



Consolidated Management Report | 2020

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ABOUT THIS REPORT

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Table of contents Act 11/2018
GRI Table of Contents
Content Index Sustainability Accounting Standards Board (SASB)
EXTERNAL VERIFICATION REPORT

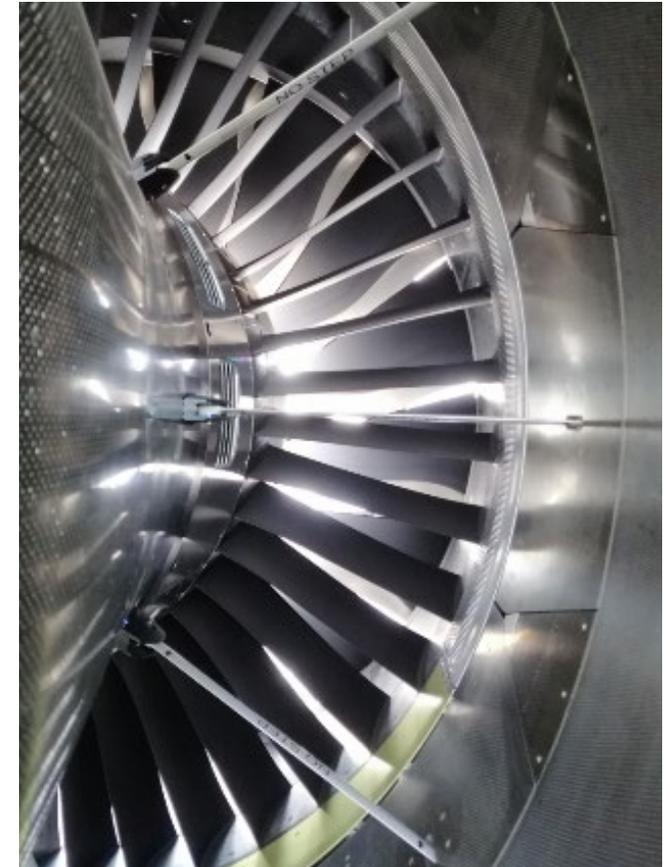


Document approach

The Consolidated Management Report presents information related to the activity of the Aena Group during the 2020 fiscal year, and must be understood in the context of said fiscal year, taking into account the characteristics of the same and as a response to stakeholder expectations of receiving relevant information.

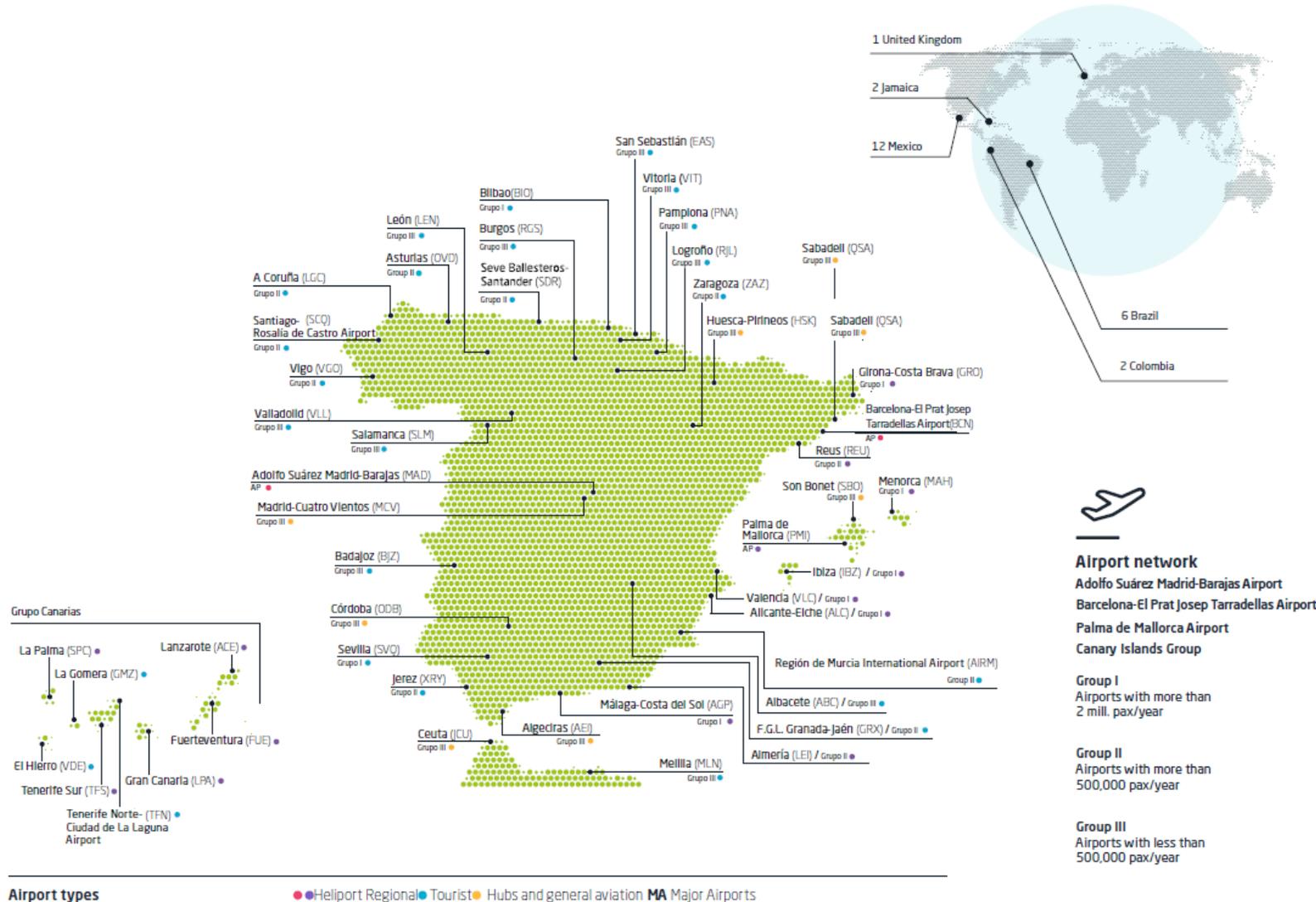
The health situation that has arisen as a result of the COVID-19 pandemic is a globally relevant event of such magnitude that, in line with Aena's commitment to transparency, it makes necessary detailed reflection and an analysis on its effects on the Company's activity. Despite the difficulty of predicting its evolution and the current uncertainty, this Aena Report seeks to demonstrate 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 the most recognised reporting practices, the Company's economic and financial information is complemented with a Non-financial Information Statement and a Corporate Governance Report for the 2020 fiscal year. The company's website (www.aena.es) offers additional detailed information on different aspects, which are relevant to the different stakeholders.

As detailed in Note 5 of the Consolidated Annual Accounts, the Group conducts its business activities centred on the following segments: Airports, Real Estate Services, International and SCAIRM. The Airports segment encompasses the Group's operations as a manager of its airport network in Spain, and In the financial information by segments of the Consolidated Annual Accounts, they are identified in the activity called aeronautics. Likewise, the Airports segment includes the activity of managing the commercial spaces in the airport terminals and the network of parking lots, which are identified under the activity called Commercial. The Real estate services segment essentially includes the Group's operation of the industrial and real estate assets that are not included in the airport terminals. The Internacional segment relates to the Group's international development, which coincides with the operations carried out by the subsidiary Aena Desarrollo Internacional, S.A., and consists in investments in other airport operators, mainly in the United Kingdom, Brazil, Mexico and Colombia. The SCAIRM segment corresponds to the activity of the Company "Aena Sociedad Concesionaria del Aeropuerto Internacional de la Región de Murcia S.M.E., S.A.", which is also considered a single cash generating unit itself. For analytical purposes and with the aim of offering a better understanding of the results of the Group's management of the airports that it operates in Spain, the operational information as well as the financial data of the Company "Aena Sociedad Concesionaria del Aeropuerto Internacional de la Región de Murcia S.M.E., S.A." are integrated with those of the network by presenting the evolution of the aeronautical, commercial and real estate services activity in this Consolidated Management Report.



Aena airport network

The Aena group is made up of Aena, Sociedad Concesionaria del Aeropuerto Internacional de la Región de Murcia (the concession company of the Región de Murcia International Airport, “SCAIRM”), Aena Internacional, the companies of the London Luton Airport Group, as well as the Concession Company Aeroportos do Nordeste do Brasil, S.A. (the concession company of the Northeast Brazil airport group, “Aena Brasil”).



The evolution of the Group's business is explained in the Consolidated Management Report, the exposure 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 data on the aeronautical operations, sections 2.1 and 2.2 of the chapter Economic and Financial Information include a comprehensive description of the evolution of traffic at the airports of the network in Spain, and section 2.3 includes the evolution of operations corresponding to airports where the Group has an international presence. For their part, the financial results of the business areas are analysed by segment in section 3. For these analytical purposes and with the aim of offering a better understanding of the results of the Group's management of the airports that it operates in Spain, the operational information as well as the financial data of the Company "Aena Sociedad Concesionaria del Aeropuerto Internacional de la Región de Murcia S.M.E., S.A." are integrated with those of the network by presenting the evolution of the aeronautical, commercial and real estate services activity in the Consolidated Management Report.

Consolidated Management Report 2020

Last year, the structure of the Consolidated Management Report was improved to provide both the financial and non-financial information in a single document: Consolidated Annual Accounts and Consolidated Management Report, which, in Section 14, includes the Non-Financial Information Statement. The Annual Corporate Governance Report (document that followed the CNMV [the Spanish Securities Market Commission] format) and the Corporate Responsibility Report were also published.

In 2020, this information is grouped into a single document, as sections of the Consolidated Management Report, available in the following sections:

- **'2020: an unprecedented challenge'**, which offers a cross-sectional view of the impact of the COVID-19 pandemic on air transport and airports managed by Aena, risks and risk management.
- **Block A: 'Economic and financial information'**
- **Block B: 'Non-financial Information Statement (NFIS)'**, which includes the information required by Act 11/2018 concerning non-financial information and diversity, along with the most relevant information contained in the traditional Corporate Responsibility Report.

To address some of the issues included within the scope of the NFIS (Non-Financial Information Statement) and to avoid duplications on aspects detailed in other sections (in particular, this chapter, as well as in "**2020: an unprecedented challenge**"), the correspondence table includes a brief mention of these issues as well as reference to the chapter in which they are explored.

- **"Corporate Governance": Executive Summary**, which offers a general overview of the content detailed in the Annual Corporate Governance Report.
- **Appendices**
 - Consolidated Financial Statements.
 - Summary of communications with the National Securities Market Commission.
 - Annual Corporate Governance Report (document following CNMV format).

This format presents the information more clearly, and integrates financial information and that related to environmental, social and corporate governance activities (known as ESG), with the aim of facilitating its understanding, avoiding repetition and, at the same time, improving and expanding upon the level of disclosure and transparency.

Level of review by external auditors

The content of the 2020 Consolidated Management Report has been submitted, as required by current legislation, to different levels of review by external auditors and verifiers with their corresponding degrees of assurance. The different levels of review can be summarised as follows:

- KPMG, Auditores, S.L. 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, has been provided in the manner as set out in the applicable regulations. 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. See '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 on the financial information of Aena S.M.E., S.A. and subsidiaries as of 31 December 2020, which is in-

cluded as an appendix to section F of the Annual Corporate Governance Report of Aena S.M.E., S.A. of 31 December 2020.

- Deloitte, S.L. has issued a verification report with a limited scope of review of the contents in terms of non-financial information and diversity required by Act 11/2018 and included in this consolidated management report. This Report is included as an 'Independent Verification Report' within the 'B. Non-financial Information Statement' section.

With regard to forecasts and estimates, it is currently difficult to anticipate when the recovery in traffic will be seen. The content of the 2020 consolidated Management Report does not collect forecasts in terms of passengers or results estimates.

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

Materiality

The 2020 materiality analysis involves an update of the issues identified in the previous fiscal year, achieved through an analysis of the presence of Aena in external sources, the identification and characterisation of the stakeholders involved, and the preparation of a "material thermometer" —taking the Mitchell model as a reference¹, assessing the relevance of the groups based on their power, legitimacy and the urgency of claims—, and proceeded to a reformulation with the aim of adapting it to the 2020 context.

From an external perspective, the following have been reviewed:

- Public sources and international reference bodies to identify the main trends and challenges affecting the sector (the Spanish Congress of Deputies, CNMV, European Parliament, European Commission, ACI and CEOE [Spanish Confederation of Business Organisations], articles of the Elcano Royal Institute, World Economic Forum, Forética, APD and Edelman Trust Barometer).
- Trends and main aspects evaluated by investors and ESG rating agencies in financial and extra-financial matters, including the most recognised reporting standards (mainly GRI, SASB, Global Compact and the United Nations Sustainable Development Goals).
- Reports on the Company's presence on social networks; complaints appearing on Twitter and Facebook in 2020; information published by reference public organisation bodies: BlackRock letters to managers,

companies and CEOs (2020); Aena 2020 Shareholders' Meeting; and press releases and news about the company published in digital newspapers.

From an internal perspective, the results of the analysis carried out in 2019 on different areas of the Company have been considered in terms of their perception on the relevance of the different trends recognised, and the identification of the main risks, adapting them to the context of the COVID-19 pandemic and their relevance to the different issues based on the strengths of the Group, and the impact on management that these may have.

In conclusion, the list of relevant topics in 2019 has been updated, adapting them to the 2020 context and incorporating the following issues:

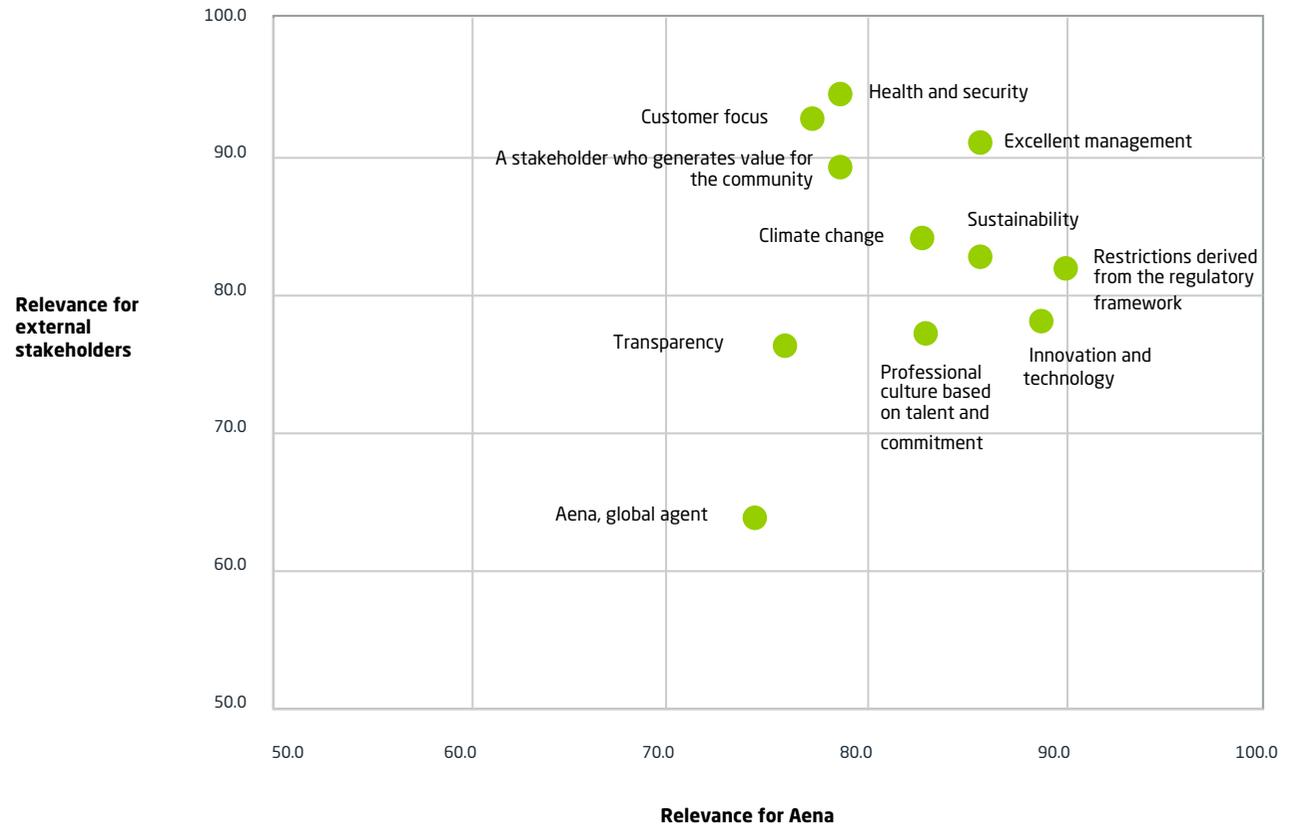
- Reinforcement, in all definitions, of the most transversal issues: being customer-focused; sustainability and environmental considerations; talent management; safety culture from a broader perspective, incorporating the context of a health emergency; the exposure of the business to the risks of the technological environment (cybersecurity); and the presence of innovation and technology in all processes.
- Inclusion of the SDG perspective and social contribution in the context of the health emergency at all levels: risk or opportunity management, government, alliances, security, solidarity, etc.

To compile the chart of material issues, which is presented below, we have taken the scores attributed to the different issues covered in the analysis for the year 2019, which was derived from consultations with the Aena business units.

¹ R. K. Mitchell, B. A. Agle & D. J. Wood, 1997. 'Toward a Theory of Stakeholder Identification and Salience: Defining the Principle of Who and What Really Counts'.

These scores have been updated with the analysis of external sources carried out in 2020. The information that appears in the sources consulted has initially been grouped by topics, associating each piece with a specific topic and stakeholder. This results in a classification of the topics according to their frequency and importance (medium, high or very high) that each stakeholder concerned represents for the company. This relationship has subsequently been refined to improve its consistency with global trends at the end of 2020, increasing the score of the topics mentioned in the Global Risk Report of the World Economic Forum, the Forética Report on post-COVID-19 scenarios, the Edelman 2021 Trust Barometer and the APD Observatory No. 2 on Sustainable Transformation.

As a result of the process, some of the issues have been re-named and grouped with respect to 2019, resulting in the following chart of material issues:





Material issues for Aena

Aena material aspect	Why is it material?	Examples of issues taken into account
Customer focus	<p>Aena's search for excellence implicitly involves delivering all services with the highest level of quality, excellence and innovation. The Company focuses on the customer, so that their journey through our airports is a positive experience, where the maximum quality and safety requirements are combined with the most advanced methods and technologies to reduce waiting times and improve conditions.</p>	<ul style="list-style-type: none"> • Future trends • Geopolitical factors • Economic Situation • Customer health and safety • Suppliers • Business model • Complaint mechanisms
Health and security	<p>Safety and security are priorities in airports around the world. In order to prevent risky situations from occurring, possible contingencies that may affect the normal performance of activities must be continuously evaluated, while mechanisms, measures, and human and material resources aimed at guaranteeing airport, operational and information security must exist and be made available, in line with applicable national and international regulations. In addition, increasing process digitisation exposes the Company to emerging cybersecurity risks. Strengthening computer security mechanisms and protocols is essential for a company such as Aena, for which the comprehensive protection of all (employees, external companies, general users, etc) takes precedence.</p> <p>In 2020, as a result of the health emergency, the concept of Health Safety is also particularly relevant, focused on minimising the risk of contagion, promoting and preserving the health of the whole of society.</p>	<ul style="list-style-type: none"> • Geopolitical factors • Regulatory factors • Business model • Risk management • Relationship with stakeholders • Customer health and safety
Climate change	<p>The urgency to address the health crisis has not diverted the global concern for climate change and its consequences, and key institutions are advocating economic recovery that allows the negative consequences of both situations to be addressed at the same time: the pandemic and the fight against climate change.</p> <p>Aena is defining its new roadmap in the full knowledge that the recovery must be a green recovery, and is committed to sustainability, protecting the environment, decarbonisation and the climate emergency as key issues within its management. The group seeks to establish measures for all groups with which it has a relationship in order to make progress in this area and multiply the impact of its decisions by involving customers, suppliers and collaborators. The Company develops and implements policies, strategies and procedures, using as a reference, among others, the Sustainable Development Goals, the TCFD recommendations, the Principles of the Global Compact, and the environmental objectives set at national and international level.</p>	<ul style="list-style-type: none"> • Fight against climate change • Energy consumption
Sustainability	<p>The Sustainable Development Goals, the Principles of the Global Compact, and the environmental goals set at national and international level also define Aena's roadmap to ensure that sustainability is fully integrated into the business model and ensure the creation of shared value in the environment in which it operates and society as a whole.</p>	<ul style="list-style-type: none"> • Impact on local communities • Relationship with stakeholders • Efficient consumption of resources • Biodiversity • Human resources and talent management
Innovation and technology	<p>The management of airports is directly related to the use of cutting-edge technologies and the development of specific solutions for all the challenges that Aena faces when carrying out its activity, both in terms of internal management and in areas related to customers and shareholders.</p> <p>The company continuously works to improve processes and tools, and is open to collaboration with internal and external stakeholders, thus ensuring a safe and quality service.</p>	<ul style="list-style-type: none"> • Relationship with stakeholders • Efficient consumption of resources



Material issues for Aena

Aena material aspect	Why is it material?	Examples of issues taken into account
Excellent management	<p>The company's survival is based on obtaining sufficient profitability thresholds to meet its operational needs and the interests of all its owners, both public institutions and private shareholders. The Company makes every effort to guarantee the best services, while ensuring the best financial results.</p> <p>Aena sees trust as an essential pillar for maintaining the business, based on efficiency, quality and transparency, aimed at all stakeholders. To achieve this, the Company makes various communication channels available to them that are treated with the utmost seriousness and are open to dialogue.</p>	<ul style="list-style-type: none"> • Geopolitical factors • Economic situation • Suppliers • Business model • Risk management • Regulatory factors • Relationship with stakeholders
Professional culture based on talent and commitment	<p>The social and economic relevance of the activities carried out by Aena requires the best talent, and relies on teams that are motivated and committed to a shared project, built with the contributions of all and supported by the vocation of public service.</p> <p>Given the severity of the crisis caused by the pandemic, the Company has focused its efforts on ensuring the health and safety –both physical and emotional– of workers; promoting equality, conciliation, and minimising the impact of the pandemic on all its professionals. Management of “talent” has also been a priority, and a basic pillar for the management and performance of the organisation in which the well-being of employees has been a priority.</p>	<ul style="list-style-type: none"> • Equality • Talent management • Training • Employment • Organisation of work • Social dialogue • Human rights and labour rights
A stakeholder who generates value for the community	<p>Large infrastructures are designed to improve people's lives. Their optimal management involves considering, in addition to operational factors, the implications for sustainable development and the expectations of external groups, as well as promoting synergies and alliances that multiply the positive impacts of operations and contribute to building the trust that stakeholders place in the Company.</p>	<ul style="list-style-type: none"> • Dialogue with stakeholders • Relationship with local communities • Social action • Suppliers • Human rights
Restrictions derived from the regulatory framework	<p>Aena, as a state trading company configured as a public limited company, may be exposed to certain limitations due to its legal status (for example, in the hiring of personnel, in bidding processes, or organisational development), which could represent a competitive disadvantage compared to other private listed companies, making it difficult to respond to new challenges and opportunities.</p> <p>Nevertheless, Aena maintains strict and timely compliance with the growing regulations regarding its activities and characteristics, optimally complying with mandates received from its shareholders, and collaborating with different authorities in the design and operation of resilient, and effective, infrastructures.</p>	<ul style="list-style-type: none"> • Business model • Regulatory context • Risk management
Transparency	<p>We view transparency as an essential pillar of the trust that all our stakeholders place in us. To achieve this, we make various communication channels available to them that are treated with the utmost seriousness and are open to dialogue.</p>	<ul style="list-style-type: none"> • Regulatory factors • Relationship with stakeholders • Suppliers • Business model • Risk management
Aena, global agent	<p>Aena's vocation to expand its operational excellence model finds its natural scope in airports located outside of Spain, with other business guidelines and, often, at different times in the business cycle. The Company thus diversifies risks and makes the most of opportunities in its management capabilities, based on participation in each entity, without circumventing its responsibilities as an active and relevant member of the different communities.</p>	<ul style="list-style-type: none"> • Economic situation • Geopolitical factors • Relationship with stakeholders • Business model • Risk management

Relationships and dialogue with stakeholders

Understanding the expectations of stakeholders is critical for Aena, and is an essential element for setting goals, creating long-term value and contributing to the Sustainable Development Goals.

Aena builds relationships with its stakeholders on the basis of transparency, dialogue, the generation of trust and creation of shared value

The principles on which the Company bases its relationship with its stakeholders are formalised through the Corporate Responsibility Policy, the Code of Conduct and the Communication Policy, which reflect the importance of applying mechanisms that contribute to establishing and maintaining effective channels of communication, participation and dialogue, basing commitments on values such as transparency, opportunity, relevance and co-responsibility.

The Integrated Management System (IMS) includes the process to follow in order to understand the needs and expectations of stakeholders, as well as the materialisation of requirements and the use of tools for assessing compliance. Each Aena unit/site is involved in this process, conducting a specific analysis of the stakeholders with whom it interacts, and of the methods established for follow-up and review.

On an annual basis, the Management Review of the IMS analyses the possible changes that may exist in the needs and expectations of the stakeholders, and evaluates the degree of satisfaction in order to improve the services provided and adapt them accordingly.

In the most recent review of stakeholder parent companies, audited by Aenor within the framework of ISO 9001:2015, the Company has identified 26 different groups that can influence it, or that affect Aena's decisions. For the purposes of this report, these groups have been placed into 10 categories.

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



Communication from Aena with its stakeholders

Major stakeholders

Passengers
(low cost, seniors, business, family, leisure, etc.)

Airlines
(low cost and traditional)

Employees and other units

Public Administration, Regulatory bodies and other bodies
(Enaire, Aemet)

Ministry of Defence, security forces and bodies, civil protection and other emergency services

Communication tools

- Complaints, suggestions and compliments tracking and management
- Periodic analysis of ASQ surveys
- EMMA surveys
- Monitoring of process indicators
- DORA indicators
- "HappyorNot" devices

- Surveys to companies
- Direct contact/meetings
- Indicators associated with company processes
- Attendance at specialised forums and conferences
- User committee
- Work groups

- 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

- 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
- Presentations

- Specialised committee (emergency, national security, simulations, etc)
- Meetings
- AESA and internal audit committees
- Interministerial Commission for Defence and Development meetings



Web



Networks



Press



Alliances

Expectations

- Absence of supervening costs
- Good quality/price ratio
- Excellence in service
- Commercial and catering offer
- Efficiency, attention and friendliness of staff
- Service advantages
- Minimum wait times
- Comfortable and clean facilities
- Charging points, Wi-Fi
- Competitive prices and discounts

- Efficient and coordinated work procedures
- Quality of service
- Active collaboration
- Operational and analytical information of potential markets
- Incentives and discounts
- Operational priorities
- Help with passenger mobility
- Biometric boarding
- Baggage tracking
- Facilities and initiatives

- Acknowledgement
- Professional development
- Transparency and ethics
- Ease of providing ideas
- Social contribution
- Clear guidelines for action
- Proactivity

- Interministerial Commission for Defence and Development
- Site-specific meetings/committees
- National Security Committee
- Simulations
- AESA and internal audits
- Emergency Committee

- Interministerial Commission for Defence and Development
- Site-specific meetings/committees
- National Security Committee
- Simulations
- AESA and internal audits
- Emergency Committee

Common



Communication from Aena with its stakeholders

Major stakeholders

**Society, Local Communities/
Nearby Companies/ NGOs/
Associations**

**Investors and
shareholders**

**Communication
media**

**Suppliers
Service-providing partners
and other leaseholders
Cargo companies
Tour operators**

**General
aviation**

Communication tools

- Commissions and committees
- Public information
- Complaints, suggestions and compliments tracking and management
- Meetings
- Work groups
- Intersectoral committees

- Meetings
- General meeting
- Public information
- Communications to the CNMV
- Contact Channels for Relations with Investors

- Meetings
- Complaints, suggestions and compliments tracking and management
- Follow-up of news in the media

- 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
- Specialised forums and conferences

- User committee
- Direct contact/meetings
- Work groups



NFIS and other reports



Dialogue



Appointments and remuneration committee



Board of Directors

Expectations

- Sound Insulation Plan Commissions
- Public information on plans, projects, strategic noise maps
- Complaints, suggestions and compliments tracking and management

- Meetings of the Board of Directors
- Annual shareholders' meeting
- Publication of results

- Meetings with the media
- Media complaints, suggestions and compliments tracking and management

- Meetings with contractors, user committees
- Contractor follow-up/service provided
- Work groups
- Complaints, suggestions and compliments tracking and management

- User committee
- Direct contact/meetings
- Work groups

- Meetings with companies and associations
- Work groups
- Consultations, and public information on plans and projects
- Intersectoral committees

- Internal Control over Financial Reporting System (ICFR)
- Risk management system
- Internal and external audits

- Follow-up of news in the media

- 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

Common



Communication and transparency

To ensure effective two-way communication, the Company makes a series of communication channels available to all its stakeholders. These include the Company's website and social networks.

The commercial services that Aena provides to its different users, both passengers as well as travel companions and employees, are adapted to their profiles. This commercial offer presents varied and attractive types of concepts, both locally and internationally.

According to the survey conducted to analyse the workers' general perception of internal communication during confinement, more than half of the respondents considered that Aena has reported sufficiently, and 71% feels that the transparency was sufficient or considerable.





Corporate website and intranet

Using the **online services** portal, available on the Company's website, stakeholders can **make suggestions for improvements or report any reason for dissatisfaction online**. This information is essential for the continuous improvement of the Company's performance.

Main reflection of the Company's commitment to information, dialogue and transparency.

The website includes all information for general users, as well as details concerning the business and its progress. Likewise, it responds to the different stakeholders and contains specific sections in which more detailed information can be found according to the needs raised. Including:

Some specific sections

- ✔ **Shareholders and investors portal**, with detailed information on the company's financial development and sustainable corporate governance.
- ✔ **A corporate and environmental responsibility section**, specifying key data and management mechanisms concerning Aena's ESG performance.
- ✔ **Contracting and companies**, with basic information and links to redirect to contracting portals.
- ✔ **Information for users and airlines** in general.
- ✔ **Employment portal**, with details of the recruitment processes.
- ✔ **Online services portal** for the electronic processing of any suggestion for improvement, complaint or claim by stakeholders.

COVID-19: communication and transparency

As a result of COVID-19, the Company has made a **significant effort in communication and transparency**, adapting its website to provide useful information at all times to airport users, including passengers, airlines, commercial operators, leaseholders, employees, etc.

External

Likewise, specific landing pages have been created to detail Aena's response to COVID-19 with the specific measures adopted, information for users to take into account before traveling and during their journey through the airport, updated details of the status of Aena airports, etc.



Internal

This effort has also been made internally, increasing the frequency of communication with the organisation's employees and using new channels to do so (newsletters, management team meetings, emails, intranet, etc).



Almost
17 million
visits to the Aena website
(Spain and Brazil).

65
internal publications (Aena 360°) during the state of emergency period alone, which were assessed in the employee perception survey with a score greater than 4 out of 5 by nearly 75% of employees.

Approximately
200
questions received during the virtual meeting with the President and the HR manager, open to all employees, which received a rating of more than 4 out of 5 from almost 67% of employees in the employee perception survey.

Almost
Ten
direct communications to employees (letters) from the Chairman informing them about the situation of the Company and the conditions of the health emergency.

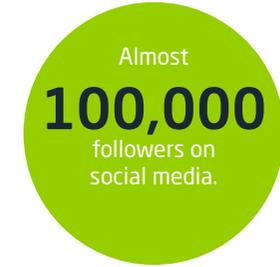
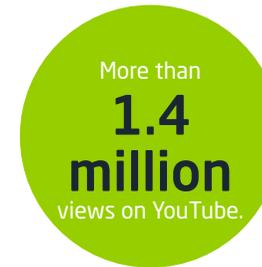
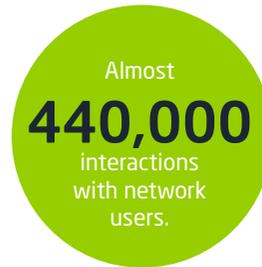


Social media

They allow the Company to receive continuous feedback from its stakeholders and promote those aspects that are of greater interest to users.

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.

In 2020, social networks have become a fundamental tool for Aena, reporting on the status of airports in real time, and acting as speakers for the needs of stakeholders, thus responding to all issues in real time:



During the first state of emergency (March-June), on Twitter, which was Aena's main communication channel, there were more than **5.2 million views** and more than **14,800 clicks on links**, alongside more than **4,800 retweets** and more than **12,700 likes**.

Aena Profiles

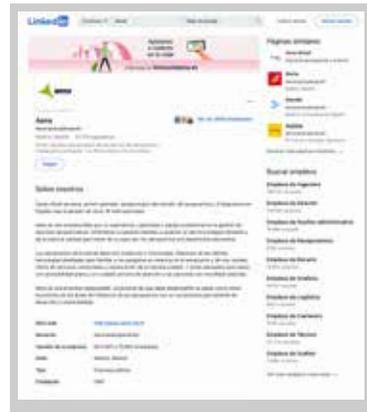
➤ Aena Facebook



➤ Twitter



➤ LinkedIn



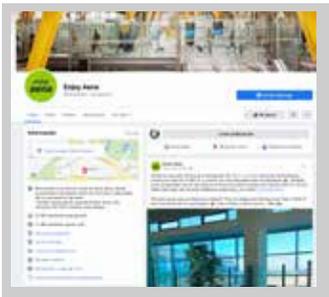
➤ Instagram



➤ YouTube



➤ Enjoy Aena Facebook



➤ Enjoy Aena Instagram



2020: An unprecedented challenge

Milestones

JANUARY

- Start of Aena's operations at the Juazeiro do Norte-Orlando Bezerra de Menezes and Campina Grande-President João Suassuna airports.
- Aena launches the third call for the Innova awards among its employees.

FEBRUARY

- The Company launches a new employee portal.
- The Company presents the results for 2019, with the best record in its history, a total of:

275M PASSENGERS

MARCH

- Aena successfully concludes the beginning of the management
- **6 AIRPORTS IN BRAZIL**
- On 1 March 2020, the airport charges applicable for 2020 came into force.
- The health crisis erupts due to the outbreak of COVID-19 and one of the strictest lockdowns in Europe begins in Spain. Many of the Company's employees start working from home.
- Aena reinforces communication channels with its employees.



JUNE

- Aena launches 'DESPEGANDO RECURSOS' (Deploying Resources), with the aim of caring for emotional well-being.
- The Aena Board of Directors decides to cancel the proposal for the application of results for the 2019 fiscal year and postpones the Shareholders' Meeting.
- The Minister of Health, the Minister of Transport, Mobility and Urban Agenda, the CEO of Aena and the Director of the Adolfo Suárez Madrid-Barajas Airport supervise security measures before the opening of borders and the arrival of the first flights.

MAY

- Aena strengthens its **LIQUIDITY** to address the COVID-19 crisis (€2,000 million).
- Aena assumes the cost of the airport charges for aircraft that have transported medical supplies.
- Aena joins the Vueling and Iberia initiative, taking charge of the 25,000 double-ticket airport charges that airlines give to healthcare personnel.

APRIL

- Aena becomes an essential party in the transportation of goods.
- The Company donates **€2 MILLION** to the CSIC for COVID-19 research.
- Aena launches the "SUPPORTIVE PAYROLL" INITIATIVE to raise funds for the CSIC. More than 100,000 euros are collected, in more than 2,500 contributions.
- The GRO (Operational Recovery Group) is created to identify safe airport processes.

JULY

- Aena launches **AENA VENTURES**, an accelerator in search of startups



SEPTEMBER

- Aena launches Aena Maps, a guided platform for the inside of its airports.
- Aena voluntarily provides its workers with various COVID-19 diagnostic tests, that can be taken on a voluntary basis, in order to contribute to the return to work with maximum safety.

OCTOBER

- Aena holds its General Shareholders' Meeting remotely.
- During the months of October to December, the consultation process on the 2021 airport charges is carried out.

NOVEMBER

- Vocento rewards Aena for its commitment to gender **DIVERSITY AND EQUALITY**.
- Recife Airport receives the Secure Tourism Seal of the Ministry of Tourism of Pernambuco, for its efforts to comply with the COVID-19 safety protocols in recent months.

DECEMBER

- The year ends with: **+72% FALL IN TRAFFIC**
- On 22 December, the first meeting takes place starting the DORA 2022-2026 consultation process.

2019 was an excellent year for Aena, with record results in terms of both finance and activity. The financial solvency, the soundness of the main economic indicators and the consolidation of the Company's privileged position in the global airport sector achieved up to that point have been outweighed by the difficult situation resulting from the worldwide COVID-19 health emergency beginning in March. The global impact of the pandemic on tourism and air transport activities, closely linked to each other, its development and the geographic spread of the coronavirus epidemic has caused a pronounced decline in economic activity that has seriously affected practically all sectors of activity, and has led to a drop in the main economic indicators worldwide.

In 2020, the activity of the Aena Group's companies and the evolution of their businesses was affected by the mobility restrictions in force since March both in Spain and in the rest of the world to avoid the spread of COVID-19.

Impact of COVID-19 on air transport and airports managed by Aena

There has been no historical precedent for the situation caused by coronavirus and its profound impact on the worldwide aviation sector, not only in Spain, since World War II. Air traffic has always experienced a growing trend (doubling every 15-20 years), despite different events that have temporarily affected its behaviour to a

greater or lesser extent, such as 9/11 or the financial crisis of 2008, and even other pandemics such as the 2003 SARS outbreak or bird flu, the impact of which, in this sector, was more geographically limited than the current disease.

