safety training' (p. 253). Chap. "5. Staff and social issues", Section '5.5.2. Promoting the health and well-being of workers' (p. 254) and '5.5.3. Commitment to companies (external/concurrent)' (p. 260).	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. Staff and social issues", Section '5.5.1. Aena's Health and Safety Model', Tables 'Accidents (own staff)' (p. 248 and 249).	GRI 403-9
	Occupational diseases; broken down by gender.	Chap. "5. Staff and social issues", 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. 251).	GRI 403-10

Industrial relations	Organisation of social dialogue, including procedures for informing and consulting with staff, and negotiating with them.	Chap. "3. Commitment to society and human rights", Section '3.3.2. Human rights due diligence procedure' (p. 160), Subsection 'Identification and evaluation of risks in Aena and subsidiaries, risk prevention and mitigation measures' (p. 162). Chap. "5. Staff and social issues", Section '5.4. Industrial relations' (p. 235). Chap. "5. Staff and social issues", Section '5.5.1. Aena's Health and Safety Model', Subsection 'Communication, dialogue and participation of employees in occupational safety' (p. 245).	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. Staff and social issues", Section '5.4. Industrial relations' (p. 235). Chap. "5. Staff and social issues", Section '5.5. Occupational health and safety', Subsection 'Communication, dialogue and participation of employees in occupational safety' (p. 245).	GRI 3-3
	Percentage of employees covered by collective agreements by country.	Chap. "5. Staff and social issues", Section '5.4. Industrial relations' (p. 235).	GRI 2-30
	The balance of collective agreements, particularly in the field of health and safety at work.	Chap. "5. Staff and social issues", Section '5.5. Occupational health and safety', Subsection 'Communication, dialogue and participation of employees in occupational safety' (p. 245).	GRI 403-4
Training	Policies implemented in the field of training.	Chap. "5. Staff and social issues", Section '5.3.3. Training' (p. 227) and Subsection 'Significant training actions in 2023' (p. 228).	GRI 3-3 GRI 404-2
	Total amount of training hours by professional categories.	Chap. "5. Staff and social issues", Section '5.3.3. Training,' Tables 'Main training data' (p. 231) and 'Training hours by gender, professional category and region' (p. 232)	GRI 404-1
Universal accessibility for people with disabilities		Chap. "5. Staff and social issues", Sections '5.2.2. Universal accessibility to employment for people with disabilities' (p. 219) and '5.2.3. Accessibility of the services' (p. 220).	GRI 3-3

		Consolidated Management Report	Contents	Introduction	2023: Reactivation and new challenges	Sustainable Governance Model	Commitment to the environment
		Commitment to society and human rights	Responsible Management	Staff and social issues	Safe, quality services	Innovation	About this report
Equality	Measures taken to promote equal treatment and opportunities between women and men.	Chap. "5. Staff and social issues", Section '5.2.1. Gender diversity' (p. 213).				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. Staff and social issues", Section '5.2.1. Gender diversity' (p. 213).				GRI 3-3	
	Measures taken to promote employment.	Chap. "5. Staff and social issues", Sections 'Introduction' (p. 191) and '5.2.6. Generational diversity, age management and the promotion of the integration of young people in the workplace' (p. 221).				GRI 3-3	
	Protocols against sexual and gender-based harassment, integration and universal accessibility for people with disabilities.	Chap. "5. Staff and social issues", Section '5.2. Diversity and inclusion' (p. 211). Chap. "5. Staff and social issues", Section '5.2.1. Gender diversity', Subsection 'Cases of discrimination and corrective actions' (p. 215). Chap. "5. Staff and social issues", Sections '5.2.2. Universal accessibility to employment for people with disabilities' (p. 219) and '5.2.3. Accessibility of the services' (p. 220).				GRI 3-3	
	The policy against all types of discrimination and, where applicable, management of diversity.	Chap. "5. Staff and social issues", Section '5.2. Diversity and inclusion' (p. 211).				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. Commitment to society and human rights", Section '3.3.1. Formal commitment to Human Rights' (p. 157). Chap. "3. Commitment to society and human rights", Section '3.3.2. Human rights due diligence procedure', Subsection 'Mechanisms for making complaints: reporting human rights violations' (p. 168).				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. Sustainable Governance model", Section '1.2. Culture and corporate ethics' (p. 20). Chap. "3. Commitment to society and human rights", Sections '3.3.1. Formal commitment to Human Rights' (p. 157) and '3.3.2. Human rights due diligence procedure' (p. 160).				GRI 2-23 GRI 3-3	
Complaints about cases of violation of human rights.		Chap. "1. Sustainable Governance model", Section '1.2.10. Complaints Channel' (p. 37). Chap. "3. Commitment to society and human rights", Section '3.3.2. Human rights due diligence procedure', Subsection 'Mechanisms for making complaints: reporting human rights violations' (p. 168). Chap. ""5. Staff and social issues" Section '5.2.1. Gender diversity', Subsection 'Cases of discrimination and corrective actions' (p. 215).				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. Commitment to society and human rights", Sections '3.3.1. Formal commitment to Human Rights' (p. 157) and '3.3.2. Human rights due diligence procedure' (p. 160), Subsection 'Identification and evaluation of risks in Aena and subsidiaries, risk prevention and mitigation measures' (p. 162).				GRI 2-23 GRI 407-1	

 Consolidated Management Report	Contents	Introduction	2023: Reactivation and new challenges	Sustainable Governance Model	Commitment to the environment
Commitment to society and human rights	Responsible Management	Staff and social issues	Safe, quality services	Innovation	About this report
The elimination of discrimination in employment and the workplace.	Chap. "1 Sustainable Governance model", Section '1.2.10. Complaints Channel' (p. 37). Chap. "5. Staff and social issues", Section '5.2. Diversity and inclusion' (p. 211). Chap. "5. Staff and social issues", Section '5.2.1. Gender diversity', Subsection 'Cases of discrimination and corrective actions' (p. 215).			GRI 3-3 GRI 406-1	
The elimination of forced labour.	Chap. "3. Commitment to society and human rights", 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. 162).			GRI 409-1	
The effective abolition of child labour.	Chap. "3. Commitment to society and human rights", 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. 162).			GRI 408-1	
Information on combatting corruption and bribery	Location (page, section)			Framework used	Omissions
Measures taken to prevent corruption and bribery.	Chap. "1. Sustainable Governance model", Sections '1.2. Culture and corporate ethics' (p. 20), '1.2.1. Regulatory Compliance System' (p. 22), '1.2.3. Code of Conduct' (p. 28), '1.2.3 Regulatory Compliance Policy' (p. 27), '1.2.4. Prevention of fraud, corruption and bribery' (p. 29), '1.2.5. Procedure for Related Transactions' (p. 33), '1.2.6. Conflicts of interest' (p. 33). Chap. "1. Section '1.2.4. Prevention of fraud, corruption and bribery', Table 'Nature of the cases of confirmed corruption incidents' (p. 31).			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. Sustainable Governance model", Sections '1.2. Culture and corporate ethics' (p. 20), and '1.2.7. Specific measures to combat money laundering' (p. 34).			GRI 3-3	
Contributions to foundations and non-profit organisations	Chap. "3. Commitment to society and human rights", Section '3.1.1. Social action: Contributions to foundations and non-profit organisations' (p. 146).			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. Commitment to the environment", Sections '2.1.3. Management of environmental risks and impacts' (p. 84), '2.5.2. Protected spaces' (p. 132) and '2.3. Pollution' (p. 114). Chap. "2. Commitment to the environment", Section '2.3.3. Noise', Subsection 'Sound Insulation Plans' (p. 121). Chap. "3. Commitment to society and human rights", Sections '3.1. Commitments to sustainable development and society' (p. 143), '3.2. Impact of the activity on society and the environment' (p. 152), '3.2.1. Creating social value' (p. 152) and '3.2.2. Impact on the local populations and territory', Subsection 'Operations with significant negative impacts' (p. 155). Chap. "5. Staff and social issues", Section '5.5. Occupational health and safety' (p. 240). Chap. "5. Staff and social issues", Section '5.5.1. Aena's Health and Safety Model', Subsection 'Communication, dialogue and participation of employees in occupational safety' (p. 245). Chap. 'About this report,' Sections 'Relationships and dialogue with stakeholders' (p. 314) and 'Communication and transparency' (p. 320).	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. Sustainable Governance model", Section '1.1.2. Governing bodies', Subsections 'Annual General Meeting' (p. 6) and 'Communication with shareholders' (p. 8). Chap. "2. Commitment to the environment", Section '2.1.4. Environmental inquiries' (p. 85). Chap. "2. Commitment to the environment", Section '2.3.3. Noise', Subsection 'Communications' (p. 122). Chap. "3. Commitment to society and human rights", Section '3.1. Commitments to sustainable development and society' (p. 143). Chap. "3. Commitment to society and human rights", Section '3.2.2. Impact on the local populations and territory', Subsection 'Operations with significant negative impacts' (p. 155). Chap. "4. Responsible management of the supply chain", Section '4.2.1. General aspects', Subsection 'Transparency and dialogue' (p. 177). Chap. "5. Staff and social issues", Section '5.4.2. Communications with employees' (p. 237). Chap. "6. Safe, quality services", Sections '6.7.2. Customer rights and obligations' (p. 297) and '6.7.3. Complaints mechanisms' (p. 297). Chap. 'About this report,' Sections 'Relationships and dialogue with stakeholders' (p. 314).	GRI 2-29 GRI 413-1 GRI 413-2	
	Association or sponsorship actions.	Chap. "2. Commitment to the environment", Section '2.1.6. Environmental endorsements, partnerships and recognitions' (p. 89). Chap. "3. Commitment to society and human rights", Sections '3.1. Commitments to sustainable development and society' (p. 143) and '3.2. Impact of the activity on society and the environment' (p. 152). Chap. "3. Commitment to society and human rights", Section '3.2.1. Creating social value', Table "Generation of resources in the community (social cash flow)" (p. 152).	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. Responsible management of the supply chain", Section '4.2. Sustainable value chain management' (p. 176). Chap. "4. Responsible management of the supply chain", Section '4.3.1. Inclusion of social and environmental issues in bidding procedures' (p. 183).	GRI 3-3 GRI 308-1 GRI 414-1	
	Consideration in relations with suppliers and subcontractors of their social and environmental responsibility.	Chap. "4. Responsible management of the supply chain", Section '4.3. The acquisition and purchasing process' (p. 182). Chap. "4. Responsible management of the supply chain", Section '4.3.2. Contract execution processes' (p. 185), Subsection 'Negative impacts in the supply chain' (p. 189).	GRI 3-3 GRI 308-2 GRI 414-2	
	Supervision and audit systems, and their results.	Chap. "6. Safe, quality services", Section '6.1.4. General aeronautical audits, checks and drills of Operational Safety' (p. 266).	GRI 3-3	
Consumers.	Measures for the health and safety of consumers	Chap. "6. Safe, quality services", Sections '6.1. Operational Safety' (p. 264), '6.1.4. General aeronautical audits, checks and drills of Operational Safety' (p. 266), '6.2. Airport Security' (p. 273), '6.3. Cybersecurity or information security' (p. 280) and '6.4 Health safety' (p. 284). Chap. "6. Safe, quality services", Section '6.2.3. Excellent Airport Security levels,' Subsection 'Airport security audits, inspections and drills' (p. 277).	GRI 3-3 GRI 416-1	
	Systems for claims and complaints received, and their resolution.	Chap. "6. Safe, quality services", Section '6.7.3. Complaints mechanisms' (p. 297).	GRI 3-3 GRI 416-2	



Tax information	Profits obtained, country by country.	Chap. "1. Sustainable Governance model", Section '1.3.1. Tax contributions', Table 'Tax indicators' (p. 47).	GRI 207-4	
	Taxes paid on profits	Chap. "1. Sustainable Governance model", Section '1.3.1. Tax contributions', Table 'Tax indicators' (p. 47).	GRI 207-4	
	Public grants received	Chap. "1. Sustainable Governance model", Sections '1.1.1. Structure of the property' (p. 3) and '1.3.1. Tax contributions', Table 'Tax indicators' (p. 47).	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 2023.

