

POLICY ON COMMUNICATION AND CONTACTS WITH SHAREHOLDERS, INSTITUTIONAL INVESTORS AND PROXY ADVISERS OF AENA, S.M.E., S.A.

Approved by the Board of Directors of Aena S.M.E.,
S.A. on 19 December 2023.

I. PURPOSE

The Board of Directors of Aena, S.M.E., S.A. (hereinafter, “**Aena**” or “**Company**”) approves this Policy on Communication and Contacts with Shareholders, Institutional Investors and Proxy Advisers of Aena (hereinafter, “**Policy**”) in order to permanently and correctly attend to its shareholders and professional or qualified equity and socially responsible investment investors (“**Institutional Investors**”), as well as the proxy advisers governed by the provisions of Law, its Regulations and the “*Company’s Internal Code of Conduct for Securities Markets*” (“**RIC**”) and, on the basis of the principles established in this Policy and in the “*Aena Corporate Governance Policy*”.

II. SCOPE

The principles contained in this Policy apply to the Company’s information and communications with shareholders, Institutional Investors and other interested parties, such as financial intermediaries, managers and custodians of the Company’s shares, financial analysts, regulatory and supervisory bodies, rating agencies, information agencies, proxy advisers, and other interested parties.

Notwithstanding the principles of equal treatment and non-discrimination, the Company may adapt the general information and special communication channels and other information and communication initiatives with shareholders, Institutional Investors and the markets in general, depending on the various target groups.

III. PRINCIPLES

The Board of Directors manages and supervises the information provided to shareholders, Institutional Investors and the markets in general at the highest level, by safeguarding, protecting and facilitating the exercise of their rights and interests within the framework of defending the corporate interest, all of which is in accordance with the following general principles:

- Transparency, veracity, immediacy, equality, homogeneity, coherence, integrity and symmetry when disseminating information.
- Equal treatment in recognising and exercising the rights of all shareholders who are in identical conditions and are not affected by conflicts of competence or interest, establishing appropriate measures to avoid the communication of information that could provide a privilege or advantage over other shareholders or harm the corporate interest.
- Protection of the legitimate rights and interests of all shareholders.
- Proactive pursuit of interaction with the Company’s shareholders to encourage their involvement in corporate life, maintaining a constructive and permanent dialogue in order to align their interests with those of the Company.

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- Encouragement of ongoing and permanent information for shareholders, when General Meetings of Shareholders are called, as well as making effective additional channels of dialogue and participation available to them so that they are constantly informed of proposals that may be made in relation to the management of the Company and to report conduct that may imply a breach of the RIC in the terms envisaged in the following sections.
- Shareholder communication and relations to ensure that information and market relations practices are transparent, effective and in keeping with the company's interests.
- Development and use of the most appropriate information and communication tools to allow and guarantee shareholders and investors access to information in the easiest and most convenient manner.
- Coordination of the Company's communication with shareholders.
- Compliance with the provisions of the law and the RIC and with the principles of cooperation and transparency with the competent authorities, regulatory bodies and administrations.

IV. COMMUNICATION CHANNELS

Dissemination of news that may contain privileged or material information

The Company has established the following internal coordination rules to ensure that the dissemination of news that may contain privileged or market-relevant information takes place under conditions of transparency, symmetry and in accordance with the provisions of the law and the RIC. Should the information generated in the Company be susceptible of being classified as privileged or relevant to the market or should there be any doubt as to the obligation to report it to the National Securities Market Commission ("**CNMV**") in accordance with the law and the Corporate Governance System, the Secretary of the Board of Directors of the Company shall be responsible for the preparation of the information to be communicated to the CNMV, prior thereto and, if applicable, for drafting, reviewing, and sending it to the CNMV through the authorised interlocutors designated by the Company for such purpose.

The information contained in the Inside Information Disclosure or other relevant information may not be disseminated by any other means without prior publication on the CNMV's website. In addition, relevant information disseminated to the market through any information or communication channel other than the CNMV must be consistent with the content of the corresponding communication of inside information or other relevant information.

Information generated in the Company may be communicated to shareholders, Institutional Investors and the markets, without being subject to the foregoing, by any means that respects this Policy provided that there is no doubt that it is not necessary to communicate such information to the CNMV as inside information or other relevant

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information; or when, having consulted with the Secretary of the Board, the latter has determined, in accordance with the rules set forth in the preceding section, that it is not mandatory to send inside information or other relevant information to the CNMV.

- **National Securities Market Commission and other bodies**

The Company's general communication channel to shareholders, Institutional Investors and the markets in general is the CNMV, as well as, where appropriate, the channels established by other foreign supervisory authorities and bodies, with the immediate dissemination and public nature of the information sent to these institutions through the publication of Inside Information and Other Relevant Information on their websites, which are simultaneously incorporated into the Company's corporate website.

- **Corporate website**

The Company's primary channel of official communication with shareholders, Institutional Investors and the markets in general is its corporate website (www.aena.es), which is constantly updated, through which the Company transmits all information that may be of interest to shareholders and Institutional Investors, guaranteeing the immediacy of its publication and the possibility of subsequent access, so that transparency is the priority value that shapes the Company's relations with the markets and the public in general.

The Secretary's Office of the Board of Directors of Aena decides which information must be included on the Company's corporate website, in coordination with the Economic-Financial Department.

The information that the Company transmits through its corporate website is incorporated simultaneously, whenever possible, in Spanish and English, with the Spanish version prevailing in the event of discrepancy.