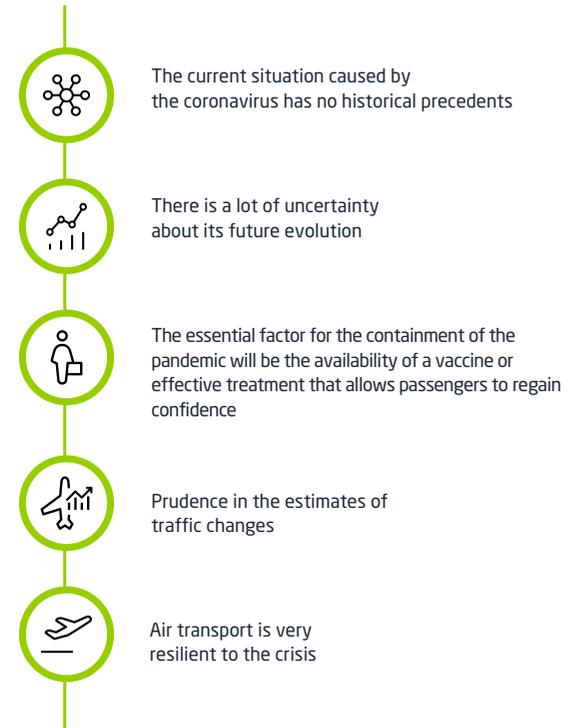
However, the main international aviation bodies (mainly the ICAO, IATA and ACI) warn that the short- and medium-term impact on global air traffic due to the COVID-19 pandemic will cause a drop in global passenger traffic on a scale never seen before. According to EUROCONTROL projections from January 2021 related to number of operations, only up to 51% of the 2019 European traffic volume will be recovered throughout 2021, accelerating from the summer onwards. Traffic would only return to 92% of 2019 levels in 2024, and figures would recover completely in 2026. Moreover, ACI Europe, also in January 2021, has lowered its passenger traffic forecast at European airports for 2021 to -56% of the 2019 level (base case) compared to -43% in its previous forecast.

In the long term, there is a lot of uncertainty regarding the return of traffic to levels recorded in 2019, which these bodies do not predict for Europe will be reached before 2026. The duration of this recovery will depend mainly on the degree of disease transmission and the ability to control it (other factors that affect the recovery of traffic worth mentioning are the availability and scope of the vaccine, and the restrictions on mobility that directly affect the recovery of traffic). While under normal conditions the main driver to assess air traffic trends is economic development and, therefore, GDP growth,

this paradigm has now changed. The pandemic has become the fundamental element that will condition the sector's level of recovery.

This same situation applies to the growth of the Spanish economy in 2020. Its weakening has been fundamentally due to a worsening of internal consumption and the structure of the economy itself, with its great dependence on the services and tourism sector, precisely the ones most hit by the current health crisis.

Incidence of the pandemic



This has caused the air transport sector, a strategic sector for Spain due to its economic and social impact, as well as its close relationship with tourism, to suffer significantly.

The main macroeconomic indicators point to a slower recovery than initially expected. Thus, the latest estimates of the Spanish Government indicate that 2020 has seen a fall in GDP of 11.2% (in 2019, GDP grew by 2.0%).

In terms of tourism, according to data from January to August 2020, only 15.7 million international tourists arrived in Spain, compared to 58.1 million in the same period the previous year (73% fewer), of which 75.3% did so using our airports. This circumstance is not exclusive to Spain and has affected all countries in our sector in a very similar way (for example, it has happened in Mediterranean countries that compete to attract tourism such as Greece, Portugal, Turkey, Tunisia and Italy, which have registered similar levels of activity).

The behaviour of London-Luton Airport and the airports in Brazil has been similar, although the development of traffic has been different depending on the regions and their type of operations. The London-Luton Airport has lost 12.5 million passengers in 2020, representing a year-on-year drop of 69.6%. With regard to Aena Brasil, located in the eastern part of the continent, although they were seriously affected at the start of the pandemic (they lost 6.1 million passengers in 2020, reflecting a year-on-year drop of 44.0%), they have been favoured by the activity of domestic traffic.

Given this situation, during 2020, the priority has been to enhance its public service activity, facing the challenges posed by COVID-19 with the utmost strength and stability.

Aena (the Spanish airport network) affected by the fall in tourism.



Measures implemented at Aena

Aena S.M.E., S.A.

With the declaration of the state of emergency in March, a period of inactivity began that caused an almost total collapse in traffic levels. With the aim of adapting to this sudden decline in activity, the Company adopted a series of operational, economic and financial measures that would allow for a more efficient management of the business, including the following in particular:

- **Adjusting the capacity and services to the specific needs of current operations** (adaptation of schedules, on-demand operation, temporary closure of spaces and terminals, adaptation of services, etc.). These measures, which can be modified in accordance with the changes in the pandemic and the levels of traffic, were supplemented by a cost saving plan. The main objective of this plan was to protect cash flow, via the renegotiation of service contracts (safety, cleaning, maintenance, etc.), the elimination of expenses and a freeze on new non-essential contracts. The reduction in average monthly cash outflows on operating expenses was estimated at around €43 million. The accumulated savings obtained during the period April–December amounted to €404.7 million. Likewise, the investment programme was also temporarily halted, estimating a monthly reduction in average cash outflows of approximately €52 million.

Since June, the 2020 investment plan has been reimplemented and, as a consequence of the temporary suspension, the amount of investment carried out amounted to €435.7 million.

- **Regarding financing**, with the aim of strengthening the Company's liquidity, Aena proceeded to sign loans with various financial entities between April and May, for a combined amount of €2,325.6 million. Thanks to these loans, Aena increased the availability of cash and credit facilities at 31 December 2020 to a total of €2,065 million; while also having the possibility of issuing, through the Euro Commercial Paper (ECP) programme, up to €900 million in debt, of which, at the end of the financial year, €845 million were available.

On 1 December 2020 the Company obtained waivers until at least June 2022 for the covenants established in the current financing agreements with the European Investment Bank (EIB), Instituto de Crédito Oficial (ICO Official Credit Institution), FMS Wertmanagement AöR (FMS) and Unicaja.

In order to strengthen the Company's solvency at a time when the future impact of the COVID-19 health crisis on the economy of the markets in which it operates cannot be assessed, the General Shareholders' Meeting agreed not to pay out the dividend corresponding to the results of the 2019 financial year and to add it to reserves.

- **Health protection:** The COVID-19 crisis has shown how a pandemic can affect air traffic and force a review of all airport security protocols. Aena reorganised its facilities to adapt to the decline in activity and the requirements arising from the health emergency. Aena network airports, considered to be infrastructure of public interest, have played a fundamental role here. They have guaranteed, at all times, not only the necessary commercial aviation services, but other types of aviation such as air cargo (supplies for the general public and healthcare related goods) and essential services such as police, Civil Guard, sea rescue, organ transplants, etc. They have also played a fundamental role in the return of Spanish citizens and the departure of foreign citizens as quickly and safely as possible, right from the early stages of the epidemic.

- **To ensure the health of workers, subcontracted personnel and passengers:** adoption of sanitary measures aimed at preventing the spread of COVID-19 and protecting the health of workers, suppliers and external personnel. To this end, remote work and partial attendance have been facilitated when possible, reorganising shifts and following all recommendations of the health authorities —minimum safety distance, disinfection of facilities, reduction of crowds of people, etc.

The experience of teleworking, implemented over a short period of time, and applied to a high percentage of the workforce with different positions and profiles, while guaranteeing the provision of services, has

been a truly unprecedented challenge successfully overcome.

AENOR has granted Aena the **Certification for Action Protocols against COVID-19 in the Aena workplaces**. This certificate is the result of the work carried out in implementing all the measures and protocols put forth in the Operational Recovery Plans (ORPs) of each work centre, their alignment with the recommendations of the Ministry of Health and their effectiveness. It corroborates the Company's efforts to adapt workplaces to new circumstances and to create a safe working environment for its employees.

- **Commitment to suppliers, customers and society in general:** Collaboration and close cooperation with all stakeholders in the air transport value chain (airlines, handling agents, tour operators, and supervisors etc.), seeking balanced solutions compatible with the sustainability of the Company and its ability to reverse a situation such as the current one. Measures include: implementing an incentive scheme for airline companies to recover traffic, the extraordinary six-month postponement on collections for customers and lessees, exemption of fixed rents during the period of the State of Emergency for car hire and ATM operators, as well as partial exemptions of monthly fixed rent to leases applicable for most contracts signed by airlines, agents and handling companies for offices, warehouses and commercial counters (including the commercial counters of tour operators and carriers).

To address the effects of the crisis derived from covid-19 on commercial activity, Aena has analysed from its beginnings its effects on the different contracts negotiating and agreeing, where appropriate, the necessary contractual modifications.

The ultimate purpose of negotiations on commercial contracts is the continuity of operators in airports. To this end, Aena has analysed in detail the evolution of each of its airports, the particularities of each contract, as well as the state and regional legislative developments that, where appropriate, are applicable. With regard to the legal provisions on 24 December 2020, Royal Decree Law 35/2020 entered into force on urgent measures to support the tourism, the hotel industry and commerce sectors and in tax matters, which has established, with respect to certain SMEs (small and medium-sized enterprises) and autonomous companies, a legal option to modify lease agreements and which, with respect to large companies, can be modulated based on the commercial agreements reached. Following its analysis, Aena redirected its negotiations in line with what the legislator established for the benefit of entrepreneurs in a situation of financial weakness, improving the limits provided in the standard both in terms of income and term. In addition, by virtue of the principle of equality, Aena has extrapolated the essential terms to all its commercial operators, regardless of the volume of its business, although without prejudice to attending to the particularities of each one. As of the date of this report, approximately half of the lessees have given their consent to this last proposal.

For its part, the negotiations carried out with all the vehicle rental operators have allowed the parties to agree on the modification of the contracts, in essence, in terms of rent. This amendment is effective between 15 March 2020 and 31 December 2021. The modification to the contracts has led to reduced rent for the period from 21 June 2020 to 31 December 2020 of €28.6 million. As of the date of this report, all vehicle rental operators have signed the addendum in the proposed terms.

Exemption of air traffic and landing fees during the state of emergency period for those aircraft transporting health equipment for the pandemic:

Extraordinary postponement on collections of aircraft parking fees from airlines for a period of 6 months, interest-free. The total amount postponed amounted to **€101.7 million, from which commercial operators benefited to the extent of €19.5 million and airlines to the extent of €82.2 million.**

The partial exemption of rents applied to leases from 15 March to 20 June amounted to **€6.8 million.**

The exemption of fixed rents during the state of emergency period to operators of car rental activities and cash machines resulted in **€18.4 million.**

Measures taken at London-Luton Airport

To mitigate the significant reduction in activity, the London-Luton Airport drew up a contingency plan with the objective of ensuring liquidity, as well as avoiding the consequences of non-compliance with the financial covenants in effect before the crisis. The actions carried out have been:

- Closure of operational areas in the terminal building based on the level of demand. Between 22 April and 1 May, the passenger terminal was closed, although the airport remained open for cargo and general aviation flights.
- Staff adjustments were made to take advantage of, among other measures, the programmes established by the British government to protect employment.
- Review of service agreements and other operating expenses. Between March and December, spending was reduced by more than £31.4 million, which represented a 44% saving.
- Postponement of the implementation of non-essential CAPEX investment, reducing the investment by £10.7 million in 2020.
- Suspension of payment of the dividend to the shareholders, and delay in the payment of interest on the shareholder loan.
- Obtaining a temporary waiver from the covenants established in the financing agreements from financial institutions, the extension of which is being negotiated.

- Strengthening of liquidity by establishing a credit line with its shareholders, which has not required a disposal at the end of the year.
- Likewise, it should be noted that the Company requested the activation of the Special Force Majeure procedure, provided for in the concession agreement, which recognises the right of the concession company to financial rebalancing of the concession. The procedure is suspended while discussions are being held with Luton Borough Council (LBC) regarding its application.

As part of the activity resumption process, the London-Luton Airport is implementing all the health safety guidelines issued by the UK government, which include the strengthening of cleaning services, disinfection measures, among others, such as the installation of specific signage and protection measures.

Measures adopted at Aeroportos do Nordeste do Brasil

Aeroportos do Nordeste do Brasil (hereinafter, Aena Brasil) drew up a contingency plan with the aim of minimising the effects of the crisis and preserving its liquidity, adapting the measures to the recovery of activity. Thus, from the second quarter, the operating hours of airports were reduced, as was the scope of outsourced service agreements (maintenance, security and surveillance, firefighting service, cleaning and handling, among others).

Investment activity was also halted until 23 November 2020, suspending the contractual obligations and deadlines granted by the regulator, Agencia Nacional de Aviação Civil (hereinafter, ANAC).

Aena Brasil has supported the recovery of activity with commercial policies that have fostered the sustainability of its customers' operations while helping to ensure continuity in the flow of collections.

The initial capitalisation —resulting from the requirements of the concession agreement— together with the effects of the aforementioned measures, allowed Aena Brasil to meet its commitments while maintaining a sufficient level of cash in hand throughout the year. Additionally, in the month of December, the Company's liquidity was strengthened by obtaining an 18-month loan of \$R70 million.

Considering the way the concession agreement treats events of force majeure, the interpretations made by the Brazilian authorities on the COVID-19 pandemic, and the applicable legislation; in December 2020, the Aena Brasil management prepared a request for an extraordinary review to restore the economic-financial balance of the concession agreement, which is under review by the regulator.

Finally, it must be pointed out that, with the resumption of activity, Aena Brasil has implemented measures at all its airports, in coordination with ANAC and the health authorities, in order to guarantee the operational recovery of activity under optimal safety conditions, such as: carrying out tests on

its employees, reinforcing the cleaning and maintenance services of air conditioning systems, disinfection measures and the installation of specific signage.

Operational recovery plan

Since the beginning of the health crisis, Aena has worked on identifying safe and coordinated airport processes so that all airports in its network can safely resume operations and build passenger trust.

The progressive reopening of facilities and adaptation of the necessary operational services (cleaning, security, PRM facilities, stores, catering, etc) has proceeded alongside the development of traffic, as has the resumption of the investment plan that had been suspended, which has resulted in a gradual increase in the volume of expenditure and investment, although this has taken place under strict efficiency and cost savings parameters.

The Company maintains its cost saving plan and, in the last quarter, obtained savings of €120.3 million, added to the €157.1 million and €127.3 million achieved during the second and third quarters of 2020 respectively.

Since June, the 2020 investment plan has been reimplemented and, as a consequence of the temporary suspension, the amount of investment estimated to have been carried out in 2020 has amounted to €435.7 million.

The measures identified in the Operational Recovery Plan implemented at Spanish airports include those indicated by the European Air Safety Agency (EASA) and the European Centre for Disease Prevention and Control (ECDC), to safely resume operations at European airports, once mobility restrictions have been lifted. In particular:

- Increased cleaning and disinfection of facilities.
- Maintaining social distancing measures.
- Acquiring protective equipment.
- The adequacy of signage and information (eg messages on information posters and digital screens, etc).
- Increasing communication with passengers.
- Adapting airport processes (billing, shipping, etc), and infrastructure and facilities of Aena network airports (eg hydroalcoholic gel dispensers, protective screens, floor markings and social distancing signs).
- The mandatory use of masks by passengers and the limitation of access to facilities for people who are not travelling, such as those accompanying travellers.

With regard to the implementation of health controls in the airport network, Aena and the Ministry of Health signed an agreement via which the Company agrees to make available to the Ministry the human, healthcare and support resources necessary to ensure controls on the entry of passengers on international flights at airports managed by Aena.

The London-Luton Airport has been equipped with facilities to perform COVID-19 tests since 22 December.

At the same time, in order to control the arrival of foreign passengers, the guidelines of the European Commission and the European Air Safety Agency (EASA) established in collaboration with the European Centre for Disease Control and Prevention (ECDC) are followed at all times. These guidelines have also been coordinated with Member States and with the international airport (ACI) and airline (IATA) associations.

With regard to the recovery of the costs concerning the health and operational checks implemented by Aena, it should be pointed out that Royal Decree-Law 21/2020, of 9 June, establishes that Aena will temporarily make available to the central and peripheral services of the Foreign Health sub-directorate of the Ministry of Health; the human, healthcare, and support resources needed to ensure health checks on incoming passengers on international flights at airports managed by Aena, on such terms as may, by common agreement, be arranged between Aena and the Ministry of Health.

Aena will have the right to recover the costs incurred as a consequence of collaborating with the health authorities, and of the remaining operational safety and hygiene measures that must be adopted as a consequence of the COVID-19 pandemic. These costs will be recovered within the DORA framework.

If these costs cannot be recovered within the framework of DORA 2017–21, they may be recovered, duly capitalised, in any of the subsequent DORAs. In this case, the rate will not be subject to the airport charges review cap of 0%, the accumulated deficit in DORA 2017–21 may be transferred to DORA 2022–26, and the accumulated deficit in DORA 2022–26 may be transferred to the following five-year period.

Future challenges: adapting to the new context

The measures adopted in the short term have been necessary to alleviate, as far as possible, the negative effects of COVID-19 on business. While the expectations for the development of traffic are difficult to quantify, due to the complexity of the context, and in the belief that the situation will improve in the future, the Company is immersed in a constant development process, which is critical to adapting to the demands of the environment, and ensuring the continued creation of value for all stakeholders.

This transformation process is adapted to the main trends that reaffirm the Company's strategic vision: to continue being the world leader in the management of airport infrastructure.

The main future challenges to be faced in the coming years, and that will mark the path of recovery of the business, will be recovering the confidence of passengers in safe sanitary conditions.

Adapting to the New Context

Recovery of passenger confidence.



Coexistence of coordinated approaches and common European criteria in the establishment of health and transport authority measures.

Close coordination with airlines.

Need to face other challenges: environmental, regulatory requirements and service outage.

The departure of the coronavirus economic crisis must reinforce the foundations of an economy focused on digitisation and decarbonisation.

To achieve this, the following is essential:

- Harmonising measures to be adopted by the different governments of the European Union in the event of possible outbreaks of the disease, including common, coordinated actions based on clear epidemiological criteria for all Member States.
- Maintaining a close relationship with the airlines and other companies that carry out their activity in network airports, and other stakeholders.
- Responding to the new challenges associated with the aviation sector:
 - Society's growing concern for the environment.
 - More demanding regulatory requirements, especially in terms of safety, environment and passenger rights, along with the new health requirements imposed by COVID-19.
 - The greater level of demand from passengers in terms of quality of service.

In line with the commitment to continue on the path to sustainability, Aena has adhered to the Declaration for a sustainable recovery (Manifiesto por una recuperación sostenible), an initiative supported by companies, NGOs, scientists, academics and citizens in general, that urges the government to make sure that the exit from the economic crisis, caused by the coronavirus, builds the foundations of a transformation to a more sustainable and robust economy.

Strategic Prioritisation

Strategic priorities already assumed before the crisis



Environmental
sustainability Aena's
Climate Action Plan



Innovation
based on the
development of
digital solutions



DORA 2022-2066 New
Airport Regulation
Document

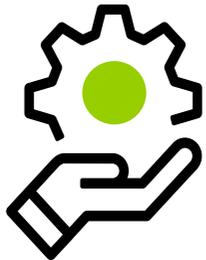
This is based on three fundamental pillars: digitisation, decarbonisation and resilience, while understanding that competitiveness and the environment go hand in hand, because without environmental sustainability there can be no economic or social sustainability.

In this regard, in the coming years, Aena will continue to focus on the strategic priorities already assumed before the health crisis, which will be the levers or driving tools for recovery, and to promote the generation of value for shareholders and the company as a whole, these are:

sustainability, innovation + digitisation and the next regulatory period DORA 2022-2026. DORA is the instrument that establishes, by five-year periods, the specific obligations derived from the current legal airport framework, which will end with the approval of the Council of Ministers planned during the third quarter of 2021.

Risks and risk management

Aena is exposed to a diversity of risk factors related to its activity, business and regulation. Since 2020, the impact of COVID-19 has been added to the mix, which directly affects all levels, and involves significant changes in management.



Risk management

A key pillar for creating value and achieving the Company's strategic objectives



RISKS RELATED TO AENA'S ACTIVITY

**RELATED TO THE GROUP'S
BUSINESS AND OPERA-
TIONS / COVID-19****IMPACTS OF COVID-19**

The global economy has been extraordinarily affected by the pandemic, especially the tourism and transport sectors, and, in particular, aviation, as a result of restrictions on mobility and air operations, which has had severe effects on operations and financing conditions at Aena.

- Drastic reduction in air activity, there is also significant uncertainty surrounding the recovery of short-term traffic, which is linked to the spread of the pandemic and the availability of an effective vaccine, accompanied by the cessation of part of the commercial business in the airport network. To address this situation, the most significant risks identified and their consequences, which are to a great extent unpredictable, the Group's management has adopted a series of measures. These include the renegotiation of commercial agreements or the approval of extraordinary incentives for the recovery of operations for airlines, under the Air Traffic Recovery Plan.
- Reduction of cash flows and, in general, liquidity problems, as well as the possible contraction of the credit market. In light of this, a plan has been put in place aimed at safeguarding the Company's liquidity to the maximum extent possible, making use of credit lines and considering new financing options. In addition, the proposed allocation of profit for the 2019 financial year was cancelled and the amount was transferred to voluntary and recapitalisation reserves.
- Possibility of non-compliance with covenants and therefore breach of the obligation to comply with certain financial ratios relating to operating results and debt. In view of this, the Company has achieved a temporary exemption from compliance with said ratios.
- At the end of 2020, the Group has carried out the appropriate impairment tests in all its Cash Generating Units, resulting in an adjustment in the amount of €108.8 million that has been recognised in the consolidated Income Statement.
- Reduced airport capacity and the need to deal with exceptional expenses aimed at protecting the health and safety of employees and other users. Closely connected to the capacity adjustments carried out at airports, Aena has developed a cost-saving plan based on the renegotiation of service agreements, the reduction of expenses, a stop on new hiring of non-essential personnel and stopping the investment plan. In addition, its status as a state-owned commercial company allows it to be exempted from the obligation to indemnify those contractors who have been forced to suspend their public service and supply contracts due to the pandemic. Finally, Aena will have the right to recover the cost of those expenses incurred for cooperating in the performance of health checks and for the adoption of operational health and safety measures in connection with COVID-19.

However, the development of the health crisis may have a material effect on the Group's business, and on its outlook, finances, condition and results of operations.

For its part, in order to accelerate the recovery of Member States, the European Union has launched a Recovery Plan that aims to take advantage of the full potential of a reinforced budget and the creation of the extraordinary instrument Next Generation EU, aimed at promoting projects related to the European Green Compact. In line with the basic points of this Plan, the Spanish Government has presented its Recovery, Transformation and Resilience Plan for the Spanish economy.

RISKS RELATED TO AENA'S ACTIVITY

MACROECONOMIC, POLITICAL, DOMESTIC AND OTHERS

BREXIT

The signing and ratification of the UK withdrawal agreement from the European Union and the end of the transitional period has given way to a new relationship framework. The risks associated with Brexit have been greatly reduced and can be summarised into four main categories:

- Operational: the various measures adopted allow the new operational requirements to be addressed, minimising their impact on airport activity.
- Fares: the General Budget Act for 2021 has included a provision whereby, until 28 February 2022, the amounts per passenger for passengers to the European Economic Area will be applied for travel to an airport in the United Kingdom.
- Traffic: this risk has been diluted in the current context caused by the COVID-19 pandemic.
- Ownership and control regulations: affected airlines have taken different measures to comply with these regulations. In any case, the withdrawal agreement plans for this to be reviewed.

CONCENTRATION AND COMPETITION

Aena faces risks related to the concentration of clients in activities, both aeronautical and commercial, and its income is especially dependent on its two main airports (Adolfo Suárez Madrid-Barajas and Barcelona-El Prat Josep Tarradellas).

- With regard to aeronautical activity:
 - Dependence on airlines. Especially the subsidiaries of the IAG Group, and some low-cost ones such as Ryanair, any reduction in their activity at the group's airports, changes in their strategies, etc., may result in a decrease in revenue, in addition to the difficulty of guaranteeing their replacement. The development of the pandemic may involve a change in this concentration.
 - Dependence on the two main airports of the network. Any disruption in their operations (due to shocks, events, macroeconomic or political factors, etc.), may affect the revenue generated by these airports and, therefore, that of the Group.
- Commercial activity.
 - Changes in consumption trends that, aggravated by the reduction in air traffic, cause a worsening of commercial business at airports, leading to a greater concentration of commercial operators, risks of non-payment and abandonment of agreements, as well as other effects derived from the worsening of their financial situation and the passenger mix.

The Group operates in a competitive environment, in which both location and type of airport play a fundamental role. In addition, the Company faces the rise of other means of transport, such as high-speed trains (for example, AVE with high passenger volume hubs). All this can affect aeronautical and commercial revenue.

OPERATIONAL: CYBERSECURITY

Aena depends on information and communication technologies to carry out multiple procedures and processes, in all its areas of activity, and its systems and infrastructure have to stand up to certain risks, such as cybersecurity or Information security. This has been particularly relevant with the health crisis and the consequent boost in digital transformation in many sectors, thanks to which significant advances have been made, but with new threats and vulnerabilities to cyberattacks.

Consequently, the proper functioning of these systems, exposed to continuous changes, is critical to operations and business. While Aena has a set of tools and contingency plans, including carrying out testing, audits, certifications, etc.; and promoting innovation and technology, as well as being committed to accelerating start-ups; these systems cannot be fully protected to ensure confidentiality, integrity, availability, authentication and access control. Any problem could disturb the Group's operations, in addition to causing reputational damage.

RISKS RELATED TO AENA'S ACTIVITY
**OPERATIONAL:
THIRD-PARTY
DEPENDENCY**
THIRD-PARTY DEPENDENCY

Failures in relevant operations carried out by third parties at the airport or under its coordination, and that may compromise the correct execution of services (controllers, handling companies, airlines, security, health controls, etc), including labour disputes with critical service providers or air traffic management that negatively impact the capacity of infrastructure.

The Group's operations are highly dependent on service providers, such as airlines, handling companies, etc. In addition, Aena subcontracts some security, cleaning and animal control operations, among others.

**OPERATIONAL AND PHYSI-
CAL SECURITY**

The physical or operational security risks derived from terrorist attacks, wars or aviation accidents, the probability of which has not decreased and may evolve into new scenarios, have coexisted since 2020 with an unprecedented health emergency situation that has forced all airport security protocols to be reviewed.

Aena has an advanced Operational Security Management System and collaborates with security forces in strengthening security controls, while putting special effort into innovation that allows a combination of high quality service and maximum security. The airports have contingency plans adapted to various situations, which include protocols for action in the event of reduced personnel at their facilities, as has happened in Spain during the declaration of the state of emergency.

AERIAL REGULATION

Airline rates are subject to current national and European regulations, and to the provisions of the DORA, which has limited the increase in maximum revenue per passenger until 2025.

These limitations can generate a deficit if operating costs increase above certain thresholds, if the volume of passenger air traffic is insufficient to cover expenses or if there are unpredictable or urgent regulatory changes that require investments greater than €450 million. In any case, Aena reserves the right to recover, through aeronautical rates, any additional and unforeseen capital expenses to comply with these possible legislative changes.

The Group may be subject to costly obligations to maintain all its airport certifications in accordance with EU Regulation 139/2014.

The consultation process of the new Airport Regulation Document for the 2022-2026 period (DORA II) is being developed, which could involve changes in its rates and impacts derived from the new regulatory context.

RISKS RELATED TO AENA'S ACTIVITY

SUSTAINABILITY, CLIMATE CHANGE AND ENERGY TRANSITION

Environmental regulatory restrictions could limit the Group's commercial activities, hinder the growth of the Group or require substantial expenses.

Despite the fact that the interruption of activity on a global scale has forced a substantial decrease in oil prices, plans to activate the transition to a decarbonized economy have also been advanced. Environmental awareness continues to grow among the general public, businesses and governments, where collaborative models are emerging to exploit synergies and foster cascade effects, while the increase in teleworking in many sectors has reduced or modified passenger transport patterns. In January, the Spanish government made a Declaration on the Climate and Environmental Emergency in Spain.

The consequences of climate change (adverse and extreme climatic events) can affect the operational capacity, safety and efficiency of airports. In addition, the growing social sensitivity on the use of fossil fuels can affect the demands of airport customers and users. In this sense, Aena has a Climate Change Strategy and in 2020 it approved the Principles of Action against climate change and the governance of environmental matters, which serve as the basis for the future Climate Action Plan, while continuing to implement various energy efficiency and renewable energy measures at its facilities. Awareness raising actions among employees, suppliers, customers and other stakeholders were also carried out.

The Company maintains its presence in ESG indexes, such as FTSE4good, participates in international initiatives (ACA Program, Net Zero Carbon), publishes its environmental data by reporting to the Carbon Disclosure Project (CDP), and carries out collaborative work with airlines and handling agents to reduce emissions.

TAX COMPLIANCE AND TRANSPARENCY

A good governance model allows the generation of short, medium and long-term value for shareholders, customers, suppliers and other stakeholders, and strengthens the company's control environment, reputation and credibility vis-à-vis third parties.

Aena operates in a highly regulated sector, which guarantees that the management of the airport network is carried out with public service criteria. It also establishes a regime of airport charges and requires various airport security measures to be guaranteed. Together with these obligations, determined by its unique nature as a private company of public interest, the Company has its own Regulatory Compliance System, which includes procedures and policies to fight corruption and fraud, as well as different corporate policies that are periodically reviewed.

INVOLVEMENT OF STAKEHOLDERS

The way in which customers, suppliers, administrations, employees, shareholders, etc, are involved in the management of the companies has evolved towards a more digital profile, one that is more aware of environmental protection and health, more participatory and willing to be heard.

The companies must provide, in a transparent manner, sufficient information about their sustainability policies, development, implementation and results.

Need to supervise the process of preparing financial and non-financial information as well as its integrity.

DIGITAL TRANSFORMATION AND INNOVATION RISK

Risk of losing competitiveness by not developing 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.

Structure, control and risk management¹

Aena has a risk management and control model aimed at guaranteeing the achievement of the Company's objectives in a predictable manner, in a globalised competitive environment and with a complex context. This is mainly as a result of the COVID-19 crisis, where the materialisation of risk is higher and has a greater synergistic effect. Aena's Risk Management Policy² and Control System³ enable it to face any threats, or uncertainties of any kind, that might affect the company, confidently. During the health crisis, the activities of the Risk Management System have been adapted, allowing the Organisation to focus on critical matters and allocate its resources to the management of the most urgent aspects.

The priority is to have a risk management system capable of preventing social, environmental and good governance risks; and to support management by giving greater control over processes to provide an effective response to the expectations of stakeholders, as well as to promote the Company's leadership in terms of sustainability.



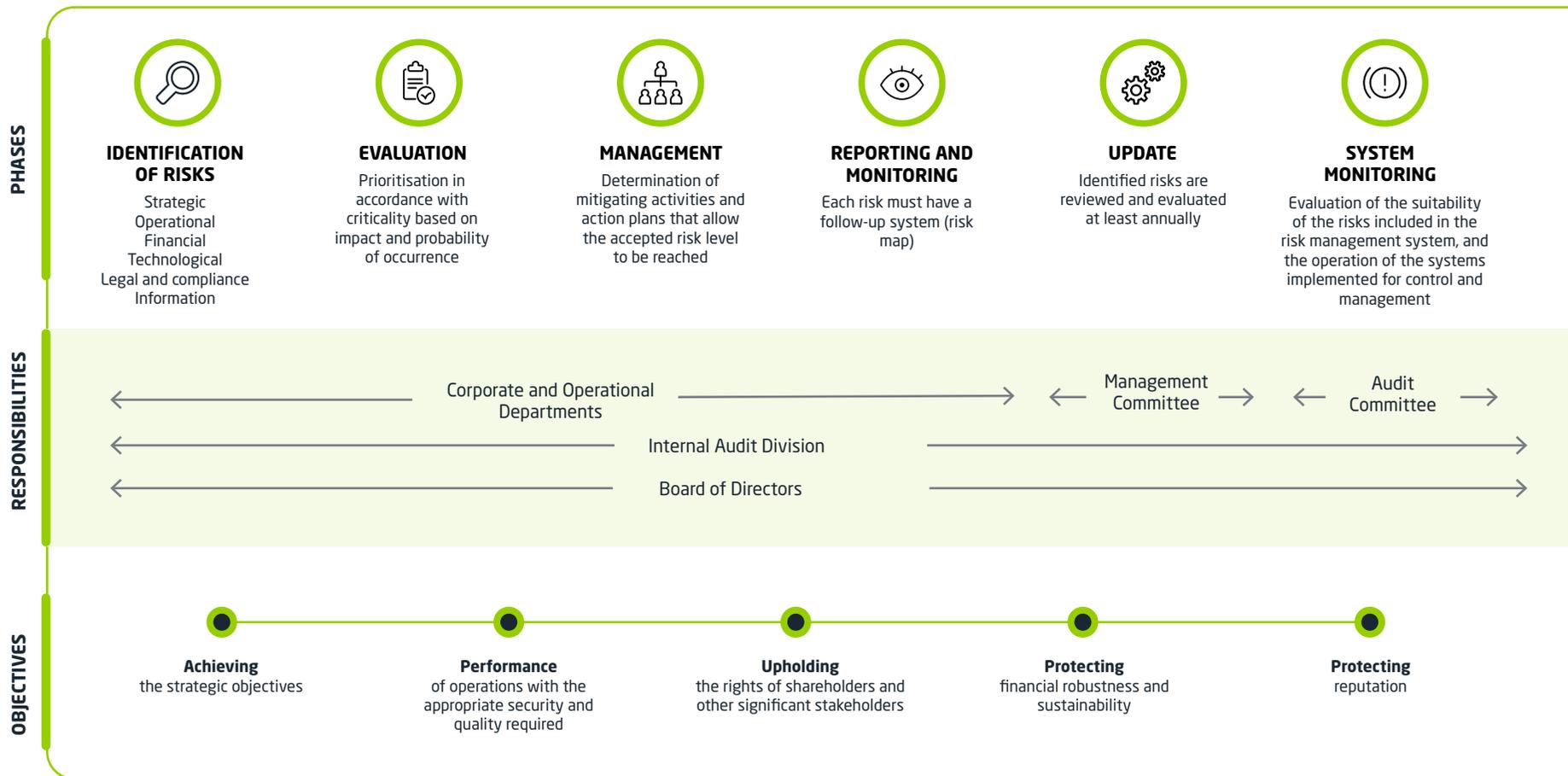
¹ Aena's Risk Management System, and the main risks faced by the Company in the short, medium and long-term, which are taken into account in the corporate risk map, are described in section E of the Annual Corporate Governance Report.

² Reviewed by the board of directors in January 2020.

³ The risks inherent to the international development of Aena are an integral part of its Risk Management System. The fundamental principles of risk management applicable in the London-Luton Airport Operations Ltd. (LLAOL) and Aeroportos do Nordeste do Brasil S.A. (Aena Brasil) subsidiaries are consistent with the contents of Aena's Risk Control and Management Policy, adapting business risk management to its dimensions and economic reality.

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)



This model is based on the following:

- The consideration of standard types of risk together with the new context arising in 2020. This structure allows the classification of identified risks in the following: strategic, operational, financial, technological, legal and compliance and information. In addition, Aena uses this system to classify financial and non-financial risks by nature, enabling it to put the necessary control mechanisms in place.
- The assessment of criticality and the definition of risk tolerance levels, by determining the impact and probability of occurrence of each risk:
 - Probability of occurrence of the risk being realised during a certain event once the controls to mitigate the risk have been considered.
 - Impact: referring to the damage that would be caused to Aena if the risk were to materialise in the form of a certain event at the following levels:
 - Economic, due to its effects on financial results.
 - Operational, affecting the provision of services.
 - Reputational, due to its consequences for the image and prestige of the Com-pany.

Based on the combination of these two variables, the criticality of each risk is automatically determined as is its location on the Risk Map.

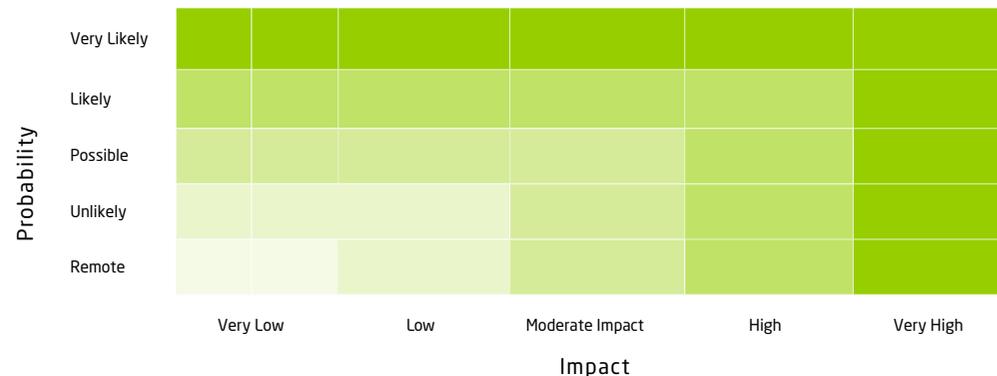
- The association of key monitoring indicators to all the risks included on the Map. Tolerance thresholds are determined for this purpose, which, if exceeded, require an assessment of the need to design mitigating

activities and action plans, specific to each type of risk, which in turn contributes to minimising their effects and maximising opportunities.

- The Policy defines the guidelines to follow to control and manage risks within appropriate tolerance limits, and facilitates key elements in terms of deciding on the acceptable risk level.
- The update is carried out at least annually and must be submitted to the Audit Committee.
- Segregation and independence of the risk control and management functions:
 - Corporate and operational areas: identify and assess the risks for which they are responsible, together with the mitigating activities, proposing and reporting adequate monitoring indicators. They also establish action plans to mitigate risk and report on their effectiveness.
 - Internal Audit Division: It assists the Audit Committee, supervising the proper functioning of the System, standardising and consolidating reports related to the identification and evaluation of

risks and their corresponding indicators, mitigating activities and action plans and reporting to the Management Committee and the Audit Committee.