GRI contents	Description	Global Compact	SDGs	Location/Content	Page	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, SME S.A. Headquarters: C/ Peonías, 12. 28042 Madrid, Spain. Chapter "Introduction", Section "Business Model" Chapter 1, Sections "1.1.1. Organisational Details and Ownership Structure" and "1.2. Culture and Corporate Ethics"	11, 3, 20	
2-2	Entities included in the organization's sustainability reporting			Chapter. "About this report"	305	
2-3	Reporting period, frequency and contact point			Exercise 2023 (from January 1st to December 31st), as well as the Annual Accounts. Reporting frequency: Annual. Publication date: February 2024. Contact point: rc@aena.es	-	
2-4	Restatements of information					There have been no restatements of information.
2-5	External assurance			Chapter "Introduction", Subsection "Level of review by external auditors" Chapter "About this report"	6, 305	The Audit Committee has among its functions to submit to the Board of Directors for submission to the General Shareholders' Meeting proposals for the selection, appointment, re-election, and replacement of auditors, ensuring and preserving the independence of the external auditor in the performance of their duties, supervising their work, etc. Likewise, a relationship is maintained with external auditors and verifiers strictly focused on the effective performance of their services within an appropriate 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 dependent companies for the year 2023".



2. Activities and workers

2-6	Activities, value chain and other business relationships	7	8	Chapter "Introduction", Subsection "Business Model" Chapter "2023: Reactivation and New Challenges", Sections "Aena and its value chain", "Activities performed by the Company and its value chain", and "Context and strategy" Chapter 3, Subsection "3.2.2. Impact on local populations and on the territory" Section "Operations with significant negative impacts." Chapter 4, Subsections "4.1.1. Description of the supply chain" and "4.3.2. Contract execution processes" Section "Negative impacts on the supply chain"	11, 13, 14, 15, 155, 172, 189	
2-7	Employees	3, 4, 5, 6	5, 8, 10	Chapter 5, Subsection "5.1.1. Main details of the workforce", Tables "Total number and distribution of employees by gender, age, region, and professional category (as of December 31st)", "Total number and distribution of employment contract types by gender and country (as of December 31st)", and "Annual average of contracts according to their type gender, age, and professional category (consolidated)"	195, 196, 197	In Spain, employee data has been collected through SAP. In the United Kingdom, this information is obtained through personnel records, workforce data in ADP, and Goodshape reports. Lastly, in Brazil, the external provider managing this information facilitates it using standard tools.
2-8	Workers who are not employees	3, 4, 5, 6	5, 8, 10	Chapter 4, Subsection "4.1.1. Description of the supply chain"	172	In Spain, data regarding non-employee workers has been obtained through the use of a specific supplier program. In the United Kingdom and Brazil, it has been obtained through the use of standard tools.

3. Governance

2-9	Governance structure and composition		16	Chapter 1, Subsection "1.1.2. Governing Bodies", and sections "The Board of Directors", "Committees supporting the Board of Directors", 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 2023)" Chapter 1, Subsection "1.4.2. Sustainability Governance" Chapter 2, Subsection "2.1. Sustainable Environmental Management Model" Section "Environmental Governance" and Subsection "2.2.2. Supervision and Monitoring of the Climate Action Plan"	5, 9, 11, 16, 17, 50, 78, 96	
2-10	Nomination and selection of the highest governance body		5, 16	Chapter 1, Subsection "1.1.2. Governing Bodies", Infographic "Annual General Meeting 2023 (AGM 2023)" and Section "Selection, appointment, re-election, and succession plan of Aena"	7, 12	
2-11	Chair of the highest governance body			Chapter 1, Subsection "1.1.2. Governing Bodies" Sections "Composition, leadership, and independence" and "Executive Management Committee" Chapter 1, Subsection "1.2.6. Conflicts of Interest"	10, 17, 33	



2-12	Role of the highest governance body in overseeing the management of impacts	8	Chapter "2023: Reactivation and New Challenges", Subsections "2.1. Structure, control, and risk management" and "2.2. Risks in 2023", and Infographic "Main short, medium, and long-term trends and risks (including emerging risks) that may arise from the context in which Aena operates" Chapter 1, Subsection "1.1.2. Governing Bodies", Infographic "ESG Issues on the Board's Agenda during 2023", and Sections "Committees supporting the Board of Directors" and "Executive Management Committee" Chapter 1, Subsection "1.4.2. Sustainability Governance" Chapter 2, Subsection "2.1. Sustainable Environmental Management Model", Section "Environmental Governance" Chapter 2, Subsection "2.2.2. Supervision and monitoring of the Climate Action Plan"	22, 26, 16, 15, 16, 17, 50, 78, 96	
2-13	Delegation of responsibility for managing impacts		Chapter 1, Subsection "1.1.2. Governing Bodies," Section "Executive Management Committee." Chapter 1, Subsection "1.2.1. Regulatory Compliance System" Section "Parties responsible for the supervision and monitoring the System." Chapter 1, Subsection "1.4.2. Sustainability Governance." Chapter 2, Subsection "2.1. Sustainable Environmental Management Model," Section "Environmental Governance." Chapter 2, Subsection "2.2.2. Supervision and monitoring of the Climate Action Plan."	17, 22, 50, 78, 96	
2-14	Role of the highest governance body in sustainability reporting		Chapter 1, Subsection "1.1.2. Governing Bodies," Section "Annual General Meeting," Infographic "Annual General Meeting 2023 (AGM 2023)." Chapter 1, Subsection "1.1.2. Governing Bodies," Section "Committees supporting the Board." Chapter "About this Report," Section "Double Materiality."	7, 16, 305, 308	
2-15	Conflicts of interest	10	16	Section "1.2.5. Related Party Transactions Procedure" Section "1.2.6. Conflicts of Interest"	33, 33
2-16	Communication of critical concerns	1, 2, 10	16	Chapter 1, Subsection "1.1.2. Governing Bodies," Infographic "Annual General Meeting 2023." Section "Meetings of the Board of Directors" Chapter 1, Subsection "1.2.10. Complaints Channel."	7, 15, 37
2-17	Collective knowledge of the highest governance body			Chapter 1, Subsection "1.1.2. Governing Bodies," Section "Training for the Board of Directors."	14
2-18	Evaluation of the performance of the highest governance body			Chapter 1, Subsection "1.1.2. Governing Bodies," Section "Evaluation of the Board of Directors."	14
2-19	Remuneration policies	1, 6	5	Chapter 1, Subsection "1.1.2. Governing Bodies," Section "Remuneration of the Board of Directors and Senior Management." Chapter 1, Subsection "1.4.3. Features of the Sustainability Strategy." Chapter 2, Subsection "2.2.2. Supervision and Monitoring of the Climate Action Plan."	18, 52, 96
2-20	Process to determine remuneration	1, 6	5, 15	Chapter 1, Subsection "1.1.2. Governing Bodies," Infographic "Annual General Meeting 2023 (AGM 2023)." Chapter 1, Subsection "1.1.2. Governing Bodies," Section "Remuneration of the Board and Senior Management." Chapter 5, Subsection "5.1.2. Remuneration Model."	7, 18, 204



2-21	Annual total compensation ratio			Chapter 5, Subsection "5.1.2. Remuneration Model," Section "Annual Total Pay Ratio."	204 ,208
4. Strategies, policies and practices					
2-22	Statement on sustainable development strategy			Chapter "Introduction", Subsection "President's Letter" Chapter "2023: Reactivation and New Challenges", Subsection "1.2. Progress of the 2022-2026 Strategic Plan" Chapter 1, Subsections "1.4. Sustainability: Pillar of Aena's Management" and "1.4.2. Sustainability Governance" Chapter 2 "Commitment to the Environment" Chapter 3 "Commitment to Society and Human Rights" Chapter 4 "Responsible Management of the Value Chain" Chapter 5 "Staff and Social Issues" Chapter 6 "Safe, Quality Services" Chapter 7 "Innovation"	5, 19, 48, 50, 77, 142, 169, 190, 262, 300
2-23	Policy commitments	1 a 10		Chapter 1, Subsection "1.2. Culture and Corporate Ethics", Table "Internal documents that make up the Aena Action Framework." Chapter 1, Subsections "1.2.1. Regulatory Compliance System", "1.2.2. Regulatory Compliance Policy", "1.2.3. Code of Conduct", "1.2.4. Fraud, Corruption, and Bribery Prevention", and "1.2.7. Specific Measures to combat Money Laundering". Chapter 2, Subsection "2.1.1. Natural Capital Management Model". Chapter 3, Subsections "3.1. Commitments to Sustainable Development and Society", "3.3.1. Formal Commitment to Human Rights", and "3.3.2. Human Rights Due Diligence Procedure". Chapter 5, Subsection "Introduction". Chapter 6, Subsections "6.1.1. Management Framework" and "6.6.1. Main Applicable Regulations and Measures Developed to Improve the quality of the services". Chapter "Links of interest".	21, 22, 27, 28, 29, 34, 80, 143, 157, 160, 191, 264, 287, 364
2-24	Embedding policy commitments	1 a 10		Chapter "2023: Reactivation and New Challenges", Subsection "2.1. Structure, Control, and Risk Management" and Section "Aena's Risk Control and Management Policy". Chapter 1, Subsection "1.2. Corporate Culture and Ethics", Table "Internal documents that make up the Aena Action Framework.." Chapter 3, Subsection "3.3.1. Formal Commitment to Human Rights."	22, 24, 21, 157
2-25	Processes to remediate negative impacts	1, 7, 10	16	Chapter 2, Subsection "2.1.4. Environmental inquiries." Chapter 3, Subsection "3.3.2. Human Rights Due Diligence Procedure." Chapter 6, Subsections "6.1.5. Other Mechanisms to Maintain Excellent Levels of Operational Safety" and "6.7.3. Complaint Mechanisms." Chapter "About this Report," Subsection "Relationship and Dialogue with Stakeholders."	85, 160, 269, 297, 314