The Company's corporate website has a specific section dedicated to its investors. The content made available to shareholders includes the following topics: (i) the Aena share (including information relating to the share price, share capital, shareholder remuneration and analyst coverage); (ii) general information (highlighting, communications to the CNMV and the investor agenda; (iii) economic-financial information (in particular, the annual, half-yearly and quarterly accounts, management reports, as well as presentations of results, the average supplier payment period as well as other relevant financial information are available); and (iv) information on Corporate Governance (Board of Directors, corporate policies, General Shareholders' Meeting), notwithstanding the fact that all this information can also be found in other sections of the corporate website, as well as on the CNMV website.

Besides its publication on the Company's corporate website, the Company's economic-financial information and institutional and general information, once submitted to the

CNMV when required, is disseminated through its communication to analysts, the media, and international, national and regional news agencies.

- **Shareholder and Investor Relations (Shareholder and Investor Relations Office)**

The Board of Directors of Aena provides shareholders, Institutional Investors, and other interested parties with appropriate channels so that they may be kept permanently informed and may submit proposals regarding the management of the Company, in accordance with law and with the Company's Corporate Governance System.

The primary objective of the Shareholders' and Investors' Relations Office is to serve as an open, permanent, and transparent channel of communication with all of the Company's shareholders, continuously developing initiatives aimed at strengthening such relationship and allowing them to be kept permanently informed.

Accordingly, the Shareholders' and Investors' Office has been set up to attend, at all times and on a permanent basis, to shareholders' queries, questions or suggestions, through a telephone helpline (+34 913 211 449) and an e-mail address (ir@aena.es), being in contact with shareholders voluntarily registered in its database.

This Office shall endeavour, insofar as possible, giving absolute priority to the corporate interest and respecting the law and the RIC, to respond to the enquiries and requests made by registered shareholders, constituting a permanent information system through which shareholders may take an interest and keep up to date on the progress of the Group.

Additionally, this Office constitutes an open and permanent channel of communication between the Company and the shareholders who voluntarily join and are interested in following the Company's performance on an ongoing basis. Thus, in addition to the telephone service, electronic correspondence is offered by this Shareholders' Office to disseminate annual and quarterly reports, communications to the CNMV or any other document that the Company deems appropriate to inform through this channel.

- **Analyst and Institutional Investor Relations**

The Shareholders' and Investors' Relations Office, organised and managed by the Economic-Financial Department, is responsible for permanently and individually attending to the queries of analysts and Institutional Investors, and for such purposes has an e-mail address (ir@aena.es).

The Company organises informative meetings on the progress of the Company and the Group or other aspects of interest to analysts and Institutional Investors, in order to provide them with adequate information on the Company. This is without prejudice to the Company's strict observance of the principle of equal treatment of all shareholders who

are on an equal footing and who are not affected by any conflicts of competence or interest.

- **General Shareholders' Meeting**

All duly accredited shareholders are entitled to attend the General Shareholders' Meeting, without being required to hold a minimum number of shares. The Board of Directors of Aena encourages the informed and responsible participation of shareholders at the General Shareholders' Meeting and adopts, through the Office of the Shareholder and other means, such measures and guarantees as may be appropriate to enable the General Shareholders' Meeting to effectively exercise its duties pursuant to law, the Regulations for the General Shareholders' Meeting, and the Company's Corporate Governance System.

When convening the General Shareholders' Meeting, the Company may use the services of agencies, entities, and financial intermediaries for a better distribution of information among its shareholders and Institutional Investors and may adapt the means and instruments of proxy-granting and absentee voting to the characteristics of the Institutional Investors.

The Shareholders' Office also has a specific place in the premises where the meeting is held to resolve any questions that may be raised by attendees and to attend to and inform those who wish to speak.

The Secretary of the Board of Directors, with the support of the Shareholders' and Investors' Service Office, is responsible for maintaining a dialogue with proxy advisers, responding to their queries regarding the proposed resolutions to be submitted to the General Shareholders' Meeting and providing them with any clarifications deemed appropriate.

The Company will make the broadcast of the General Shareholders' Meeting available to shareholders and Institutional Investors through the corporate website to facilitate their access to the issues that may arise at said Meeting. Furthermore, the Board of Directors actively promotes the attendance of shareholders at the General Shareholders' Meeting and the possibility of their participation therein, and therefore the possibility of holding remote general meetings is foreseen, with the attendance and participation of shareholders via electronic means. The Company shall also adopt the necessary measures to enable the participation of hearing-impaired attendees. To this end, simultaneous interpretation into Spanish sign language shall be provided at the General Shareholders' Meeting.

During the General Shareholders' Meeting, as a complement to the written dissemination of the Annual Corporate Governance Report, the Chairman of the Board of Directors verbally informs the shareholders, in sufficient detail, of the most relevant aspects of the company's corporate governance and, in particular: (i) of the changes that have occurred since the previous ordinary general meeting; and (ii) of the specific reasons why the company does

not follow any of the recommendations of the Code of Good Governance and the alternative rules it applies in this area.

V. MONITORING AND CONTROL

The Audit Committee supervises and monitors compliance with this Policy and its consistency with the provisions of the General Economic and Financial, Non-Financial, and Corporate Information Policy, the Stakeholder Relations Policy, the RIC, and the other provisions of the Company's Corporate Governance System included within the scope of its powers.

The Audit Committee shall review the periodic financial presentations as well as any other financial information that the Company intends to publish in order to ensure consistency between the information provided to the securities markets and the annual accounts.

The Board of Directors shall be regularly informed of the Company's main relationships with shareholders, Institutional Investors and proxy advisers pursuant to the provisions of this Policy.

VI. VALIDITY

This Policy was approved by the Board of Directors of Aena at its meeting of 23 February 2016 and last updated at its meeting of 19 December 2023. It will remain in force as long as no amendments are made to it.