- Audit Committee: monitors the risk management system, ensuring that major risks are identified, managed, communicated and maintained at planned levels.
- Board of Directors: It defines, updates and approves Policy, and sets the acceptable risk level for each situation, being ultimately responsible for the existence, and operation, of an adequate and effective risk management system.
- The transparency of the information provided to third parties, ensuring its reliability and accuracy.



Risks in 2020

The 2020⁴ risk map shows the main risks to which Aena has been exposed. The System review, carried out in the context of the health emergency to adapt it to the new reality, has resulted in:

- The updating of controls, indicators and action plans of the existing risk sheets.
- The monitoring of measures implemented for the management of COVID-19 impacts, reporting monthly to the Audit Committee.

Based on this review, a total of 18 risks have been identified in the Map, ⁵including: the impact of the pandemic, climate change and service quality/health safety. They are all classified, as previously noted, into strategic, operational, financial, technological, legal and compliance and information.

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



The negative effects derived from the impacts and the uncertain situation generated by the development of the pandemic have had an impact at an operational, financial and regulatory level, as well as impacting the health and safety of workers. Control and action measures have been proposed in all areas.

⁴ The risk map has been reviewed in January 2021.

⁵ The corresponding chapters will provide detailed information about each of them.

MAIN TYPES OF RISKS

TYPE OF RISKS	CONTENT	CONTROL MECHANISMS AND MITIGATING ACTIVITIES
STRATEGIC	Risks that can arise from a chosen business strategy, and those from external and internal sources that could have a significant direct or indirect impact on the Group achieving its long-term vision and objectives. This category includes risks arising from changes in the environment in which the Group operates (political, economic and social), in the competitive environment (aeronautical and non-aeronautical market), and changes that affect fees and operations, among others. All risks related to the governance model are included in this type.	<ul style="list-style-type: none"> • Monitoring of the 2018-21 Strategic Plan. • Monitoring of measures and controls developed within the framework of COVID-19. • Master Plans. • Integrated Quality, Environmental and Energy Efficiency Management Policy. • Plan to attract air traffic and boost airline loyalty. • Liaising with institutions, bodies and airlines affected by Brexit. • Working group for monitoring and establishing activities in relation to Brexit. • Climate change strategy and analysis of climate scenarios, and assessment of needs to adapt airports. • Initiatives for the five-year DORA consultation process and the annual consultation on charges for the following year. • Potential detection programmes in personnel and Employer Branding.
OPERATIONAL AND TECHNOLOGICAL	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 security of infrastructure and systems, investments, coordination of operations and air control; in addition to those related to employment and human resources.	<ul style="list-style-type: none"> • Operational security management system. • Self-protection plans and contingency, preparation and response procedures to emergencies. • Organisational Model and information security policy. • Disaster Recovery Plans (DRPs). • Cybersecurity plan. • COVID-19 measures: communications, security and systems. • External airport security audits (<i>safety and security</i>). • Airport Incident Management Centres. • 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. • Integrated quality and environment management system. • Investment planning, control and execution procedure. • ICT security reviews under ISO 27002:2013 • Civil aviation liability policy for airport operator + war and terrorism civil liability. • Employee protection policy (life, safety and health).
FINANCIAL AND NON-FINANCIAL	Events that may have negative impacts and significantly affect the results of financial operations, usually due to market, credit and liquidity risks.	<ul style="list-style-type: none"> • Interest rate hedging instruments, guarantees and bonds, or prepayment required from clients • 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 2020, based on the criteria established in COSO. • Internal regulations and contracting control systems.
LEGAL AND COMPLIANCE	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.	<ul style="list-style-type: none"> • Code of Conduct. • Regulatory Compliance Policy. • Regulatory compliance system including policies and procedures to combat corruption and fraud, and the Corporate Governance Policy. • Corporate Tax Policy.
INFORMATION	These are risks related to the reliability of the sourcing, and preparation of financial and non-financial information, both internal and external, that are significant for the Group, or which affect the reputation of the Company.	<ul style="list-style-type: none"> • Internal Control over Financial Reporting System (ICFR). • Oversight of financial and non-financial information by governing bodies.



Block B: Non-financial information statement (NFIS)

The adaptation to the sudden decline in activity has required adjusting capacities and services to the specific needs of the operation, maintaining efficiency, safeguarding an essential service, and without compromising the future of the Company

1

Aena: Sustainable governance model

Reference airport operator

SPAIN

46 general interest airports
2 heliports

Participate in the management of **23** international airports:

1 in Europe (United Kingdom)
22 in the Americas (6 in Brazil, 12 in Mexico, 2 in Colombia and 2 in Jamaica)

Majority shareholder entity
51%

AENA IS PART OF IBEX 35

Reference framework based on ethics, integrity, compliance, legality and transparency

- Regulatory Compliance System
- Code of Conduct
- Regulatory Compliance Policy
- Anti-corruption and fraud policy
- Complaints Channel
- Other corporate policies

CORPORATE POLICIES WERE REVISED AND UPDATED IN 2020

Governing bodies

- General Shareholders' Meeting
- Board of Directors: **15** directors
 - Succession plan
 - Remuneration according to public regulations
 - Support commissions
- Management Committee

33% FEMALE PRESENCE ON THE BOARD OF DIRECTORS

Unique legal nature

- State-Owned Commercial Company
- Listed Public Limited Company

2020
98

complaints related to the Code of Ethics (consolidated data)

0
cases of corruption identified

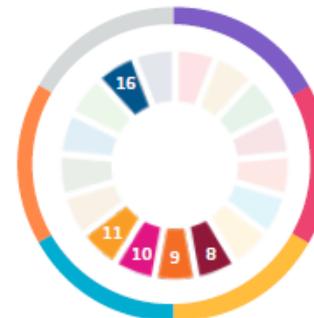
Data protection

- Compliance Model
- Privacy from the design
- Internal audits
- Training and information for employees
- Cybersecurity plan

0 PERSONAL DATA SECURITY BREACHES DETECTED IN 2020

Sustainable finance

- Sustainable syndicated credit line



Commitment to SDGs

8
SDG 8 Decent work and economic growth

9
SDG 9 Industry, innovation and infrastructure

10
SDG 10 Reduced inequalities

11
SDG 11 Sustainable cities and communities

16
SDG 16 Peace, justice and strong institutions

The year 2020 has proved to be one of the greatest challenges in Aena's history. Faced with the effects derived from the spread of COVID-19, the company has had to adapt to circumstances at all times, adopting all the necessary measures to ensure its sustainability, as well as to preserve and protect the social interest of the Company, its employees, suppliers, customers and other stakeholders, while at the same time maintaining responsible environmental management.

1.1. Capital and organisational structure

As an airport operator, Aena currently manages 46 airports of general interest in Spain, and two heliports. Aena owns a total of 32 airports and has shared use of another eight with the Ministry of Defence. A further five are military airbases that are open to civilian traffic. It also operates Región de Murcia International Airport ("AIRM") as a concession.

The Company is also present outside of Spain through its subsidiary Aena Desarrollo Internacional S.M.E., S.A. (hereinafter referred to as "Aena Internacional").

The Aena group is made up of Aena, Sociedad Concesionaria del Aeropuerto Internacional de la Región de Murcia (the concession company of the Región de Murcia International Airport, "SCAIRM"), Aena Internacional, the companies of the London Luton Airport Group ("LLAOL"), as well as the Concession Company Aeroportos do Nordeste do Brasil, S.A. (the concession company of the Northeast Brazil airport group, "Aena Brasil").



THE AENA GROUP

It comprises the following:
Aena, Sociedad Concesionaria del Aeropuerto Internacional de la Región de Murcia (the concession company of the Región de Murcia International Airport, "SCAIRM"), Aena Internacional, the companies of the London Luton Airport Group, as well as the Concession Company Aeroportos do Nordeste do Brasil, S.A. (the concession company of the Northeast Brazil airport group, "Aena Brasil")



**51% MAJORITY
STAKE IN THE
MANAGEMENT
COMPANY OF THE
LONDON-LUTON
AIRPORT,
IN THE UNITED
KINGDOM**



**SHAREHOLDING IN
12 AIRPORTS
IN MEXICO,
2 IN JAMAICA AND
2 IN COLOMBIA**



**OWNER OF THE
CONCESSION FOR THE
MANAGEMENT OF
6 AIRPORTS IN
NORTHEAST BRAZIL**

Governing Bodies

The highest governing bodies responsible for management, supervision and control of the Company are the General Shareholders' Meeting and the Board of Directors.



Through its Corporate Governance system

Aena guarantees the generation of value, the efficient use of resources and transparency in its management, and protects the interests of shareholders and the Company itself. The Corporate Governance tools comply with national and international best practices and recommendations, including those of the Code of Good Governance of the Spanish National Securities Market Commission (CNMV [Comisión Nacional del Mercado de Valores]).

Shareholders and the General Shareholders' Meeting

Aena S.M.E., S.A. is a state-owned commercial company configured as a public limited company. Its majority shareholder is ENAIRE (Public Corporate Entity under the Ministry of Transport, Mobility and Urban Development¹) with 51% of the shareholding. The remaining 49%, as of 11 February 2015, consists of private capital listed on the Madrid, Barcelona, Bilbao and Valencia Stock Exchanges (for full details of shareholdings at the close of 2020, see the Annual Corporate Governance Report).

Aena has been part of the Ibex 35 index since June 2015². The share capital of the company is represented by one hundred and fifty million (150,000,000) shares, each with a par value of ten euros (€10), fully subscribed and paid.

Aena maintains a permanent relationship with shareholders through different forums, such as the General Shareholders' Meeting, presentations of financial results, investor relations, roadshows, the investor relations website located on the Company's corporate website, the Customer Service for Shareholders (ir@aena) and the Investors Relations Office, located at Aena's corporate headquarters.

The General Shareholders' Meeting is the sovereign body of Aena in which all shareholders meet to deliberate and decide on matters that fall within their purview—in accordance with the majorities required in each case—or to be informed of any other matters that the Board of Directors deems appropriate. The organisation and operational rules are published in the Company's Corporate Bylaws (Articles 11 to 28, inclusive) and in the Regulations of the General Shareholders' Meeting.

In order to facilitate attendance, participation, communication and interrelationship with all shareholders, and to guarantee their rights, Aena incorporates different

SIGNIFICANT SHAREHOLDERS - TO BE UPDATED ↗

DENOMINATION	% OF VOTING RIGHTS ATTRIBUTED TO THE SHARES			% OF VOTING RIGHTS THROUGH FINANCIAL INSTRUMENTS	% OF TOTAL VOTING RIGHTS	DATE REGISTERED WITH CNMV	ADDITIONAL INFORMATION	PREVIOUS NOTIFICATIONS
	% TOTAL (A)	% DIRECT	% INDIRECT	(B)	(A+B)			DETAIL / CANCELLATIONS
BLACKROCK INC.	2.994	0.000	2.994	0.250	3.224	12/10/2020		↗
ENAIRE	51.000	51.000	0.000		51.000	17/02/2015		↗
HOHN, CHRISTOPHER ANTHONY	3.860	0.000	3.860	3.607	7.467	03/06/2020		↗
THE CHILDREN'S INVESTMENT MASTER FUND	0.000	0.000	0.000	3.607	3.607	23/04/2020		↗

¹ Previously known as the Ministry of Public Works, name changed on 13 January 2020.

² Consult the Annual Corporate Governance Report on Aena's website for more information.

mechanisms, such as remote voting or live broadcasting of the General Shareholders' Meeting through the corporate website.

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

In order to ensure the safety of attendees, and as a result of the measures and restrictions approved by the health authorities due to the COVID-19 health emergency, the Board meeting held in October 2020³ was carried out solely online, through delegation and early voting and attendance was exclusively remote. For this purpose, an online platform was set up for live broadcasting, as well as for the intervention and voting of shareholders through telematic means. In the session held in October 2020, among other matters, the following was approved: the allocation of the 2019 profits to reserves⁴, the appointment of Javier Marín San Andrés as Executive Director, the approval of the Principles of Action against Climate Change and Governance in Environmental Matters, and the approval of the Non-Financial Information Statement for fiscal year 2019.



³ The General Shareholders' Meeting was initially convened for March 2020 but was suspended as a result of the COVID-19 situation, with a new Meeting announced in June to be held in October.

⁴ Decision made after assessing the damages caused by the COVID-19 pandemic and with the objective of strengthening the solvency of the company under the current circumstances that do not allow for the assessment of the future impact from the health crisis.

The Board of Directors

The Board of Directors is the highest administrative and representative body of the Company. It is also a supervisory and control body, performing its duties with unity of purpose and independently from management and providing the same treatment to all its shareholders, whose main premise is the interest of the Company.

Within the framework of the Company's commitment to its shareholders, the Board of Directors carries out its activity in accordance with certain corporate governance standards, mainly included in the Corporate Bylaws, in the Regulations of the General Shareholders' Meeting, in the Regulations of the Board of Directors and in the different Corporate Policies.

As a supervisory and control body for the Company's activity, it is the competent body for establishing management strategies and guidelines, implementing and ensuring the establishment of adequate reporting procedures for shareholders and markets in general, and adopting decisions on business and financial operations of special relevance, among others.

In addition to the above, it is the body responsible for approving the Corporate Policies, including Corporate Governance, Corporate Social Responsibility, Risk Control and Management, Regulatory Compliance and Information Security.

The organisation and operation rules are published in Aena's Corporate Bylaws (Articles 29 to 50, inclusive) and in the Regulations of the Board of Directors⁵.

As at 31 December 2020, Aena's Board of Directors was composed of 15 members comprising the following: six independent directors; six nominee directors appointed at the proposal of the majority shareholder, ENAIRE; one nominee director appointed at the proposal of the TCI Group; and two executive directors, one of which is the current Chairman and CEO of Aena, Maurici Lucena. In accordance with the provisions of the Regulations of the Board of Directors and the Selection Policy for Board Member Candidates, and in compliance with the Code of Good Governance of the CNMV Listed Companies; the selection of Board Members is based on a prior analysis of the needs of the Company and the Board of Directors, encouraging diversity of knowledge, experience and gender, and rejecting any type of discrimination based on a person's race, nationality, social origin, gender, marital status, sexual orientation, religion, political ideology, disability or any other personal condition of a physical or social nature.

The Board of Directors of Aena Internacional is composed of nine members. Of the nine directors, five are nominee directors employed by the Aena Group, three are independent directors and one is an executive director—the CEO, Javier Marín San Andrés. The Chairman of the Board of Directors, Maurici Lucena Betriu, is a non-executive Chairman. The Corporate Bylaws of

Aena Internacional state, in Article 17, that the Board of Directors shall be composed of a minimum of three and a maximum of nine members. The current composition is nine. There is no appointment policy. Of the nine current members of the Board of Directors, six are employees of the Aena Group and three are employees of the public sector.

The Board of Directors of Aeroportos do Nordeste do Brasil, S.A. (Aena Brasil) is composed of seven members, of which five are nominee directors appointed by the sole shareholder Aena Desarrollo Internacional SME, S.A. Of the six board members appointed by the sole shareholder, employees of the Aena Group, one is an independent director and another is an executive director—the Chairman of Aeroportos do Nordeste do Brasil, S.A. The Chairman of the Board of Directors, Javier Marín San Andrés, is a non-executive Chairman. As established in the Corporate Bylaws of Aena Brasil, the Board of Directors shall be composed of a minimum of five and a maximum of nine members, who are elected by the General Shareholders' Meeting for a period of two years.

The corporate bylaws of London Luton Airport Operations Limited (LLAOL) do not establish the number of members that the Board of Directors must have. The appointments are made in accordance with the provisions of the Shareholders Agreement signed between the two shareholders of the companies that make up the Luton Group. There is no appointment policy.

⁵ In October 2020, the General Shareholders' Meeting agreed to amend the company's corporate bylaws, with the inclusion of a new article (article 50 Bis), in order to give the Board of Directors the responsibility for preparing,

publishing and updating a multiyear Climate Action Plan that includes actions for mitigating the effects of climate change and monitoring the indicators established for meeting decarbonisation objectives. As of 2022, the

Company must prepare and publish a specific and detailed annual report on the progress of the aforementioned Climate Action Plan.

33%



Women on the Board
—5 out of a total of 15 directors—
(as of 31/12/2020).

In compliance with the
recommendations of the Code of
Good Governance of the CNMV,
**Aena is committed to having
women make up 40% of its
Board of Directors by 2022.**



Diversity of the Board



55.33

average age of the Directors

AENA collaborates with the
**Woman Forward Foundation,
Garrigues and the Institute
of Business Governance in
the Women Joining Boards
programme**, which aims to
improve the creation of value
within companies, promoting the
transformation of the Board by
establishing efficient processes
that make it the engine of the
company, as well as through
strict control processes for
corporate tasks.



2.92

average years of
seniority on the Board



Board structure

Name	Type of Director	Selection procedure****	Member of other expert committees	Training	Experience	Director in other entities (number)*****	Attendance at Board meetings (%)	Attendance at Committee meetings (%)	Voting rights based on shares
Maurici Lucena Betriu CEO (Chief Executive Officer)	E	GSM	EC	E/F	FS, SM, IT, AER, UN		100%	100%	N/A
Francisco Javier Marín San Andrés Executive Director	E	GSM		AE, E/F	IT, FS, AUD, AER, INFRA, SM, UN, T, ESG	2 entities of the Aena Group	100%	N/A	340 shares
Pilar Arranz Notario	N	GSM		OT	AUD, CO, AER, SM, INFR, OT		100%	N/A	N/A
Francisco Javier Martín Ramiro	N	GSM		SC/ENG, OT	INFR, UN, OT		90%	N/A	N/A
Ángel Luis Arias Serrano	N	GSM	ARCGC (M)	AE, OT	AUD, AER, INFR, SM, ESG, IT, UN		100%	100%	N/A
Juan Ignacio Díaz Bidart	N	GSM		E/F	SFUN, AUD, T, OT, UN, SM		100%	N/A	N/A
Marta Bardón Fernández-Pacheco	P	GSM	AC (M)	E/F	FS, AUD, SM, OT		100%	100%	N/A
Francisco Ferrer Moreno	D	GSM	AC (M), EC (M)	E/F	FS, INFR, AUD, UN		100%	100%	N/A
Angélica Martínez Ortega	P	GSM	EC (M)	E/F, OT	FS, AUD, INFR, SM		92.31%	100%	N/A
TCI Advisory Services LLP - Christopher Anthony Hohn	N	GSM	ARCGC (M), EC (M)	E/F, AUD, ESG	FS, AUD, SM, ESG, INFRA	9 companies of the TCI Group	100%	ARCGC: 25% CE: 100%	3.55%
Amancio López Seijas	I	GSM	ARCGC (C)	E/F	FS, T, OT	Chairman and CEO of the Companies of the Hoteles Turísticos Unidos, S.A Group.	100%	100%	N/A
Jaime Terceiro Lomba Lead Independent Director	I	GSM	AC ARCGC (M), EC (M)	E/F, AER	FS, AUD, AER, UN		100%	100%	N/A
José Luis Bonet Ferrer **	I	GSM	AC	E/F, OT	T, UN	1	100%	100%	N/A
Josep Antoni Durán i Lleida	I	GSM	ARCGC (M)	OT	UN, SM, T, OT	1	100%	100%	30 shares
Jordi Hereu Boher ***	I	GSM	ARCGC (M)	OT	OT, UN	1	100%	100%	N/A
Leticia Iglesias Herraiz	I	GSM	AC (C)	E/F, AUD	FS, AUD, SM	3	100%	100%	N/A
Irene Cano Piquero	I	GSM	ARCGC (M)	E/F	FS, AUD, IT, SM	-	N/A	N/A	N/A
Juan Río Cortés	I	C	AC (M)	E/F, SC/ENG	FS, IT, SM	-	N/A	N/A	N/A

* Francisco Javier Martín Ramiro's role ended on 29 October 2020.

** José Luis Bonet Ferrer's role ended on 29 October 2020.

*** Jordi Hereu Boher's role ended on 22 December 2020.

**** The Regulations of the Board of Directors and the Selection Policy for board members stipulate that the Appointments, Remuneration and Corporate Governance Committee (ARCGC) will propose or notify the appointments of new board members.

***** In accordance with the provisions of the Regulations of the Board, Board Members may not be part of more than five (5) Boards (Art. 29 [xii]) or more than three (3) Boards of Directors of other companies whose shares are traded on any domestic or foreign stock exchange.

KEY

Type of Director: I = Independent; E = Executive; N = Nominee.

Selection procedure: GSM= General Shareholders' Meeting; B= Board

Member of other expert committees: EC: Executive Committee; AC: Audit Committee; ARCGC: Appointments, Remuneration and Corporate Governance Committee; (M): Member; (C): Chairman.

Training: Economic/Financial: E/F; Auditing and risk management: A/R; Environmental, Social and Governance matters: ESG; Non-financial risks: NFR; Aeronautical: AE; Other Science and Engineering: SC/ENG; Other: OT

Professional Experience: Innovation/New technologies/Digital transformation: IT; Data protection: DP; Auditing/Risk Management: AUD; Compliance: CO; Academic/University/Research sector: UN; Financial Sector: FS; Aeronautical: AER; Infrastructure and transport: INFR; Senior Management (other sectors): SM; Sustainability: ESG; Corporate Governance: CG; Tourism: T; Other: OT

Aena Succession Plan

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 Officer. It is also responsible, if applicable, for drawing up any proposals to the Board of Directors so that such succession occurs in an orderly and planned manner (art. 24 of the Regulations of the Board of Directors). For its part, the Lead Independent Director has the power to coordinate the Chairman's succession plan (art. 15 of the Regulations of the Board of Directors).

With the statutory term ending for the positions of Francisco Javier Martín Ramiro and Jose Luís Bonet Ferrer as members of the Board of Directors, the General Shareholders' Meeting agreed to the appointment of Irene Cano Piquero and Francisco Javier Marín San Andrés as board members. In addition, in its meeting of 22 December 2020, the Board of Directors agreed to the appointment of Juan Río Cortés as a member, filling the vacancy resulting from the resignation of Jordi Hereu Boher.

The profiles of the three board members can be found at the following link: <http://www.aena.es/csee/Satellite/Accionistas/en/Page/1237568525334/1237568522634/Composition.html>

Evaluation of the Board

As established in the Regulations of the Board of Directors, the Board of Directors will prepare an annual action plan for the following fiscal year, which, among other things, will include the evaluation of its own performance, the quality and efficiency of its work and the operation and composition of its Committees. Where appropriate, the Board shall adopt an action plan that corrects any deficiencies identified. Additionally, every three years, the Board of Directors will be assisted in carrying out the evaluation by an external consultant, whose independence will be verified by the Appointments, Remuneration and Corporate Governance Committee.

In 2020, the results obtained from the evaluation of the functioning of the Board and its Commissions have been very positive. In addition, as a novelty this year, some questions have been included in the questionnaire given to each of the Directors regarding the procedure for online meetings and the measures adopted for the proper functioning of the Board during the health crisis caused by COVID-19.

With respect to the results obtained, 90% of the Directors' evaluations have been excellent or satisfactory with respect to the functioning of the Board of Directors and only 6% of the Directors' evaluations suggest that some aspects should be reinforced. With regard to the operation and composition of the Commissions, 98% of the Directors' evaluations have been excellent or satisfactory compared to 2% that suggest some aspects could be improved.

On the other hand, the measures adopted for the proper functioning of the Board during the health crisis caused by COVID-19, such as telematic sessions, have been positively appraised by the members of the governing body.

Likewise, an Action Plan has been developed for fiscal year 2021 that addresses the main deficiencies detected during this evaluation.

Remuneration of the Board

Aena S.M.E. S.A. is subject to both commercial law, applicable to capital companies, and to the regulatory framework applicable to the remuneration model for senior managers and directors in the corporate public sector, with the latter prevailing. The application of public regulations of a prevalent nature to the regulatory standards of capital companies, implies that:

- The contracts of the executives who are part of the Executive Management Committee of Aena S.M.E., S.A., and those of the Internal Audit Manager and the Head of Aena Internacional, 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 predetermined by public regulations, including the following: Royal Decree 462/2002, of 24 May, on the compensation for services provided; the aforementioned Royal Decree 451/2012; the Order issued by the Ministry of Finance, of 30 March 2012, which approves the classification of

state-owned commercial companies in accordance with Royal Decree 451/2012, of 5 March, which regulates the remuneration regime of senior managers and directors in the corporate public sector, and other entities; and the Order issued by the Ministry of Finance, of 8 January 2013, which approves the maximum amounts of compensation for the attendance to board of director meetings of state-owned commercial companies. Due to this, the Company has no discretion to set remuneration amounts under the terms indicated in Article 217.4 of the Corporate Enterprises Act, given that, in addition, the directors receive no compensation for the exercise of their positions as members of the Board of Directors, but only financial compensation for attending Board meetings, with this compensation being limited by maximum amounts as detailed in the Annual Report on Remuneration.

Remuneration received in 2020:

- **Fees of the Executive Director:** the first Executive Director and also Chairman and CEO of the Board of Directors has received €170,000 (including fixed and variable remuneration and other supplements). For his part, the Executive Director, Francisco Javier Marín San Andrés, has received—since his appointment to the position by the General Shareholders' Meeting on 29 October 2020— €25,000 (including fixed and variable

remuneration and other supplements received in his capacity as CEO).

- **Remuneration of Directors⁶:** in accordance with the Order issued by the Ministry of Finance and Public Administrations, of 8 January 2013, the maximum annual amount has been set at €11,944 (Group 1), derived from their attendance to Board meetings (11 meetings in total).

However, the remuneration corresponding to Board Members with the status of High Ranking Government Officials is deposited into the Public Treasury⁷. Taking the foregoing into account, and in accordance with the number of times Directors attended Board of Directors meetings, the average remuneration received by male Directors was €11,944 and the average received by female Directors was €11,944⁸.

- **Remuneration of Senior Management⁹:** the average remuneration received by women in this category was €121,339 and the average received by men was €129,857¹⁰. The wage gap stands at 7% for this category.

The annual average compensation of each of the Board Members¹¹ of the Aena concession company Region de Murcia International Airport is €6,853.99 (according to the certified record of 18 September 2018 of the decision by the sole shareholder in

which the decision was adopted). The remuneration of the Directors is predetermined by public regulations¹², such that the Company has no discretion to set remuneration amounts under the terms indicated in Article 217.4 of the Corporate Enterprises Act, given that, in addition, the directors receive no compensation for the exercise of their positions as members of the Board of Directors, but only financial compensation for attending Board meetings. These amounts are limited by the maximum remuneration established by the Spanish Ministry of Finance for companies in the public sector of Group 3 (currently an annual maximum of €6,854 for attending the meetings of the Board of Directors, and €1,520 for attending Board committee sessions). Throughout 2020, a total of 11 meetings were held, for each of which each Director received a remuneration of €623.09.

The remuneration of Aena Internacional Directors is predetermined by public regulations, including the following: Royal Decree 462/2002, of 24 May, on the compensation for services provided; the aforementioned Royal Decree 451/2012; the Order issued by the Ministry of Finance, of 30 March 2012; and the Order issued by the Ministry of Finance, of 8 January 2013. Due to this, the Company has no discretion to set remuneration amounts under the terms indicated in Article 217.4 of the Corporate Enterprises Act, given that, in addition, the remuneration of the directors only

⁶ Information about the remuneration of the Board of Directors is detailed in the Annual Report on Remuneration, which can be consulted on the company's corporate website.

⁷ During fiscal year 2020, remunerations corresponding to attendance by High Ranking Officials at Aena (Maurici Lucena Betriu, Angélica Martínez, Juan Ignacio Díaz Bidart, Angel Luis Arias Serrano and Francisco Javier Martín Ramiro) were deposited into the Public Treasury.

⁸ 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.

⁹ To calculate the average remuneration of Senior Management, salaries, allowances, pension plans and insurance are considered.

¹⁰ For the purposes of calculating the average broken down by gender, the average workforce of the members of the Senior Management of Aena, S.M.E and AIRM (due to the changes in the organisational structure throughout 2020) has been considered.

To calculate the average remuneration, the base salary, variable remuneration, allowances, compensation, long-term forecast systems and other items have been taken into account.

The salary review included in Royal Decree-Law 2/2020, which approves urgent measures regarding compensation in the public sector, is pending application.

¹¹ Section 18 of the SCAIRM corporate bylaws, on the remuneration of directors, states that "Directors and the Secretary of the Board, if they are not a Director, shall be entitled to receive the allowances for attending the Sessions, as well as the appropriate compensation for travel expenses incurred from attending the meetings held. The amount of these allowances will be set by the General Shareholders' Meeting, subject to the provisions of applicable legislation. The maximum amount of the annual remuneration must be approved by the General Shareholders' Meeting and will remain in force as long as its modification is not approved".

¹² Namely, Royal Decree 462/2002, of 24 May, on the compensation for services provided; the cited Royal Decree 451/2012; the Order issued by the Ministry of Finance of 30 March 2012; and the Order issued by the Ministry of Finance, of 8 January 2013.

consists of allowances for attending Board meetings. These compensation amounts are limited by the maximum remuneration established by the Spanish Ministry of Finance for Group 3 companies in the public sector (currently an annual maximum of €6,854 for attending Board of Directors meetings, and €1,520 for attending Board committee sessions).

Regarding matters of remuneration, Aena Internacional—as a company through which the parent company Aena S.M.E., S.A. invests abroad— established certain corporate governance rules in 2020 relating to the remuneration of directors in investee companies. The average remuneration received per male Director was €7,614 and €7,682 per female Director¹³.

In the case of the group holding the London-Luton Airport concession, currently, only the Independent Director is paid, who signs a contract for this purpose. The Independent Director is the Chairman of the Board, who serves as a Director and Chairman at the group's five companies, and as a member of the *Audit and Risk Committee* and the *Remuneration Committee*, and his total annual fixed gross remuneration is £100,000 per year.

As for Aena Brasil, in October 2020, the Company's Shareholders' Meeting approved a directors' remuneration plan applicable from that date. Therefore, it is not possible to calculate the average annual remuneration for 2020.

Committees supporting the Board

The Board of Directors has three delegated committees: the Executive Committee, the Audit Committee, and the Appointments, Remuneration and Corporate Governance Committee¹⁴.

The Regulations of the Board of Directors detail their specific powers, the performance assessment process of their members, as well as the rights and duties of the Directors.

Appointments, Remuneration and Corporate Governance Committee

This committee is composed of a total of five non-executive Directors, with three as independent directors, and has powers to be informed of and to drive, steer and monitor Aena's objectives, action plans and practices in matters of corporate responsibility and sustainable development, as well as communicate their agreements to the Board of Directors as a whole. Its functions include the following:

- Periodically review the corporate responsibility policy and strategy.
- Be informed of and drive, steer and monitor the objectives, action plans and practices of the Company in matters of corporate responsibility. In particular, with regard to the following: the fulfilment of the corporate responsibility strategy and practices, ensuring that they focus on achieving greater social and environmental sustainability, and the creation of long-term value; the processes of maintaining rela-

tionships with the various stakeholders; the contribution to achieving the Sustainable Development Goals (SDGs); and coordinating the process of reporting non-financial and diversity information, which includes ethical issues and/or the Corporate Responsibility Report.

- Periodically evaluate the adequacy of the corporate governance system of the company, specifically in corporate governance policies. Evaluate the knowledge and experience needed on the Board of Directors and, consequently, define the required functions and skills of the candidates who must fill each vacancy, as well as to assess the time and dedication required so that they can perform their duties correctly.
- Establish a gender-based representation objective, make recommendations on how to achieve it, and inform the Board of diversity issues.
- Submit proposals for the appointment of Independent Directors to the Board of Directors, and report the proposals for the appointment of the remaining directors.
- Verify annual compliance with the policy of selecting directors.
- Report proposals for the appointment and termination of senior management.

In 2020, eight meetings of this Committee were held. They were attended (in-person and via a representative) by 100% of its members in two of them and 80% in six of them.

¹³ 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.

¹⁴ The composition, responsibilities and regulations of these bodies are available on the corporate website.

Audit Committee

In accordance with the provisions of the Regulations of the Board of Directors (article 23), the Audit Committee has powers to monitor and control non-financial information, and evaluate non-financial risks.

As such, further to its functions in the area of monitoring and control of financial information, and systems of internal control and risk management, the Audit Committee has the authority to evaluate everything related to the non-financial risks of the company, including operational, technological, legal, social, environmental, political and reputational risks.

In addition, it has regulatory compliance powers, which include the following specific powers: to establish and supervise a mechanism that allows employees to confidentially report any irregularities of potential significance that may be detected within the company; to coordinate the bodies responsible for compliance; review the regulatory compliance policy, and any other policies and procedures aimed at preventing inappropriate conduct; and supervise the management of the Complaints Channel.

In 2020, eight meetings of this Committee were held. 100% of the meetings were attended, in person or through representatives, by all the directors.

Executive Committee

By virtue of the provisions of Article 22 of the Regulations of the Board of Directors, this body is composed of five directors, has a general decision-making capacity and, therefore, is able to expressly delegate all the powers that correspond to the Board of Directors, except those that are considered to be non-delegable by law, any applicable regulations, Corporate Bylaws or the Regulations of the Board itself.

This year, due to the crisis caused by the COVID-19 pandemic, the Executive Committee has met on four occasions, in which 100% of its members attended (in-person and through representatives).

Management Committee

In accordance with the Regulations of the Board of Directors, the ordinary management of the company's business is entrusted to the management team and the corresponding executive bodies, thereby creating a connecting link between the Board of Directors and the rest of the Company. Aena's organisational structure is designed to ensure compliance with the commitments in its regulatory framework (Airport Regulation Document, DORA 2017-2021)¹⁵, and to foster new business lines that generate value, such as commercial and real estate activities, international expansion, sustainability and innovation.

Composition of the Management Committee (31/12/2020)



Maurici Lucena Betriu
Chairman and CEO



María José Cuenda Chamorro
Managing Director of Commercial and Real Estate



Javier Marín San Andrés Director
Managing Director of Airports



Ángel Luis Sanz
Director of the Chairman's Office, Regulation and Public Policies



Amparo Brea Álvarez
Director of Innovation, Sustainability and Customer Experience



José Leo Vizcaíno
Economic-Financial Director



Juan Carlos Alfonso Rubio
General Secretary and Secretary of the Board of Directors



María Gómez Rodríguez
Communications Director



Begoña Gosálvez Mayordomo
Organisation and Human Resources Director

* Change of name of the Innovation, Sustainability and Customer Experience Directorate.

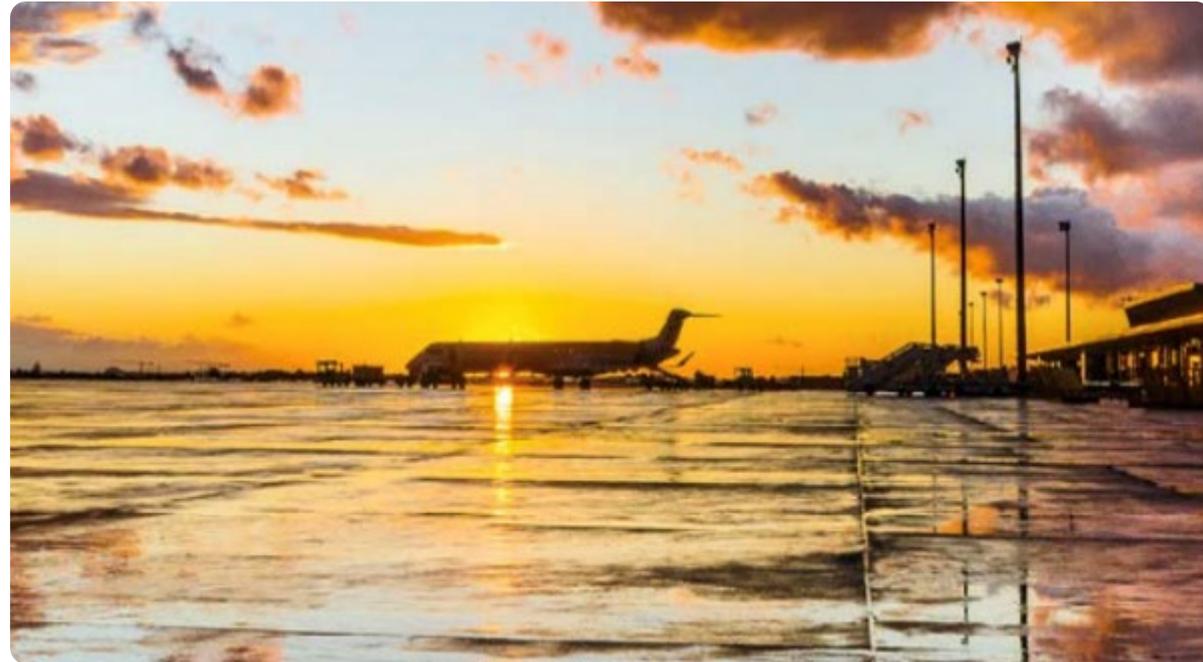
¹⁵ Airport Regulation Document (DORA [Documento de Regulación Aeroportuaria]): an instrument that establishes the minimum conditions needed

to guarantee the accessibility, sufficiency and suitability of airport infrastructure, as well as the adequate provision of basic airport network services.

1.2. Culture and corporate ethics

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

Its unusual legal nature affects issues such as its policy on the remuneration of directors, the range of responsibilities of the directors, the acquisition of majority interests in other companies, the hiring of personnel, the contracting of suppliers, the access to public information and the transparency in their activities. In addition, Aena is subject to the provisions of the Airport Regulation Document (DORA) —instrument that establishes the minimum necessary conditions in airport management— and to the requirements established in European regulations on airport and operational security as well as by various provisions of the European Union Aviation Safety Agency (EASA), the Directorate General



for Civil Aviation (DGCA) and the International Civil Aviation Organization (ICAO). It is also subject to quality and environmental requirements stemming from the application of standards such as ISO 20906, ISO 9001:2015, ISO 14001:2015, ISO 27002:2013 and ISO 19600, the EU Regulation 139/2014 or the Airport Carbon Accreditation, to which it has voluntarily subscribed.