2-26	Mechanisms for seeking advice and raising concerns	1, 2, 10	16	Chapter 1, Sections "1.2.2. Regulatory Compliance Policy", "1.2.3. Code of Conduct", "1.2.4. Fraud, Corruption, and Bribery Prevention", "1.2.7. Specific Measures to combat Money Laundering", and "1.2.10. Whistleblowing Channel." Chapter 1, Section "1.3. Fiscal Transparency," Subsection "Risk Control and Management." Chapter 2, Subsection "2.1.4. Environmental inquiries." Chapter 3, Subsection "3.3.2. Human Rights Due Diligence Procedure." Section "Mechanisms for making complaints: reporting human rights violations." Chapter 4, Section "Negative Impacts on the Supply Chain," Subsection "4.3.2. Contract Execution Processes." Chapter 5, Section "Cases of Discrimination and Corrective Actions," Subsection "5.2.1. Gender Diversity." Chapter 6, Subsection "6.7.3. Complaint Mechanisms."	27, 28, 29, 34, 37, 45, 85, 168, 189, 215, 297	
2-27	Compliance with laws and regulations	1 a 10	-	-	-	In 2023, Aena has not received fines or penalties for non-compliance with applicable legislation and regulations that could be considered significant according to the internal criterion of significance.
2-28	Membership associations		17	Chapter 1, Subsection "1.2.8. European Transparency and Lobbying Register." Chapter 2, Subsection "2.1.6. Environmental-related Memberships, Alliances, and Recognitions." Chapter 3, Subsections "3.1. Commitments to Sustainable Development and Society" and "3.2. Impact of Activities on Society and the Environment."	35, 89, 143, 152	On the Aena website, a more detailed list of associations and organizations can be found. See: www.aena.es/es/corporativa/transparencia/convenios-y-acuerdos-de-colaboracion.html
5. Stakeholder engagement						
2-29	Approach to stakeholder engagement			Chapter 1, Subsections "Annual General Meeting" and "Communication with Shareholders". Chapter 2, Subsection "2.1.4. Environmental inquiries". Chapter 2, Subsection "2.3.3. Noise," Section "Communication." Chapter 3, Subsections "3.1. Commitments to Sustainable Development and Society" and "3.2.2. Impact on Local Populations and Territory." Chapter 4, Subsection "4.2.1. General Aspects," Section "Transparency and Dialogue." Chapter 5, Subsection "5.4.2. Communication with Employees." Chapter 6, Subsections "6.7.2. Customer Rights and Obligations" and "6.7.3. Complaint Mechanisms." Chapter "About this Report," Subsection "Relationship and Dialogue with Stakeholders" and infographic "Aena's Communication with its Stakeholders."	6, 8, 85, 122, 143, 154, 177, 237, 297, 314, 316	
2-30	Collective bargaining agreements	1, 3, 4, 6	8	Chapter 5, Section "5.4. Industrial Relations."	235	

GRI 3: Material Topics 2021



3-1	Process to determine material topics			Chapter "2023: Reactivation and New Challenges", Subsection "2.2. Risks in 2023." and Infographic "Main Emerging Risks in the Short, Medium, and Long Term that may arise from the context in which Aena operates." Chapter "About this Report", Subsection "Double Materiality."	16, 26, 308	
3-2	List of material topics			Chapter "2023: Reactivation and New Challenges", Subsection "2.2. Risks in 2023." and Infographic "Main Emerging Risks in the Short, Medium, and Long Term that may arise from the context in which Aena operates." Chapter "About this Report", Subsection "Double Materiality."	16, 26, 308	
Material Topic: Business Conduct (Corporate culture, corruption and bribery)						
3-3	Management of material topics	10	16	Chapter 1 "Sustainable Governance Model" Chapter 1, Sections "1.1.2. Governing Bodies", "1.2. Corporate Culture and Ethics", "1.2.1. Regulatory Compliance System", "1.2.4. Fraud, Corruption, and Bribery Prevention", "1.2.7. Specific Measures against Money Laundering", "1.4.2. Sustainability Governance", "1.4.3. Characteristics of the Sustainability Strategy", and "1.5. Sustainable Financing. Taxonomy" Chapter 3.3 Section "3.1. Commitments to sustainable development and society", "3.3.2. Human Rights due diligence procedure", section "Identification and evaluation of risks in Aena and subsidiaries, and risk prevention and mitigation measures", Chapter 4 "Responsible Supply Chain Management" Chapter 4, Sections "4.1. Criteria for Aena's Contracting", "4.1.2. Key Contracting Milestones in 2023" Subsection "Training", "4.2. Sustainable Management of the Value Chain", "4.3. Acquisition and Procurement Process", and "4.3.2. Contract Execution Processes" Chapter 6, subsections "6.6 Quality management", "6.7.3. Complaint mechanism" Chapter "About this Report", Subsection "Double Materiality."	2, 5, 20, 22, 29, 34, 50, 52, 57, 143, 160, 162, 169, 172, 174, 176, 182, 185, 286, 297, 308	
201-4	Financial assistance received from government	10	16	Chapter 1, Sections "1.1.1. Organizational Details and Ownership Structure" and "1.3.1. Fiscal Contribution"	3, 47	Consult the Annual Accounts (see Section 24)
204-1	Proportion of spending on local suppliers		16	Chapter 4, Section "4.1.1. Description of the Supply Chain."	172	Unavailable information: As of the current date, at London-Luton Airport in the United Kingdom, records of construction and service projects, materials, and equipment are not accounted for according to that classification. Additionally, it is not possible to provide information on the total number of suppliers or new ones. However, efforts are underway to provide this information in future reporting periods.
205-1	Operations assessed for risks related to corruption	10	16	Chapter 1, Section "1.2.4. Fraud, Corruption, and Bribery Prevention."	29	
205-2	Communication and training about anti-corruption policies and procedures	10	16	Chapter 1, Section "1.2.4. Fraud, Corruption, and Bribery Prevention," Subsection "Training in Fraud, Corruption, and Bribery Prevention."	30	



205-3	Confirmed incidents of corruption and actions taken	10	16	Chapter 1, Section "1.2.4. Fraud, Corruption, and Bribery Prevention," Subsection "Communications Regarding Corruption and Bribery" and Table "Nature of Confirmed Corruption Cases." Chapter 1, Section "1.2.10. Complaints Channel"	31, 31, 37	
206-1	Legal actions for anti-competitive behaviour, anti-trust, and monopoly practices	10	16	Chapter 1, Section "1.2.9. Unfair Competition"	36	As reported in the Sustainability Report - NFIS 2023, on February 20, 2020, the Commercial Court summoned Aena to respond to the lawsuit filed by Ryanair DAC, in which it seeks the annulment of a penalty imposed by Aena on Ryanair amounting to €9,000, an immaterial amount for the Organization. Ryanair also seeks the annulment of the contractual clause establishing the penalty and the refund of the imposed amount. The annulment of the contested clause is based on the assertion that it was imposed through an abuse of dominant position. The trial was scheduled for March 1, 2023; however, it was postponed and took place on January 8, 2024. Aena has consistently maintained that the basis of the Plaintiff's claim is not a matter of abuse of dominant position but rather opposition to the imposed penalty, thus a contractual issue. Aena believes that the competent courts to address this matter are those of civil jurisdiction, as it has indicated at the appropriate procedural moment.
207-1	Approach to tax		16	Chapter 1, Section "1.3 Fiscal Transparency," Subsection "Fiscal Approach"	45	
207-2	Tax governance, control, and risk management	10	16	Chapter 1, Section "1.3. Fiscal Transparency," Subsections "Fiscal Governance" and "Risk Management and Control."	45, 45	
207-3	Stakeholder engagement and management of concerns related to tax		16	Chapter 1, Section "1.3 Fiscal Transparency," Subsection "Participation of stakeholders and management of tax concerns"	46	
207-4	Contry-by-country reporting		16	Chapter 1, Section "1.3.1. Fiscal Contribution," Table "Tax Indicators"	47, 47	
415-1	Political contributions	10	16	Chapter 1, Section "1.2.8. European Transparency and Lobbying Register."	35	
Material Topic: Climate change (Mitigation and adaptation to climate change, Energy)						



3-3	Management of material topics	7, 8, 9	3, 7, 8, 12, 13, 14, 15	Chapter "2023: Reactivation and New Challenges", Section "2. Risks and Their Management." Chapter 1, Section "1.4.3. Features of the Sustainability Strategy." Chapter 2, "Commitment to the Environment" Chapter 2, Subsections "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," "2.2.1. Climate Action Plan" under Section "Specific decarbonisation targets," "2.2.3. Risks and Opportunities Related to Climate Change," "2.2.4. Metrics. Carbon Footprint," "2.2.5. Energy Efficiency and Use of Renewables," "2.2.5. Energy Efficiency and Use of Renewables" Infographic "Energy Efficiency in 2023," "2.2.6. Renewable Energies," "2.3. Pollution." Chapter "About This Report," Section "Double Materiality."	22, 52, 77, 82, 84, 90, 90, 92, 97, 100, 104, 106, 108, 114, 308	
201-2	Financial implications and other risks and opportunities due to climate change	7, 8, 9	13	Chapter 2, Sections "2.2.1. Climate Action Plan" and "2.2.3. Risks and Opportunities Related to Climate Change"	90, 97	
302-1	Energy consumption within the organization	7, 8, 9	7, 8, 12, 13	Chapter 2, Section "2.2.6. Renewable Energies," Table "Renewable Energy facilities in Spain," and Section "Energy Consumption Scheme within the Organization"	108, 112	
302-2	Energy consumption outside of the organization	7, 8, 9	7, 8, 12, 13	-	-	Not applicable: Disclosing information related to this content is not applicable since Aena provides services that do not involve external energy consumption.
302-3	Energy intensity	7, 8, 9	7, 8, 12, 13	Chapter 2, Section "2.2.6. Renewable Energies," Infographic "Energy Intensity"	111	
302-4	Reduction of energy consumption	7, 8, 9	7, 8, 12, 13	Chapter 2, Section "2.2.6. Renewable Energies," Subsection "Main Energy Consumption Indicators "	111	
302-5	Reductions in energy requirements of products and services	7, 8, 9	7, 8, 12, 13	-	-	Not applicable: Disclosing information related to this content is not applicable since Aena provides services that do not involve energy consumption by the end user.
305-1	Direct (Scope 1) GHG emissions	7, 8, 9	3,12,13,14, 15	Chapter 2, Section "2.2.4. Metrics. Carbon Footprint," Tables "Carbon Footprint" and "Direct GHG Emissions (Scope 1)".	100, 101, 102	
305-2	Energy indirect (Scope 2) GHG emissions	7, 8, 9	3,12,13,14, 15	Chapter 2, Section "2.2.4. Metrics. Carbon Footprint," Tables "Carbon Footprint" and "Indirect GHG Emissions (Scope 2)".	100, 101, 103	
305-3	Other indirect (Scope 3) GHG emissions	7, 8, 9	3,12,13,14, 15	Chapter 2, Section "2.2.4. Metrics. Carbon Footprint," Table "Carbon Footprint," Section "Scope 3 Emissions."	100, 101, 104	
305-4	GHG emissions intensity	7, 8, 9	13, 14, 15	Chapter 2, Section "2.2.4. Metrics. Carbon Footprint," Table "Intensity of GHG emissions kgCO2e/ATU (Scopes 1 and 2)."	100, 100	



305-5	Reduction of GHG emissions	7, 8, 9	13, 14, 15	Chapter 2, Section "2.2.1. Climate Action Plan," Table "Evolution and progress of decarbonization goals." Chapter 2, Section "2.2.4. Metrics. Carbon Footprint," Table "Evolution of GHG emissions (tons of CO2 equivalent)." Chapter 2, Section "2.2.6. Renewable Energies," Subsection "Reduction of emissions thanks to renewable energy installations and energy efficiency."	90, 95, 100, 100, 109	Information not available: As of the current date, no implementation measures for renewable self-consumption have been developed in the United Kingdom, although it is included in their planning up to 2026. In Brazil, the implementation of renewable self-consumption is expected 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: Disclosing information related to this content is not applicable as Grupo Aena does not significantly emit substances that deplete the ozone layer (ODS).
Material Topic: Pollution (Air pollution)						
3-3	Management of material topics	7, 8, 9	13, 14, 15	Chapter 2. Section "2.3. Pollution." Chapter "About this report". Section "Double Materiality."	114 , 308	
305-7	Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions	7, 8, 9	13, 14, 15	Chapter 2, Section "2.3.1. Air Pollution." Subsection "Indicators on atmospheric pollution"	116	
Material Topic: Water and marine resources (Water consumption)						
3-3	Management of material topics	7, 8, 9	6, 11, 12, 13, 14, 15	Chapter 1, Sections "1.4.2. Sustainability Governance" and "1.4.3. Characteristics of the Sustainability Strategy." Chapter 2, Sections "2.1. Sustainable Environmental Management Model" and "2.4. Sustainable Use of Resources: Water." Chapter "About this report", Section "Double Materiality."	50, 52, 78, 124, 308	
303-1	Interactions with water as a shared resource	7, 8, 9	6, 14	Chapter 2, Section "2.4.1. Water Management"	124	
303-2	Management of water discharge-related impacts	7, 8, 9	6, 14	Chapter 2, Section "2.4.2. Initiatives for Responsible Water Consumption," Subsection "Indicators on Water Consumption."	128	
303-3	Water withdrawal	7, 8, 9	6, 14	Chapter 2, Section "2.4.2. Initiatives for Responsible Water Consumption," Subsection "Indicators on Water Consumption," Table "Water Extraction/Consumption."	128	
303-4	Water discharge	7, 8, 9	6, 14	Chapter 2, Section "2.4.2. Initiatives for Responsible Water Consumption," Subsection "Indicators on Water Consumption," Tables "Wastewater Discharges by Water Type - Thousands of m3" and "Wastewater Discharges by Destination - Thousands of m3."	129, 130	Unavailable information: At the moment, the closing date for this categorization report regarding London-Luton Airport in the United Kingdom is not available. However, efforts are underway to include this information in future reports.
303-5	Water consumption	7, 8, 9	6, 14	Chapter 2, Section "2.4.2. Initiatives for Responsible Water Consumption," Subsection "Indicators on Water Consumption," Table "Water Extraction/Consumption."	128	
Material Topic: Biodiversity (Impacts on the status of species)						



3-3	Management of material topics			Chapter 1, Sections "1.4.2. Sustainability Governance" and "1.4.3. Characteristics of the Sustainability Strategy." Chapter 2, Subsections "2.1. Sustainable Environmental Management Model" and "2.5.2. Protected Areas." Chapter "About this report", Section "Double Materiality."	50, 52, 78, 132, 308	
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	Chapter 2, Sections "2.5.1. Biodiversity Management and Protection Model" and "2.5.2. Protected Areas."	131, 132	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	Chapter 2, Section "2.5.1. Biodiversity Management and Protection Model," subsection "Main Impacts of Activity on the Environment," and Sections "2.5.2. Protected Areas" and "2.5.3. Studies on Surrounding Wildlife and Control Services."	131, 131, 132, 133	



304-3

Habitats protected or restored

7, 8, 9

15

Chapter 2, Sections "2.5.2. Protected Areas" and "2.5.3. Studies on Surrounding Wildlife and Control Services."

132, 133

Spain is one of the countries with the greatest biological diversity in the European Union and the airports in 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, inside 24 of the 46 airports in the network there is some protected natural space (see note (2) below the GRI table).

In this regard, it should be noted that the actions of airports and the companies that carry out their work there are carried out in strict compliance with current legislation. As a result, any possible action that may affect these areas must obtain the corresponding resolution or environmental permit, and actions that alter said spaces cannot be carried out without the application of the corresponding protective measures that these resolutions determine.

These areas are perfectly delimited by the responsible for each airport in order to limit any action that is carried out on them to ensure that their natural values are maintained. Both the London-Luton Airport in the United Kingdom and the airports of Aena subsidiaries in Brazil are not located in protected areas. Likewise, indicate that in the Environmental Resolutions published on the Aena website, the special protection areas found inside the airport premises can be consulted, as well as the measures carried out to protect them and correct their possible condition. The application of these measures established in the environmental resolutions are supervised by the Ministry both during the construction and exploitation phases of the projects, through the Environmental Surveillance Plan (PVA) carried out by the company. Through this PVA, the application of each of the planned corrective measures is controlled, providing information about their efficiency and correct execution.



304-4	IUCN Red List species and national conservation list species with habitats in areas affected by operations	7, 8, 9	15	Chapter 2, Sections "2.5.2. Protected Areas" and "2.5.3. Studies on the Surrounding Wildlife and Control Services".	132, 133	<p>Aena's airports and heliports are located throughout the Spanish geography, in the central area of the United Kingdom, and in 9 states of Brazil. Habitats located in these areas could be affected by Aena's operations. However, through environmental impact assessments and wildlife risk management studies, different species that could be affected have been identified, and the main measures adopted for biodiversity protection have been defined.</p> <p>Regarding the specific value of biodiversity in Spanish airport facilities, this is documented in the environmental resolutions published on Aena's website, specifying the level of protection. In the case of Aena's airports in the United Kingdom and Brazil, they are not located in areas of special protection nor have protected species been identified on their premises. The presence of the species <i>Calidris pusilla</i> has been detected only at Presidente Castro Pinto Airport, with the following protection level: International level: NT; National level: EN.</p>
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Material Topic: Circular economy (Output of resources related to products and services, Waste)

3-3	Management of material topics			Chapter 1, Sections "1.4.2. Sustainability Governance" and "1.4.3. Characteristics of the Sustainability Strategy." Chapter 2, Sections "2.1. Sustainable Environmental Management" and "2.6. Waste Management and Circular Economy in Airport Facilities." Chapter "About this report", Section "Double Materiality."	50, 52, 78, 135, 308	
306-1	Waste generation and significant waste-related impacts	7, 8, 9	11, 12	Chapter 2, Section "2.6.1. Waste Management and Circular Economy Model"	135	
306-2	Management of significant waste-related impacts	7, 8, 9	11, 12, 13, 15	Chapter 2, Sections "2.6.1. Waste Management and Circular Economy Model," "2.6.3. Initiatives for Waste Reduction, Reuse, Recycling, and Proper Treatment of Hazardous Waste," and "2.6.4. Collaborative Initiatives for Waste Reduction, Reuse, and Recycling with Third Parties."	135, 139, 140	
306-3	Waste generated	7, 8, 9	11, 12	Chapter 2, Section "2.6.5. Waste Indicators," Table "Generated Waste, Waste Not Destined for Disposal, and Waste Destined for Disposal."	141	
306-4	Waste diverted from disposal	7, 8, 9	11, 12	Chapter 2, Section "2.6.5. Waste Indicators," Table "Generated Waste, Waste Not Destined for Disposal, and Waste Destined for Disposal."	141	<p>Information not available: Currently, the breakdown of the type of waste valorization carried out by third parties is not available. Efforts are being made to provide this information in future reports.</p>



306-5	Waste directed to disposal	7, 8, 9	11, 12	Chapter 2, Section "2.6.5. Waste Indicators," Table "Generated Waste, Waste Not Destined for Disposal, and Waste Destined for Disposal."	141	
Material Topic: Research, innovation, design y digital transformation (Research, innovation, design y digital transformation)						
3-3	Management of material topics	9	4, 9, 12	Chapter 7, Section "7.1. Innovation Management at Aena." Chapter "About this report", Section "Double Materiality."	300, 301, 308	
404-2	Programs for upgrading employee skills and transition assistance programs	9	4, 9, 12	Chap. 5, sections "5.3.2. Attraction, developing and retaining of talent", "5.3.3. Training", section "Significant actions in 2023 regarding training"	223, 227, 228	
Material topic: Affected groups (Noise, Economic, social and cultural rights of the groups)						
3-3	Management of material topics	1, 2	5, 8, 9, 11, 16, 17	Chapter 2, Section "2.3.3. Noise" Chapter 3 "Commitment to society and human rights" Chapter 3, Subsection "3.2. Impact of the activity on society and the environment" About this report, Section "Double Materiality."	117, 142, 152, 308	
AO7	Exposure to noise		11	Chapter 2, Section "2.3.3. Noise," Subsection "Measurement, reduction, and control."	119	Information not available: No soundproofing actions have been carried out in Brazil to date. However, efforts continue to improve the measurement and monitoring of aircraft noise, as well as to track this information through the creation of External Committees with various stakeholders from local communities.
201-1	Direct economic value generated and distributed			Chapter 3, Subsection "3.2.1. Creation of social value," Tables "Generation of resources in the community (Social cash flow)" and "Social impact indicators."	152, 152, 154	
203-2	Significant indirect economic impacts		16	Chapter 2, Subsection "2.3.3. Noise," Section "Sound Insulation Plans." Chapter 3, Subsections "3.2.1. Creation of social value" and "3.2.2. Impact on local populations and territory."	121, 152, 154	
413-1	Operations with local community engagement, impact assessments, and development programs		8,17	Chapter 2, Subsections "2.1.3. Management of environmental risks and impacts" and "2.5.2. Protected spaces." Chapter 3, Subsections "3.1. Commitments to Sustainable Development and Society," "3.1.1. Social Action: Contributions to Foundations and Non-Profit Entities," and "3.2. Impact of Activity on Society and the Environment." Chapter 5, Subsection "5.5.1. Aena's Health and Safety Model," Section "Communication, Dialogue, and Employee Participation in Occupational Safety." Chapter "About this Report," Subsection "Relationship and Dialogue with Stakeholders" and Section "Aena's Communication with its Stakeholders." Chapter "About this Report," Subsection "Communication and Transparency."	84, 132, 143, 146, 152, 245, 314, 316, 320	