Based on the guidelines provided for in the regulatory framework, Aena has developed a structure of basic standards (of high level) that configure the Company's Compliance model, and contribute to effectively and efficiently articulating the management of the company with its strategic objectives.

It is essential for Aena to guarantee the legality of the actions taken by its employees, directors and managers when carrying out their professional activities. Ethics, compliance, legality, integrity and transparency are the basis of their activity, and the starting point for establishing relationships with their stakeholders.

The Aena General Regulatory Compliance System comprises, among other things, elements such as the Code of Conduct, the Regulatory Compliance Policy, and the Anti-Corruption and Fraud Policy, which are binding and applicable to the members of the Management Bodies, to Senior Management and—in general, without exception and whatever their position, responsibility, occupation or geographic location—to all employees of Aena or any other company wholly owned by Aena and domiciled in Spain.

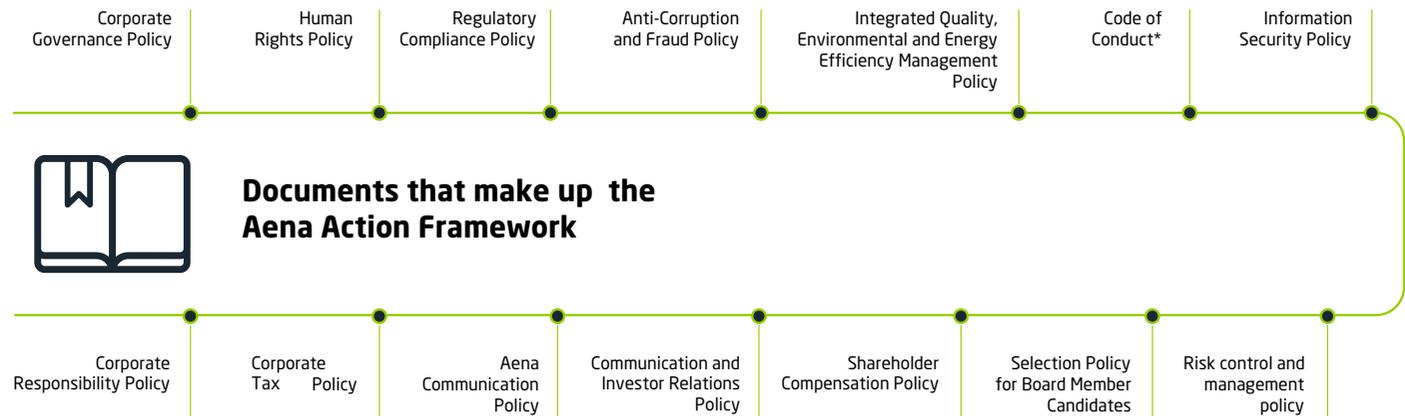
These Policies shall apply to the Directors and employees of Aena subsidiaries where it has a majority shareholding and which are not domiciled in Spain (London-Luton Airport and Aena Brasil) in accordance with its regulations, unless otherwise established in its own policies—since its Compliance bodies are responsible for implementing its Regulatory Compliance Systems, in coordination with Aena’s Compliance Supervision and Control Body (OSCC [Órgano de Supervisión y Control de Cumplimiento]).

In this regard, Aena’s compliance supervision and control body (OSCC) will ensure that their investee companies have Regulatory Compliance Systems, applying the best international standards, through their representatives in the companies in which they may be invested with a minority shareholding. To this end, some principles of action have been developed.

Under the principle of zero tolerance for any type of illicit behaviour, Aena regulates the potential conflicts of interest among its various groups. Thus, there is a specific Conflict of Interest Policy for Managers and Directors, while various internal regulations also make reference to conflicts of interest, which are duly regulated.

In 2020, the Regulatory Compliance Policy and its Development Regulations have been modified to reinforce the regulation of potential conflicts of interest.

Its internal regulations establish a culture of prevention, based on the principle of “zero tolerance” towards corruption in businesses, in all its forms.



* The companies in the London-Luton Airport Holding Group have rules of conduct that have been approved by their boards of directors and apply to their employees, managers and executives. The Group is currently reviewing its compliance system and its policies and procedures to improve them and their efficiency.

The Board of Directors is responsible for ensuring that the directors of the Company comply with ethical standards in the exercise of their duties.

As established in the Regulations, the Directors are vested with the broadest powers to obtain information on any aspect of the Company. Specifically, External Directors may request for advisers and experts to be recruited by the Company in order to be assisted in the exercise of their duties.

In 2020, the review of corporate and compliance policies was carried out, with aspects of their content that required updating being modified, especially within the framework of the review of the Code of Good Governance of Listed Companies published by the CNMV last June. In addition, Aena's commitment was strengthened in certain matters, with the approval of specific policies, in areas such as Human Rights, Information Security, and Risk Control and Management, which are particularly relevant in terms of establishing specific controls to prevent their materialisation.

This Risk Control and Management Policy explicitly refers to the risks related to corruption, and, although they may fall within the category of "legal and compliance risks", all risks relating to the nature of mandatory legal regulations. In turn, this category includes all those risks related to breaches of legal regulations, sectoral regulations and internal regulations. For its part, the Corporate Responsibility Policy —also updated in January 2020— outlines principles of action that support the Corporate Responsibility of the Company, among which is included the "establishment of principles of transparency, integrity and business ethics, while rejecting any type of corruption and acting in accordance with the Code of Conduct".

With regard to Aena's policies on environmental and social matters, these identify and include the corresponding principles, commitments, objectives and strategies, as well as the methods or systems used for monitoring compliance with policies, associated risks, and their management, and mechanisms for risk supervision. Specifically, Aena's Communications Policy and the Communications and Contact Policy with shareholders, institutional investors and voting advisors refer to the relevant channels of communication,

participation and dialogue with stakeholders, as well as responsible communication practices that avoid any manipulation of information, and protect integrity and honour.

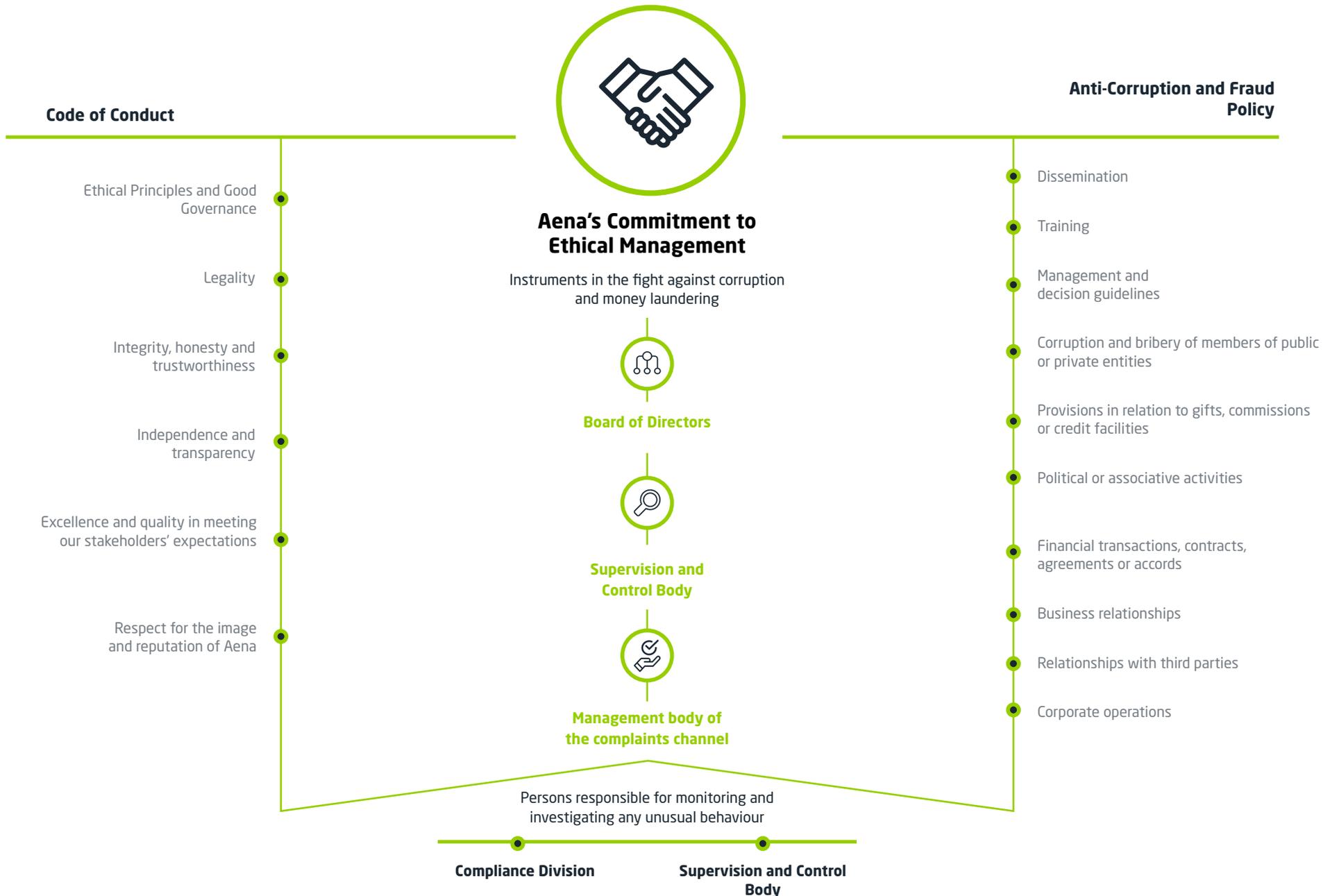
Regulatory Compliance System

The **Regulatory Compliance System** has a cross-divisional approach and aims to prevent and mitigate not only criminal risks, but also those derived from any breach of internal or external regulations applicable to Aena. This ensures the legality of the actions carried out by employees, managers and executives of the Company in the performance of their professional duties, whilst minimising, as far as possible, the risk of any bad practices or breaches of regulations arising in the performance of said duties.

To manage and coordinate its management, the Board of Directors has appointed a Compliance Division and an internal expert body: the Compliance Supervision and Control Body (OSCC). It is the responsibility of the OSCC, in particular, to implement, develop and apply the General Regulatory Compliance System of Aena, without prejudice to the responsibilities that correspond to other bodies and management divisions of the Company.

To this end, the OSCC has the necessary powers of initiative and control to monitor the operation, the effectiveness and the compliance with Regulatory Compliance Policy; ensuring the adaptation of the General Regulatory Compliance System to the needs and circumstances of the Company at all times.

The OSCC is an expert body that reports to the Board of Directors, and will have the following composition: Chairman: General Secretary, Compliance Director, the Internal Audit Director and six members appointed by each of the following management divisions: General Directorate of Airports, General Directorate of Commercial and Real Estate Business, Economic-Financial Management, Organisation and Human Resources Management, one representative of the Affiliated Companies proposed by the General Directorate of Airports and one Secretary appointed by the Chairman of the OSCC.



The essential elements of the Compliance System are the Code of Conduct, the Regulatory Compliance Policy, the Anti-Corruption and Fraud Policy and the Complaints Channel.

The development of a culture of compliance within the organisation is a fundamental axis in the management of the Company, as is the offering of specific training on the subject to managers, directors and employees. Aena reinforces its partnerships with other companies to be at the forefront of best practices in the sector. It actively participates in different business forums, and leads some of the most outstanding initiatives in this field, such as the Forética Transparency, Good Governance and Inclusion Cluster.

Code of Conduct

The Code of Conduct is the Company's main instrument for coping with behaviours that may breach regulations or be unethical. It is binding and applicable to the Management Bodies, to the Senior Management and, without exception, to all employees of Aena or any other company fully owned by Aena and domiciled in Spain¹⁶; whatever their position, responsibility, occupation or geographic location. They all have the duty to familiarise themselves with it, and comply with it.

With this, respect for the following principles is enshrined as an internal standard of the Company:

- Legality.
- Integrity, honesty and trustworthiness.
- Independence and transparency.

- Excellence and quality in meeting our stakeholders' expectations.
- Respect for the image and reputation of Aena.

Aena is committed to complying with and enforcing these Principles of Ethics and Good Governance, which, at all times, have to guide and preside over the actions of people who are subject to the Code of Conduct. To ensure this, in addition to the specific training programmes for employees, in 2020 the Compliance Supervision and Control Body (OSCC [Órgano de Supervisión y Control de Cumplimiento]) has implemented a Communications and Awareness Plan, which includes various actions, including, among others, a series of publications in the Company's newsletter —also accessible through the intranet—, awareness messages posted on noticeboards in workplaces, as well as training sessions for different groups. All of these actions are aimed at reinforcing knowledge about the Regulatory Compliance System and the

Code of Conduct, and, ultimately, preventing or mitigating the risk of any criminal actions from being committed.

To record this Senior Management commitment, also with third parties, the President, and his executives, disseminate messages regarding the importance of our Code of Conduct and its guiding principles, which can be found on Aena's corporate website.

Committed to its objective of making people aware of the General Regulatory Compliance System recently implemented at Aena, online training was given throughout 2019 to all Aena, Aena International Development (ADI [Aena Desarrollo Internacional]) and Región de Murcia International Airport (AIRM [Aeropuerto Internacional Región de Murcia]) employees; in which 7,200 people (93.5% of the workforce) participated.

This training was reinforced with online training during 2020, in this case for specific groups, in which around



¹⁶ London-Luton Airport has its own Code of Conduct, although it includes values that are in line with those of Aena. The Board of Directors of Aena Brasil has approved its own Code of Conduct in the first half of 2020,

which is aligned with the principles and values of its parent company, and has adhered (with adjustments due to local regulations) to Aena's Regulatory Compliance Policy and Anti-Corruption Policy.

723 people have participated, including managers and other staff members. Training and communication actions have also been carried out through other means, such as contests, messages in the Aena magazine and on information boards at workplaces. During 2020, there has been a total of 1,566 hours of specific training dedicated to Regulatory Compliance.

This multi-year training and communication plan will continue to be implemented in 2021, while the rest of the organisation is expected to continue with the training sessions.

Companies LLA and Aena Brasil, in turn, have approved their training plans, which have been implemented in 2020 and will continue in 2021. At Aena Brasil, in 2020, training was provided on the prevention/mitigation of the risk of committing criminal acts in order to promote awareness of the Company's Code of Conduct and Complaints Channel to more than 269 employees (comprising 538 hours of training).

The Compliance Supervision and Control Body (OSCC [Órgano de Supervisión y Control de Cumplimiento]) is responsible for the supervision, control and evaluation of the proper functioning of the Regulatory Compliance System. It reviews the Code of Conduct and the Regulatory Compliance Policy annually, and if applicable, proposes any modifications to the Board of Directors. In December 2020, the Board of Directors approved the update of the Code of Conduct, the Regulatory

Compliance Policy, and the Anti-Corruption and Fraud Policy.

Aena discloses its explicit commitment to minimising conflicts of interest, regulating this in different internal regulations texts. In the Code of Conduct, published on Aena's website, a section is dedicated to regulating conflicts of interest, which applies to all persons subject to the Code¹⁷. Aena also has a specific Conflict of Interest Policy for Directors. The OSCC has also approved some General Instructions for managing possible conflicts of interest between Directors of Aena, ADI and AIRM. In this regard, the developing regulations of the Regulatory Compliance Policy regulate possible conflicts of interest for members of the Compliance Division.



In 2020, the Internal Audit Division carried out a review of the compliance function, which has led to the development of an action plan aimed at correcting the detected incidents, and this is expected to end in 2021.

¹⁷ In accordance with Article 26 - Duty of diligence, of the Regulations of the Board of Directors, the Board Members are obliged to clearly express their objection when they consider that any proposed decision submitted to the Board of Directors is contrary to the law, the corporate bylaws, these Regulations or the social interest, and request that this objection is recorded. In particular, Independent Directors and other Directors who do not affect the potential conflict of interest must also express their objection when dealing

with decisions that may harm shareholders not represented on the Board of Directors. Likewise, Aena has a Conflict of Interest Procedure whose purpose is to establish the action procedures of Aena, S.M.E., S.A. ("Aena") to prevent conflicts of interest in which the Directors and shareholders of the Company and its Group may find themselves, as well as their respective related persons, in accordance with the provisions of the current corporate and regulatory regulations and in the Aena Corporate Governance system.

Likewise, this procedure also includes the actions to prevent conflicts of interest involving both the members of the management team of Aena, S.M.E., S.A. and its Administrators who have the consideration of a Senior Officer of the State Administration, subject to Act 3/2015, of 30 March, regulating the exercise of the Senior Officer of the General State Administration.

Regulatory Compliance Policy

The Aena Regulatory Compliance Policy is applicable to the Board of Directors, managers and all employees of the Aena Group, without exception, regardless of their position, responsibility or geographic location. It is based on their commitment to the values and principles contained in the Code of Conduct and the rejection of any conduct that involves an unlawful act and that goes against the company's principles, values or policies.

With this Policy, Aena reinforces its commitment to good corporate governance and contributes to exercising enforceable control over administrative bodies, managers and employees, minimising the risk of bad practices or regulatory breaches when carrying out actions related to our activity.

In order to achieve a reasonable level of security within the Company, prevention, action and review controls have been implemented in the Organisation.

Based on the development of a regulatory compliance risk map, Aena has established a General Regulatory Compliance System to reduce both the risk of committing crimes, as well as the risk of breaches of the whole regulatory and corporate governance system applicable to the Company occurring. It also guarantees that Aena exercises the legally required proper preventative control over third parties.

This is a set of general and specific measures aimed at preventing, detecting and reacting to possible regulatory breaches, which include preventative controls such as internal action policies, like the Complaints Channel, and review policies, for which the OSCC was created as the main review body, and the Compliance Division.

All members of the Board of Directors, managers and Aena employees must report any act that constitutes a possible criminal offence, legal breach or inconsistency of which they become aware through the Complaints Channel.

Regulatory compliance policy



Legislation

Safeguarding and complying with current legislation and internal regulations.

Disclosure

Facilitating 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.

Complaints channel

Promoting channels that facilitate the reporting of criminal offences or regulatory breaches.

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.

In response to Aena's strategy consisting of the compliance, review and continuous improvement of the compliance and good corporate governance system, the Company has the Compliance Supervision and Control Body as its main review control.

During 2020, Aena's activities that could be most exposed to risk due to the incidence of COVID-19 have been analysed. As a result of this analysis, some values of the Company's risks have increased due to them being considered as more likely to occur, which has resulted in an updating of the risk map for regulatory breaches. Thus, for example, the risks of computer damage derived from threats to confidentiality have increased, including cybersecurity, crimes against public health, as a result of regulatory changes, as well as other sanitary measures implemented at airports, the risk of the discovery and disclosure of secrets, etc.



Complaints Channel

The Compliance Division and Compliance Supervision and Control Body are responsible for monitoring and verifying any suspicious conduct, as well as managing Aena's complaints channel, and, in particular, they are attributed the following functions:

- Ensuring that all complaints received are analysed independently.
- Guaranteeing the confidentiality of the identity of the person making the complaint, as well as the identity of the reported party or parties, whose identification is required by the Code of Conduct.
- Informing the people who are strictly involved in the process, and following up on and finalising the complaints made.
- In the event of a violation, applying the procedures set forth in Chapter XIV of Aena's Collective Bargaining Agreement.
- For breaches attributable to members of the Board of Directors, the provisions of the Regulations of the Board of Directors will apply; for senior managers, the provisions of the contracts governing their relationship with Aena will apply.

In its capacity as the party responsible for the supervision, control and evaluation of the proper functioning of the General Regulatory Compliance System, the Compliance Supervision and Control Body is, among other things, obligated to promote knowledge of and compliance with the Code of Conduct, interpret it and guide decision-making in case of doubt. It must also make any proposals for its improvement that it deems appropriate.

The Complaints Channel receives complaints and other communications of suspicious conduct that may constitute a breach of the law, the Company's policies and procedures, or the rules of conduct as they appear in the Code of Conduct. The channel is managed and supervised by the OSCC through the Compliance Division, for which it has the support of an external office that reports the actions carried out in the complaints received, without prejudice to the final conclusion of the complaints study process, which will be carried out by the OSCC. The OSCC is therefore responsible for guaranteeing the confidentiality of the complainants. Its regulations are set down in the Management Procedure for the Complaints Channel and the Communication of Suspicious Conduct, which is available from the Intranet home page. The external Complaints Channel has been available since April 2019, which any person, even anonymously, can access through Aena's corporate website (www.aena.es). It is available in the co-official languages of Spain (Catalan, Galician, Basque and Valencian) and in English, and allows external groups to raise their complaints or queries in a more flexible and accessible manner.

With regard to London-Luton Airport, this type of complaint can be received through any of the following: the direct manager, the Whistleblowing Officer, the airport operations service, a confidential external telephone service managed by an external company (whistle@pcaw.co.uk), the legal advisor or the CEO.

At present, Aena Brasil solely has an external complaints channel that any user can access.

In particular, complaints are received through the Online Ethics Channel, Ouvidoria Channel and via email.

In 2020, a total of 98 complaints¹⁸ related to the Code of Ethics have been received a de-tailed summary of which can be found below:

ENTRIES IN THE COMPLAINTS CHANNEL ²⁰	2019			2020		
	Claims for the provision of airport services	Complaints		Claims for the provision of airport services	Complaints	
		RECEIVED VIA INTERNAL CHANNEL	RECEIVED VIA EXTERNAL CHANNEL		RECEIVED VIA INTERNAL CHANNEL	RECEIVED VIA EXTERNAL CHANNEL
AENA SME, AIRM, ADI	74	14	41	78	23	37
LUTON	0	0	N/A ²¹	0	2	0
BRAZIL ²²	N/A	N/A	N/A	1	0	36
TOTAL	74	14	41	79	25	73

NATURE OF THE COMPLAINT	AENA SME, AIRM, ADI			London-Luton Airport			AENA BRASIL		
	DISMISSED	ACCEPTED	MEASURES TAKEN	DISMISSED	ACCEPTED	MEASURES TAKEN	DISMISSED	ACCEPTED	MEASURES TAKEN
WORKPLACE HARASSMENT ¹⁹	1	0	N/A	1	0	N/A	0	0	N/A
DISCRIMINATION BASED ON GENDER	0	0	N/A	0	0	N/A	0	0	N/A
HUMAN RIGHTS VIOLATIONS	0	0	N/A	0	0	N/A	0	0	N/A
MONEY LAUNDERING	0	0	N/A	0	0	N/A	0	0	N/A
CORRUPTION AND FRAUD	2	0	N/A	0	0	N/A	1	0	N/A
UNFAIR COMPETITION AND MONOPOLISTIC PRACTICES	0	0	N/A	0	0	N/A	0	0	N/A
DATA PROTECTION	20	0	N/A	0	0	N/A	0	0	N/A
COVID-19	7	0	N/A	0	0	N/A	0	0	N/A
PROCUREMENT	6	0	N/A	0	0	N/A	0	1	Strengthening of supplier follow-up after contract termination
OTHERS	42	0	N/A	1	0	N/A	28	6	Verbal warnings and the corresponding explicit request for compliance with measures, as well as their monitoring; hiring of more staff; and the incorporation of mitigating measures, among others.

¹⁸ Complaints due to a violation of the Code of Ethics that, after being investigated by the company, are confirmed as such.

¹⁹ Complaints of harassment may be received through the Complaints Channel or the programme provided in the protocol for addressing the prevention of sexual harassment, and includes a specific protocol.

²⁰ Itemised by country, if possible, or indicate countries of reference in each case.

²¹ Only an internal channel is available.

²² Available since July 2020.

Anti-corruption and fraud policy

The Company's commitment to combat corruption and bribery, specifically recorded in Aena's 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.

The Anti-Corruption and Fraud Policy applies to members of the Board of Directors, managers and all employees of the Aena Group, regardless of where they reside or where they conduct their business, and to consultants, partners and third-party representatives who may act on their behalf. Thus, this Policy will also apply to the subsidiaries controlled directly or indirectly by Aena, adapting, where appropriate, those procedural or other matters that are strictly essential to make them compatible and comply with the regulatory requirements applicable in each case, adapting and/or developing the principles contained in the aforementioned Policy to the particularities of their own nature and jurisdiction. In all other companies in which Aena participates directly or indirectly without control, Aena promotes, through its participation in their governing bodies, the adoption of anti-corruption and fraud policies, and the establishment of compliance supervision and control systems, in case they have not yet adhered to this Aena Policy.

- Among the due diligence measures to prevent corruption set forth in the Policy, it is established that the Compliance Supervision and Control Body (OSCC) will develop the criteria for which: *"according to criteria commonly accepted in the international community, certain operations or investments are considered to be high risk"*. These criteria will be updated with the frequency determined by the OSCC. Included among the measures contained in the Anti-Corruption and Fraud Policy to avoid these behaviours, in addition to the general provisions of the Code of Conduct, (especially in its sections: 4.12 [*Corruption and bribery of members of public or private entities. Gifts, commissions or credit facilities*], 4.13 [*Political or organisation membership activities*], and 4.16 [*Projects of a social nature and sponsorships*] applicable to the Required Parties), are a series of due diligence measures in business transactions, specifically aimed at preventing corruption. Thus, 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.

Other measures:

- Properly considering the risks associated with fraud, corruption and bribery in Aena's internal procedures, particularly in all those related to relations with third parties. In accordance with the regulations governing its activities, Aena's relationship with its suppliers is based on the principles of legality, efficiency and transparency.
- In this context, none of Aena's suppliers will directly or indirectly offer or grant, to public officials, third parties or any employee of Aena; gifts, presents or other unauthorised advantages, in accordance with the provisions of the Code of Conduct, in order to obtain favourable treatment in the granting, or conservation, of contracts or benefits of a personal nature or for the supplier company.
- Knowledge of and respect for these procedures are promoted through adequate dissemination and specific training programmes.
- With respect to the Code of Conduct especially with regard to corruption and bribery of members of public or private entities, gifts, commissions or credit facilities, political or associative activities, or social projects and sponsorships, a series of due diligence measures have been adopted in commercial transactions, specifically aimed at preventing corruption:
 - Entering into any financial transaction, contract, convention or agreement is prohibited whenever there may be sufficient reasons to believe that there could be some link to improper or corrupt activities, in accordance with established criteria.

- Establishing commercial relations that, in accordance with the developed criteria, are considered high risk is not permitted.
 - The qualifications and integrity of every supplier and customer will be verified before initiating binding commercial relations, whenever it may be deemed appropriate by the Unit proposing the commercial relationship, thereby always taking into account the contracting regulations that may be applicable in each case.
 - Awarded suppliers and customers must have anti-corruption protocols and controls. In any case, an anti-corruption clause will be included in any contracts or agreements to be signed.
- Management of queries and direct reporting to the Compliance Supervision and Control Body (OSCC);
 - Submission of the corresponding complaint in the Complaints Channel;
 - Training, education and updating of employees in this regard;
 - Internal and external dissemination of the Policy; control measures in contracting with suppliers, commercial customers and representatives, as well as in corporate operations.

At the same time, a series of due diligence measures in commercial transactions have been adopted, specifically aimed at preventing corruption:

- Regarding relations with third parties (commercial agents, representatives and partners), the following is specified:
 - The third party must be appropriately evaluated by Aena regarding matters such as the type of transaction to be conducted, the type of agreement or contract to be signed, the identity of the third party or their shareholders, jurisdiction, etc.
 - Aena's partners must have anti-corruption protocols and controls. In any case, an anti-corruption clause will be included in any contracts or agreements to be signed.
 - In the event that additional risks appear, a strengthened due diligence process will be conducted.
- Regarding corporate operations, Aena establishes a process of maximum diligence that analyses and assesses all implications and risks. The due diligence process will be determined, in each case, according to the specific circumstances that are present in the corporate operation. Specifically, Aena has a Procedure of Related-Party Transactions, with the objective of being able to adequately meet its obligations of prioritising its sole aim of making

decisions that are in the best interest of the Company or of its Group; thereby avoiding the influence of persons guided by their own motivations or their own aims, or any other motivation which differs from the cited aim, over these decisions²⁴.

- With regard to Aena's relations with suppliers, the Contracting Specifications themselves provide minimums for contracting with Aena, which include the anti-corruption clause. The required parties must inform the Compliance Supervision and Control Body of any suspicious or inappropriate conduct, or breach of provisions.

Training

Aena encourages the knowledge of and respect for the Anti-Corruption and Fraud Policy by all Required Parties through the proper dissemination of this policy and through specific training programmes.

NATURE OF THE CONFIRMED CORRUPTION CASES (NO.)	AENA S.M.E, AIRM, ADI	Airport London-Luton	Aena Brasil
In which an employee has been terminated for corruption or disciplinary action has been taken (no.)	0	N/A	0
In which contracts with business partners have been terminated or not renewed due to corruption-related violations (no.)	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 (no.)	0	0	0
Fines or penalties for cases of corruption or bribery	0	0	0
Contributions to political parties and/or representatives ²³	0	0	0

²³ The Aena Code of Conduct prohibits the financing of political parties and/or representatives.

²⁴ In accordance with Article 30 of the Regulations of the Board of Directors, "The Board of Directors shall know the operations that the Company carries out, directly or indirectly, with Directors, with significant shareholders or those represented on the Board or with persons related to them. The carrying out of these operations or transactions shall require the authorisation of the Board of Directors, after a favourable report from the Audit Committee, which must be approved with the favourable vote of at least eighty percent (80%) of the Directors, present or represented, at the aforementioned meeting. The Directors affecting the aforementioned operations, in addition to not exercising or delegating their right to vote, must be absent from the meeting room whilst the Board of Directors deliberates and votes on it."

Training actions on the Anti-Corruption and Fraud Policy have been carried out, aimed at Directors and staff members with a certain degree of responsibility. Around 250 people have participated in these actions, in which situations where corrupt practices could occur have been addressed and raised. Awareness-raising activities have also been carried out among the workforce in general, through internal newsletters or information boards at workplaces.

Measures to combat money laundering

The Anti-Corruption and Fraud Policy establishes Aena's commitment to maintaining business relations with reliable and integral third parties. In any case, for specific relations with partners, commercial agents and representatives, it indicates the obligation to determine, through the due diligence process, the following:

- The identity of the counterparty and their directors in fact or by law.

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

As also mentioned in the preceding section, Aena prohibits entering into any financial transaction, contract, convention or agreement whenever there may be sufficient reasons to believe that there could be some link to improper or corrupt activities. Moreover, transactions with partners will only be conducted after having verified that they have a good reputation in their sector and that they have a recognised history of ethical behaviour. Third parties (partners, commercial agents and representatives) are appropriately evaluated through a due diligence procedure, in which the type of transaction to be conducted will be one of the elements to be evaluated.

At the close of 2020, Aena had no knowledge of complaints related to money laundering.



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



Data protection

Aena has a data protection and privacy compliance model managed by the Central Data Protection Unit (CDPU), under the Directorate of International Legal Advice and Compliance and the Corporate General Secretariat. 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 mandatory data protection audits, 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 ocpd@aena.es, and with the Data Protection

Officer, who has the highest responsibility in ensuring effective compliance with the regulations in question, at the following address: dpd@aena.es.



Data protection



Data Protection Officer, assumes the role of point of contact



Data Protection Committee, supports the regulatory compliance functions and responsibilities, and advises on obligations and responsibilities



ICT Security Office (ICTSO), develops the security strategy and reports on the results of the reviews



Central Data Protection Unit, ensures compliance with current data protection legislation



Data Protection Coordinator, the person appointed by Aena to coordinate the implementation of the necessary measures at each centre, in order to comply with current data



ICT Managers, the person or persons appointed to coordinate and control the technical security measures within each centre (Airport, Management)



Internal Manager and/or Functional Manager, ensures that only the necessary data is collected in the information assets and that they are up to date

The Privacy Policy of the companies of the Aena Group is included in the Information Security Policy of Aena S.M.E., S.A.²⁵, which includes, among other things, the principles and commitments applied by the company to ensure compliance with data protection and privacy regulations in all jurisdictions where it carries out its activity, and to guarantee the rights and freedoms of all data subjects (customers, users, employees, etc).

There are different Informative Personal Data Privacy Policies for employees of Aena S.M.E., S.A., Aena Sociedad Concesionaria Aeropuerto Internacional de la Región de Murcia and Aena Desarrollo Internacional S.M.E., S.A. There is an Informative Privacy Policy for users of our facilities, websites and APP, as well as Informative Policies on the Privacy of Personal Data of Collaborating Companies.

All of this is completed with a set of rules, procedures and guides necessary to ensure compliance with current legislation, which are applicable to the entire company, its administrators, directors and employees, both of Aena's Central Services and of its Airports and Heliports, as well as to all persons who are linked to our Company.

The protection of personal data is taken into account from the first stages of the design of any product or service that will handle this type of data (privacy by design). With regard to security measures, Aena has the necessary measures based on the risk to guarantee

the rights and freedoms of data subjects regarding the processing of their personal data. To this end, a risk analysis methodology has been defined that affects the privacy of personal data, as well as a methodology for conducting the corresponding "Impact Assessments on data protection", following the guidelines of the Spanish Data Protection Agency.

Through the airports internal audit programme, the degree of compliance with data protection regulations is checked and, where appropriate, the deficiencies are detected and remedied. On-site reviews are carried out annually at a group of Aena network airports, and, in 2020, the first biennial audit adapted to the regulations was scheduled, two years after it was fully implemented. However, due to the current COVID-19 pandemic, this has been postponed until 2021.

	AENA SME	AIRM	ADI	London-Luton Airport	AENA BRASIL
Video conferences/face-to-face meetings on data protection with airport Coordinators	11	0	11	0	0
Data protection training for employees (no. employees)	0	0	0	101	0
No. of hours of data protection training for employees	0	0	0	101	0
Internal audit programmes at airports (no. participants, hours, etc.)	2 with 32 people			0 ²⁶	0

²⁵ Aena S.M.E., S.A., Sociedad Concesionaria del Aeropuerto Internacional de la Región de Murcia, S.M.E, S.A., Aena Desarrollo Internacional, S.M.E, S.A., its subsidiaries and any other company determined in the future.

²⁶ The London-Luton Airport does not conduct internal audits as such. The person in charge of data protection is responsible for the supervision.

As for training, monthly video conferences are held with Data Protection Coordinators from Airport Groups, where the Data Protection Officer presents the most relevant issues that occurred during that period, and questions and queries raised by the Coordinators on the subject are resolved. The content of the basic online training course for all staff has been reviewed in order to adapt it to the latest changes, and a face-to-face session was scheduled during the month of June, which had to be cancelled due to the pandemic.

In January 2020, Aena's Board of Directors approved the Information Security Policy of Aena S.M.E., S.A. applicable to Directors, Executives and, in general, to all Aena employees, without exception and regardless of their position, responsibility, occupation or geographic location. This also applies to contracted companies, partner companies and customers and, more generally, to any person who has access to the organisation's information and/or systems, as well as all physical infrastructure (buildings, airports, etc.).

In turn, it is applicable to all of Aena's information systems, regardless of the supporting technology and all types of information created or used to support Aena's business, regardless of its format or storage medium.

The Information Security Policy 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.



Aena's Management Committee and the Information Technologies Division are responsible for promoting and supporting the establishment of technical, organisational and control measures that guarantee the integrity, availability, confidentiality, authenticity and traceability of computer assets. This is done in order to

avoid their possible alteration, destruction, theft, copy, counterfeiting and other existing threats, whether or not these are accidental. They are also responsible for the training and awareness actions that are necessary to guarantee the success of information security.

In order to minimise the risk of a cyber-attack, the Company has implemented a cybersecurity plan to enhance information security in the company, strengthening existing controls and improving the capacity to respond to threats. (See chapter on security/cybersecurity)

In 2020, no personal data security breaches were detected, and all Spanish Data Protection Agency requirements were met. There were no breaches of data protection regulations.

Moreover, in order to promote corporate culture regarding personal data protection, the intranet provides employees with a multitude of materials and general information (disclosure plans, educational pills, training days and guides, as well as a frequently asked questions section that includes the most common queries raised by centres). One action worth highlighting that

took place this year is an awareness-raising task for Data Protection Coordinators of the different centres.

This involved issuing educational pills on the basic notions of data protection, as well as practical issues that occur in our everyday activity.

	AENA SME	AIRM	ADI	London-Luton Airport
Personal data security breaches detected (no.)	0	0	0	0
Violations of the data protection regulations and notified to the user	0	0	0	0
- Breaches of personal data	0	0	0	0
- Breach of confidential business information	0	0	0	0
Number of customers affected	0	0	0	0

At Aena Brasil, they are initially carrying out an internal diagnosis, with the support of an external company, so this information is not available.



Fiscal transparency

Aena maintains a firm commitment to promoting cooperative relationships with the Tax Agency in the different jurisdictions where it is present.

With the Corporate Tax Policy, which ensures fiscal transparency, Aena undertakes to follow the recommendations of the codes of good tax practices that are implemented in the countries in which it develops its activity, or those developed by Group companies controlled by the Company. The responsibilities of the Audit Committee include reviewing the Regulatory Compliance Policy and other policies—including those related to fiscal transparency—and procedures to prevent inappropriate conduct, as well as supervising the management of the Complaints Channel and the Annual Report on the Compliance System that will be submitted to the Board. In January 2020, the Corporate Tax Policy was reviewed, the amendment of which was approved by the Board of Directors.

At least twice a year, coinciding with the drawing up of Annual Accounts and with the submission of Corporate Tax, the manager of the Financial-Economic Department informs the Board of Directors of the tax policies applied, as well as the operations with relevant fiscal impact. At the same time, 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 contribution²⁷.

Aena has adhered to the Code of Good Tax Practices, approved by the Large Companies Forum according to the wording proposed by the Spanish Tax Agency (AEAT [Agencia Estatal de Administración Tributaria]) since 2017. Good Tax Practices are defined in the Code as *"all those that lead to the reduction of significant tax risks and the prevention of behaviours that will likely cause them"*. Also a reflection of its commitment, Aena voluntarily submits the Transparency Report to the Tax Agency framed within the scope of reinforcing good fiscal transparency practices of companies adhered to the Code. Aena is also at the disposal of the competent Administrations to facilitate the documentation and information they may require in order to comply of their obligations.