413-2	Operations with significant actual and potential negative impacts on local communities	1, 2	11	Chapter 3, Subsection "3.2.2. Impact on Local Populations and Territory," Section "Operations with Significant Negative Impacts." Chapter "About this Report," Subsection "Relationship and Dialogue with Stakeholders," and Section "Communication with Aena's Stakeholders."	155, 314, 316	
Material topic: Workers in the value chain (Working conditions, Equal treatment and opportunities for all)						
3-3	Management of material topics	1, 2, 3, 4, 5	8	Chapter 3 "Commitment to Society and Human Rights" Chapter 3, Subsection 3.3.1 "Formal Commitment to Human Rights" Chapter 3, Subsection "3.3.2. Human Rights Due Diligence Procedure," Section "Identification and Assessment of Risks in Aena and Subsidiaries, and Prevention and Mitigation Measures." Chapter "About this Report," Subsection "Double Materiality."	142, 157, 160, 308	
308-1	New suppliers that were screened using environmental criteria		8	Chapter 4. Section "4.3.1 Inclusion of Social and Environmental Issues in the bidding Processes".	183	
308-2	Negative environmental impacts in the supply chain and actions taken		8	Chapter 4. Section "4.3.2 Contract Execution Processes", Subsection "Negative Impacts on the Supply Chain"	189	
407-1	Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	3	8	Chapter 3, Section "3.3.2. Human Rights Due Diligence Procedure," Subsection "Identification and Assessment of Risks at Aena and Subsidiary Companies, and Prevention and Mitigation Measures." Chapter 4, Section "4.3.2. Contract Execution Processes," Subsection "Negative Impacts on the Supply Chain." Chapter 5, Subsection "5.4. Industrial Relations".	162, 189, 235	
408-1	Operations and suppliers at significant risk for incidents of child labor	2, 5	8	Chapter 3, Section "3.3.2. Human Rights Due Diligence Procedure," Subsection "Identification and evaluation of risks in Aena and subsidiaries, and risk prevention and mitigation measures."	162	
409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labor	2, 4	8	Chapter 3, Section "3.3.2. Human Rights Due Diligence Procedure," Subsection "Identification and evaluation of risks in Aena and subsidiaries, and risk prevention and mitigation measures."	162	
410-1	Security personnel trained in human rights policies or procedures	2, 4	8			Not applicable: Security personnel training is not the responsibility of Aena. However, the tender documents for companies providing services at airports include a clause on "Diversity and Airport Culture," which includes sections to ensure equal treatment for users. Additionally, monitoring of compliance with applicable regulations is carried out.
411-1	Incidents of violations involving rights of indigenous people	1, 2, 4	8	Chapter 3, Section "3.3.2. Human Rights Due Diligence Procedure," Subsection "Mechanisms for making complaints: reporting human rights violations".	168	As of the date of this report, there is no knowledge of possible cases of violation of the rights of indigenous peoples.



414-1	New suppliers that were screened using social criteria		8	Chapter 4, Section 4.3.1: "Inclusion of Social and Environmental Issues in Tender Processes"	183	
414-2	Negative social impacts in the supply chain and actions taken	1, 2, 4	8	Chapter 4, Section 4.3.2: "Execution of Contract Processes, Subsection 'Negative Impacts on the Supply Chain'."	189	
Material Topic: Own Workforce (Work conditions, equal treatment y opportunities for everyone, other labor rights)						
3-3	Management of material topics	3, 6	3, 4, 5, 8, 10, 16	<p>Chap. 5 "Social and personnel issues"</p> <p>Chap. 5, Section "Introduction"</p> <p>Chap. 5, Section "Introduction," Section "Personnel management risks."</p> <p>Chap. 5, Sections "5.1.1. Main staff data", "5.1.2. Remuneration model", "5.1.3. Organization of work time and disconnection", "5.2. Diversity and inclusion", "5.2.1. Gender diversity", "5.2.1. Gender diversity" Section "Cases of discrimination and corrective actions", "5.2.2. Universal accessibility to employment for people with disabilities", "5.2.3. Accessibility in services", "5.2.6. Generational diversity, age management and promotion of the labour integration of young people", "5.3. Promotion and development of talent, skills and knowledge", "5.3.3. Training", "5.4. Industrial relations", "5.4.2. Communication with workers", "5.5. Health and safety at work", "5.5.1. Aena health and safety model", "5.5.1. Health and safety model" Section "Communication, dialogue and employee participation in occupational safety", "5.5.2. Promotion of the health and well-being of workers" Section "Specific conciliation and well-being measures"</p> <p>Chapter. 6 "Safe and quality services"</p> <p>Chap. "About this report," Section "Double Materiality."</p>	190, 191, 192, 194, 204, 209, 211, 213, 215, 219, 220, 221, 223, 227, 235, 237, 240, 241, 245, 255, 262, 308	
202-1	Ratios of standard entry level wage by gender compared to local minimum wage		16	Chapter 5, Section "5.1.2. Remuneration Model," Subsection "Comparison with the Minimum Interprofessional Wage"	208	
401-1	New employee hires and employee turnover	6	5, 8, 10	Chapter 5, Section "5.1.1. Main Workforce Data," Subsections "Recruitments", "Dismissals," and "Turnover Rate."	198, 200, 202	
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	6	3, 5, 8	<p>Chapter 5, Section "5.1.2. Remuneration Model."</p> <p>Chapter 5, Section "5.5.2. Promotion of Health and Well-being of Workers," Subsection "Specific Measures for Work-Life Balance and Well-being."</p>	204, 255	The usual benefits for full-time employees are similar to those for part-time employees.
401-3	Parental leave	6	5, 8	<p>Chapter 5, Section "5.5.2. Promotion of Health and Well-being of Workers," Subsection "Specific Measures for Work-Life Balance and Well-being."</p> <p>Chapter 5, Section "5.5.2. Promotion of Health and Well-being of Workers," Table "Parental Leave."</p>	255, 257	
402-1	Minimum notice periods regarding operational changes	3	3, 8	Chapter 5, Section "5.4.4. Restructurings".	239	
403-1	Occupational health and safety management system	3	3, 8	Chapter 5, Section "5.5.1. Aena's Health and Safety Model".	241	
403-2	Hazard identification, risk assessment, and incident investigation	3	3, 8	Chapter 5, Section "5.5.1. Aena's Health and Safety Model," Subsections "Hazard Identification, Risk Assessment, and Accident Investigation" and "Reporting, Recording, and Investigating Accidents."	244, 246	



403-3	Occupational health services	3	3, 8	Chapter 5, Section "5.5.2. Promotion of Health and Well-being of Employees."	254	
403-4	Worker participation, consultation, and communication on occupational health and safety	3	3, 8	Chapter 5, Section "5.5.1. Aena's Health and Safety Model," Subsection "Communication, Dialogue, and Employee Participation in Occupational Safety."	245	
403-5	Worker training on occupational health and safety	3	3, 8	Chapter 5, Section "5.5.1. Aena's Health and Safety Model," Subsection "Training in Occupational Health and Safety."	253	
403-6	Promotion of worker health	3	3, 8	Chapter 5, Section "5.5.2. Promotion of Health and Well-being of Employees."	254	
403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships		3, 8	Chapter 5, Subsection "5.5.3. Commitment to Companies (External/Concurrent)."	260	
403-8	Workers covered by an occupational health and safety management system		3, 8	Chapter 5, Subsection "5.5.1. Aena's Health and Safety Model."	241	
403-9	Work-related injuries		3, 8	Chapter 5, Subsection "5.5.1. Aena's Health and Safety Model," Tables "Accidents (Own Staff)" and "Absenteeism (Own Staff)."	248, 249, 252	<p>Regarding the accident rate of non-employee workers, in 2023 in Spain, information has been collected voluntarily by third parties through the platform provided for this purpose. In this regard, 571 accidents have been reported from 21 different airports, all of them minor.</p> <p>On the other hand, at Aena's subsidiary airports in Brazil, 2 accidents have occurred, based on data obtained from the companies with the highest volume of activity at the airports.</p> <p>Lastly, at London-Luton Airport in the United Kingdom, the number of accidents has been 18.</p>
403-10	Work-related ill health		3, 8	Chapter 5, Subsection "5.5.1. Aena's Health and Safety Model," Table "Number of Occupational Diseases Declared by Region by the Insurance Company (Own Staff)."	251	Information not available: Aena has information on third-party accidents. However, it does not register information on occupational diseases to date.
404-1	Average hours of training per year per employee		4, 5, 8, 10	Chapter 5, Subsection "5.3.3. Training," Tables "Main Training Data" and "Training Hours by Gender, Professional Category, and Region."	231, 232	
404-2	Programs for upgrading employee skills and transition assistance programs		8	Chapter 5, Subsection "5.3.2. Attraction, Development, and Talent," Chapter 5, Subsection "5.3.3. Training," and Section "Significant training actions in 2023"	223, 227, 228	
404-3	Percentage of employees receiving regular performance and career development reviews		8	Chapter 5, Subsection "5.3.2. Attraction, Development, and Talent," Table "Percentage of Staff that has Received Performance Evaluation by Gender and Professional Category (%)."	226	



405-1	Diversity of governance bodies and employees	6	5, 8, 10	Chapter 1, Subsection "1.1.2. Governing Bodies," Table "Diverse and Balanced Board of Directors in Competencies, Origins, Experiences, Age, and Gender (as of December 31, 2023)." Chapter 5, Subsection "5.2.1. Gender Diversity," Table "Percentage of Staff by Gender, Age, and Professional Category (as of December 31)." Chapter 5, Subsection "5.2.2. Universal Accessibility to Employment for People with Disabilities," Table "Employees with Disabilities."	11, 217, 219	Confidentiality restrictions: In the United Kingdom, disability is considered a protected characteristic under the Equal Opportunity Act 2010 (covering all local employees). Information can only be available for those workers who voluntarily provide such information. Based on the above, in 2023, 9 employees with disabilities have worked at London-Luton Airport.
405-2	Ratio of basic salary and remuneration of women to men	6	5, 8, 10	Chapter 1, Subsection "1.1.2. Governing Bodies," Section "Remuneration of the Board and Senior Management," Table "Remuneration Received by Directors and Executives." Chapter 5, Subsection "5.1.2. Remuneration Model," Table "Average Remuneration and Its Evolution Disaggregated by Gender, Age, and Professional Classification or Equivalent Value." Chapter 5, Subsection "5.1.2. Remuneration Model," Table "Gender Pay Gap."	19, 207, 208	
406-1	Incidents of discrimination and corrective actions taken	6	5, 8, 10	Chapter 1, Section "1.2.10. Whistleblower Channel." Chapter 3, Section "3.3.2. Human Rights Due Diligence Procedure," Subsection "Complaint Mechanisms: Reports of Human Rights Violations." Chapter 5, Section "5.2.1. Gender Diversity," Subsection "Cases of Discrimination and Corrective Actions."	37, 168, 215	
Material Topic: Growth (Internationalization, Sustainability and economic profitability)						
3-3	Management of material topics	-	8, 9, 16	Chapter "2023: Reactivation and New Challenges," Section "1. The Aviation Sector" Chapter 1, Section "1.5. Sustainable Financing. Taxonomy." Chapter "About this Report," Section "Double Materiality."	15, 57, 308	
2-22	Statement on sustainable development strategy	-	-	Chapter "2023: Reactivation and New Challenges," Section "1.2. Progress Status of the 2022-2026 Strategic Plan"	22	
203-1	Infrastructure investments and services supported	0	8, 9, 16	Chapter 2, Section "2.3.3. Noise," Subsection "Sound Isolation Plans." Chapter 3, Subsections "3.1.1. Social Action: Contributions to Foundations and Non-profit Organizations," "3.2.1. Creation of Social Value," and "3.2.2. Impact on Local Populations and Territory."	121, 146, 152, 154	
Material Topic: Cybersecurity						
3-3	Management of material topics		16	Chapter 1, Section "1.2.11. Data Protection." Chapter 6 "Secure and Quality Services." Chapter 6, Subsection "6.3. Cybersecurity or Information Security." Chapter "About this report", Section "Double Materiality."	40, 262, 280, 308	