The Tax Strategy defines the approach to fiscal matters in a manner that is consistent and aligned with the group's strategy, and is based on the fundamental values of transparency, integrity and prudence²⁸.

The aim of the tax strategy can be summarised as the management of fiscal matters in a transparent, proactive and responsible manner with all stakeholders²⁹,

for the purpose of complying with the tax legislation of each country where Aena operates, minimising reputational risk, making it compatible with the creation of value for the shareholder. The nondelegable power of determining this falls on the Board of Directors.

Aena manages fiscal matters proactively, responsibly and transparently with all its stakeholders, being accountable to the company in all of the countries in which it operates.

²⁷ The risks related to non-compliance with tax obligations are included among the so-called "Legal and compliance risks", as set out in the Company's risk control and management policy. As for their governance, supervision and review model, as it is incorporated in the Company's Risk Map, it is subject to the same governance model as the rest. The Board of Directors defines, updates and approves the Risk Control and Management Policy implemented in Aena and establishes the acceptable risk level. Subsequently, and supervised by the Audit Committee, the Aena Management Committee updates the risk map annually based on the monthly information provided by the different corporate management departments.

²⁸ Moreover, as previously indicated, any type of complaint can be made through the Complaints Channel that reveals irregular conduct that may involve the commission of an act contrary to the law, the company's policies and procedures or the rules contained in the Code of Conduct, including tax obligations.

²⁹ 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.

Tax paid^(*) ^(**)

Aena considers the payment of taxes, under the premises of responsible taxation and transparency, as its main contribution to sustaining public charges, in line with its commitments to sustainable development and contribution to the progress of the communities where it operates.

The Aena Group tax contributions for the fiscal year 2020 amounted to €222 million. The taxes paid amounted to €181.3 million, the most significant being Property Tax, which totalled €148.4 million. The 2020 tax contributions are divided between €11.4 million of taxes paid in the United Kingdom, (5.1% of the total), €206 million in Spain (92.8% of the total), and €4.7 in Brazil (2.1%).



Tax jurisdictions where Aena has shares	Revenue from intragroup transactions with other tax jurisdictions 2020	Pre-tax profit 2020	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) 2020	Accounting expense for the tax on profits/losses of companies for the fiscal year 2020	Other taxes or payments to governments
SPAIN	4.5	-78.1	161.3	-127.5	-	28.2	18	-21.8	153.6
UNITED KINGDOM	-	-70.7	3.2	-1.5	-	-	4.5	-28.7	5.2
BRAZIL	-	-79.5	2.5	2.2	-	-	-	-1.3	-

(¹) All data relating to Aena's tax contribution have been included in the Annual Accounts, and are therefore verified by an external auditor.

(²) Regarding the public subsidies received by Aena, you can consult the details in the Annual Accounts.



Sustainable finance

One of the aspects highlighted by the COVID-19 crisis has been the growing trend to coordinate financing and investment options with ESG aspects. The post-pandemic scenario has placed many companies in a position to require additional capital in order to move forward with their recovery plans. Faced with this new need for financing, some choose to turn to financial instruments that take into account the environmental and social impacts generated in this recovery process, and/or try to promote environmental, social and good governance aspects beyond those that are purely financial. Sustainable finances are, thus, becoming a

key issue, promoting the design and distribution of financial products that balance profitability and sustainability objectives.

In order to seek financing alternatives that provide added value to society and the environment, and incorporating ESG factors into its financing decisions, in 2018, the Company drew up a syndicated sustainability-linked credit facility with BBVA, one of the different sustainable financing products currently available. The financial conditions of this revolving credit facility, which acts more like a contingency line, have since been linked, in addition to the assessments issued by financial ratings, to the ESG rating that Aena obtains through the assessment of its performance in these matters, and which is carried out annually by the specialised agency Sustainalytics.³⁰

Aena became the first airport operator in the world to perform an operation of this type by choosing to resort to this sustainable financing instrument, intended, in this case, to finance general corporate needs. In 2020, the extraordinary situation caused by the COVID-19 pandemic has forced the Company to use it for the first time.

³⁰ Information on the amounts drawn down and their costs in 2020 can be consulted in the Company's Annual Accounts.

2

Commitment to the environment

One of the main lines of action that will generate value for society and for the Company over the next few years will be the fight against climate change

Sustainable environmental management model

- TCFD Recommendations
- Climate Action Principles
- Supervision by the Board of Directors
- Climate risks included in the risk management system
- Environmental protection policies, plans and strategies
- Environmental certifications
- Environmental requirements in contracting
- Responsible Business Strategy at London-Luton Airport

STRATEGIC SUSTAINABILITY PLAN FOR 2021

Waste management and circular economy

- Initiatives for the reduction, reuse, recycling of waste and the proper treatment of hazardous waste
- Collaborations with third parties

↓ REDUCTION OF WASTE GENERATED IN 2020

Pollution

- Air quality control in airport areas of influence
- Management of impacts associated with noise:
 - Measurement, reduction and control
 - Sound Insulation Plans
 - Communication
- Environmental inquiries

24,526 HOMES INSULATED IN THE PERIOD 2000-2020 (SPAIN)

Protecting biodiversity

- Actions to reconcile the conservation of natural heritage in protected spaces with airport operations
- Studies on the fauna of the surrounding area
- Control Services
- Control of vegetation

ACCURATE MONITORING IN 2020 OF THE PRESENCE OF FAUNA WITHIN THE FACILITIES

Aena and the climate emergency

- Effective actions and measures to achieve the decarbonisation objectives
- Carbon footprint
- Promoting the use of renewable energy in airports
- Search for greater efficiency in the use of energy

NET ZERO CARBON OBJECTIVE BROUGHT FORWARD TO 2040

Sustainable use of resources: water

- Strict control of water use and efficiency measures
- Water footprint (Spain)
- Initiatives for responsible water consumption

2021: STRATEGIC PLAN FOR WATER MANAGEMENT



2020

€10,977 M

in investment allocated to the protection and improvement of the environment

85%

Reduction of Aena's CO₂ emissions in absolute terms (baseline year 2015)

100%

of energy consumption from renewable sources in the Spanish network

Commitment to SDGs

- 6 SDG 6 Clean water and sanitation
- 7 SDG 7 Affordable and non-polluting energy
- 9 SDG 9 Industry, innovation and infrastructure
- 11 SDG 11 Sustainable cities and communities
- 12 SDG 12 Responsible production and consumption
- 13 SDG 13 Climate action
- 15 SDG 15 Life on land
- 16 SDG 16 Peace, justice and strong institutions
- 17 SDG 17 Partnerships to achieve the goals

2.1. Sustainable environmental management model

2020 began in a climate emergency context and, a few weeks later, the health crisis linked to the COVID-19 pandemic broke out, which has lasted throughout the year and affected all sectors, including tourism and aviation, and in general, the mobility of citizens around the world.

The urgency to address the health crisis has not diverted the global concern for climate change and its consequences, and key institutions are advocating economic recovery that allows the negative consequences of both situations to be addressed at the same time: the pandemic and the fight against climate change. The achievements reached before the start of the pandemic, with the presentation of the 'European Green Deal' in the EU, the 'Energy and Climate Framework' or the 'Climate Emergency Declaration' in Spain, are reinforced months later with the focus placed on the "new normal" phase. This can be seen, for example, in Spanish initiatives such as the Draft of the "Climate Change and Energy Transition Act" and the "National Integrated Energy and Climate Plan" (PNIEC [Plan Nacional Integrado de Energía y Clima]) and the already ratified "Hydrogen Roadmap". Challenges that the business world has very actively joined.

In line with this trend, for Aena, the situation created by COVID-19 has not hindered its commitment to sustainability, rather it has reinforced it by bringing forward and expanding the milestones related to its decarbonisation. The Company has defined its new roadmap fully aware that the recovery can only be green and is committed to sustainability, protecting the environment, decarbonisation and the climate emergency as key issues in its management.

As an engine for tourism and aviation, the Company develops a model of action that guarantees sustainable coexistence, both with local communities and with the natural environment.

The main areas of environmental management in Aena are:

- Climate change, energy efficiency and clean energy
- Noise
- Air pollution
- Waste management and circular economy
- Management of biodiversity
- Efficient water management

Environmental risks and opportunities

The health emergency has been incorporated into the companies' risk maps, reinforcing and accelerating awareness for the search for effective solutions that contribute to and reinforce the management of pre-existing risks.

It is estimated that the air transport industry contributes 2.5% of CO2 emissions globally. For years, companies have been working on achieving a transition towards a more sustainable model, with energy sources that are low in emissions and clean means of transportation, the use of sustainable fuels for aviation or the development of more efficient aircraft models, which contribute to mitigate and minimise the effects of climate change.

As an airport service manager, and part of the air transport value chain, all of this can directly affect Aena. It should be remembered that adverse weather events can have significant consequences on the operational capacity, safety and efficiency of airports. On the other hand, some voices are calling for the use of air transport to be minimised, despite its undoubted contribution in terms of territorial cohesion and structuring. In addition to this situation, there is an increasing number of demanding regulations in the fight for the climate.

In 2019, Aena took an important step by incorporating the risks associated with Climate Change into its risk management system, including them, consequently, in its management, supervision and control mechanisms¹. During 2020, Aena has gone beyond this, using the recommendations of the *Task Force on Climate-related Financial Disclosure* (TCFD) as a tool to analyse and show how the Company is working on the path towards decarbonisation and integrating climate change at all levels.

¹ 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.

In this regard, Aena has begun to work on identifying risks and opportunities arising from climate change in accordance with these guidelines, considering different scenarios² that cover physical risks (due to the direct consequences they may have on airport operations) and transition risks. In the case of the latter, the market risks, regulatory risks (arising from the approval of regulations on climate change and decarbonisation that directly affect the air transport sector), as well as reputational risks, are particularly taken into account.

In terms of adapting to climate change, during the strategic environmental assessment of its Management Plans, Aena evaluates and assesses the foreseeable evolution of climate variables, the possible impacts of climate change and the possible effects on airport infrastructures and operations, establishing specific measures for adapting the airport to the expected changes in the analysed climate variables.

The inclusion of climate risks in the Company's financial and reputational risk map contributes to developing sustainable, efficient and proactive management, as well as to the detection of new business opportunities. Thus, Aena is already implementing mitigation actions, reducing the negative environmental impacts associated with airport activity and, in order to support the development of clean means of transport, promoting collaboration actions with airlines and other stakeholders.

Aena Climate Risk Analysis



² In order to analyse the physical risks, the projections developed by the Spanish State Meteorology Agency (AEMET [Agencia Estatal de Meteorología]) for the RCP 8.5 scenario defined in the Fifth Report of the Intergovernmental Panel on Climate Change (IPCC) have been considered. As for the transition risks, the 2DS scenario developed by the International Energy Agency (IEA) has been selected. The Business as Usual scenario (RCP 8.5) and a more aggressive emission mitigation scenario (RCP 2.6) have been used to identify the risks.

London-Luton Airport has published a summary report on adaptation to climate change in 2011 that identifies some of the physical risks associated with climate change. In 2021, the Airport will publish a new report that will be aligned with the national guide. Likewise, progress has been made on the upcoming integration of climate change risks into the formal risk governance processes. And they have plans to analyse the necessary evaluation and identification of the main financial, operational and reputational risks and opportunities associated with the climate emergency, in line with the TCFD guidelines.

London-Luton Airport Climate Risk Analysis



Physical risks

- Reduced visibility (fog, cloud cover, etc).
- Extreme winds.
- Flooding.
- Extreme temperatures/snow.
- Heat spikes.



Transition risks

Regulatory and legal

- Changes in regulations that may result in an increase in the price of carbon and/or the tightening of carbon markets.
- Transition costs associated with the adoption of low-emission technologies.
- Changes in consumer behaviour and preferences (demand).

Market

- Decrease in market demand due to changes in customer behaviours and demands, as well as general flight reduction, aggravated by recent events (for example, COVID-19).

Reputation

- New geopolitical requirements (Brexit).
- Changes in the market and domain segments, e.g. business trips / cargo movements, including the impact of emerging markets.



Opportunities

Increases in some destinations during the summer season.

Opportunities to support new technologies / operational measures / better infrastructure.

The physical climate impacts (for example, increase in dry period, warmer temperatures) increase the demand for certain routes or create new destination options.

With regard to Aena Emergency Plans linked to climate changes, you can consult more information in chapter 6 “Quality and safety of services”.

The London-Luton Airport has emergency plans in the event of any climatic events relating 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.

Aena's Board of Directors has been assigned a series of duties, which cannot be delegated, regarding orientation and control of the strategy, objectives, risks and results in matters related to sustainability. In 2018, the Company's 2018-2021 Strategic Plan was presented at the General Shareholders' Meeting. This Plan includes environmental sustainability as one of its strategic lines. Twice a year, the Board monitors the Plan, after receiving a report from the Executive Committee.

The **Director of Innovation, Sustainability and Customer Experience** is responsible for informing the Committee/Board of matters related to the risks and opportunities linked to the Company's Sustainability Strategy, as well as the cross-sectional aspects derived from it.

In 2020, taking things one step further, the General Shareholders' Meeting approved the principles of Aena's Climate Action Plan, which includes actions to mitigate the effects of climate change, as well as the follow-up of the indicators established for compliance with the decarbonisation objectives. Its evolution and the level of progress of its measures will be approved annually. By doing this, the Company has become the first company in the world to submit its Action Plan on Climate Change to a vote at the Shareholders' Meeting each year.

This **Climate Action Plan** consists of a multiannual plan, aligned with:

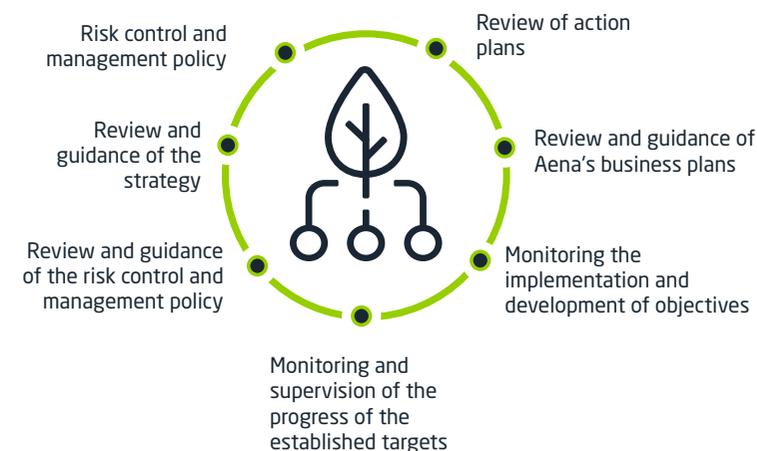
- The “climate change sustainability objectives” based on regulatory requirements at the European and national level, as well as the objectives of the Paris Agreement.
- The recommendations of the Task Force on Climate-related Financial Disclosures (TCFD).
- Act 11/2018 on non-financial information and diversity and the guidelines derived from the European Commission's climate information supplement, included in Directive 2014/95/EU of the European Parliament and of the Council, which establishes a description of the policies, results and risks related to environmental issues.

This Climate Action Plan will include the appropriate management, monitoring and communication mechanisms.

Policies, strategy and objectives

To ensure that sustainability is integrated into the business model and that the environmental risks are addressed, Aena develops and implements policies, strategies and procedures, using as a reference, among others, the Sustainable Development Goals, the TCFD recommendations, the Principles of the Global Compact, and the environmental objectives set at a national and international level.

Supervision of climate issues by the Board of Directors



Policies and strategies

Strategic objectives

Aena

- **Aena's Integrated Quality, Environmental and Energy Efficiency Management Policy**

It includes the guiding principles and reference framework for the Company's activity with respect to environmental issues, combined with quality standards. In 2020, the Company approved the monitoring of compliance with this Policy by the Appointments, Remuneration and Corporate Governance Committee, which is in charge of ensuring its proper application and compliance.

- **Aena 2018-2021 Strategic Plan**

It integrates the environmental variable into the airport management decision-making process, establishing *KPIs* and environmental objectives that can meet existing needs and guaranteeing a solid action framework, provided with adequate funding.

- **Climate change strategy**

Approved in 2018, and reformulated in 2020, according to the growing environmental demands, as well as the provisions of the Draft Climate Change and Energy Transition Act and the European Green Deal, its goal is to maximise energy efficiency and promote the use of energy from renewable sources for self-consumption, as well as provide innovative solutions to reduce the Company's carbon footprint.

- **Principles for action against climate change and governance in environmental matters**

Approved by the 2020 General Shareholders' Meeting, it entrusts the Board of Directors with presenting, at the 2021 General Shareholders' Meeting, a multiannual or pluriannual **Aena Climate Action Plan** that includes actions to mitigate the effects of climate change and monitor the indicators established for the achievement of the decarbonisation objectives, in line with the national

and international regulatory framework (Paris Agreement, the objectives and commitments set out in the declaration of the government of Spain with regard to the climate and environmental emergency, the 2021-2030 National Integrated Energy and Climate Plan, the Sustainable Development Goals and the TCFD recommendations).

- **Strategic Sustainability Plan**, which will include strategic aspects related to the management of waste, water, biodiversity, air quality, etc. This will be done through a global diagnostic study, which, in a cross-departmental way across all Aena areas, establishes a series of sustainability measures and indicators based on the Company's strategy, policies, current regulations and the UN Sustainable Development Goals.

- **Strategic Water Management Plan** that is scheduled to be completed in 2021 and includes the diagnostic survey of the water management situation at Aena's airports, as well as the various improvement objectives, along with their corresponding actions and indicators. Thus, the plan will contribute to achieving the objective of ensuring that water management is adapted to the requirements of use, consumption and purification posed by the different stakeholders at the airports, as well as the Sustainable Development Goals (SDGs) to which Aena has committed.

- **Environmental monitoring of suppliers (ISO 14001):** environmental evaluation of the property portfolio and tenant operations.

- **Noise Pollution Action Plans**

- Maximisation of the energy efficiency of the activity and promotion of renewable energies, contributing to the minimisation of CO₂ emissions until the facilities achieve carbon neutrality.
- Make the management of airports compatible with respect for the environment where they are located.
- Reinforce a model that guarantees sustainable coexistence with local communities and the natural environment, especially in matters pertaining to noise and air quality.
- Respond to society's needs, going beyond established legal requirements, by implementing innovative solutions.
- Reduce the carbon footprint and greenhouse gas emissions (commitment to Climate Change) through adaptation and mitigation actions.
- Reduce the impact of their infrastructures and of their portfolio of buildings in the natural environment.
- Promote the reuse and reduction of natural resources.
- Calculate the water footprint.

LONDON-LUTON AIRPORT

- **London-Luton Airport Energy Policy**, aligned with the ISO 50001 standard. It shows the Airport's commitment to improving energy management and performance.

- **London-Luton Airport Environmental Policy** recognises and accepts the Airport's responsibility in minimising its environmental impact, and undertakes to continuously review its performance.

- **2019-2023 Noise Action Plan at London-Luton Airport**

- **London-Luton Airport Aircraft Noise Inquiry and Complaint Policy**

- **Luton Airport Access Strategy**

London-Luton Airport is the fifth most transited passenger airport in the United Kingdom, with excellent transport connections that connect it to London, the southeast, the east of England and the South Midlands.

- **London-Luton Airport's Responsible Business Strategy**, published in 2020, contains six lines of action, the first of which is focused on guaranteeing the care of the environment with responsibility and efficiency, and minimising the environmental impact of the airport, through a series of specific annual objectives.

- Reduction of greenhouse gas emissions, increasing the use of renewable energy, climate risk analysis.
- Minimisation of water consumption per passenger.
- Reduction of waste and increased recycling.
- Preparation of the air quality strategy.
- Encouraging the use of sustainable mobility.
- Collaboration with airlines to reduce aircraft noise and with the community to improve noise management.
- Reduction of the number and severity of spills in the operations area that occur at the airport.
- Collaboration in the elimination of single-use plastics, and in avoiding their use.

AEROPORTOS DO NORDESTE DO BRASIL

- **Aena's Integrated Quality, Environmental and Energy Efficiency Management Policy**

- Noise control.
- Reduction in energy consumption / ATU.
- GHG emissions control - Preparation of the air quality strategy.
- Photovoltaic Plan.
- Minimisation and control of water consumption.
- Waste reduction.
- Reduction of waste and increased recycling.

Management instruments

Aena's Integrated Quality and Environment System certified according to ISO 14001 standard

It addresses the most significant environmental aspects linked to an airport's activity, including: Noise emissions associated with airport activity, atmospheric pollution, greenhouse gas (GHG) 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. Its development, execution and control correspond to Planning and Environmental Management. The Company guarantees the continuous improvement of its environmental performance, by applying the policy and conducting regular audits of samples at its sites.

Sound Insulation Plans (PAA [Planes de Aislamiento Acústico])

(see "Noise" section for more information).

Integrated Management System in Aena's Airports in Brazil and implementation of the Quality Management System

The System considers environmental aspects related to airport activity, including: noise emissions associated with airport activity, atmospheric pollution, greenhouse gas (GHG) emissions, water consumption, energy consumption, hazardous and non-hazardous waste, spills, soil pollution and supplier environmental control. Obtainment of environmental operating licenses and facility licenses: expansion work at Aena's airport in Brazil.

ISO 20906 Standard

Aena is the first global operator to have noise data accredited in accordance with the ISO 20906 standard at six of its most relevant airports.

Environmental inquiries

(see corresponding section for more information).

ISO 50001 Standard

EMAS

Evaluation of the environmental impact of plans and projects, both in Spanish airports, London-Luton and Aena's airports in Brazil

(see "Protection of biodiversity" section for more information).

Carbon Footprint

EFQM



Quality (ISO 9001)

All Central Services units and Aena sites have been certified (including, as of January 2021, AIRM)



Carbon footprint (ISO 14064)

- Málaga-Costa del Sol Airport
- Palma de Mallorca Airport
- Barcelona-El Prat Josep Tarradellas
- Airport Adolfo Suárez Madrid-Barajas
- Airport César Manrique-Lanzarote
- Airport Menorca
- Airport
- Alicante-Elche Airport
- Santiago-Rosalía de Castro
- Airport London-Luton Airport



Environment (ISO 14001)

All Central Services units and Aena sites have been certified (including, as of January 2021, AIRM)

London-Luton Airport

<https://www.london-luton.co.uk/corporate/lla-and-the-environment/our-environmental-policy2>



Energy efficiency (ISO 50001)

- Reus Airport
- Valladolid Airport
- SATE Adolfo Suárez Madrid-Barajas Airport
- Zaragoza Airport

London-Luton Airport

<https://www.london-luton.co.uk/corporate/lla-and-the-environment/reducing-our-carbon-footprint>



EMAS Regulation

- Menorca Airport
- Tenerife Sur Airport



EFQM

Adolfo Suárez Madrid-Barajas Airport



ISO 20906 (Unmanned monitoring of aircraft noise in the vicinity of airports)

- Barcelona-El Prat Josep Tarradellas
- Airport Adolfo Suárez Madrid-Barajas Airport
- Alicante-Elche, Málaga-Costa del Sol, Palma de Mallorca and Valencia airports

Based on its strategic objectives, Aena sets specific environmental objectives and actions in the short, medium and long term, which are reviewed annually. Aena's commitments have evolved, the initially established commitments have been updated, the time frames for achieving them have been moved forward, their scope has been expanded and, in short, they have become more ambitious with the implementation of multiple actions.

In a cross-sectional manner and as established in the principles of the Climate Action Plan, Aena plans to reinforce, in the short term, the appropriate management, monitoring and communication mechanisms. To this end, the Company pays special attention to the recommendations of the TCFD.

Aena's new Climate Change Strategy has set these goals for 2026: achieve carbon neutrality at all its airports and achieve a 100% renewable electricity self-sufficiency. In addition, it has moved the fulfilment of its "Net Zero Carbon" commitment forward to 2040, which was initially planned for 2050.



Short-term objectives and actions

Aena

London-Luton Airport

Aeroportos do Nordeste do Brasil

Noise management

- Implementation of Noise Monitoring Systems and Interactive Noise Maps in all airports with more than 50,000 operations
- Continuous monitoring of the measures included in the Action Plans
- Soundproofing of 29,000 homes and buildings for sensitive uses, included in the sound insulation plans.

- **2021:** no Chapter 3 aircraft operating at the airport. Subject to restart of Project Lithium
- **2022:** 100% of Chapter 4 aircraft
- **2022:** conduct surveys of local communities for the improvement of noise management
- **2023:** evaluation of the implementation and adoption of recommendations for smooth approach manoeuvres

- Noise control - Implementation of Noise Monitoring Systems and Interactive Noise Maps in all airports with more than 50,000 operations.
- Continuous monitoring of the measures included in the Action Plans.

Fight against climate change

- Attainment of Level 3 (Optimisation) of the Airport Carbon Accreditation, in the Adolfo Suárez Madrid-Barajas Airport and Barcelona-El Prat Josep Tarradellas Airport in **2021**, Palma de Mallorca Airport in **2022**, Málaga-Costa del Sol Airport in **2023** and Alicante-Eliche Airport, Ibiza Airport and Menorca Airport in **2024**.
- **2023:** Increase in the network of electrical charging points in the parking lots for passengers and employees, as well as for the air side.
- **2025:** replacement of Aena's vehicle fleet with electric vehicles or eco-friendly vehicles..
- **From 2020:** electricity consumption, 100% with renewable origin guarantee effective.
- Increased energy supply from renewable energies in own facilities
- **2025:** Promotion of the use of geothermal energy, to provide cold and heat to the airports' terminals.
- Progressive reduction of CO₂ emissions from "Handling for third parties" equipment by incorporating requirements for the replacement of handling equipment with other less polluting equipment: electric, hydrogen and other renewable sources.
- Implementation of new collaborative measures and improvements that improve the efficiency of airport operations, as well as the congestion of European airspace, reducing waiting and flight times.

- **2021:** Low carbon emission vehicles plan (land and air side).
- **2021:** 100% electricity from renewable sources.
- **2022:** attainment of Level 2 (reduction) of the Airport Carbon Accreditation.
- **2022:** identification of the risks associated with climate change and development of a resilience plan, integrating commercial risks into the assessment.
- **2023:** reduction of the demand for operating electricity (excluding vehicles) to less than 2.0 kWh/passenger.

- **17.5%** reduction in energy consumption / ATU.
- Emissions control.
- **From 2021:** purchase of clean energy from the Deregulated Energy Market.
- **From 2022:** Photovoltaic Plan (study and analysis of large-scale self-consumption facilities for photovoltaic renewable energy equipment).
- **2025:** **40%** reduction in CO₂ / ATU emissions.

Environmental protection

- Minimisation and control of water consumption.
- Increase in percentages of waste recovery.
- Preservation and maintenance of biodiversity through specific actions to reconcile our activity with the conservation of natural heritage.
- Together with the inclusion of zero single-use plastics in new concession contracts, which has already been carried out, incorporation of own initiatives to reuse waste.

- **2021:** transfer of less than 5% of non-hazardous waste from construction and demolition to landfills.
- **2022:** develop the air quality strategy.
- **From 2021:** include the requirement for zero single-use plastics in new concession contracts.
- **2022:** recycle at least 70% of non-hazardous waste (excluding airplane waste).
- **2022:** obtain the Carbon Trust Standard - Zero waste to landfills.
- **2023:** reduction of total water consumption to 6.98 litres/passenger.
- **2023:** reduce waste (excluding airplane waste) to 0.12 kg/passenger.

- Minimisation and control of water consumption.
- Waste reduction.
- Implementation of a wastewater treatment system to reuse the water.

Medium and Long term objectives and actions

Aena London-Luton Airport Aeroportos do Nordeste do Brasil

Noise management

- Planning of actions to minimise noise.
- Inclusion of measures to discourage the loudest aircraft.



- Noise control - Implementation of Noise Monitoring Systems and Interactive Noise Maps in all airports with more than 50,000 operations.
- Continuous monitoring of the measures included in the Action Plans.

Fight against climate change

- **2026:** 100% self-supply of renewable energy in Aena's airport network based on Aena's Photovoltaic Plan.
- **2026:** Airport Carbon Accreditation ACI EU Level 3+ Neutrality in the main airports and neutral carbon accreditation in the entire Aena airport network
- **2030:** incorporation of a network with a minimum of 100 hydrogen stations and "handling" machinery powered by hydrogen in the five main airports. Initiatives to encourage the promotion and consumption of hydrogen, both in vehicles, as well as promote its use as a vector for the accumulation of electric energy.
- **2040:** adhesion to ACI EU's Net Zero, to have zero net emissions at all airports in the network.
- Boost the production, distribution and use of biofuels (SAF).
- Mobility plan, eco-friendly shuttles, close connections, bike lane.
- Replace or adapt the equipment and vehicles that consume fossil fuels with others that allow the consumption of 100% renewable electric energy, biofuels, biogas or other biomass derivatives.

- **2026:** 25% energy supply from renewable energies in own facilities.
- **2050:** adhesion to ACI EU's Net Zero, to have zero net emissions.

- **2030:** Reach level 3+ of the Airport Carbon Accreditation programme of ACI EUROPE at the main airports (Recife Airport, João Pessoa, Maceio, Aracaju, Juazeiro do Norte and Campina Grande).
- **2050:** commitment to ACI EU's Net Zero, to have zero net emissions.



Environmental protection

- Reforestation projects, collaborations with universities and technology centres, mechanisms for offsetting employee travel emissions and development of carbon absorption solutions and carbon sinks.
- Promotion of the use of waste as a raw material for energy generation, applying the circular economy principles and for the manufacture of SAF, biomethane, etc.



Progress and indicators

In 2020, we can highlight the progress made in the achievement of the specific proposed environmental objectives, although they have been altered as a result of the exceptional health circumstances³.

		Aena	London-Luton Airport
Progress in the achievement of the environmental objectives established for 2020	Noise management	Number of acoustically isolated sensitive housing and buildings based on the SIP.	Objectives set for 2020: <ul style="list-style-type: none"> Development of a strategy for reducing the noise contour area (day and night) for 2028, sent to Luton City Council at the end of 2019 and currently pending approval.
	Fight against climate change	<p>2019: 53% reduction of Aena's CO₂ emissions in absolute terms (baseline year 2015).</p> <p>2020: 85% reduction of Aena's CO₂ emissions in absolute terms (baseline year 2015).</p> <p>2020: the goal of reducing CO₂ emissions in handling: 20-30% in 2020 (base year 2016) set, advances its completion to 2019. In any case, due to the reduction of the operation during 2020, it is expected that the targeted objective will be met.</p> <p>2019: purchase 60% energy from renewable sources. 2020: purchase 100% energy from renewable sources.</p> <p>Maintain accreditation in the <i>Airport Carbon Accreditation</i> programme at Level 1 – Inventory (airports of Santiago-Rosalía de Castro, Menorca and Alicante-Elche) and Level 2 – Reduction (Airports of Barcelona-El Prat Josep Tarradellas, Adolfo Suárez Madrid-Barajas, Palma de Mallorca, Málaga-Costa del Sol and César Manrique-Lanzarote).</p> <p>Maintain level A Leadership in the CDP report (Carbon Disclosure Project)</p>	<p>2019: 30% reduction of Scope 1 and 2 emissions, despite the 23% increase in traffic since 2016.</p> <p>2020: the data is not representative due to the traffic reduction during 2020.</p> <p>Maintain <i>Airport Carbon Accreditation (ACA)</i> Level 1 “Inventory” certification.</p> <p>Creation of the Sustainability Department and publication of the 2020-2025 Sustainability Strategy.</p> <p>Preparation of the Carbon Management Plan (postponed to 2021)</p>
	Environmental protection ⁴	Calculation of water footprint. Waste recovery and awareness campaigns.	

³Not measurable in the case of airports in Brazil due to having started their activity throughout 2020.



Other indicators related to environmental management and resources dedicated to the prevention of environmental risks⁵

	Aena	LLA	Aena Brasil
Number of people assigned to environmental management	Aena Central Services: 35, 15 technical assistance staff, airports: 1 coordinator + corresponding team (no full dedication at all airports)	4	Central Services 1
Investment allocated to the protection and improvement of the environment (€)	€10,977 (thousands)	€222,462.0	€392,249.2
Expense allocated to the protection and improvement of the environment (€)	€10,405 (thousands)	€440,474.7	
Investment in R&D&I to reduce the impacts generated by pollution, generation of waste or the use of resources (€)	€236,060	N/A	N/A
Investment allocated to R&D&I activities in environmental and climate change matters (€)	€1,611,500	N/A	N/A
Costs associated with impacts generated by pollution, generation of waste or the use of resources (€)	€300,696 (corresponding to greenhouse gas emission rights acquired by Aena) €4,052,413 (corresponding to waste management)	€355,939.2 (amount corresponding to waste management)	N/A
Non-compliance with environmental legislation and regulations, including those related to water consumption	3	N/A	N/A
Cost related to non-compliance with environmental regulations and water consumption	Sevilla Airport: 73,764.40 Adolfo Suárez Madrid-Barajas Airport: two fines or penalties for the total amount of €2,500	0 €	0 €
Environmental risk provisions and guarantees	See 2020 Consolidated Annual Accounts and Management Report		

⁵ Exchange rates as of 31/12/2020 used for Balance Sheet accounts:
EUR vs GBP= 0.89903
EUR vs BRL= 6.3735

Green leases and value chain

By definition, a “green lease” contains provisions and, consequently, commitments, aimed at minimising the environmental impact such as, for example, the reduction of energy consumption, generation of waste, emissions, etc. In this regard, the technical specifications for leases include clauses related to the proper management of waste, as well as other measures related to air quality, spills, storage of hazardous substances and strict monitoring of these measures that are required from the tenants in their offers.

In addition, Aena is developing two white books that incorporate sustainability criteria into 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 supplement the future conditions documents for tenders for the construction projects of future Real Estate Plans, ensuring that the environmental sustainability component is incorporated into the general design criteria and in matters related to urbanisation and landscaping.

They will also stipulate that the commitment to sustainability is transferred to the value chain mainly through the inclusion of environmental clauses incorporated into the contracting documents (see Chapter 4 for more information).

100% of Aena's contracts, at London-Luton Airport and Aena's airports in Brazil, include environmental or social criteria in the contracting processes. Those which are introduced in the special execution conditions may lead to penalties in case of non-compliance.

The tender documents include, among other environmental requirements, the need to obtain certifications, such as ISO 14001.

Specifically, the technical specifications that regulate the contracts for handling agents (one of the main fuel consumers at airport's after airlines) that provide assistance services on the air side of the airports, include environmental clauses that establish that said agents must prepare a plan to replace their equipment in order to reduce their emissions, at least, by 20% by the end of 2020 at all airports, with the exception of Adolfo Suárez Madrid-Barajas Airport, where it is set at 30% with respect to the 2016 baseline year.

For its part, Aena monitors the companies that work in the airports, supervising their environmental behaviour and transferring the commitment and providing support in the development of initiatives to improve environmental management. Special attention is given to those contracts associated with actions that have a potential impact on the environment, which are controlled through periodic environmental monitoring, such as visits to facilities or assessment of compliance with the Environmental Monitoring Plan, as well as all its related aspects.

The purpose of the environmental monitoring of companies is:

- Establish the rules and actions that the contracted companies and those companies that carry out their activities at Aena's facilities must respect.
- Identify and control the environmental aspects of the activities carried out by other companies in the facilities, sites and premises owned by Aena.

- Describe the follow-up performed by Aena to verify the correct provision of the service.

This procedure applies to the monitoring of companies that work for the Company or carry out their activity in the facilities, sites and premises owned or leased by Aena (contracted companies and tenants) and whose products or services have an influence on Aena's environmental and energy management or on the quality of the service it provides.

Also, new food and beverage contracts have progressively included a specific clause that seeks to reduce the volume of plastic waste generated, avoiding the use of single-use plastics and promoting the use of disposable products (biodegradable or recyclable materials). In this regard, in addition, Aena carries out the control and follow-up of the different types of waste generated in all airport activities, including the control of contractors and tenants, to ensure the proper segregation, collection and external management of waste.

Life cycle

During the development of the processes, Aena's units and centres take into account the life cycle of the activities, products and services that are under their control, as well as those they can influence to minimise the associated environmental impacts.

AS for the organisation's processes that have the greatest impact on environmental aspects, different actions are carried out to manage them from the life cycle perspective.

Infrastructure Planning Stage

The environmental variable is integrated into the first stages of the planning process for airport infrastructures through the process of **Strategic Environmental Assessment of planning instruments** (Master Plans and Special Plans). This process analyses the different plans from the environmental perspective based on the type of assessment procedure to be followed (ordinary or simplified) that ends with the corresponding resolution issued by the competent environmental body. The Environmental Reports approved by the Ministry of the Environment integrate the environmental aspects that need to be considered in the proposals for final Master/Special Plans, which will be subject to the corresponding compliance monitoring. [See the environmental reports obtained](#)

The **Environmental Impact Assessment of Projects** is a process or instrument that enables the preservation of natural resources and the protection of the environment by introducing the environmental variable in the decision-making process for projects that are expected to have a significant impact on the environment. The **Environmental Impact Assessment (EIA) of projects** and the subsequent publication of the **Environmental Impact Statement (EIS)** are the result of this process. [See the environmental resolutions obtained here.](#)

Execution stage of construction projects

During the execution of construction projects, they undergo Environmental Monitoring, to oversee them in order to ensure compliance with all the established requirements, whether related to consumption, separation of materials or the final destination of waste.

Moreover, the documents for the construction projects include some 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).

Operation stage

Through the **Operational Control** process and the **Identification, Assessment and Evaluation of Environmental Aspects** process, Aena's units and centres take into account the influence of their activity on the life cycle of the services and products used to provide said activity.