418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	1	16	Chapter 1, Section "1.2.11. Data Protection," Table "Indicators on Data Protection."	44	
Material Topic: Consumers and end users (Information-related impacts for consumers or end users, Personal safety of consumers or end users, Social inclusion of consumers or end users)						
3-3	Management of material topics		3, 12, 16	Chapter 6 "Safe and Quality Services." Chapter 6, Infographic "Guarantee of Safety and Health at Aena." Chapter 6, Sections "6.1. Operational Safety," "6.1.4. Audits, verifications, and general aeronautical safety drills," "6.2. Airport Security," "6.4. Health Security," "6.6. Quality management," "6.7.3. Complaint mechanisms"; Chapter "About this Report," Sections "Double Materiality," "Relationship and Dialogue with Stakeholders," and "Communication and Transparency."	262, 263, 264, 266, 273, 284, 286, 297, 308, 314, 320	
416-1	Assessment of the health and safety impacts of product and service categories		3, 16	Chapter 6, Section "6.1.4. Audits, verifications, and general aeronautical safety drills for Operational Safety." Chapter 6, Section "6.2.3. Excellent Levels of Airport Security," Subsection "Audits, verifications, and drills for Airport Security." Chapter 6, Section "6.4 Health Security."	266, 277, 284	
416-2	Incidents of non-compliance concerning the health and safety impacts of products and services		3, 16	Chapter 6, Section "6.7.3. Complaint Mechanisms."	297	
417-1	Requirements for product and service information and labeling		12	Chapter 6, Section "6.7.3. Complaint Mechanisms."	297	Not applicable due to the nature of Aena's activities.
417-2	Incidents of non-compliance concerning product and service information and labeling		12, 16	Chapter 6, Section "6.7.3. Complaint Mechanisms."	297	
417-3	Incidents of non-compliance concerning marketing communications		12, 16	Chapter 6, Section "6.7.3. Complaint Mechanisms."	297	
Material topic: Airport Capacity						
3-3	Management of material topics	9	4, 9, 12	Chapter 7 "Innovation". 7.1. Innovation Management at Aena. Chapter "About this Report," Section "Double Materiality."	301, 308	
Material Topic: Legal nature						
3-3	Management of material topics	1 a 10	16, 17	Chapter "2023: Reactivation and New Challenges", Section "1. The Aviation Sector". Chapter 1 "Sustainable Governance Model". Chapter 1, Subsections "1.2. Corporate Culture and Ethics" and "1.2.1. Regulatory Compliance System". Chapter "About this Report," Section "Double Materiality."	2, 15, 20, 22, 308	



Tax indicators (GRI 207-4)

Tax jurisdictions in which Aena has holdings	Revenues			Corporate income tax			
	Year-end staff	Third-party sales	Intra-group transactions	Profit before tax	Tangible assets other than cash and cash equivalents	Paid	Cumulative over profit
2023							
SPAIN (Aena, S.M.E., S.A., Aena Sociedad Concesionaria del AIRM, S.M.E., S.A. y ADI, S.M.E., S.A.)	8,502	4,423.1	16.5	1,869.35	11,964.6	414.4	454.6
UNITED KINGDOM (London Luton Airport Operations Ltd)	814	341		41.89	217.7	17.9	12.8
BRAZIL (Aeroportos do Nordeste do Brasil, S.A.)	795	259.2		158.56	1.4	1	53.4
2022							
SPAIN (Aena, S.M.E., S.A., Aena Sociedad Concesionaria del AIRM, S.M.E., S.A. y 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

(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

The type of operation to be carried out in the natural spaces located at airports is classified as “Office” based on the classification of the GRI Guides.

Regarding the value of the biodiversity existing in airport facilities, this is included in the environmental resolutions published on the Aena website, where their level of protection is specified.



In the case of Aena airports in the United Kingdom and Brazil, they are not located in specially protected natural areas nor do they have protected species identified on their premises. The presence of *Calidris pusilla* has only been detected at the Presidente Castro Pinto airport with the following level of protection: International level: NT; National level: EN

Sustainability Accounting Standards Board (SASB) Content Index

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 commercial sector and services	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'.	40, 281	
	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'.	40	
	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'.	44, 283	



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)'.	11, 194, 214, 217	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'.	202	
Professional integrity	SV-PS-510a.1	Approach to ensuring professional integrity	Chap. 1, Section '1.2. Culture and corporate ethics'.	20	
	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'.	31	
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)'.	100, 101, 102	
	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'.	90, 92, 95	
Air quality	TR-AF-120a.1	Atmospheric emissions of NOx, SOx and PM10	Chap. 2, Section '2.3.1 Air pollution', Table 'Nitrogen oxides (NOx), sulphur oxides (SOx) and other significant air emissions'.	116	
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)'.	248	
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'.	264	
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.'	111	
	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'.	104	
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'.	128	
	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'.	124	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.'	86, 183	
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'.	97	



Annex I: Taxonomy 2022

Alignment with taxonomy by activity and environmental objective																
Turnover				Substantial criteria	contribution	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 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%													
B. NON-ELIGIBLE ACTIVITIES UNDER THE TAXONOMY																
Turnover volume of non-eligible activities under the taxonomy (B)		1,658.66	39.20%													
Total (A + B)		4,228.62	100.00%													

Alignment with taxonomy by activity and environmental objective																	
CapEx				Substantial criteria	contribution	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)	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 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. NON-ELIGIBLE ACTIVITIES UNDER THE TAXONOMY																	
CapEx volume of non-eligible activities under the taxonomy (B)		319.94	45.30%														
Total (A + B)		706.52	100.00%														

Alignment with taxonomy by activity and environmental objective																										
OpEx				Substantial criteria	contribution	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
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	N/A	Y	—%	F											
Low-carbon airport infrastructures	6.17	11.81	4.10%	4.10%	—%	Y	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	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	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	N/A	Y	—%	F											
Acquisition and ownership of buildings	7.7	83.36	29.20%	29.20%	—%	Y	Y	Y	Y	Y	Y	Y	Y	29.23%												
Turnover volume of environmentally sustainable activities (that comply with the taxonomy) (eligible and 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. NON-ELIGIBLE ACTIVITIES UNDER THE TAXONOMY																										
Turnover volume of non-eligible activities under the taxonomy (B)		113.03	39.60%																							
Total (A + B)		285.21	100.00%																			33.37%				



Links of interest

(GRI 2-23)

Overview of the document	
Aena's website	www.aena.es
Aena's Consolidated Annual Accounts 2022	www.aena.es/es/accionistas-e-inversores/informacion-economico-financiera/publicaciones-financieras-y-operativas.html
Shareholders and investors portal	www.aena.es/es/accionistas-e-inversores.html
Social Sustainability section of the Aena website	www.aena.es/es/corporativa/rc/negocio-responsable/negocio-responsable-aena.html
Environmental section of the Aena website	www.aena.es/es/corporativa/sostenibilidad-ambiental/oficina-de-atencion-ambiental.html
Contracting and companies	www.aena.es/es/negocioscomerciales/negocios-comerciales.html
General information for users and airlines in general	www.aena.es/es/pasajeros/pasajeros.html
Employment portal	empleo.aena.es/empleo/
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
Company Bylaws	www.aena.es/sites/Satellite?blobcol=urldata&blobkey=id&blobtable=MungoBlobs&blobwhere=1576857202785&ssbinary=true
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/es/accionistas-e-inversores/gobierno-corporativo/reglamentos-consejo-administracion.html
Corporate policies	www.aena.es/es/accionistas-e-inversores/gobierno-corporativo/politicas-corporativas.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/es/accionistas-e-inversores/gobierno-corporativo/comisiones-del-consejo.html
Activities reports of Board committees	www.aena.es/es/accionistas-e-inversores/gobierno-corporativo/informes/otros-informes.html
Composition of the Board of Directors and their CVs	www.aena.es/es/accionistas-e-inversores/gobierno-corporativo/consejo-de-administracion.html



Composition of the Executive Management Committee and their CVs	www.aena.es/es/corporativa/sobre-aena/comite-de-direccion-ejecutivo.html
Annual Report on Remuneration	www.aena.es/es/accionistas-e-inversores/gobierno-corporativo/informes/remuneracion-consejeros.html
Corporate Governance Report	www.aena.es/es/accionistas-e-inversores/gobierno-corporativo/informes/informes-gobierno-corporativo.html
Aena's Non-financial Information Statement 2021	www.aena.es/es/corporativa/rc/balance-sostenibilidad/estado-de-la-informacion-no-financiera.html
Airport Regulation Document (DORA) 2022-2026	www.mitma.gob.es/recursos_mfom/dora_2022-2026.pdf
Aena's Complaints Channel	serviciotelematicos.aena.es/es/servicios-telematicos/servicios-disponibles/ciudadanos/canal-de-denuncias.html
ANB Ethics Channel	aloetica.com.br/otrs/canal-de-etica.pl?CustomerID=aenabrazil;Language=es
Aena's website privacy policy	www.aena.es/es/politica-de-privacidad.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/es/accionistas-e-inversores/informacion-general/operaciones-vinculadas.html
Aena Tax Strategy	www.aena.es/es/accionistas-e-inversores/informacion-economico-financiera/transparencia-fiscal/estrategia-fiscal.html
Sustainability Strategy 2021-2030	www.aena.es/es/corporativa/sostenibilidad-ambiental/sostenibilidad/estrategia-de-sostenibilidad.html
Strategic Plan 2022-2026	www.aena.es/es/accionistas-e-inversores/informacion-general/plan-estrategico.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/es/corporativa/sostenibilidad-ambiental/oficina-de-atencion-ambiental.html
Interactive noise maps of Aena	www.aena.es/es/corporativa/sostenibilidad-ambiental/ruido/mapas-interactivos-de-ruido.html
The Telematic Services portal	serviciotelematicos.aena.es/es/servicios-telematicos/servicios-telematicos.html
London-Luton Airport interactive noise map (TraVis)	travisln.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 <i>Feedback-form</i>	www.london-luton.co.uk/contact-us
ANB's complaints channel Canal de Ouvidoria	ouvidoria.aenabrazil.com.br/
Aena Climate Action Plan 2021-2030: path to zero emissions	www.aena.es/es/corporativa/sostenibilidad-ambiental/cambio-climatico/plan-accion-climatica.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/es/redair---mapa-de-estaciones.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/es/corporativa/sostenibilidad-ambiental/calidad-del-aire.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/es/corporativa/sostenibilidad-ambiental/evaluacion-ambiental/evaluacion-de-impacto-ambiental-de-proyecto-eia.html
Chapter 3: Commitment to society and human rights	
Collaboration agreements signed by Aena	www.aena.es/es/corporativa/transparencia/convenios-y-acuerdos-de-colaboracion.html
Environmental Master Plans	www.aena.es/es/corporativa/sostenibilidad-ambiental/evaluacion-ambiental/evaluacion-ambiental-estrategica-de-planes-eae.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/
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/es/corporativa/aena-internacional/contratacion/norma-de-contratacion.html
Landing page for Aena Suppliers and Aena Companies	contratacion.aena.es/contratacion/?_ga=2.131687503.1303479140.1609751344-996859737.1585825955
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/es/corporativa/prevencion-riesgos-laborales.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

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.aenabrazil.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.aenabrazil.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.aenabrazil.com.br/pt/aeroportos/aeroporto-internacional-de-joao-pessoa-presidente-castro-pinto/Assistencia-especial-.html

Special assistance for persons with reduced mobility – Aracaju – Santa Maria Airport

www.aenabrazil.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.aenabrazil.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.aenabrazil.com.br/pt/aeroportos/aeroporto-de-campina-grande-presidente-joao-suassuna/Assistencia-especial.html

Passenger rights

www.aena.es/es/pasajeros/viajeros/incidencias-en-tu-viaje.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 2023

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 2023

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 Sustainability Report - Consolidated Non-Financial Information Statement for the year ended 31 December 2023 of AENA S.M.E., S.A. (the Parent) and its subsidiaries (the Group), which forms part of the Group's consolidated directors' report for 2023.

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 "Table of Contents GRI" and "Table of Contents Law 11/2018" tables included in the accompanying Sustainability Report - Consolidated Non-Financial Information Statement.

Directors' Responsibilities

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 "Table of Contents Law 11/2018" table and in accordance with the GRI standards as indicated for each matter in the "Table of Contents GRI" 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 Management

We have complied with the independence and other ethical requirements of the International Code of Ethics for Professional Accountants (including International Independence Standards) issued by the International Ethics Standards Board for Accountants (IESBA Code), which is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

Our firm applies International Standard on Quality Management (ISQM) 1, which requires the firm to design, implement and operate a system of quality management including policies or 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 on 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 work 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, 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 2023 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 2023.
- 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 2023.
- 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 2023 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, based on the Delegated Acts adopted in accordance with the provisions of that Regulation, establishes the obligation to disclose information on how and to what extent an undertaking's activities are associated with eligible economic activities in relation to the environmental objectives of the sustainable use and protection of water and marine resources, the transition to a circular economy, pollution prevention and control and the protection and restoration of biodiversity and ecosystems (the other environmental objectives), and in respect of certain new activities included in the climate change mitigation and climate change adaptation objectives, for the first time for 2023, in addition to the information referring to eligible and aligned activities required in 2022 in relation to the climate change mitigation and climate change adaptation objectives. Therefore, the accompanying Sustainability Report - Consolidated Non-Financial Information Statement does not include comparative information on eligibility in relation to the other environmental objectives indicated above or to the new activities included in the climate change mitigation and climate change adaptation objectives. Also, since the information relating to 2022 was not required with the same level of detail as in 2023, the information disclosed in the accompanying 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 accompanying 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 "Table of Contents GRI" table included in the Sustainability Report - Consolidated Non-Financial Information Statement for the year ended 31 December 2023 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 2023 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 "Table of Contents Law 11/2018" 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

February 27, 2024



AEENC46458

AENA S.M.E., S.A.

Independent limited assurance
report on greenhouse gas (GHG)
inventory

February 27, 2024

Translation of a report originally issued in Spanish. In the event of a discrepancy, the Spanish-language version prevails.

INDEPENDENT LIMITED ASSURANCE REPORT ON GREENHOUSE GAS (GHG) INVENTORY

To the Management of AENA, S.M.E., S.A.,

We have performed a limited assurance engagement on the accompanying 2023 GHG inventory of AENA, S.M.E., S.A. (the Parent) and its subsidiary AENA Sociedad Concesionaria del Aeropuerto Internacional de la Región de Murcia, S.M.E., S.A. ("AENA") for the year ended 31 December 2023, which includes the inventory of emissions and the related explanatory notes. This engagement was carried out by a multidisciplinary team that includes assurance practitioners.

Responsibilities of Management

Management of AENA is responsible for the preparation and content of the 2023 GHG inventory in accordance with the Greenhouse Gas Protocol applied as explained in AENA's internal calculation procedure "Carbon Footprint Calculation Procedure of Aena S.M.E., S.A. and Aena Sociedad Concesionaria Aeropuerto Internacional de la Región de Murcia", available on its website. These responsibilities include the design, implementation and maintenance of internal control relevant to enabling the GHG inventory to be free from material misstatement, whether due to fraud or error.

The quantification of GHGs is subject to inherent uncertainty due to the incomplete scientific knowledge used to determine the emission factors and values needed to combine emissions of different gases.

Our Independence and Quality Management

We have complied with the independence and other ethical requirements of the International Code of Ethics for Professional Accountants (including International Independence Standards) issued by the International Ethics Standards Board for Accountants (IESBA Code), which is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

Our firm applies International Standard on Quality Management (ISQM) 1, which requires the firm to design, implement and operate a system of quality management including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

Our Responsibility

Our responsibility is to express a limited assurance conclusion on the 2023 GHG inventory based on the procedures performed by us and the evidence obtained. We conducted our limited assurance engagement in accordance with International Standard on Assurance Engagements (ISAE) 3410, Assurance Engagements on Greenhouse Gas Statements (ISAE 3410) issued by the International Auditing and Assurance Standards Board (IAASB). That Standard requires that we plan and perform this engagement to obtain limited assurance about whether AENA's 2023 GHG inventory is free from material misstatement.

A limited assurance engagement conducted in accordance with this ISAE 3410 includes assessing the suitability in the circumstances of AENA's use of the Greenhouse Gas Protocol as the basis for preparing the 2023 GHG inventory, assessing the risks of material misstatement, whether due to fraud or error, in the 2023 GHG inventory, as a response to the assessed risks, as necessary in the circumstances, and evaluating the overall presentation of the 2023 GHG inventory. A limited assurance engagement is substantially less in scope than a reasonable assurance engagement in relation to both the risk assessment procedures, including an understanding of internal control, and the procedures performed in response to the assessed risks.

The procedures we performed were based on our professional judgement and included inquiries, observation of processes performed, inspection of documents, analytical procedures, evaluating the appropriateness of quantification methods and reporting policies, and agreeing or reconciling with underlying records.

Given the circumstances of the engagement, in performing the procedures listed above we:

- Through inquiries, obtained an understanding of AENA's control environment and information systems relevant to emissions quantification and reporting, but did not evaluate the design of particular control activities, obtain evidence about their implementation or test their operating effectiveness.
- Evaluated whether AENA's methods for developing estimates are appropriate and had been consistently applied. However, our procedures did not include testing the data on which the estimates are based or separately developing our own estimates against which to evaluate AENA's estimates.
- We verified, by means of sample-based analytical and substantive tests, the quantitative information used to determine the 2023 GHG inventory and the adequate compilation thereof based on the data furnished by the information sources of AENA.
- We obtained a representation letter from the directors and management.

The procedures performed in a limited assurance engagement vary in nature from, and are less in extent than for, a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had we performed a reasonable assurance engagement. Accordingly, we do not express a reasonable assurance opinion about whether AENA's 2023 GHG inventory has been prepared, in all material respects, in accordance with the Greenhouse Gas Protocol applied as explained in AENA's internal calculation procedure "Carbon Footprint Calculation Procedure of Aena S.M.E., S.A. and Aena Sociedad Concesionaria Aeropuerto Internacional de la Región de Murcia"

Conclusion

Based on the procedures we have performed and the evidence we have obtained, nothing has come to our attention that causes us to believe that AENA's 2023 GHG inventory for the year ended 31 December 2023 is not prepared, in all material respects, in accordance with the Greenhouse Gas Protocol applied as explained in AENA's internal calculation procedure "Carbon Footprint Calculation Procedure of Aena S.M.E., S.A. and Aena Sociedad Concesionaria Aeropuerto Internacional de la Región de Murcia".

Use and Distribution

We do not accept or assume any liability to any third party other than the addressees of this report. This engagement does not constitute an auditor's report in the terms envisaged in the audit regulations in force in Spain.

DELOITTE, S.L.



Ana Sánchez Palacios

February 27, 2024



Greenhouse gas (GHG) emissions inventory of Aena S.M.E., S.A. and Aena Sociedad Concesionaria del aeropuerto Internacional de la Región de Murcia¹ for the fiscal year 2023

AENA GHG INVENTORY 2023		tCO2e
Direct GHG emissions (Scope 1)	Gasoil	7,883.5
	Gasoline	97.5
	Natural gas	6,215.1
	Propane	25.5
	Kerosene	58.9
	HVO	27.9
	Biomethane	0.4
	Biopropane	0.2
Subtotal S1		14,309.1
Indirect GHG emissions (Scope 2) (Market Based)	Electricity (MB)	0.0
	Heating and cooling energy (MB)	26,263.3
Subtotal S2 (Market Based)		26,263.3
Other indirect emissions GHG (Scope 3)	Purchased Goods and Services	398,007.5
	Capital goods	204,687.1
	Fuel and Energy-Related Activities Not Included in Scope 1 or Scope 2	12,469.4
	Waste Generated in Operations	5,749.7
	Business Travel	1,186.2
	Employee Commuting	6,486.3
	Upstream Leased Assets	127.7
	Downstream transportation and distribution	384,554.1
	Use of Sold Products	2,266,948.4
Investments		95,738.5
Subtotal S3		3,375,955.1

¹ Hereinafter referred to as Aena

1. ORGANIZATIONAL BOUNDARIES

The accounting of emissions is carried out on those activities included within the organizational boundaries as defined in section 4.B regarding the Determination of the company's organizational boundaries of the Carbon Footprint Calculation Procedure of Aena SME SA and Aena Sociedad Concesionaria Aeropuerto Internacional de la Región de Murcia² hereinafter referred to as Aena, following at all times what is established in the Greenhouse Gas Protocol (GHG Protocol) of the WRI and WBCSD.

Aena's emissions are calculated under the operational control approach, i.e., for those facilities over which it has the authority to introduce and implement its corporate policies in Spain.