Product/Service purchase stage

Aena establishes different environmental criteria in the contractual documents for the acquisition of products (mainly: computer equipment, paper, electrical energy supply, construction material, etc.) that are more environmentally friendly.

For example:

- Energy-efficient products.
- Products with no hazardous materials in their composition.
- Products that minimise waste at the end of their useful life.
- Products that are easy to recover at the end of their useful life.

Dismantling stage of facilities and infrastructure

In those cases in which the dismantling of a facility or infrastructure is carried out, the applicable environmental criteria are taken into account to maximise the separation of the different materials (wood, glass, metals,

etc.) in order to facilitate their reuse and thus reduce the occupation of landfills.

Sustainable purchases

Aena promotes the acquisition of new technologies to foster and provide the Company with a more agile, efficient and transparent supply chain, which in turn allows it to gradually incorporate criteria that are more environmentally friendly, thus extending the principles of sustainability to its entire value chain. In this regard, the most notable initiatives are:

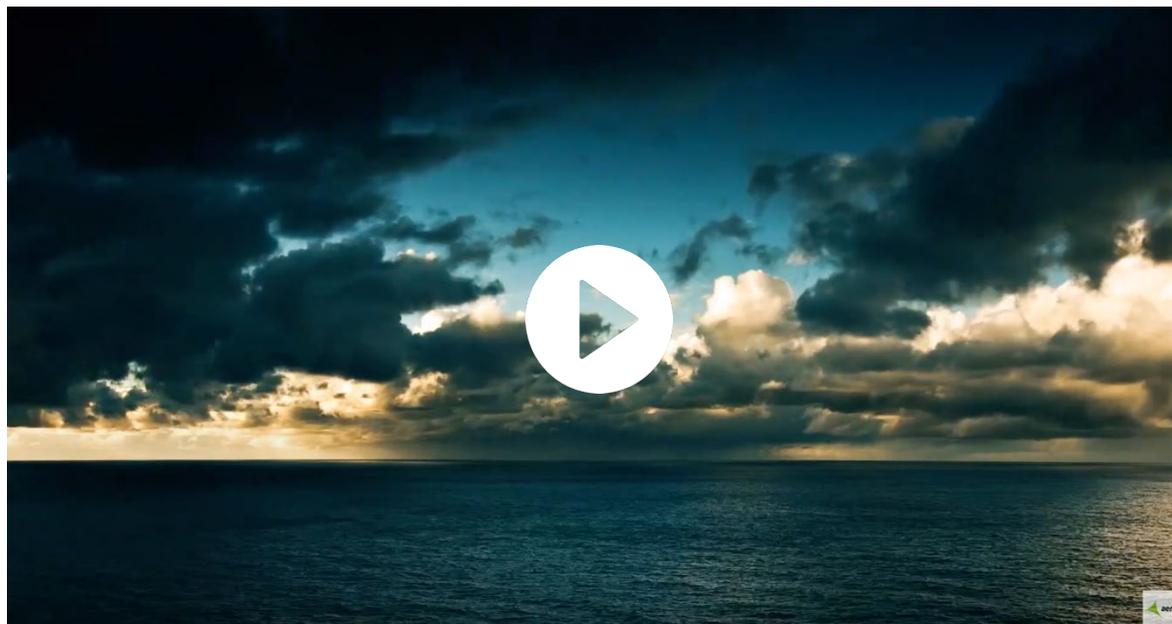
- Sustainable vehicle fleet: the new tender contracts for cars belonging to Aena's fleet are restricted to electric or eco-friendly vehicles.
- Purchase of renewable electrical energy: since 2020, the company has purchased 100% of its electrical energy with a renewable origin guarantee. This green energy is supplied to all our tenants through our network, which covers all the companies that work in our airports.

2.2. Aena and the climate emergency

The situation created by COVID-19 has not hindered the Company's commitment to sustainability, which has in fact been strengthened, bringing forward and broadening the decarbonisation milestones. In 2020, Aena has reinforced its Climate Change Strategy with the approval of more ambitious decarbonisation objectives and the commitment to develop, in 2021, a Climate Action Plan that will include the Company's financial forecasts for these purposes⁶.

In order to achieve these objectives, a set of effective actions and measures are being developed, focused on energy efficiency, the use of renewable energies, sustainable mobility, the reduction of third-party emissions and the decarbonisation of processes and activities.

All of these actions are in line with the commitment made in 2019 to adhere to the ACI Europe (Airports Council International) Net Zero initiative, which has the objective of reaching zero net carbon emissions at airports and has been moved forward to 2040⁷, without including emission offsetting mechanisms. This agreement is currently signed by over 200 European airports, a significant milestone in the actions that airports are adopting in the fight against climate change.



Aena aims to achieve zero net carbon emissions in Spanish airports by **2040**.

Luton Airport Airport and Aena Brasil also include achieving “**NEtZero Carbon**” by **2050** among its commitments.

⁶ As stated above, London-Luton Airport has its own Responsible Business Strategy with specific objectives for decarbonisation.

⁷ Objective initially planned for 2050.

Effective mitigation and adaptation actions and measures to achieve the decarbonisation objectives

Improve the energy efficiency of the facilities and uses of renewable energy*

- Since 2020, the electricity consumed in the 46 airports in Spain already comes from renewable origin sources but the Company will continue to make progress to reach 100% self-supply with the Photovoltaic Plan by 2026. This is a very ambitious measure which aims to ensure that all the electrical energy consumed comes from its own photovoltaic facilities.
- This Plan makes Aena a leader in the airport sector as regards the production of renewable energy for self-consumption, with 950 GWh/year from 2026.
- London-Luton Airport develops measures for the improvement and maintenance of lighting, boilers, etc. In 2020, London-Luton Airport replaced the emergency lighting in the baggage dock and the lower floor.

Airport Carbon Accreditation

- In 2020, the Airport Carbon Accreditation (ACA) programme renewed the current certifications, achieving the accreditation of more than 70% of the carbon emissions.
- The airports of Alicante-Elche, Menorca and Santiago-Rosalía de Castro, and London-Luton Airport, maintain the Airport Carbon Accreditation (ACA) Level 1 "Inventory" certification.
- The Adolfo Suárez Madrid-Barajas, Josep Tarradellas Barcelona-El Prat, César Manrique-Lanzarote, Palma de Mallorca and Málaga-Costa del Sol airports maintain the Level 2 "Reduction" certification.
- In 2020, London-Luton Airport began its adhesion to the program, obtaining Level 1 "Inventory", with the aim of gradually increasing levels.
- As an objective for 2026, the Company's main airports will be certified level 3+ carbon neutral and all the network's airports will be included in Aena's emissions neutrality programme.

Airports with a sustainable fleet

- Replacement of Aena's fleet of cars with cleaner and more efficient vehicles and expansion of the recharge point network for electric or hybrid vehicles.
- In 2020, the Company has a fleet of 58 fully electric vehicles (6.5% of the total fleet) and more than 144 recharge points in the *car parks* of 30 airports. As an additional measure, it has promoted efficient driving courses for the personnel that have a valid airside driving permit.
- The Company has established a target of 100% eco-friendly vehicles by 2025.
- London-Luton Airport is committed to acquiring low-emission vehicles in 2021 as part of its Responsible Business Strategy.

Communication and reporting

- Annually, Aena completes the Carbon Disclosure Project (CDP) questionnaire, the main reporting framework for climate change, in which it obtained the Leadership "A" rating in 2020.
- Adhesion to the Declaration for a sustainable recovery (Manifiesto por una recuperación sostenible): an initiative supported by companies, NGOs, scientists, academics and citizens in general, that urges the government to make sure that the path that leads us out of the financial crisis caused by the coronavirus, builds the foundations of a transformation to a more sustainable and robust economy. This is based on three fundamental pillars: digitalisation, decarbonisation and sustainability; understanding that competitiveness and the environment go hand in hand, because without environmental sustainability there can be no economic or social sustainability.
- Selection of Aena's new climate change strategy in the 101 Ecodes Initiatives for Climate
- London-Luton Airport publishes its Carbon Footprint Report. Likewise, the London-Luton Airport Responsible Business Strategy, published in 2020, contains six lines of action, the first of which is focused on guaranteeing the care of the environment with responsibility and efficiency, and minimising the environmental impact of the airport, through a series of specific annual objectives.

*Given the importance of the Company's actions in this area, this information will be developed in the following section "Efficiency in the use of energy".

Airport Carbon Accreditation

- **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, through the shared use of updated information of an operational nature. This implementation involves a reduction of taxi times and, therefore, lower fuel consumption and emissions and has been implemented in Adolfo Suárez Madrid-Barajas Airport, Barcelona-El Prat Josep Tarradellas Airport and Palma de Mallorca Airport.

100% of the gangway parking spaces have a 400 Hz electricity supply system. In 2020, progress has been made in the implementation of new sockets, and on the replacement and substitution of old equipment. Specifically, this year, 17 pieces of equipment were replaced, divided between Adolfo Suarez Madrid-Barajas Airport (6 units) and Barcelona-El Prat Josep Tarradellas Airport (11 units).

For 2030, the airports are expected to have 508 power supply points working at 400 Hz for aircraft.

- **Plan for reducing the emissions of the handling vehicles:** it includes the replacement of equipment with other less polluting equipment by the handling agents. The requirements for the progressive reduction of emissions from GSE equipment have been incorporated into the conditions of the tenders and a common methodology for calculating and monitoring vehicle emissions has been established.

-In 2019, there was a reduction of up to 30% in emissions at Adolfo Suarez Madrid Barajas Airport and 20% at the rest of the airports

- **Commitment to electric mobility.** Electric charging points have been installed in passenger and employee parking lots. In 2019, 92 new recharge points have been installed, in addition to those already existing at the Adolfo Suarez Madrid-Barajas Airport and Palma de Mallorca Airport, among others. Aena will continue to install recharge points until it has more than 2,000 points available in 2023. London-Luton Airport has 24 electric charging points (10 in public car parks and 14 for office staff). It also has an Access Strategy for the facilities (*Airport Surface Access Strategy*) in which it develops measures for the promotion of sustainable transport.

- **Promoting the use of sustainable fuel for aviation:** one of the commitments of the sector in the fight against climate change is the use of sustainable aviation fuels (SAFs) as a measure for reducing emissions. Thus, Aena is involved in this challenge through active collaboration with biokerosene producers, airlines and other stakeholders in order to increase the use of this type of fuel and promote production.

- **Promotion of sustainable mobility:** in collaboration with other administrations and institutions, Aena integrates its infrastructures with other transport methods and implements various sustainable mobility initiatives in the field of intermodality. It does this through initiatives such as the improvement of the connection with the suburban train or the bicycle lane in several airports, improving airport access and urban planning in airport environments. In addition, the Company works on the development of specific Mobility Studies and Plans that integrate the access and transportation infrastructures of cities and of the airport itself, facilitating the best access combinations.

-London-Luton Airport also takes measures to encourage the use of buses and trains as an alternative to private cars. The extensive network of bus docks and the Direct Air-Rail Transit project, under development, are important contributions in this regard. In line with its airport access strategy, there are several incentives to promote sustainable transportation, such as discounts, bicycle parking, etc. You can find details on the airport access strategy (ASAS) here. Replacement of belt-driven engines with a direct drive system. Updates of the check-in/over-the-counter AHU fans to direct the drive fans and installation of heating fans on the doors that reduce the loss of hot air from the building. The calculated savings amount to £24,878 and 248,784 kWh per year, in addition to the additional maintenance benefits and reduced consumables. As an objective for 2026, the Company's main airports will be certified level 3+ carbon neutral and all the network's airports will be included in Aena's emissions neutrality programme.

Carbon footprint⁸

The Company monitors its carbon footprint to track its Climate Change Strategy and identify the effectiveness of the measures applied. **The exceptional reduction in traffic in 2020 has had its counterpart in the reduction of GHG emissions.**

Evolution of GHG emissions (equivalent tonnes of CO₂)⁹

Intensity of GHG emissions, kg CO₂e/ATU (market-based scopes 1 and 2)

YEAR	Aena	LLA
2018	0.48	N/A
2019	0.26	0.30
2020	0.22	0.61

	2018		2019		2020	
	Aena	LLA	Aena	LLA	Aena	LLA
Direct emissions (scope 1) ¹⁰	23,852.4	3,189	22,769.6	3,076	17,390.4	2,016
Indirect emissions (scope 2)	218,936.9	10,184	113,860.9	4,981	25,260.1	3,395

NOTE: The 2019 NFIS collected estimates calculated with the best information available at the date of publication. In this document, the 2019 data have been adjusted once the consolidated information has been made available. Likewise, the current emission factors that are updated each year have been used to calculate current emissions.

In this regard, it should be noted that Aena provides 100% renewable electricity to its tenants, which means that its emissions associated with their electricity consumption, taking into account market-based criteria, are zero. In the case of London-Luton Airport, CO₂ emissions linked to the electricity consumption of tenants reached 2,728.87 tCO₂ in 2020.

⁸ The calculation of emissions for Scope 2 has been made according to market-based criteria.

⁹ The Carbon footprint of the airports in Brazil will be calculated from 2021.

¹⁰ 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 electric generators, portable generators, boilers, firefighting service activities (SEI [Servicio de Extinción de Incendios]) and auxiliary pumps of firefighting water tanks.
- Combustion from mobile sources. Emissions from vehicles belonging to the airports, both light and heavy.

Indirect emissions or Scope 2. Indirect emissions that are produced by the generation of electricity or thermal energy acquired and consumed at our airports. Their source is:

- Electricity consumption. Emissions associated with the electrical consumption of the activities carried out by airports for air conditioning, lighting and operation of various facilities

DIRECT GHG EMISSIONS (SCOPE 1)

	2018				2019				2020			
	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
Aena												
Diesel	14,654.6	0.3%	0.4	14,774.8	12,958.1	0.3%	0.3%	13,088.3	9,470.8	0.2	0.2	9,545.5
Petrol	157.9	0.05	0.01	162.2	159.2	0.05	0.01	163.4	130.9	0.04	0.01	134.4
Natural gas	8,647.8	0.2	0.2	8,697	9,213.7	0.2	0.2	9,266.5	7,513.1	0.1	0.1	7,556.1
Propane	63.6	0.001	0.004	64.7	54.1	0.001	0.003	55.2	35.1	0.0005	0.002	35.7
Kerosene	152.2	0.004	0.005	153.7	194.2	0.005	0.006	196.3	117.5	0.003	0.003	118.7
TOTAL	23,676	0.5	0.5	23,852.4	22,606.4	0.5	0.5	22,769.6	17,267.3	0.4	0.4	17,390.4
LLA												
Diesel	206.2	0.2	18.4	224.8	929.8	1.0	10.6	941.5	461.8	0.5	5.2	467.5
Petrol	0	0	0	0	0	0	0	0	0	0	0	0
Natural gas	1,672.8	2.2	0.9	1,675.9	1,558.8	2.0	0.8	1,561.7	1,346.5	1.8	0.7	1,349.0
Propane	0	0	0	0	8.1	0	0	8.1	2.3	0	0	2.3
Diesel	1,086.4	0.2	15.6	1,102.1	387.8	0.0	5.2	393.0	194.8	0.0	2.7	197.6
TOTAL	2,965.3	2.6	34.9	3,002.8	2,884.5	3.1	16.7	2,904.3	2,005.3	2.3	8.7	2,016.4

NOTE: The 2019 NFIS collected estimates calculated with the best information available at the date of publication. In this document, the 2019 data have been adjusted once the consolidated information has been made available. Likewise, the current emission factors in force have been used to calculate the current emissions, these being updated each year.

INDIRECT GHG EMISSIONS (SCOPE 2)

	2018				2019				2020			
	Aena											
	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	188,266.48	0	0	188,266.48	83,789.64	0	0	83,789.64	0	0	0	0
Heating and cooling energy	30,670.38	0	0	30,670.38	30,071.26	0	0	30,071.26	25,260.1	0	0	25,260.1
TOTAL	218,936.86	0	0	218,936.86	113,860.9038	0	0	113,860.90	25,260.1	0	0	25,260.1
LLA												
Electric power	10,105.21	23.74	55.04	10,184.00	4,941.89	12.67	26.70	4,981.25	3,364.99	10.49	20.10	3,395.57
Heating and cooling energy	0	0	0	0	0	0	0	0	0	0	0	0
TOTAL	10,105.21	23.74	55.04	10,184.00	4,941.89	12.67	26.70	4,981.25	3,364.99	10.49	20.10	3,395.57

Source of emission factors: MITECO, EMEP/EEA (Corinair), US EPA, US FAA and UK Government (LLA).
Note: Data calculated with market-based criteria.

Efficiency in the use of energy and use of renewable energy

The Company's Photovoltaic Plan, consolidated in 2019, will allow it to achieve, by 2026, 100%¹¹ energy self-supply from solar energy, thus avoiding the emission of 159,200 tons of CO₂ to the atmosphere each year, equivalent to the consumption of around 280,000 homes throughout a year. This Plan will turn the Company into one of the leaders among European airports in the production of renewable energy for its own consumption (950 GWh) and will supply buildings owned by Aena as well as those of its lessees. This project is currently in the approval and commencement phase (project drafting, requesting of permit and deposit of the necessary financial guarantees). Likewise, since 2020, all the airports and their lessees consumed 100% renewable electricity.

In parallel, in order to achieve an effective reduction in energy consumption, the network's airports continuously analyse their energy consumption to identify areas of improvement. As a result, to date, a series of measures have been developed aimed at controlling energy consumption and adapting it to the actual operation of the airports. Other measures are aimed at improving the technological aspects of the lighting and air conditioning (presence detectors, replacement of lighting with LEDs, renovation of air conditioning installations and automatic lighting regulation), etc.

In addition, to be able to adequately manage energy consumption, Aena has smart meters in some of its facilities and properties in its portfolio. The Adolfo Suárez Madrid-Barajas Airport has an Energy Management Platform in the Terminals that allows it to analyse consumption in a systematic way, enabling it to use the results it obtains to establish measures to increase the energy efficiency of the terminal's facilities.

All these initiatives, aimed at improving energy efficiency in the Company's buildings and property portfolio, will also contribute to the reduction of the carbon footprint and operating costs.

Energy efficiency in 2020 Some relevant related actions



Airport	Action	Description	Milestone
Adolfo Suárez Madrid-Barajas Airport		Replacement of T-1 Terminal air curtains	
Gran Canaria Airport		Supply with installation of frequency converters in air conditioners	
Málaga-Costa del Sol Airport		Supply and installation of solar protection sheets in Dock B and C in Terminal T-2 and Dock D in Terminal T-3	
London-Luton		Renewal of the check-in/over-the-counter AHU fans to direct the fans and installation of heating fans on the doors that reduce the loss of hot air from the building	
Palma de Mallorca Airport		Change of lighting to LED technology	
Santiago-Rosalía de Castro		Change of lighting to LED technology	
Adolfo Suárez Madrid-Barajas Airport		Change of lighting to LED technology	
Córdoba		Change of lighting to LED technology	
Málaga-Costa del Sol Airport		Change of lighting to LED technology	
London-Luton		Change of lighting to LED technology	

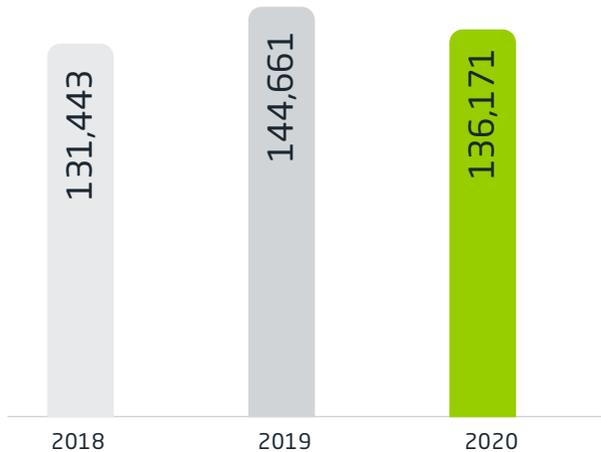
¹¹ Initially planned 70%.

Reduction of emissions thanks to renewable energy facilities¹²

The amount of emissions avoided due to the Company's renewable energy facilities and energy efficiency, as well as to the purchase of electrical energy from a renewable source (100% in 2020) has amounted to 136,171¹³ tonnes of CO₂ in 2020.

The amount of emissions avoided due to the Company's renewable energy facilities and energy efficiency, as well as to the purchase of electrical energy from a renewable source

(tons of CO₂e)



NOTE: The CO₂ calculation is obtained from the relationship established between the electricity generated by the indicated facilities and the estimated CO₂ emission factor. Source of the electrical factor: REE.



¹² To date, London-Luton Airport and the Brazilian airports have not carried out any measures in this regard, so the emissions avoided thanks to their own renewable energy facilities and energy efficiency and the purchase of electricity with renewable origin is zero for the fiscal year 2020.

¹³ Data calculated with market-based criteria.

REDUCTION IN GHG EMISSIONS (SCOPE 1)

	2018		2019		2020	
	kWh generated	tCO ₂ e avoided	kWh generated	tCO ₂ e avoided	kWh generated	tCO ₂ e avoided
Aena Installation						
Cogeneration plant at Bilbao Airport	1,067,935	234	10,513	2	128,860	21
Thermal solar collectors at Barcelona-El Prat Josep Tarradellas Airport	8,180	2	0	0	0	0
Reus Airport geothermal power plant	43,258	9	41,224	7	61,488	10
Total (scope 1)	1,119,373	245	51,737	9	190,348	31

Reduction in GHG emissions (scope 2)

	2018		2019		2020	
	kWh generated	tCO ₂ e avoided	kWh generated	tCO ₂ e avoided	kWh generated	tCO ₂ e avoided
Aena facilities						
Wind turbines at La Palma Airport	2,577,197	564	2,493,058	411	1,904,174	314
Photovoltaic modules at Menorca Airport	70,320	15	75,777	13	72,862	12
Photovoltaic modules at Ibiza Airport	81,977	18	72,184	12	83,849	14
Photovoltaic modules at Alicante-Elche Airport	46,413	10	18,771	3	17,814	3
Photovoltaic modules at Adolfo Suárez Madrid-Barajas Airport	88,622	19	88,780	15	48,964	8
Photovoltaic modules at Madrid-Cuatro Vientos Airport	18,561	4	25,627	4	81,101	13
Photovoltaic modules at La Palma Airport	60,291	13	38,301	6	53,279	9
Photovoltaic modules at Valencia Airport	32,316	7	34,720	6	33,532	6
Photovoltaic modules at Vigo Airport	20,650	5	19,167	3	13,815	2
Total (scope 2)	2,996,347	656	2,866,385	473	2,309,390	381

NOTE: The 2019 NFIS collected estimates calculated with the best information available at the date of publication. In this document, the 2019 data have been adjusted once the consolidated information has been made available. Likewise, the current emission factors in force have been used to calculate the current emissions, these being updated each year.

Main indicators

The reduction of traffic in our airports, as a result of the health crisis generated by COVID-19, together with the implementation of energy efficiency measures in airports and the important work done to raise awareness and sensitisation among all users and employees, has led to a notable decrease in energy consumption in 2020.

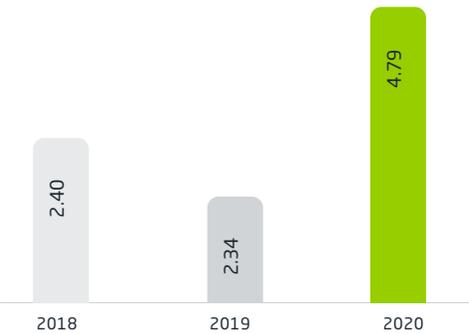
The energy performance and operational management of the network's airports, aimed at improving energy efficiency, are key indicators of the sustainable design of a building.



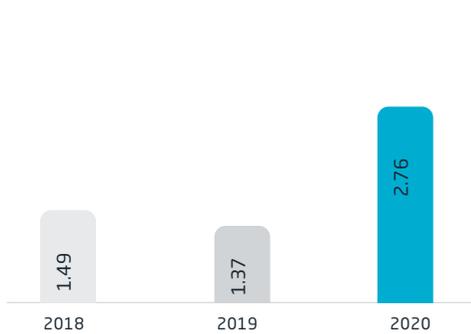
Energy consumption

Kwh / ATU

Aena



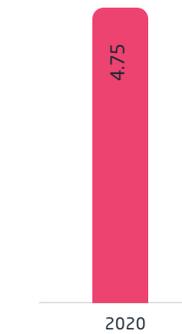
LLA



Electricity consumption

Kwh / pax

Aena Brasil**



(*) Includes consumption of fuel, electricity, heating and cooling.

(**) The data relating to the Aena Brasil correspond only to 2020, the year from which these airports began their activity as part of Aena.

Electricity consumption by Aena's tenants reached a total of 74,681,238 KWh in 2020, which constitutes 10.4% of Aena's global consumption¹⁴.

Tenant consumption in 2019 constituted 12.9%¹⁵ of Aena's global consumption and 12.7%¹⁶ in 2018.

As regards the reduction of energy requirements for products and services, the services offered by Aena do not entail energy consumption by the end user.

Total energy and total consumption, broken down

Fuel consumption	2018		2019		2020		
	Aena (GJ)	LLA (litres)	Aena (GJ)	LLA (litres)	Aena (GJ)	LLA (litres)	Aena Brasil ¹ (litres)
Diesel	197,767	75,679	175,238	341,329	127,811	169,525	-
Petrol	2,279	-	2,297	-	1,888	-	-
Natural Gas	153,331	818,732,951	164,590	763,413,717-	134,210	660,876,297	-
Propane	999	-	851	5,300	551	1,449	-
Kerosene	2,084	-	2,661	-	1,609	-	-
Diesel	-	419,554	-	151,503	-	77,599	556,079.16
Subtotal	356,460	819,228,184	345,637	763,911,849	266,071	661,124,870	556,079.16

Energy consumption GJ	2018		2019		2020		
	Aena (GJ)	LLA (litres)	Aena (GJ)	LLA (litres)	Aena (GJ)	LLA (litres)	Aena Brasil ¹ (litres)
Electricity	3,386,704	129,517	3,437,454	70,158	2,583,994	52,432	88,534.98
Heating	213,872	32,796	201,131	30,580	179,520	26,413	-
Cooling	402,666	-	421,865	-	316,959	-	-
Subtotal	4,003,242	162,313	4,060,450	100,739	3,080,473	78,845	88,534.98
Total energy consumption	4,359,702		4,406,087		3,346,544		

Note: The data relating to the Aena Brasil correspond only to 2020, the year from which these airports began their activity as part of Aena.

Note: The 2019 NFIS collected estimates calculated with the best information available at the date of publication. In this document, the 2019 data have been adjusted once the consolidated information has been made available.

¹⁴ Data corresponding to 97.9% of the centres in Aena's network, estimated from 99.0% real data and 1.0% estimated data from the leased areas.

¹⁵ Data corresponding to 97.9% of the centres in Aena's network, estimated from 99.3% real data and 0.7% estimated data from the leased areas.

¹⁶ Data corresponding to 95.8% of the centres in Aena's network, estimated from 99.3% real data and 0.7% estimated data from the leased areas.

Renewable energies

Aena explores the use of renewable energy sources that allow us to reduce the dependence of aviation (and airports) on fossil fuels and thereby reduce greenhouse gas emissions.

In 2020, according to the foreseen plan, the percentage of electricity purchased by Aena in its Spanish airport network certified to be from renewable sources has increased.

In the Spanish airport network, 100% of renewable energy sources. London-Luton Airport aims to achieve this 100% in 2021. The electrical energy used by the tenants in Aena's airports corresponds to Aena's own network, so it is also from renewable energy sources.

% electricity with renewable source guarantee	Aena	LLA	Aena Brasil
2019	60%	0%	0%
2020	100%	0%	0%

Renewable energy facilities at Aena		2018	2019	2020
Energy generated from renewable sources (GJ)	Wind power	9,278	8,975	6,855
	Solar power/photovoltaics	1,509	1,344	1,459
	Solar thermal energy	29	0	0
	Geothermal	156	148	221
	Subtotal	10,972	10,467	8,535
Energy consumed from renewable sources (GJ)	Wind power	8,324	8,453	6,353
	Solar power/photovoltaics	1,416	1,244	1,361
	Solar thermal energy	29	0	0
	Geothermal	156	148	221
	Subtotal	9,925	9,845	7,936
Energy sold from renewable sources (GJ)	Wind power	954	522	502
	Solar power/photovoltaics	93	100	97
	Solar thermal energy	0	0	0
	Geothermal	0	0	0
	Subtotal	1,047	622	599

NOTE: The 2019 NFIS collected estimates calculated with the best information available at the date of publication. In this document, the 2019 data have been adjusted once the consolidated information has been made available.

NOTE: 1 The energy consumed and generated through renewable sources at London-Luton Airport and at Aena Brasil is zero.

2.3. Pollution

Air pollution¹⁷

The air quality monitoring networks located in several airports characterise, control, monitor and correct the atmospheric emissions generated by the activity.

These measure the concentration levels of the main substances such as sulphur dioxide (SO₂), nitrogen oxides (NO_x) and particulate matter (PM). These substances come from both Aena's own activities, as well

as other sources of emission in the surrounding area. This enables continuous and automatic control of air quality in the area of influence of a number of airports.

Nitrogen oxides (NO _x), sulphur oxides (SO _x) and other significant air emissions	NO _x (t)		SO _x (t)		CO(t)		NMVOC(t)		PM10(t)		PM2.5(t)	
	Aena	LLA	Aena	LLA	Aena	LLA	Aena	LLA	Aena	LLA	Aena	LLA
2018												
Diesel	82.5771	N/A	7.3978	N/A	26.1659	N/A	6.4272	N/A	5.3223	N/A	4.9631	N/A
Petrol	0.7611	N/A	0.0005	N/A	5.4090	N/A	0.6609	N/A	0.0017	N/A	0.0017	N/A
Natural Gas	11.3465	N/A	0.1027	N/A	4.4466	N/A	3.5266	N/A	0.1196	N/A	0.1196	N/A
Propane	0.0680	N/A	0.0006	N/A	0.0495	N/A	0.0423	N/A	0.0836	N/A	0.0836	N/A
Kerosene	0.2423	N/A	0.0490	N/A	32.3618	N/A	0.9737	N/A	7.3133	N/A	7.3133	N/A
Total 2018	94.9950	N/A	7.5507	N/A	68.4328	N/A	11.6306	N/A	12.8406	N/A	12.4813	N/A
2019												
Diesel	69.8684	N/A	6.3357	N/A	22.0498	N/A	5.2221	N/A	4.4890	N/A	4.1596	N/A
Petrol	0.7597	N/A	0.0005	N/A	6.0814	N/A	0.6717	N/A	0.0018	N/A	0.0018	N/A
Natural Gas	12.1797	N/A	0.1103	N/A	4.7731	N/A	3.7856	N/A	0.1284	N/A	0.1284	N/A
Propane	0.0587	N/A	0.0005	N/A	0.0394	N/A	0.0334	N/A	0.0601	N/A	0.0601	N/A
Kerosene	0.3094	N/A	0.0626	N/A	41.3201	N/A	1.2432	N/A	9.3378	N/A	9.3378	N/A
Total 2019	83.1759	N/A	6.5096	N/A	74.2640	N/A	10.9560	N/A	14.0171	N/A	13.6877	N/A
2020												
Diesel	50.4348	2.9627	4.4936	0.0849	15.96946	1.1549	3.7216	0.2228	3.22563	0.2422	2.9918	0.2368
Petrol	0.6282	0	0.0004	0	4.6369	0	0.540904	0	0.0014	0	0.0014	0
Natural Gas	9.9316	1.9071	0.0899	0.0173	3.8921	0.7474	3.0868	0.5928	0.1047	0.0201	0.1047	0.0201
Propane	0.0381	0	0.0003	0	0.0252	0	0.0213	0	0.0375	0	0.0375	0
Kerosene	0.1871	0	0.0379	0	24.9854	0	0.7517	0	5.6464	0	5.6464	0
Total 2020	61.2204	4.8698	4.6221	0.1022	49.5090	1.9023	8.1305	0.8156	9.0163	0.2623	8.7818	0.2569

NOTE: The 2019 NFIS collected estimates calculated with the best information available at the date of publication. In this document, the 2019 data have been adjusted once the consolidated information has been made available.

¹⁷ Data not available for Aena Brasil because the air quality monitoring system is in the implementation phase.

These networks are implemented in the airports of Adolfo Suárez Madrid-Barajas, Barcelona-El Prat Josep Tarradellas, Palma de Mallorca, Alicante-Elche and Málaga-Costa del Sol¹⁸. In certain cases, measurement stations are integrated and form part of the municipal and/or autonomous community air quality surveillance networks.

In accordance with the principles of Aena's Integrated Quality and Environmental Policy, they carry out Air Quality Control and Monitoring Programmes in the vicinity of the airports.

For its part, London-Luton Airport, thanks to the installation of air quality monitors, has identified the areas with the most emissions and, as a result, has implemented new actions (for example, the introduction of a specific policy for buses and coaches, in order to improve air quality in front of the terminal). To date, 18 different locations have been monitored to ensure NO₂ measurements in the areas of greatest use and impact; the concentration levels of particulate matter (PM) are measured in two locations, and work is being done to record PM_{2.5} particles. As part of the Responsible Business Strategy, the Airport will present a formal strategy for improving air quality before the end of 2022, with specific objectives.

The data obtained by this Airport have been shared with the data of the local authorities and are also [published monthly](#).



Noise

Noise pollution is one of the main environmental aspects generated by airport activity. Fully aware of this, one of Aena's priorities is to reduce noise levels to a minimum and protect the quality of life of the surrounding populations.

While the reduction of air traffic caused by the health crisis has been accompanied by the consequent drop in noise this year, the Company has not stopped making significant efforts to improve the measurement, control

and minimisation of the impact of noise, as well as to ensure active and bidirectional communication with all stakeholders involved.

Measurement, reduction and control

Based on the Strategic Noise Maps (SNMs)¹⁹, Aena diagnoses the overall exposure to noise during a full year in the vicinity of airports with more than 50,000 annual operations.

¹⁸ You can consult the [reports](#) from the surveillance network of the Adolfo Suárez Madrid-Barajas Airport, as well as the [data from](#) the stations around the Barcelona-El Prat Josep Tarradellas Airport that are attached to the Catalan Government network.

¹⁹ EU Environmental Noise Directive 2002/49.

Evolution of the number of people exposed to noise in the Spanish airport network

SNM PHASE I:

Noise levels	Gran Canaria Airport	César Manrique-Lanzarote Airport (*)	Tenerife Sur Airport	Tenerife Norte-Ciudad de La Laguna Airport	Alicante-Elche Airport	Bilbao Airport	Barcelona-El Prat Josep Tarradellas Airport	Ibiza Airport (*)	Adolfo Suárez Madrid-Barajas Airport	Málaga-Costa del Sol Airport	Palma de Mallorca Airport	Valencia Airport	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 Airport	César Manrique-Lanzarote Airport (*)	Tenerife Sur Airport	Tenerife Norte-Ciudad de La Laguna Airport	Alicante-Elche Airport	Bilbao Airport	Barcelona-El Prat Josep Tarradellas Airport	Ibiza Airport (*)	Adolfo Suárez Madrid-Barajas Airport	Málaga-Costa del Sol Airport	Palma de Mallorca Airport	Valencia Airport	Sevilla Airport (*)
Lday 65 dB (A)	57	-	0	475	61	29	23	9	1,824	232	110	3	0
Levening 65 dB (A)	0	-	0	198	60	506	18	9	149	240	110	3	0
Lnight 55 dB (A)	42	-	45	0	112	0	26	637	38	348	152	19	0

SNM PHASE III:

Noise levels	Gran Canaria Airport	César Manrique-Lanzarote Airport (*)	Tenerife Sur Airport	Tenerife Norte-Ciudad de La Laguna Airport	Alicante-Elche Airport	Bilbao Airport	Barcelona-El Prat Josep Tarradellas Airport	Ibiza Airport (*)	Adolfo Suárez Madrid-Barajas Airport	Málaga-Costa del Sol Airport	Palma de Mallorca Airport	Valencia Airport	Sevilla (*)
Lday 65 dB (A)	282	304	20	252	86	-	13	14	1,751	319	177	1	-
Levening 65 dB (A)	0	294	0	13	62	-	14	14	1,497	255	187	1	-
Lnight 55 dB (A)	308	0	90	0	201	-	13	591	1,754 (**)	1,520	515	91	-

(*) The SNM was not prepared as the threshold of 50,000 annual operations had not been reached at the time. The preparation and management of SNMs is regulated both by Directive 2002/49/EC and its corresponding transposition to national regulations.

(**) The increase in night-time values at the Adolfo Suárez Madrid-Barajas Airport is due to maintenance actions on runway 32R-14L. These actions have forced the use of the non-preferred runway (32L-14R) during 2016. The Lday, Levening and Lnight levels correspond at all times to applicable regulations.

Evolution of the number of people exposed to noise at London Luton Airport (2020 figures)

Noise Level	SNM Phase I	SNM Phase II	SNM Phase III
Lden 55 dB(A)	8,600	14,300	17,000
Lday 66 dB(A)	<100	<100	<100
Levening dB (A)	<100	0	<100
Lnight 57 dB (A)	2,300	900	600

In 2020, in compliance with the procedures for notifying the European Commission of the data of the Strategic Noise Maps and Action Plans to be prepared in the fourth phase of application of Directive 2002/49/EC, the General Directorate of Civil Aviation has been informed of the large airports in Aena's network that, according to the data corresponding to the year 2019, exceed the amount of 50,000 annual operations.

The level of noise incidence in the territory is defined by the Acoustic Easements. To this end, the acoustic impact generated in the airports is evaluated and its evolution is predicted. During 2020, the Acoustic Easements for the A Coruña airport and the review of the Bilbao and Tenerife Sur airports were carried out and made public. The Joint Commission has also granted its approval for the Easements of the Tenerife Norte-Ciudad de La Laguna and César Manrique-Lanzarote airports. Currently, Aena has 10 approved Acoustic Easements, as well as their corresponding Action Plans. It is expected that, by 2021, the approval of another five Acoustic Easements will be obtained.

Based on the conclusions drawn from the SNMs and the Acoustic Easements, a series of measures aimed at assessing, preventing and reducing noise in the environment are being prepared. All of this is included in the corresponding Action Plans. London-Luton Airport also has a 2019-2023 Action Plan against noise corresponding to its SNM.

To achieve effective noise minimisation, in addition to taking specific measures, Aena establishes collaborations with other stakeholders aimed at reducing noise at the source, improving operational procedures, introducing operational restrictions on certain aircraft, establishing measures to discourage noisy aircraft and supporting air traffic control and discipline.

Finally, with regard to noise control, the air routes and noise levels reached in the different airport environments are monitored through the Noise Monitoring Systems (NMSs). This system is currently available at the following airports: Alicante-Elche, Adolfo Suárez Madrid-Barajas, Barcelona-El Prat Josep Tarradellas,

Bilbao, Gran Canaria, Ibiza, Málaga-Costa del Sol, Palma de Mallorca, Tenerife Norte-Ciudad de La Laguna, Tenerife Sur and Valencia.

In the case of Aena Brasil, the first studies to measure aeronautical noise in airports have begun in November 2020.

Sound Insulation Plans

The measurement, reduction, control and communication actions are supplemented by the execution of the Sound Insulation Plans (SIPs), associated with the airports. These plans serve as a corrective measure to minimise the inconvenience caused by aircraft noise and ensure compliance with noise quality objectives inside buildings, complying with the noise quality objectives established by Royal Decree 1367/2007 and in accordance with the procedure and requirements established in Act 5/2010, of 17 March, and in the corresponding Environmental Impact Statements.

In 2020, 131 soundproofing actions were carried out in homes and buildings designated for sensitive uses, a total investment of €2.1 million.

Investments made at London-Luton Airport between the start of the activities and 31 December 2020 amount to £100,000²⁰, benefiting a total of 25 homes.

Sound Insulation Plans



The process of executing these SIPs is established in collaboration with interested neighbours and local administrations, and includes:

- Inclusion of homes in the SIP.
- Measurement of existing noise insulation in homes to determine needs for additional insulation.
- Drafting and approval of the resulting acoustic insulation project.
- Performance and verification of the work.
- Payment for the actions.



²⁰ €111,230.90 according to the exchange rates as of 31/12/2020 used for Balance Sheet accounts:
EUR vs GBP= 0.89903
EUR vs BRL= 6.3735

Communication

Different tools are available to report the noise management actions at Aena:

- Interactive Noise Maps (WebTrak), implemented in 11 airports of the network (the corresponding [maps can be checked on the Aena website](#)).
- Publication of monthly Noise Reports on the public website.
- Environmental Monitoring Commissions of the SIPs and Joint Commissions created to establish the Acoustic Easements and their associated Action Plans.
- Specific Management Office for the information, execution, control and management of the SIPs.

Aena Sound Insulation Plans 2000-2020*

Airport	No. of soundproofed buildings	Amount invested €M (2000-2020)
A Coruña Airport	775	6,790,708.82
Alicante-Elche Airport	2,993	41,138.883.81
Barcelona-El Prat Josep Tarradellas Airport	50	2,966,717.28
Bilbao Airport	1,572	21,010,733.10
Girona-Costa Brava Airport	0	50,902.09
Gran Canaria Airport	615	9,876,268.51
Ibiza Airport	611	6,441,186.52
La Palma Airport	22	402,328.75
Adolfo Suárez Madrid-Barajas Airport	12,917	170,228,641.78
Málaga-Costa del Sol Airport	811	16,303,302.91
Melilla Airport	0	0.00
Menorca Airport	9	204,770.75
Palma de Mallorca Airport	925	16,722,863.60
Pamplona Airport	43	1,224,083.52
Sabadell Airport	0	13,633.00
of Compostela-Rosalía de Castro	15	296,570.06
Sevilla Airport	0	65,904.13
Tenerife Norte-Ciudad de La Laguna Airport	977	24,212,794.89
Valencia Airport	1,967	11,519,954.07
Vigo Airport	224	3,322,920.35
TOTAL 2000-2020	24,526	332,793,167.92

*Noise measurements at Aena's airports in Brazil have begun in November 2020, therefore no action has been taken in this regard.

Light pollution

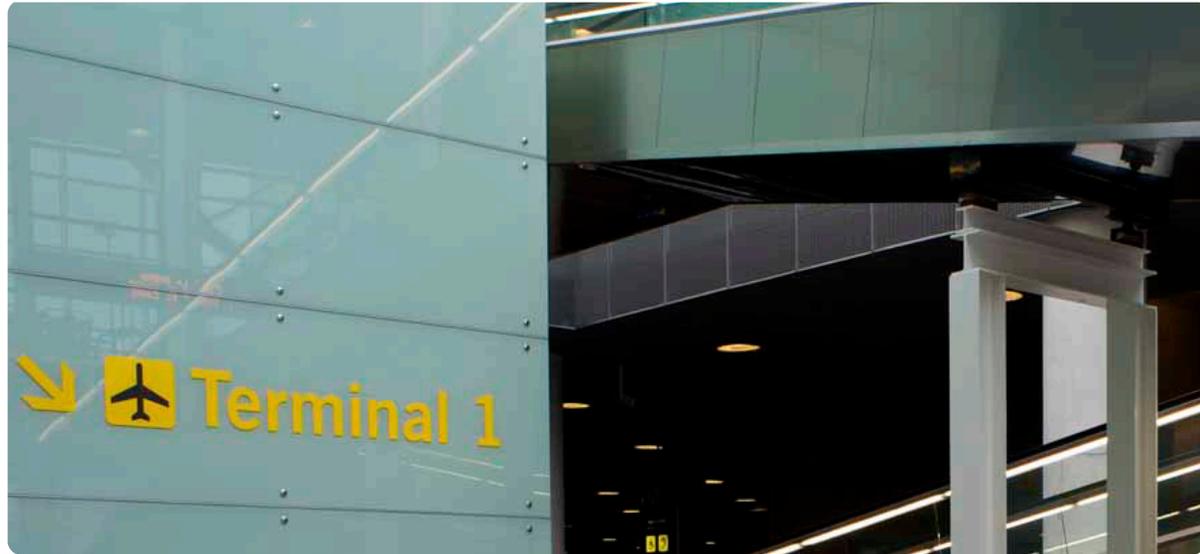
Control of light pollution is essential for sustainable coexistence. However, it should be noted that the external airport lighting of Aena Brasil and London-Luton Airport is also subject to prevailing regulations on operational security.

Environmental inquiries

Aena's public website features an environmental consultation channel for information requests, complaints and suggestions concerning the environment, enabling the Company to respond swiftly, consistently and effectively, as well as minimising response times.

London-Luton Airport has a [Policy for inquiries and complaints about aircraft noise](#) and a [website](#) from which to make the inquiries. [Follow-up reports](#) are issued quarterly with details on aircraft movements, as well as the follow-up of the noise and complaints generated by the activity itself.

In the case of Aena Brasil, a company specialised in the field has been contracted in order to conduct the environmental inquiries.



		2020		
		Aena	LLA	Aena Brasil
Environmental complaints		1,593	4,491	0
Noise complaints	related	99.6%	99.9%	0

1,593
Complaints received in Aena regarding environmental matters

99.6%
Of noise-related complaints in Aena, 99.9% in LLA

100%
Answers given

2.4. Sustainable resource use

Water

Water is the main natural resource that is consumed in Aena's facilities, mostly linked to human consumption, irrigation of green areas, cleaning, fire service and execution of construction work. As a result of this, the Company rigorously controls its use to ensure the efficient supply of water to both employees and passengers as well as the rest of the users who move through the facilities daily. In fact, in recent years, Aena has implemented a series of internal measures, focused on improving water efficiency, including, among other elements, the replacement of all of its taps of its centres with others with automatic sensors, enabled to make the output flow more efficient and promote lower consumption.

London-Luton Airport has implemented measures and systems to achieve a more efficient use of water, as part of the maintenance and improvement of the airport base.

In this regard, Aena is preparing a Strategic Plan for Managing Water at all the Company's airports which will be published in the first quarter of 2021 and will allow the creation of a specific framework of action, focused on reducing consumption and linked to initiatives such as:

- The detection and stoppage of leaks in pipes and facilities.
- The responsible use of water in green spaces.
- The installation of water-saving elements in facilities.
- The use of reclaimed water.

In particular, it will contain objectives in relation to:

- Develop water management that addresses the loss of fresh water availability and quality associated with climate variability, decreasing water consumption
- To increase the consumption of alternative water sources by performing an integrated management of water supply sources and risks derived from climate change.

Likewise, Aena's 2018-2021 Strategic Plan includes, among its lines of action on sustainability, the calculation of the water footprint²¹. In line with this, in 2020, Aena calculated the water footprint of 23 of its centres in Spain, which represent 80% of the total average water consumption for the last three years. The calculation year selected was 2019 and both the calculation and the analysis and assessment of the sustainability of the water footprints have been based on the methodology of the *Water Footprint Network* (WFN). Throughout 2021, the plan is to continue with the calculation in the remaining 26 airports of the Aena network. The results obtained in the calculation of the water footprint, as well as the objectives and measures included in Aena's water strategy can be consulted at the following link: <http://www.aena.es/en/passengers/passengers.html>.



²¹ The concept of water footprint, created by Arjen Y. Hoekstra (University of Twente, Holland), is an indicator of the water that a consumer or producer uses in their activity, considering both the direct and indirectly used water or the storm water used and the volume of water needed to absorb the contamination of an effluent

In line with the above, London-Luton Airport, for its part, includes among the objectives contained in the Responsible Business Strategy, the reduction of water consumption per passenger (to less than 6.98 litres/passenger, which implies a 10% reduction with respect to the baseline year) and the use of reclaimed water (objective for 2021).

Initiatives for responsible water consumption

As an example of some of the initiatives carried out, some of the network's airports, such as Menorca, are changing their meters for a complete system of flow meters with low consumption wireless transmission, which has improved the measurement of water flow at various points of the supply network, the control of consumption and the detection of leaks. This in turn has allowed them to achieve a more efficient management of water resources.

In addition, it is worth noting that at several airports located in territories where this resource is scarce (such as island airports), their wastewater is being re-used. This water goes through a purification system, in which it is disinfected and undergoes additional filtering, thereby allowing the airports to obtain a volume of water suitable to irrigate their green spaces and avoid extra consumption from the water supply network.

In this regard, the actions implemented by the Alicante-Elche airport are worth noting. They now make the most of the rejection water from various processes to give it a second use. The objective of this measure is to obtain savings of 15% in the airport's water consumption, which would be equivalent to seven Olympic pools at the end of the year.



This innovative strategy has involved the installation of a separate network for the collection of water from the terminal's sinks and the condensed water produced by the air conditioners. Once collected, the water is incorporated into a tank so it can be used a second time, thus preventing it from being discarded, and it is treated to enable it to be used in the 350 toilets that are distributed in the different WCs of the airport complex.

In addition, this system also includes the use of the rejection water from the osmotised water plant that supplies the terminal's food and beverage premises.

Finally, with the aim of reducing water consumption in the airport's facilities, Aena has established a directive

to eliminate the water salutes that were carried out by the fire department to welcome aircraft from new routes or other celebrations.

In addition, as already mentioned, Aena is developing two white books that incorporate sustainability criteria into the urban and architectural design of future real estate developments in the main airports of Adolfo Suárez Madrid-Barajas and Barcelona-El Prat Josep Tarradellas, related to the sustainable consumption of resources, as well as the reuse of water. The criteria developed for this purpose include the collection of stormwaters from the roofs of the buildings and their

use, the implementation of separation networks and the promotion of sustainable urban drainage.

Taking into account the circumstances of the environment, in some island airports, such as Fuerteventura,

Ibiza and César Manrique-Lanzarote, the Company uses water from the sea. In this regard, Aena collaborates with institutions to promote some of these initiatives aimed at reducing water consumption at our facilities. Tenerife Sur Airport receives its supply through

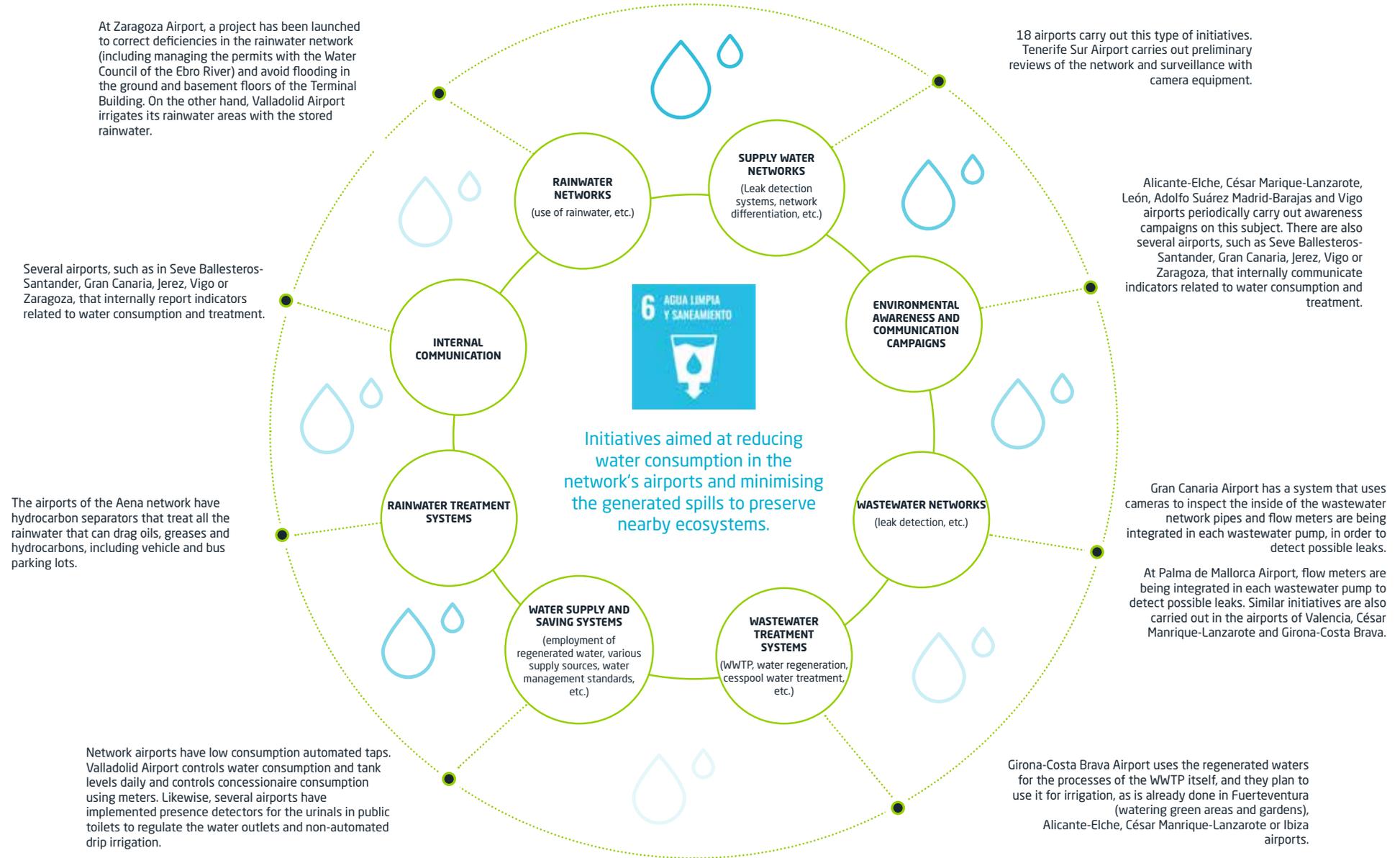
the Granadilla de Abona municipal supply network, managed by the Aqualia Entemanser company. In turn, the municipal network is supplied with desalinated water from the Granadilla de Abona desalination plant and groundwater (wells). Also, the airport is supplied with regenerated water, as the water purified by the airport's wastewater treatment plant (WWTP) is used to irrigate the airport's gardens.

On the other hand, the units and centres of Aena's network periodically monitor compliance with the parameters established in the corresponding discharge permits for both wastewater and rainwater in order to contribute to the conservation of the Public Water Domain (PWD) or Maritime-Terrestrial Public Domain (MTPD).

For its part, London-Luton Airport monitors water consumption in each area of the business monthly to identify demand peaks to encourage drops in the future. Additionally, it works in coordination with the supply company to identify areas with high water consumption in order to implement reduction measures. Once identified, they coordinate with the partners and third parties that have high water consumption (terminal services, tenant catering facilities, etc). The airports in Brazil also conduct consumption control and monitoring actions. Furthermore, in the second half of 2021, Aena Brasil plans to start a Project to implement a treatment plant to use regenerated water in Brazil.



Water management initiatives at Aena



Water consumption indicators

Due to the consequences generated by the COVID-19 health crisis, activity at airports has reduced substantially and consequently the water consumption has fallen compared to levels of previous years. The most significant indicators in this regard are set out below.

Water extraction/consumption ¹

The following table breaks down the group's total water extraction/consumption by origin, as well as in regions with water stress:

Thousands of m ³	Aena			LLA			Aena Brasil
	2018	2019	2020	2018	2019	2020	2020
Desalination water/Sea water	219.9	185.1	188.6	n/a	n/a	n/a	n/a
Water from wells/Underground water	1,825.6	1,771.8	1,361.5	n/a	n/a	n/a	63.3
Drinking water from the network	3,496.4	3,463.6	2,181.9	126.8	133.3	52.7	70.6
Consumption of regenerated water purchased from third parties and from a regenerated water network/Municipal water supply or from other water companies	90.6	42.0	91.9	n/a	n/a	n/a	n/a
Total water consumption	5,632.5	5,462.5	3,824	126.8	133.3	52.7	133.83
Reused water/Rainwater collected directly and stored/Purified wastewater	344.7	325.1	282.1	n/a	n/a	n/a	n/a
Aena							
Water consumption in regions with water stress	3,879.6	3,712	2,522.3				
% Water consumption in regions with water stress over total	72%	68%	66%				

Note: The regions considered to have water stress have been obtained from the WRI Aqueduct, which are those that are 40% (extreme and high level) above the stress threshold, corresponding to the location of 33 airports of Aena's network.

In this regard, it should be noted that the percentage of water consumed by Aena's lessee companies* (Spanish network) corresponds to 16.1% of Aena's global consumption in 2020, 26.6% in 2019 and 25.6% in 2018.

* For 2020 data corresponds to 95.74% of the centres in Aena's network, estimated from 84.7% real consumption data and 15.3% estimated data from the leased areas. For 2019, data corresponds to 95.8% of the centres in Aena's network, estimated from 79.7% real consumption data and 20.3% estimated data from the leased areas. For 2018, data corresponds to 95.8% of the centres in Aena's network, estimated from 80.5% real consumption data and 19.5% estimated data

Total wastewater discharges (Thousands of m³)

	Final destination	2018	2019	2020
AENA	Surface waters (prior to WWTP step)	253.7	309.8	269.9
	Subsoil/wells	10.1	28	38
	Sanitation network-Municipal WWTP	2,809.5	2,854.7	1,919.7
Brazil	Sanitation network-Municipal WWTP			118.5

2.5. Protecting biodiversity

The continuous and rapid loss of biodiversity poses potentially significant global risks, intimately related to the climate crisis

The Company's Strategic Sustainability Plan, which is scheduled to be launched in 2021, will include all environmental aspects, including those related to biodiversity and environmental conservation.

Given the large number of airports in the Aena network and their different locations, the diversity and ecosystem types, that can be found overall, vary greatly. For this reason, depending on the characteristics of the area in which it is located, each airport may have different habitats inside that have been preserved and maintained over time.

Protected spaces

As far as the presence of vegetation, fauna and natural spaces in airport environments that have some level of protection, various actions are carried out that make natural heritage conservation compatible with the airport's operations, preventing any effect on these natural environments as a consequence of the airport activity.

As regards decision-making, Aena prioritises the preservation of natural resources and the defence of the environment.

To this end, through the corresponding **Environmental Impact Studies and Assessments**, the different viable alternatives are analysed, always choosing those that provide the greatest reliability and confidence, pursue the general interest, and adequately guarantee public information and participation channels. Thus, Aena coordinates and prepares the documentation needed to submit its airport infrastructure projects that require environmental assessments for approval. The procedures include environmental monitoring programmes for the work stages of these projects and during their operation.

The Company's website contains the resolutions obtained in connection with these studies^{22,23}.

Studies on the fauna of the environment and control services

Within the framework of operational safety, wildlife management is carried out at all Aena airports, in a manner that protects natural heritage and maintains the safety and quality standards inherent to aeronautical operations. As part of this, in Spain, periodical studies on fauna and habitat are carried out at each centre, the results of which are validated with the collaboration of local and regional bodies, as well as the Spanish Aviation Safety and Security Agency (AESA).

Specifically, the Company monitors and controls the presence of fauna in the airport premises, with various

measures to exclude such fauna from the operation areas that are adapted to the situation of each Centre. These include the use of mechanical means, such as bloodless trapping and the use of sounds and pyrotechnics. Biological means are also applied with the use of trained falconry birds, which fly over the airfields, to deter the entrance of the birds that surround the airports, and which are currently applied in 35 airports and 1 heliport in Spain.

For their part, London-Luton Airport works with local farmers for the treatment and management of the grasslands. Likewise, local forest guards carry out the control of the pigeon populations that surround the airport's environment.

The situation caused by the COVID-19 pandemic health crisis led to a large drop in operations at airports and a drastic reduction in human activity throughout the territory. This has required precise monitoring of the presence of fauna in airports, in order to anticipate possible increases in the risk derived from changes in the behaviour of the fauna. As a result, it has been confirmed that, in general no relevant variations in the presence of fauna have been detected in airports nor have any new areas of attraction been created nor has there been an increase in the risk derived from the species. On the other hand, the planned measures have been kept in place, enhancing preventive measures, such as flights with falconry birds or fence inspections, to avoid the presence of fauna.

²² The resolutions can be consulted at: <http://www.aena.es/en/corporate/environmental-impact-assessment-eia-projects.html>

²³ London-Luton Airport does not have protected areas around its facilities.

Likewise, in Aena we have **innovation** as a tool for the control and protection of fauna, highlighting 2 projects:

Halcodrón: The project will confirm the functionality of unmanned aircraft or RPAS (Remotely Piloted Aircraft) to control wildlife in essential areas at heliports and airports. The objective is to study, in situ, the true effectiveness of the drones camouflaged as birds of prey in order to scare away surrounding birds and, thus, minimise the risk of impacts with aircraft. It is an addition to the wildlife control service, which is usually carried out with birds of prey. The flights are carried out in compliance with all security requirements and with the approval of the Spanish Air Staff. A pilot test is currently taking place at Ceuta heliport with a goshawk-shaped RPA. By means of marking and harassment flights, different variables are being measured and a series of standardized data is being taken in order to test their degree of effectiveness with the yellow-legged gull (*Larus Michaelis*); the species that poses the greatest risk at the aforementioned heliport. In addition to its possible effectiveness in relation to the scaring away of fauna, it could also have other functionalities, such as identification and monitoring of bird flows between the different sources of attraction, monitoring of migratory steps, location of land animal entry points to airport facilities, or monitoring the state of vegetation and fauna attracted by it.

Radar Aviar: this project, which is scheduled to be launched in 2021, consists of a system based on radar technology for the detection of fauna, compatible with the equipment and systems of the airport. The use of this technology in an airport environment is part of the improvement of operational safety, as well as the improvement of information on

the ethology of fauna, as it is a tool that will help identify and characterise patterns of bird movements, as well as the identification of foci of attractions. In this regard, it is expected that the information provided will allow for the establishment of new risk mitigating measures, to evaluate the efficacy of the measures already implemented and to provide additional information on events with fauna at the airport.



No. of collisions with birds inside and outside airports per 10,000 aircraft movements

	2020
Aena	6
LLA	0.46
Aena Brasil	0.58

In 2020, a modification has been made to the indexes related to the dangers of fauna. Therefore, as of now, the index of impacts with birds inside and outside the enclosures and the index of significant impacts will be provided per 10,000 operations. Thus, in 2020, the index of impacts with birds inside and outside the enclosures was 6.00 per 10,000 operations, and the one for significant impacts was 0.15 per 10,000 operations. This shows that of all impacts, only 2.4% were significant, i.e., they entailed some operational impact or damage to the aircraft of a relevant nature. In the case of Aena Brasil, the index of significant impacts in 2020 was 0.24.

Control of vegetation in the environment of the airports

Aena monitors the impact of the environment's habitats on the airport's operational areas, encouraging coordination with the entities responsible for their management and also monitors the vegetation that exists in the surroundings of the airport enclosures

through the implementation of specific measures, ensuring Operational Safety while promoting care and respect for the environment. In addition, within the framework of collaborations with third parties, the Company establishes agreements with farmers, companies and cooperatives that promote the agricultural exploitation of the land and ensure the maintenance of the vegetation.

In Brazil, the Identification of Fauna Hazards (IPF [Identificación de Peligros de Fauna]), as well as the Fauna Risk Management Programme (PGRF [Programa de Gestión de Riesgos de Fauna]), together with its corresponding Aerodrome Fauna Management Plan (PMFA [Plan de Gestión de Fauna de Aeródromo]), are the main tools for managing fauna risks.



2.6. Waste management and circular economy in airport facilities

COVID-19 has also affected the generation of waste at our airports. Although the drop in passenger volume has also led to a reduction in the volume of rubbish generated, the pandemic has generally led to an increase in the use of other types of materials, such as single-use personal protection materials and plastics (masks, gloves, etc.).

The waste generated in the airport facilities is largely similar to urban waste, but it also generates hazardous waste, including used mineral oils, batteries and cells, fluorescents, absorbent materials contaminated by the collection of hydrocarbons and contaminated empty containers. Aena works to ensure the correct management of all of them.

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
- Clients
- Airport workers
- Crews
- Airlines
- Users

EXAMPLES OF WASTE

- Plastic containers
- Glass containers
- Packaging
- Light bulbs and fluorescents
- Cleaning products
- Used mineral oils
- Electrical and electronic devices
- Tyres no longer in use
- Metals
- Dust and various leftovers

TREATMENT

- Recycling
- Reuse
- Municipal solid waste - Remaining fraction

PARTY IN CHARGE

- Aena
- Concessionaire

RELATIONSHIP

- Indirect
- Direct

The Company's own 2018-2021 Strategic Plan, the goals of which already include the promotion of a circular economy, with the aim of promoting waste reduction and maximising available resources, establishes the following priorities:

- Reduce the amount of waste generated from Company activities.
- Reduce the generation of common waste (remaining portion) in airport facilities, especially waste related to commercial activity.
- Control and carry out follow-up work on all types of waste generated in all airport activities (control of contractors and tenants) to ensure proper segregation, collection and external management of waste.

Likewise, the Company's Strategic Sustainability Plan, which is scheduled to be launched in 2021, will include all environmental aspects, including those related to the waste generated at our airports, as well as the corresponding waste reduction objectives.

For its part, London-Luton Airport's Responsible Business Strategy includes among its priorities regarding waste management and circular economy an increase in the percentage of recycled waste and preventing it from being sent to landfills. The following objectives are specifically set out:

- By the end of 2022, recycle at least 70% of the non-hazardous waste (excluding aircraft waste).
- Reduce waste (excluding aircraft waste) to 0.12 kg/passenger by the end of 2023.
- Send less than 5% of non-hazardous waste from construction and demolition to landfills, marked for 2021.

Initiatives for the reduction, reuse, recycling of waste and the correct treatment of hazardous waste

Proper management of waste generated at the network's airports is essential to preserve natural resources. Aena promotes initiatives and collaboration with stakeholders for the transition to a circular economy, generally developing initiatives at its airports. In addition, taking into account their specific characteristics, some centres put more specific actions in place.

In relation to the possible environmental impacts of the pandemic, the Company has installed specific signage in its terminal buildings and technical blocks, with the aim of raising awareness about the importance of properly discarding the used gloves and masks in the appropriate containers and promoting better segregation of this waste.

Waste treatment and recycling

Many airports have a non-hazardous waste transfer plant for concentrating waste and improving the conditions of its temporary deposit, especially the non-segregated portion of waste similar to household waste. There are also points for the temporary deposit of hazardous waste, all of which are equipped with pollution prevention measures according to the type of waste deposited. In these areas, waste is selectively deposited in containers until removed by authorised managers.

The environmental departments of the airports carry out extensive control of all waste generated from its origin and storage until its removal and transfer to an authorised manager for external treatment. Verification of the correct management of the waste generated by Aena is carried out through periodic monitoring of our activities by the Operational Control department. In the case of waste generated by contracting and tenant companies, verification is carried out through periodic monitoring of the Environmental Monitoring Plan of these companies.

For its part, London-Luton Airport works closely with tenants to separate waste. As part of the corresponding waste contract, an additional task has been introduced, in order to facilitate an additional waste classification step in specific areas. Likewise, to ensure the proper treatment of hazardous waste, the training of workers on this matter is guaranteed and contractors are monitored.

Reuse of waste

At Aena, certain waste is reused, giving it a second life, such as reusing sewage sludge as fertilizer in landscaped areas or for generation of compost, as used, for example, at Bilbao Airport.

Whenever possible, excavation material is reused at London-Luton Airport, as part of the works contracts.

Removing single-use plastics

Finally, it should be noted that the new food and beverage contracts have progressively included a specific clause that seeks to reduce the volume of plastic waste generated, avoiding the use of single-use plastics and promoting the use of products produced with biodegradable or recyclable materials.

Initiatives with third parties in terms of waste reduction, reuse and recycling

Waste management requires collaboration with authorised entities that develop specific management systems according to the type of waste. These entities are responsible for the collection and subsequent treatment of each fraction.

Therefore, Aena has established collaboration agreements in Spain with Ecoembes, Ecovidrio and ERP to ensure that the waste is properly managed. Another of the entities with which it collaborates is the Trinijove Foundation, which carries out the collection and segregation of waste that can be reused at the Barcelona-El Prat Josep Tarradellas Airport.

London-Luton Airport has created the Foxtrot Project, an initiative through which the non-perishable goods that are confiscated in the security area are donated to the local food bank instead of being removed as waste.

In relation to waste management at airports in Brazil, this is done based on the provisions of the National Solid Waste Policy (PNRS [Política Nacional de Resíduos Sólidos]) of Brazil. This Federal Law sets a series of environmental management guidelines and objectives that must be met throughout the national territory and establishes the importance of carrying out selective collections at six airports. Thus, Aena Brasil has established the following order of priority in their waste management: no generation, reduction, reuse, recycling, treatment of solid waste and final disposal, which must be environmentally appropriate.

Main indicators	2018		2019		2020		
	Aena	LLA	Aena	LLA	Aena	LLA	Aena Brasil
Generated (t)							
Hazardous (t)	655	20	938	21	435	12	42
Non-hazardous (t)	63,849	2,233	78,979	2,471	86,618	860	489
Recycled hazardous waste (t)	346	13	443	17	156	10	-
Non-Hazardous recycled waste (t)	41,739	1,432	58,409	1,476	50,335	415	-
% hazardous recycled	53	65	47	79	36	89	-
% non-hazardous recycled	65	64	74	60	58	45	-

Note: the data have changed with respect to the latest published data due to an improvement in the collection of data.

3

Commitment to society and human rights

During 2020, Aena's airports have continued to guarantee at all times both the necessary commercial aviation services, as well as air cargo and other essential services

Social contribution in the context of the health emergency

Aena with research

€2 million donated to the Higher Council for Scientific Research (CSIC) for projects to combat COVID-19

Waiver of airport fees and leases to commercial operators

181 chartered flights

€566,823 waived in airport fees, approximately

Supporting healthcare professionals

Airport fees waived in support of Grupo Iberia and Vueling's initiative: gifting 50,000 pairs of tickets to healthcare personnel

"Pay slip solidarity" initiative

€109,900 collected

+2,250 volunteer employees (30% of the workforce)

Payment deferrals

- Aircraft parking
- To suppliers and customers: logistics and handling companies or shops

Aena with music and culture

Support to the cultural sector, especially affected by the pandemic

London-Luton Airport

Donation of €20,000 to the Macmillan Foundations/Associations in 2020 and in the last three years:

£180,000

1,300 HOURS OF VOLUNTEER WORK

Donation to the Spanish Federation of Food Banks

Contribution of more than **€11,300**

that the Company will complete at the beginning of 2021, up to a total global contribution of €50,000

Aena with autism

Adjustment of the collaboration with the Spanish Autism Confederation in the face of COVID-19

€3,529,913.97

CONTRIBUTED TO NON-PROFIT FOUNDATIONS AND ENTITIES IN 2020

Areas of the Corporate Responsibility Strategic Plan that support social action

- Synergies
- Social innovation
- Transparency
- Training and employment
- Healthy lifestyle
- Support for social causes
- Research and innovation
- Emergency flights
- Commitment to the environment
- Corporate responsibility best practices
- Inclusion
- Labour integration
- Equality and accessibility
- Zero tolerance to violence

Aena's commitment to Human Rights

1. Commitments

Established in the 2020 Human Rights Policy and endorsed by other internal regulations

2. Due diligence

Corporate Regulatory Compliance Policy, Regulatory Compliance System, and the Risk Control and Management System

3. Complaint mechanisms

Internal and external complaints channel

4. Training and communication

Internal and external channels

Aena's commitments and contribution to the 2030 Agenda

- Guarantee health protection and safety
- Innovative infrastructures to guarantee essential supplies
- Alliances for the achievement of objectives and sustainable reconstruction
- Sustainable economic growth
- Combating climate change, environmental protection and efficient use of resources
- Diversity and social inclusion



Commitment to SDGs

2

SDG 2 Zero hunger

3

SDG 3 Health and well-being

7

SDG 7 Affordable and non-polluting energy

8

SDG 8 Decent work and economic growth

9

SDG 9 Industry, innovation and infrastructure

13

SDG 13 Climate action

16

SDG 16 Peace, justice and strong institutions

17

SDG 17 Partnerships for the goals

Total economic value

€2,242.8 million - €2,681.9 million

generated value

distributed value

Generation of resources in the community

€222 million

taxes and levies

€2,085 million

procurement and contracts

3.1. Commitments to sustainable development and society

The Company's firm commitment to sustainable development and progress, and its conviction that the consequences of a situation —such as that caused by the pandemic— can only be overcome by creating shared value, have guided Aena to take action throughout 2020. The Company has worked hard to continue to offer its services with the highest levels of quality, and to provide value to society as a whole.

The Company's commitment to the environment, society and corporate governance is specifically outlined in the **Corporate Social Responsibility Policy**, approved by the Board of Directors, the main objective of which is *"to establish, on a global basis, the basic and general operating principles of AENA, and to serve as the basis for their inclusion in the Company's business model and strategy, considering the corporate interest, its social return, and with a long-term vision that ensures a better future without compromising the Company's present results"*.

Principles that uphold Aena's Corporate Responsibility

Management practices based on innovation, diversity and equal opportunities, productivity, profitability and sustainable development	Economic sustainability and guaranteeing the production of economic value for all	Effective relationship channels with all stakeholders	Quality, accessibility and security of services, especially for people with special needs	Reliable, accurate and relevant information, and transparency thereof	Principles of transparency, integrity and business ethics
Management of the responsible value chain, ensuring social and environmental practices on the part of suppliers and contractors	Strong commitment to preventive action for the conservation and improvement of the natural environment	Human rights, right to organise, freedom of association and collective bargaining, absence of child labour, elimination of forced labour	Safe and healthy work environment, equal opportunities and non-discrimination, promotion of diversity, talent management and conciliation	Encouragement of sustainable development, promoting engagement in local communities	Education, cultural wealth, health, research and inclusion of the most disadvantaged groups



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

Being a responsible business makes us a better business

Supported by the organization's management, a sustainability team is being put into place to implement the new RBS, with is focused on six key areas:

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

Based on this policy and the Strategic Plan, since 2018, the Company operates in the areas for intervention, projects and initiatives as regards corporate responsibility, in line with other companies in the field and with the regulations and requirements in this area. In 2020, the Company laid the foundations for establishing its Sustainability Strategy for the future, throughout the entire Company. The aim of said strategy is to improve and structure activities in the field of sustainability, customer experience and innovation —including digital transformation— following the lead of the best practices of the sector and society in general.

The highest body that has the competencies attributed in these matters is the Board of Directors that, together with the management team, promotes Aena's commitment to sustainable development ensuring that the rest of the organisation is aligned with the objectives pursued. The responsibilities of Appointments, Remuneration and Corporate Governance Committee include knowing, promoting, guiding and overseeing the objectives, action plans and practices of the Company, as well as supporting and ensuring that Aena contributes to the achievement of the Sustainable Development Goals (SDG) (see Chapter 1 "Aena's Model of Sustainable Governance").

Together with said Committee, the Corporate General Secretariat and the Innovation, Sustainability and Customer Experience Department play a key role in the design, preparation and implementation of specific actions, as well as the engagement of all business areas and employees whose daily, exemplary work makes Aena a responsible company.

For its part, the London-Luton Airport has a Responsible Business Strategy, articulated around six key areas, whose progress is evaluated every four months by the Responsible Business Management Committee, presided over by the CEO.

The Company regularly monitors the progress and status of the proposed sustainability objectives.

Although the number of flights has dropped in 2020, airports have worked tirelessly to ensure operations, paying special attention to the transport of medical supplies and protective equipment in the fight against COVID-19.



3.2. Investment in the community. Contributions to foundations and non-profit entities

The Company promotes activity in the field of social action in collaboration with various public and private institutions, with the aim of proposing social action in keeping with the business strategy. Said action should contribute to the consolidation of the Company and respond to the needs of all stakeholders (lessees, business partners, local community, passengers, employees, etc). To this end, a series of bidirectional communication mechanisms and tools are established to provide sufficient information to adapt social action to the current needs in each moment (see the “Document approach” Chapter, section “Relationship with stakeholders” of this report).