Based on the above, the facilities included in the calculation of Aena's corporate carbon footprint are as follows:

- Headquarters of Madrid (SSCC)
- A Coruña (LCG)
- Adolfo Suárez Madrid-Barajas (MAD)
- Albacete (ABC)
- Algeciras (AEI)
- Alicante-Elche Miguel Hernández (ALC)
- Almería (LEI)
- Asturias (OVD)
- Badajoz (BJZ)
- Bilbao (BIO)
- Burgos (RGS)
- Ceuta (JCU)
- César Manrique-Lanzarote (ACE)
- Córdoba (ODB)
- El Hierro (VDE)
- Federico García Lorca Granada-Jaén (GRX)
- Fuerteventura (FUE)
- Girona-Costa Brava (GRO)
- Gran Canaria (LPA)
- Huesca-Pyrenees (HSK)
- Ibiza (IBZ)
- Internacional Región de Murcia (RMU)
- Jerez (XRY)
- Josep Tarradellas Barcelona-El Prat (BCN)
- La Gomera (GMZ)
- La Palma (SPC)
- León (LEN)
- Logroño-Agoncillo (RJL)
- Madrid-Cuatro Vientos (LECU)
- Melilla (MLN)
- Menorca (MAH)
- Málaga-Costa del Sol (AGP)
- Palma de Mallorca (PMI)
- Pamplona (PNA)

² Available on Aena's website: <https://www.aena.es/sites/Satellite?blobcol=urldata&blobkey=id&blobtable=MungoBlobs&blobwhere=1576866459141&ssbinary=true>

- Reus (REU)
- Sabadell (QSA)
- Salamanca (SLM)
- San Sebastián (EAS)
- Santiago-Rosalía de Castro (SCQ)
- Seve Ballesteros-Santander (SDR)
- Sevilla (SVQ)
- Son Bonet (LESB)
- Tenerife Norte-Ciudad de La Laguna (TFN)
- Tenerife Sur (TFS)
- Valencia (VLC)
- Valladolid (VLL)
- Vigo (VGO)
- Vitoria (VIT)
- Zaragoza (ZAZ)

2. OPERATIONAL LIMITS

The following GHG emitting sources, grouped by scopes, are included within the operational limits:

Scope 1: direct emissions.

Includes direct emissions, i.e., those from sources under the ownership or control of the airport operator:

The emissions that belong to this scope are those related to:

- Stationary combustion, which includes generators, portable generators, boilers, cogeneration plants owned by Aena and fire extinguishing service practices at the different airports.
- Mobile combustion, which includes both light and heavy vehicles belonging to Aena's fleet.

Scope 2: indirect emissions.

Includes indirect emissions from the generation of electricity and off-site heating or cooling, purchased and consumed by the airport operator's facilities and centers.

The emissions belonging to this scope are related to:

- Purchase of electricity by Aena from third parties.
- Purchase of heating and cooling by Aena from third parties.

Scope 3: other indirect emissions.

Indirect greenhouse gas emissions from activities related to Aena and generated by sources that are neither owned nor controlled by the airport manager, due to:

- Purchased Goods and Services: includes all emissions that arise in advance in the production of goods or services that Aena has acquired in the reporting year and that are necessary for the performance of its activities.
- Capital goods: includes all upstream emissions from the production of capital goods purchased or acquired by Aena.
- Fuel- and Energy-Related Activities Not Included in Scope 1 or Scope 2: include emissions related to the production of energy or fuels purchased and consumed by Aena during the reporting period. These emissions differ from those included in Scope 1 (direct emissions) and Scope 2 (indirect emissions from purchased electricity and heat).
- Waste generated in operations: includes emissions from the deposit and treatment of waste generated by Aena in its operations in the reporting year.

- Business travel: includes emissions from employee travel for business activities in vehicles owned and/or operated by third parties such as airplanes, trains, buses, etc.
- Employee commuting: includes emissions due to commuting between their homes and the workplace.
- Upstream leased assets: includes emissions from the operation of assets leased by Aena that have not already been included in its Scope 1 and 2 emissions.
- Downstream transportation and distribution: includes all emissions from downstream transportation, i.e., the movement of passengers to or from Aena's airports as well as the distribution of goods to the nearest transportation node.
- Use of Sold Products: includes emissions due to the use or consumption of goods or services sold. Aena's customers are considered to be airlines, handling agents and passengers. The use of services by passengers is included in Aena's Scope 1 and 2 emissions, since it is the use of the facilities themselves. However, in the case of airlines and handling agents, emissions derived from the LTO cycle, as well as APUs and emissions caused by the activity of handling agents, should be accounted for in this category.
- Investments: include issues associated with Aena's investees.

Exclusions.

Given the complexity in collecting primary data and its low significance, emissions from possible leaks of fluorinated greenhouse gases from Aena's air conditioning equipment have been excluded.

Based on the data available at the time of calculating Aena's footprint, it has been found that this source accounts for less than 1% of the total footprint (Scope 1+2+3). The evolution of these data will be monitored in future greenhouse gas inventories of the company to ensure that their representation remains below this level (1%).

3. EMISSION FACTORS

The following table shows the emission factors used in calculating greenhouse gas emissions from energy consumption and fuels by the organization:

Table 2: Emission Factors Sources (FE) A1 and A2

STATIONARY AND MOBILE COMBUSTION				
Fuel type	Scope	GHG	Public source	Observations
Diesel, gasoline, and propane	A1	CO ₂ CH ₄ N ₂ O	MITERD	Ministry for the Ecological Transition and the Demographic Challenge
Natural gas	A1	CO ₂ CH ₄ N ₂ O	MITERD	
Kerosene	A1	CO ₂ CH ₄ N ₂ O	MITERD	
HVO y biomethane	A1	CO ₂ CH ₄ N ₂ O	MITERD	
Biopropane	A1	CO ₂ CH ₄ N ₂ O	Supplier sustainability certificate	
ELECTRICITY PURCHASE				
Fuel type	Scope	GHG	Public source	Observations
Electricity	A2	CO ₂	MITERD	FE for the market-based method for the retailer. For calculating emissions due to electricity purchases, together with this emission factor, renewable energy origin guarantees acquired by the company during the corresponding footprint calculation period are applied.
OTHER EMISSION FACTORS				
Origin of emissions	Scope	GHG	Public source	Observations
Purchased paper	A3, category 1	CO ₂	DEFRA	
Purchased water	A3, category 1	CO ₂	"Guide from the Office of Climate Change of the Government of Catalonia"	
Purchased goods and services	A3, category 1	CO ₂	CNAE/INE	The emission factor is calculated using an EEIO model based on the equivalent CNAE (National Classification of Economic Activities) activity code and the total emission factor published by the INE for that CNAE.
Capital goods	A3, category 2	CO ₂	CNAE/INE	The emission factor is calculated using an EEIO model based on the equivalent CNAE (National Classification of Economic Activities) activity code and the total emission factor published by the INE for that CNAE.
Diesel, gasoline, natural gas, propane, kerosene, HVO, biomethane, biopropane, and electricity	A3, category 3	CO ₂	DEFRA	
Waste	A3, category 5	CO ₂	OCCC/DEFRA	The emission factors from the OCCC (Catalan Office for Climate Change) are used, which have lower geographic uncertainty. If the factor for a particular waste does not exist, those established by DEFRA are used instead.

Business Travel	S3, category 6	CO ₂	DEFRA	DEFRA emission factors will be used, except for air travel where emissions will be calculated directly using the ICAO and IATA calculators.
Employee Commuting	S3, category 7	CO ₂	OCCC/DEFRA	The factors of the OCCC (Catalan Office of Climate Change), with lower geographical uncertainty, are used. If the factor does not exist for a particular mode of transport, the ones established by DEFRA are used.
Upstream Leased Assets	S3, category 8	CO ₂	CNAE/INE	The emission factor is calculated using an EEIO model based on the equivalent CNAE (National Code of Economic Activity) activity code and the total emission factor published by the INE for that CNAE.
Passenger movements to and from airports	S3, category 9	CO ₂	OCCC/DEFRA	The factors of the OCCC (Catalan Office of Climate Change), with lower geographical uncertainty, are used. If the factor does not exist for a particular mode of transport, the ones established by DEFRA are used.
Cargo movements from airports	S3, category 9	CO ₂	OCCC	
LTO	S3, category 11	CO ₂	MITERD	
APUs	S3, category 11	CO ₂	Emission factors from the FAA AEDT FAA-AEE AEDT tool	
Handling	S3, category 11	CO ₂	EMEP/EEA air pollutant emission inventory guidebook	For emissions associated with the activity of handling agents: emissions calculated on the basis of fuel consumption provided by the main handling agents will be accounted for. (contractual requirement)
Investments	S3, category 15	CO ₂	CNAE/INE	The emission factor is calculated using an EEIO model based on the equivalent CNAE (National Code of Economic Activity) activity code and the total emission factor published by the INE for that CNAE.

The emission factors used are the most recent ones available at the time of calculating the carbon footprint, as published by each of the public sources indicated in the table.

4. UNCERTAINTY AND ESTIMATIONS

All the processes in which the different emission sources are framed are within the scope of Aena's Quality and Environment System. This system is certified in accordance with ISO 9001:2000 and ISO 14001:2004 standards. The implementation of the aforementioned quality systems minimizes the uncertainty of the information used to calculate the GHG inventory.

Likewise, to minimize the uncertainty associated with the emission factors, official sources are used whenever possible (see table included in the "EMISSION FACTORS" section).

On the other hand, the information on activity data associated with Scope 1 and 2 emission sources comes, whenever possible, from invoices, which are commercial records based on meter measurements that comply with the standards established by current legislation.

In addition, the information of the input data associated with the emission sources of the different Scope 3 categories comes, as appropriate, from invoices, company accounting records, public statistics performed by the company and public information from official sources ensuring the validity of the data in the data collection process. The emission factor databases and calculation tools used to calculate Scope 3 emissions are of recognized prestige.

Notwithstanding the above, among all the sources considered in the inventory, it is considered that uncertainty should be taken into consideration in the case of the following:

- Scope 1 emissions: estimates of natural gas, diesel, gasoline, propane and kerosene consumption for the last month of the year based on primary data corresponding to the previous months (January-November) or the corresponding months of the previous year, if applicable.
- Scope 2 emissions: estimates of electricity consumption for the last month of the year based on primary data corresponding to the previous months (January-November) or the corresponding months of the previous year, if applicable.
- Scope 3 emissions, mainly in the categories:
 - Category 1: Estimates of water consumption for the last month of the year are based on primary data from the previous months (January-November).
 - Category 3: The same fuel and electricity consumption data used to calculate Scope 1 and Scope 2 emissions are used. Therefore, it should be noted that the same consumption estimates are employed accordingly.
 - Category 6: The kilometres used to calculate the trips made have been obtained through the best available source for each mode of transportation and based on the origin and destination of the trips made.
 - Category 7: Since mobility plans are not available at all airports, the modal split for them is estimated by assimilating the percentages established in the existing mobility plans of Málaga-Costa del Sol, Barcelona-El Prat, and Palma de Mallorca airports, based on the size of the airport and the surrounding public transportation network.
 - Category 9: In the case of airports with mobility surveys where the percentages of access modes by type of transport and occupancy factor are established, that data has been used applied to the airport, and in the case of those airports without these surveys, the average has been used.
 - Category 11: For calculating emissions due to LTO, emission data from the national inventory of emissions submitted by the Ministry of Transportation of the immediately preceding year (the most recent available) is used and adjusted to the year in which the footprint is calculated applying the ratio of ATUs from the two years considered.