With the emergence of COVID-19 and the impact it has had on society as a whole, Aena has adapted its social initiatives to today’s current needs, by prioritising action and readjusting action proposed to date, in order to help cope with the effects of the health crisis.

- On the one hand, and despite the fact that the new reality imposed by the health emergency has prevented the implementation of activities of a face-to-face nature, priority has been given to the implementation of proposals for the promotion of the health and safety of all citizens, placing a special focus on the employees, to drive R&D, the protection of local companies or maintaining support for entities and bodies that protect childhood and the most disadvantaged groups or the integration of disadvantaged people.
- On the other hand, the collaboration framework with other entities has been maintained, with the aim of sharing experiences and knowledge on sustainability and good practices. Aena is a signatory of The UN Global Compact and takes part in expert organisations in the field of sustainability, such as: Forética, the Excellence in Sustainability Club, the Comunidad Por el Clima initiative, the Initiative of Enterprises for a society free of gender violence or the Seres Foundation, and Aena has joined the Declaration for a sustainable recovery (Manifiesto por una recuperación sostenible).

The London-Luton Airport, through a specific line in the Responsible Business Strategy, works on engagement within the community in the following ways: donations to local organisations to implement local projects and those that impact the local environment; volunteering for employees; tools and training in schools; promote community

well-being or the reduction of noise pollution. These actions have been reinforced with the implementation of a specific training programme.

Aena’s total contributions to non-profit foundations and entities in 2020 amounted to €3,327,473.56 in Spain and to €202,440.41 at London-Luton Airport¹ (which includes both membership in the aforementioned organisations and also different initiatives for social action).

This amount also includes donations made to organisations with which Aena is affiliated to or with which it holds an agreement, as well as a range of specific initiatives in the fight against the COVID-19 pandemic.



Humanitarian lights

The airport bases are available every day of the year for emergency situations and for the transfer of organs and medical equipment. As a result, in 2020, almost 12,300 ambulance flights were carried out*

(*) Provisional data. Type of “Ambulance” service: commercial flights for the transport of wounded or sick people, organs or similar.

Added to this amount are other types of non-monetary contributions such as the use of spaces, awareness-raising campaigns, etc.

On the corporate website you can consult, in detail, all agreements concluded between Aena and a range of entities: <http://www.aena.es/en/corporate/agreements.html>.

In 2020, the amount of Aena’s contributions to non-profit foundations and entities amounted to €3,327,473.56 in Spain, and to €202,440.41 at London-Luton Airport

¹ Exchange rates as of 31/12/2020 used for Balance Sheet accounts:
EUR vs GBP= 0.89903
EUR vs BRL= 6.3735

Social contribution in the context of the health emergency

AENA WITH RESEARCH

€2,000,000

DONATED TO THE HIGHER COUNCIL FOR SCIENTIFIC RESEARCH (CSIC)

To support research projects, already underway, in the fight against the COVID-19 pandemic and, in the same way, contributing to consolidating the field of research and R&D&I in Spain.

"PAY SLIP SOLIDARITY" INITIATIVE

More than 8,000 employees were invited to join the "Aena with research" project, by donating part of their wages for the month of April. As a result of the donations made by more than 2,250 employees (almost 30% of the workforce), €109,900 was raised. To this figure Aena added the sum of 2 million euros in support of the projects and lines of work led by the CSIC in this area.

30% HOLDER OF THE WORKFORCE



WAIVER OF AIRPORT FEES AND LEASES TO COMMERCIAL OPERATORS

Waiver of the payment of air traffic and landing fees in Spain for aircraft transporting medical supplies during the state of emergency. In total, taxes on 181 chartered flights have been waived at various airports in the network, estimated at €566,823 in airport fees. In addition, the leases to commercial operators during the state of emergency have been waived.

SUPPORT FOR HEALTHCARE PERSONNEL

Grupo Iberia, Vueling and Aena joined forces to pay a well-deserved tribute to hospital workers, health centres and nursing homes during the COVID-19 crisis, including doctors, nurses, care assistants, janitors, cleaning staff and health transportation, among others. Grupo Iberia and Vueling have given away a total of 50,000 double tickets (25,000 each), and Aena is covering the airport fees.

PAYMENT DEFERRALS

Deferral of aircraft parking fees, as well as supplier and customer fees in Spain (logistic companies, handling agents, shops, restaurants, etc).

DONATION TO FOOD BANKS

In order to help with the supply of food needed to satisfy the increase in demand from families and disadvantaged groups, due to the social and financial crisis caused by the pandemic, Aena employees have donated more than €11,300 which the Company will complete at the start of 2021 to make a total global donation of €50,000 to the Spanish Federation of Food Banks.

Additionally, London-Luton Airport has donated more than 10,000 items to the Food Bank.

AENA WITH MUSIC AND CULTURE

Support to the cultural sector, especially affected by the pandemic: Aena has various Collaboration Agreements with musical institutions, and runs support programmes for musicians and young talent.



AENA WITH AUTISM

Adaptation of the collaboration framework with the Spanish Autism Confederation to the circumstances caused by COVID-19, to maintain the Company's commitment to accessibility for people with disabilities.

HEROES LLA

During the first wave of the pandemic, more than 65 London-Luton Airport employees volunteered to collaborate with more than 18 local and national charities by making donations, volunteering in specialist educational programmes, by helping to distribute supplies, etc.



RECOGNITION

London-Luton Airport has been shortlisted for the "Best Staff Fundraising Scheme" as part of the Better Society awards.

LLA COMMUNITY TRUST FUND

London-Luton Airport contributed €150,000 to the Bedfordshire & Luton Community Fund, in addition to more than €11,000 for noise fines.

In particular, to aid the recovery of Bedfordshire, the airport has donated €50,000 in support of a range of social causes, including:

MENTAL HEALTH: young people; social exclusion.

POVERTY: employment and training (with a focus on young people), destitution, advice, information, guidance.

EQUALITY: Educational disadvantages (youth), Health.

CORPORATE SOLIDARITY

€20,000 donation to the Macmillan foundations/associations in 2020 and in the last three years:

€180,000

1,300

HOURS OF VOLUNTEER WORK

- More than 100 hospital care packages to enhance care for cancer patients, especially during the Christmas period.
- Macmillan emergency grants programme in Bedfordshire for people with cancer.

TRAINING PROGRAMME - GET INTO AIRPORTS

Although the programme did not go ahead in 2020 due to COVID-19, the twentieth edition of this programme took place in 2019 in collaboration with "The Prince's Trust" and "The Launch Group" at London-Luton Airport. 12 young people between the ages of 18 and 30 years participated in the programme in spring 2019 and 15 in the autumn. Since 2011, 178 young people have taken part in the programme.

81% HAVE FOUND FULL-TIME WORK

SCHOOL PROGRAMME

In 2019, London-Luton Airport collaborated with 10 educational centres in the most disadvantaged districts of Luton and Beds, with a particular focus on developing skills for the world of work (communication, problem solving). In total, 164 students participated, of which 93% considered the training to be useful.



Commitments to the 2030 Agenda

Aena takes on the Goals set forth by the United Nations 2030 Agenda as its own, and undertakes to actively contribute to reaching them.

The **Ten Principles of the Global Compact** and the **Sustainable Development Goals (SDGs)** can be found both in the fabric of the Company's lines of action, and in the deployment of its entire operations. Aware of the key role played by companies in achieving this, Aena has aligned its business strategy with the SDGs, establishing a sustainability roadmap so it can evaluate its performance, and highlight the value created across all areas for its stakeholders.

The profound health, economic and social crisis that the pandemic has caused has only reinforced the role that 2030 Agenda is playing in addressing current problems, preventing future problems and successfully facing challenges.

The SDGs have become a fundamental part of the solution. The 2030 Agenda is the new roadmap for economic and social reconstruction.

The Aena Board of Directors takes on the commitment of the Organisation to the SDGs.

In the face of this new context, beyond working on identifying objectives and goals, the Company focused its activity during the fiscal year 2020 on specific actions aimed at mitigating the impact of the crisis, by making a particularly significant contribution to the objectives that have been most directly affected: SDG 3 (Good Health and Wellbeing); SDG 8 (Decent Work and Economic Growth); SDG 9 (Industries, Innovation and Infrastructure); SDG 12 (Responsible Consumption and Production); SDG 13 (Climate Action); and SDG 17 (Partnerships for the Goals).



SDGs	CONTRIBUTION	NOTEWORTHY INITIATIVES	FIELD OF INVOLVEMENT	REPORT SECTION
	<p>Guaranteeing protection and health security</p> <p>Protecting the health and safety of employees, external personnel, and users, in general, as well as contributing to significant advances in the field of health to reduce the impact caused on society as a whole.</p>	<p>Remote work</p> <p>Adapting workplaces to ensure hygiene, ventilation and social distancing measures</p> <p>Providing each employee with personal protection kits</p> <p>Providing two phases of diagnostic testing</p> <p>Creation of the “Despegando Recursos” (Utilising Resources) portal for psychological support during the pandemic</p> <p>€175.80 million invested in safety measures</p> <p>Donating €2.11 million to the CSIC for research projects in the fight against COVID-19</p>	<p>Healthy lifestyle</p> <p>Sustainable innovation</p> <p>Support for social causes</p>	<p>Staff and social issues</p> <p>Safe, quality services</p> <p>Social management of our value chain</p> <p>Commitment to society and human rights</p>
  	<p>Economic and sustainable growth. Decent work and improvement of living standards</p> <p>Guaranteeing the best working conditions, taking into account workers’ special situations and promoting the reconciliation of work, private and family life.</p> <p>Equal opportunities and non-discrimination, promotion of diversity and talent management.</p>	<p>In 2020, 36.6% of the Company’s employees are women</p> <p>44.3% of executive, middle management and graduate positions are occupied by women</p> <p>Vocento Award for Equality</p> <p>Women Leaders in Transportation. Encouraging Equality</p> <p>Call for integration into the labour market or job creation actions to be undertaken by social entities, foundations or associations: €100,000/year</p> <p>LGBTI Diversity and Inclusion Business Network</p> <p>Agreements with universities</p> <p>Employer Branding Project</p> <p>Inclusion of social clauses in procurement specifications</p> <p>Training resources on aviation and aeronautics, created by London-Luton Airport and freely available for educational centres (students and professors)</p> <p>Lighting of Aena Airports in Brazil for Women’s Day, Mother’s Day and for cancer awareness</p>	<p>Commitment to human capital</p> <p>Social innovation</p> <p>Corporate Responsibility best practices</p> <p>Synergies and alliances</p> <p>Commitment to our contractors</p>	<p>Staff and social issues</p> <p>Social management of our value chain</p>
    	<p>Combating climate change, environmental protection and efficient use of resources</p> <p>Meeting the commitments in the field of decarbonisation and environmental protection, working together with stakeholders and implementing actions aimed at improving energy efficiency and the use of renewable energies.</p> <p>Reducing water footprint, advocating waste reduction and reuse</p>	<p>Incorporation into the bylaws of the commitment to decarbonisation: principles of action against climate change and governance in environmental matters</p> <p>TCFD recommendations</p> <p>Aena photovoltaic plan</p> <p>Purchase of 100% of renewable energy in 2020</p> <p>“Management A” rating by the Carbon Disclosure Project</p> <p>ACA Programme</p> <p>Strategic plan for water management. Calculation of water footprint</p> <p>Waste recovery and awareness campaigns</p> <p>Inclusion of environmental clauses in procurement specifications</p>	<p>Commitment to the environment</p> <p>Social innovation</p> <p>Corporate Responsibility best practices</p>	<p>Commitment to the environment</p> <p>Social management of our value chain</p> <p>Innovation</p>

SDGs	CONTRIBUTION	NOTEWORTHY INITIATIVES	FIELD OF INVOLVEMENT	REPORT SECTION
 	Innovative infrastructures to guarantee essential supplies Innovative, safe and quality services to ensure cohesion and connection throughout the territory and the transportation of essential supplies, ensuring the protection of all users and employees of airport facilities.	Reinforcement of cleaning and disinfection services	Emergency flights	Safe, quality services
		ISO 27001 certification		
		Use of electric vehicles on runways, and installing quick charging points	Social innovation	Social management of our value chain
		Total investment: €502.12 million		
		Almost 12,300 air ambulance flights	COVID-19 measures	Innovation
		€566,823 Waived in fees for aircraft transporting medical supplies		
		Over €10 million devoted to R&D&I		
		Launch of AenaMaps		
		Automated passenger access to security control at A Coruña Airport		
		Facial recognition pilot tests		
Implementation of the Spain Travel Health-SpTH platform at more than 40 airports throughout Spain				
Approval for a new check-in system to reduce passenger waiting times				
  	Alliances for the achievement of objectives and sustainable reconstruction Recognition of the importance of alliances, communication and transparency as tools for awareness and the achievement of goals, with the knowledge that solutions to these new global challenges can only be found with everyone's collaboration. Collaborate with these alliances to reduce poverty and hunger.	FESBAL Alliance: €50,000 donated	Support for social causes	Sustainable governance model
		Luton Food Bank: over 100,000 items donated		
		<i>Landing pages</i> and specific platforms to improve stakeholder relationships	Communication and transparency	Safe, quality services
		Updates to the Anti-Corruption and Fraud Policy		
		Approval of the Human Rights Policy	Corporate Responsibility best practices	
		Over 100 agreements with associations in 2020		
		Continuous coordination and contact with the Ministry of Health, law enforcement bodies and security forces, and other agencies to offer the best service	Synergies and alliances	
€3,327,473.56 in contributions to non-profit Foundations and entities and €210,855 in contributions by London-Luton Airport				
 	Diversity and social inclusion Diversity and universal accessibility, through the promotion and exchange of 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 (such as noise).	520,819 services to persons with reduced mobility at Spanish airports, 35,685 at London-Luton Airport and 5,105 at Aena's airports in Brazil in 2020	Equality and accessibility	Safe, quality services
		Adaptation of the "Aena with Autism" project		
		London Luton Airport partnerships with associations working with Alzheimer's disease, hearing disabilities, autism, diabetes, etc.	Inclusion	Social management of our value chain
		Cultural promotion initiatives: World Tourism Day 2020 ("Tourism and Rural Development" at Tenerife Norte-Ciudad de La Laguna Airport; "Digital Transformation and Tourism", organised jointly with the CIT [Tourism and Innovation Centre (Centro de Iniciativas y Turismo)] of Southern Tenerife and the CIT of El Hierro); art exhibitions at the La Gomera Airport; Sketches Day; exhibition of the "Miradas desde mi Lanzarote" (In the eyes of my Lanzarote) collection, etc.		
		Waiver of rent for commercial operators during the state of emergency and discounts to non-commercial operators	Corporate Responsibility best practices	Innovation
		Payment deferral for aircraft parking		
				Synergies
		Support for social causes		

Impact of the activity on society and the environment. Creating social value.

Aena is aware of the social and economic impact (qualitative and quantitative) that its activity generates in the countries in which it operates, and of its key role in terms of cohesion and territorial connection.

The impact of the Company's activity in the different areas extends to the entire community, contributing to the generation of employment, (local and otherwise), the hiring of specialised companies, the creation of spaces for different economic activities (which in turn generate employment), the tax² contribution or the implementation of social innovation initiatives. The Aena Group tax contributions for the fiscal year 2020 amounted to €222 million. The taxes paid amounted to €181.3 million, the most significant being Property Tax, which totalled €148.4 million. The 2020 tax contributions are divided between €11.4 million of taxes paid in the United Kingdom, (5.1% of the total), €206 million in Spain (92.8% of the total), and €4.7 in Brazil (2.1%).

Employment and local development

Worldwide, the pandemic has had direct effects on the tourism and aviation sector. The reduction in economic activity of the aviation sector has reached ³51.5%, which has directly and specifically affected the ⁴Company's activities and has reduced its revenue by 96.6%.

Until 2020, the air transport sector generated 87.7 million jobs worldwide. However, in 2020 after the pan-demic this figure dropped to 41.7 million (52.6%). Internally, the Company tried to keep all its staff members, with the workforce only decreasing by 1.2% when compared to 2019.⁵

As a result of all of this, it has produced lower figures than in 2019 in terms of social *cash flow* and total economic value generated and distributed:

Aena actively collaborates in the generation of business network and launches **Aena Ventures**[®], aimed at other companies participating for six months in an acceleration program implementing financed pilot projects.

GENERATION OF RESOURCES IN THE COMMUNITY (SOCIAL CASH FLOW)

€222 million €2,085 million

IN TAX AND CONTRIBUTION PAYMENTS (-272% COMPARED TO 2019) IN PROCUREMENT AND CONTRACTS* (+59% COMPARED TO 2019)

ALLOCATION OF 2019 PROFIT TO RESERVES

TOTAL ECONOMIC VALUE GENERATED AND DISTRIBUTED €2,242.8 million

OF ECONOMIC VALUE GENERATED (REVENUE) (-96.6% COMPARED TO 2019)

An example of the incorporation of sustainability criteria in the value chain is the hiring of local suppliers in those territories in which it operates, contributing to the creation of local employment.

% NATIONAL SUPPLIERS

99.74%	32%	100%	BY MEANS OF DIRECT, INDIRECT AND INDUCED INVESTMENT, THE COMPANY GENERATES ENORMOUS BENEFITS FOR SOCIETY
2019 99.70%	2019 30%	2019 100%	
SPAIN	UNITED KINGDOM	BRAZIL	

* Allocation of dossiers, minor contracts and procurement associated with leasing properties for commercial activity

	2020 (Millions of €)	Notes
A. Direct economic value generated (revenue)	2,242.8	Total revenue
B. Economic value distributed	-2,681.9	
Operating costs	-1,878.2	Total expenses, except staff costs
Wages and employee benefits	-456.9	Staff costs
Payments to capital providers	-121.4	Financial results and payment of dividends
Government payments (by country)	-222.0	Tax paid
Investments in the community	-3.5	Contributions to foundations and non-profit entities
C. Economic value retained	-349.1	C=A-B

² See section "Tax strategy" in Chapter 1. Business Model.

³ ATAG. Aviation Benefits Beyond Borders, ed. 2020, available at: <https://www.atag.org/our-publications/latest-publications.html>

⁴ section A Economic and Financial Information of the Consolidated Management Report details the effects that the health emergency has caused on passenger, cargo and aircraft traffic.

⁵ See "Chapter 5. Staff and social issues" for more information.

Impact on local populations and on the territory

Aena plays a key role in territorial cohesion and supporting its structural order, providing an essential service for the movement of people. In order to go further, the Company applies a responsible management strategy in which listening to stakeholder demands is essential, thus contributing to the implementation of effective actions that ensure cohesion and optimization of airport and environmental connectivity. Among others:

- **Promoting sustainable mobility.** By supporting more sustainable and intermodal transport alternatives for users, helping to reduce travel and waiting times, as well as saving energy and reducing emissions.

In collaboration with other organisations, Aena promotes the integration of infrastructures with other modes of transport, to improve access, urban planning, and combination with other infrastructures.

As a result, in recent years there has been an increase in the use of public transport to the detriment of access in private cars (from 30.5% in 2010 to 27.5% in 2019, a percentage that in 2020 possibly due to the health crisis and recommendations on mobility has been reversed, reaching 31%).

On its part, London-Luton Airport has put into place an Airport Surface Access Strategy for 2018-22 ([ASAS](#)), with the aim of improving and promoting the use of sustainable transport for passengers and personnel.

- **Studies and Mobility Plans** for the integration of access and transport infrastructures in cities and the airport itself. In this way, Barcelona-El Prat Josep Tarradellas Airport has put into place a plan designed to integrate access and transport infrastructure with the airport's own infrastructure (car parks, bus stop and taxi ranks, etc). The airport also has bicycle access through a bicycle lane that connects with El Prat de Llobregat, with the connection planned with other nearby towns such as Viladecans through new bike lanes and green roads (<https://www.amb.cat/s/es/web/mobilitat/mitjans-transport/bicicleta.html>)
- **Periodic air mobility surveys (known by their Spanish acronym EMMA** [Encuestas de Movilidad en Modo Aéreo]) are carried out at various airports in order to identify passenger profiles, their modes of access and origin.
- **Application of insularity criteria** in airport charges in the Canary Islands and the Balearic Islands.
- **By setting up new subsidised routes and developing hub airports**, the Company has been able to strengthen the airport sector as a tool for connectivity and connection between the world's main cities.

Aena includes a specific analysis on the impact that the infrastructures and the airport activity itself may have on an environmental and social level, in the design of management plans for the various airports and environmental evaluation studies. In this way, at all times, its priority is to respect and care for the environment.

With the aim of preventing impact during construction work for new or already developed projects, the Company evaluates all projects in advance and proposes specific measures to guarantee sustainable coexistence with society and the environment, including, where appropriate, proposals for urban regeneration. (By way of example, consult environmental resolutions of the Environmental Management Plans (<http://www.aena.es/en/corporate/strategic-environmental-assessment-sea-plans.html>)).

Likewise, the Company collaborates with entities to improve the airport environment, as happens at London-Luton Airport, where the airport helps local charities, non-profit organisations and community groups to lead [projects with direct benefits on a local level](#). In this way, it supports the well-being and sustainable development of the local environment.

Finally, it should be noted that Aena foresees in the future the development of a pilot project called SmartCities & SmartAirports, which will include the collaboration of various town councils and with which it aims to:

- Improve the traveller's experience by exchanging information between the airport and the city.
- Use synergies to achieve the goal of the smart airport and the smart city, through their information systems.
- The coordinated action of the airport with its surroundings —city or adjoining cities— improving sustainable development actions.

Operations with significant negative impacts

Aircraft noise is one of the most significant impacts of airport activity and affects all areas around airports, in all the countries in which Aena operates. To reduce this impact, Aena has put into place various Sound Insulation Plans (SIP) in homes and spaces adjacent to the airport environment (see Chapter 2). The chapter on risk management of this report details the possible potential negative impacts associated with airport management, as well as those related to the COVID-19 pandemic. In the context of the pandemic, it has been necessary to adapt work spaces, increase hygiene of facilities, and introduce additional control checks, aimed at maintaining social distancing, and complying with the restrictions established by the competent authorities of each country, among others.

International Cooperation Programme

Among Aena's main initiatives of significance on a global social and economic level, its International Cooperation Programme is worthy of note. Said programme aims to contribute to the improvement of training of professionals in the aeronautical sector of other countries, particularly in Ibero-America, contributing, in this way, to promoting the development of air transport in these countries and regions. All the activities carried out in the framework of this programme are conducted in collaboration with national and international organisations, and institutions of renowned prestige, such as: the Spanish Agency for International Development Cooperation (AECID [Agencia Española de Cooperación Internacional para el Desarrollo]), a body affiliated with

the Ministry of Foreign Affairs, European Union and Cooperation, the Technical Cooperation Bureau of the International Civil Aviation Organisation (ICAO), and the Technical School of Aeronautic and Space Engineering at the Technical University of Madrid (UPM [Universidad Politécnica de Madrid]). In this way, the programme also contributes to consolidating the reputation of Spanish industry and its hallmark of excellence, as well as showcasing Aena's best practices abroad.

Although the programme was affected by the COVID-19 pandemic in 2020, which prevented organising in-person activities from March 2020 onwards, Aena made an effort to adapt to the circumstances and ensure the continuity of the programme by offering virtual activities. In this way, several of the usual on-site activities for international cooperation, in collaboration with other institutions, were adapted to a digital format. As a result, in 2020, 188 professionals from the Ibero-American air transport sector participated in our international cooperation training programme, totalling €84,000.

As regards 2021, the Aena International Cooperation Department will continue to adapt its training programmes to "virtual" formats, and estimates that the number of beneficiaries and activities this year will be higher than in 2020. Aena expects to continue offering said virtual activities in the future, together with in-person activities (scholarships in Spain, seminars and technical workshops, etc.).

IMPACT OF THE INTERNATIONAL COOPERATION PROGRAMME IN THE LAST FIVE YEARS

938

AERONAUTICAL PROFESSIONALS



21

DIFFERENT COUNTRIES



€774,488

COST

3.3. Human Rights

The protection of Human Rights is a central pillar for Aena and its corporate culture, and is part of the minimum framework for action, in order to ensure the legitimacy of the Company's business activity.

In addition to the commitments assumed on an international and state level in the field of Human Rights, the Company has strengthened its efforts in the field in order to guarantee and safeguard its firm commitment to human, labour and environmental rights. In this way, in January 2020, **Aena's Corporate Policy on Human Rights** was approved, which is binding and applicable for the whole Group. Said policy endorses the Company's commitment to the multinational initiatives outlined in the following section, and establishes specific principles of action, in addition to laying the foundations for its development, supervision, control and review.

The Company is adopting a series of measures based on, for example, the Governance Model, the regulatory compliance system, due diligence and the risk management system; with which it is addressing exposure to possible human rights violations, and providing solutions that allow for the mitigation and/or correction of potential negative consequences on human rights. This Policy is applicable to all employees, companies with a majority shareholding and all territories where the Group operates.

Training and awareness

Aena's Corporate Policies define the Company's management decisions, and incorporate environmental, ethical, labour and Human Rights variables. All of these Policies are public and are available on the [Company's website](#) for all stakeholders.

As regards its Human Rights Policy, Aena is committed to promoting a culture of respect for Human Rights and raising awareness among its professionals in all the areas in which it operates and, especially, in those in which the risk of violating these rights may be higher.

In 2020, specific communication and internal awareness actions on the importance of the compliance system, and its representation in the protection and prevention of possible human rights violations, have likewise taken place (see Chapter 1). In particular, specific training on the Regulatory Compliance System has been given to employees in Spain and Luton, and is also being rolled out in Brazil.

With the health, economic and social crisis of 2020 particularly affecting the most vulnerable groups of society, it has further emphasised the importance of protecting Human Rights.



COMMITMENTS
TRANSFERRED
TO THE VALUE
CHAIN

Responsible for monitoring and verifying any unusual behaviour

Compliance Division

Supervision and Control Body

Commitments



Commitments

Of Aena with fundamental conventions regarding human rights

- Universal Declaration of Human Rights of the United Nations
- Declaration of the International Labour Organization (ILO)
- Children's Rights and Business Principles
- Adhesion to the Principles of the United Nations Global Compact
- United Nations Guiding Principles on Business and Human Rights
- OECD Principles of Corporate Governance
- National and international laws and regulations in force in the countries where it operates
- Law on Public Sector Contracts

Main impacts of Aena's activity on Human Rights and Labour Rights

- Occupational health and safety of people
- Equality and non-discrimination
- Decent work
- Child labour*
- Protection of the environment
- Commitment to customer/suppliers
- Freedom of association

Principles of the UN Global Compact

- 1 2
- 1 2 6
- 3 4 5 6
- 5
- 7 8 9
- 8 10
- 3

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

Main management instruments and control mechanisms



Aena's principles and commitment to Human Rights

Established in the Corporate Policy on Human Rights



- Eradicate child labour
- Avoid discriminatory practices
- Promote the development of people
- Facilitate freedom of association and collective bargaining
- Promote adequate working conditions and protect public health
- Promote a respectful and dignified work environment
- Commitment to customers
- Commitment to people linked to suppliers, contractors, and collaborating companies and business partners
- Respect for community rights
- Promotion and awareness of Human Rights

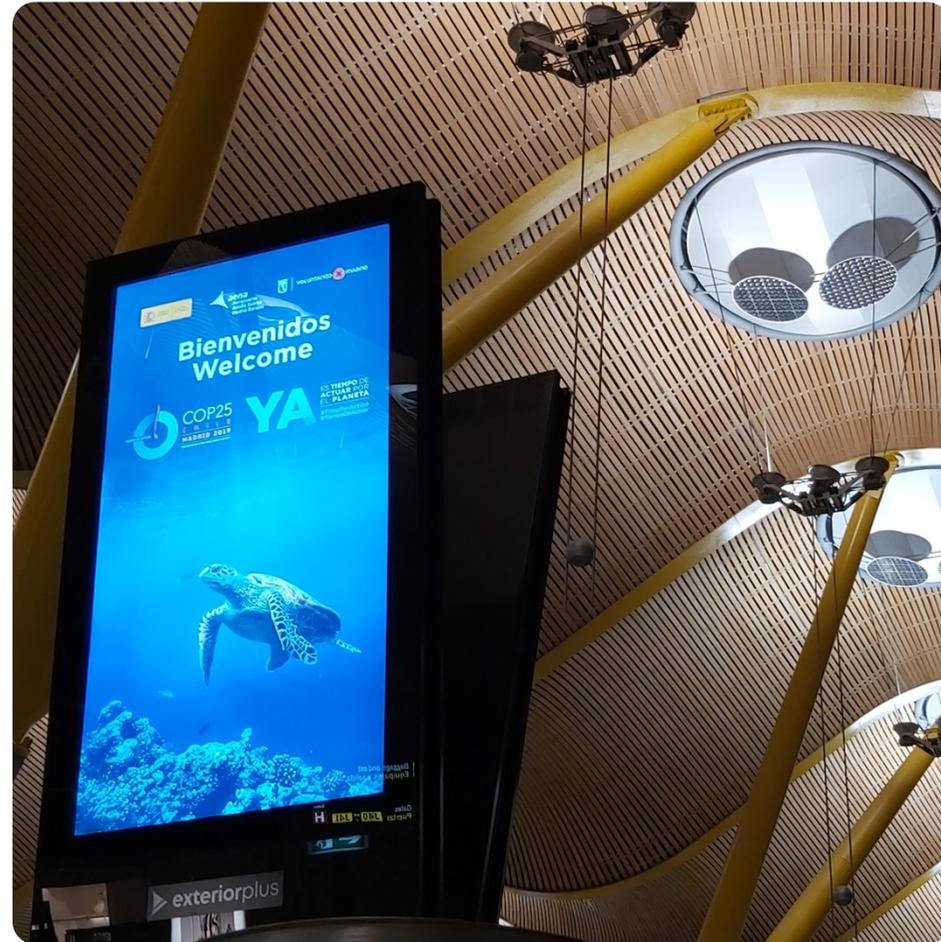
Aena's principles and commitment to Human Rights HH.

Aena's Corporate Responsibility Policy includes, among its principles of action, respect and promotion of human rights, freedom of association and collective bargaining, the absence of child labour, the elimination of forced or mandatory labour, and any other practice that involves a violation of individual or collective dignity. The updating, review and promotion of this Policy is the responsibility of the Board of Directors, through its corresponding Committees.

London-Luton Airport has a policy of rejecting any form of slavery or forced labour, an ethical Policy in Business and in July 2020 it also approved a code of conduct that includes, among its basic principles, respect for the human rights of all company employees. It is also working to renew its Ethical Business Policy, in line with expanding its operations.

Aena Brasil also has its own code of conduct, which includes the principle of action in accordance with respect of human rights.

It should also be noted that Aena's Corporate Policy on Human Rights, approved in January 2020, is applicable to those companies in which Aena has a majority stake.



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.

Due diligence and prevention of risks that violate Human Rights

To keep a control of the respect and protection of Human Rights, Aena follows a continuous process of due diligence in its own activities, in addition to others related to third parties. Said process is included in the Human Rights Policy, and focuses on identifying, preventing, mitigating and responding to potential negative consequences in this area (child labour, forced labour, discriminatory practices, etc.).

These commitments transcend the individuals who are part of Aena, as well as those who are part of its value chain (from suppliers to airport users), and all the communities located in the environment in which its operations are carried out, including indigenous populations.

For their protection, the Regulatory Compliance System establishes the principles, mechanisms, procedures and controls aimed at preventing, identifying and resolving situations in which unethical or unlawful practices or regulatory breaches occur in the development of the activity. The Regulatory Compliance System and the Risk Control and Management System allow for the continuous evaluation of the risk level, the identification of possible new impacts and social concerns as well as, in general, the safeguarding of compliance with applicable laws and regulations, both external and internal.

In the event of any violations of commitments that the Company adopts, and of those referred to in corporate

policies (for example, the commitment to eradicate child labour or forced or obligatory labour included in human rights or corporate responsibility policies), Aena implements a set of general and specific mechanisms aimed at their prevention, detection and reaction, as follows:

- Prevention control: responsibility of ensuring compliance by all members of the Organisation with the Company's internal policies and regulations, as well as identifying areas of improvement that allow for the implementation or correction of procedures as deemed appropriate.
- Action control: obligation to report any event that could constitute a possible criminal offense, legal breach or irregularity of which it becomes aware by means of the channels established for such purpose, including the Complaints Channel.
- Supervision control: with this task being carried out by the Compliance Supervision and Control Body and the Internal Audit Division.

The Risk Control System, the Collective Bargaining Agreement, the Internal Hiring Regulations and the Code of Conduct constitute the tools necessary to prevent, control and follow-up on actions that may be related to a violation of Human Rights (see Chapter 2).

London-Luton Airport and Aena Brasil include the principles of protection of human rights in their respective Codes of Conduct, guaranteeing that all corporate policies that are developed take into account their compliance and protection.

Complaints due to a violation of Human Rights

The Aena Complaints Channel (its operation is described in Chapter 1) allows for Group employees to make inquiries or report possible risks or breaches in various fields, among which are those relating to the violation of Human Rights, including the rights acquired in the Collective Agreement. Complaints related to workplace harassment are excluded, as they have their own protocol.

During 2020, no complaints referring to Human Rights violations were recorded.

Transfer of the protection of Human Rights to the value chain⁶

Aena's Code of Conduct establishes the ethical principles and values, integrity, legality and transparency that must guide the conduct of all people who are included within its scope of application. Not only between each other, but also in their relations with customers, shareholders, suppliers and, in general, with all people and entities, whether public or private, with which they may come into contact while carrying out their professional duties. At the same time, it also seeks to promote effective compliance with the standards that apply to all those activities, guided by the principle of zero tolerance for any kind of illegal behaviour.

In accordance with applicable legislation on contracting, all tenders include clauses on the respect for Human

⁶ Chapter 4, which concerns the responsible management of the value chain at Aena, includes a specific section on this (see section "Respect for human rights").

Rights, among others. The Internal Hiring Manual provides mechanisms for following up on the degree of compliance with clauses of this nature that are included in contracts and penalty measures (as detailed in section 6.4). In 2020, all the contracts signed by Aena with external suppliers included clauses on the respect for Human Rights.

London-Luton Airport follows a zero tolerance policy on human trafficking and slavery, which it applies in all its contractual relationships. Since 2018, environmental and sustainability considerations have been included in acquisition processes. 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. Likewise, the sustainability and human rights criteria continue to be key when renewing contracts (ethical treatment, zero tolerance to slavery, equality and diversity, health and safety, climate change resilience, standards for waste and natural resource management, etc.).

As regards Aena airports in Brazil, as indicated in Chapter 4, the high number of services that are outsourced at the respective airports is supervised by means of controls and the request for documentation (working hour logs, etc), which helps to mitigate the risks of mandatory or forced labour. In addition, the risk of child labour cases is considered insignificant given the characteristics of the Aena Brasil supply chain.

Future challenges

At present, the Company does not conduct any evaluations on the impact of its activities in the field of Human Rights, although its Human Rights Policy specifies that its content is binding and applicable to the range of activities and geographical areas where it operates with a majority holding.

Aena is aware that its vocation for international expansion can periodically bring new challenges, and so the Human Rights Policy —approved in 2020— takes the following sources, among others, as reference: the principles contained in the United Nations Global Compact; the Guiding Principles on Businesses and Human Rights, implementing the United Nations “Protect, Respect and Remedy” framework; the OECD Guidelines for Multinational Enterprises; the Tripartite Declaration of Principles concerning Multinational Enterprises; the Social Policy of the International Labour Organisation; and the United Nations Sustainable Development Goals.

In the context of the health emergency that has unfolded in 2020, Aena works to ensure, at all times, that:

- Safety measures in place for the COVID-19 pandemic be accessible without discrimination based on race, colour, disability, age, gender, religion, political views or any other views, national or social origin, property, birth, sexual orientation, gender identity or any other status.

- Aena applies principles of prevention and guarantees a safe working environment for all its employees, limiting their exposure to risks by establishing hygiene and cleaning measures, reducing contact, and adapting working conditions.



Accessibility in the provision of services

Aena’s strategic objectives include meeting the expectations of users, among which the improvement of airport accessibility is worthy of note. In order to do so, the Aena Policies and action plans provide supervisory mechanisms that allow for the identification of possible risks and opportunities, many of which are related to social matters, thereby facilitating the development and proposal of initiatives to the Board of Directors.

In order to continue fulfilling the commitments with the same quality, in 2020 it was especially important to adapt the facilities for their safe use by people with reduced mobility so that an adequate response can be given to the implementation of the new safety measures associated with the health emergency and minimise the health risk. *(For more information, please see Chapters 5 and 6).*

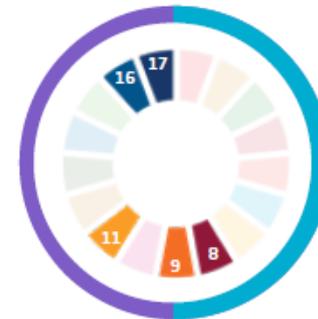
4 Social management of our value chain

The dialogue and cooperation that Aena maintained with its providers during the health emergency allowed us to offer safe and efficient services when they were most needed.

The value chain at Aena

- Necessary infrastructure
- Operations
- Customer services
- Marketing, communication and relationships with the environment
- Cross-sectional and support activities

↓
TRANSPARENCY AND DIALOGUE WITH SUPPLIERS
SUSTAINABLE VALUE CHAIN MANAGEMENT



Sustainable acquisition and purchasing process

Risk assessment

- Code of Conduct
- ESG criteria in bidding and execution processes
- Risk mitigation measures
- Code of Conduct
- Corporate Responsibility Policy
- Anti-corruption and Anti-fraud Policy
- Human Rights Policy
- Integrated Quality, Environmental and Energy Efficiency Management Policy
- Occupational Risk Prevention Policy

Internal and external framework

- Legislation of each country
- Internal codes and regulations
- Assessment and improvement tools
- Ethical culture



CONTINUOUS IMPROVEMENT: ACTIONS AND RESULTS

Commitment to SDGs

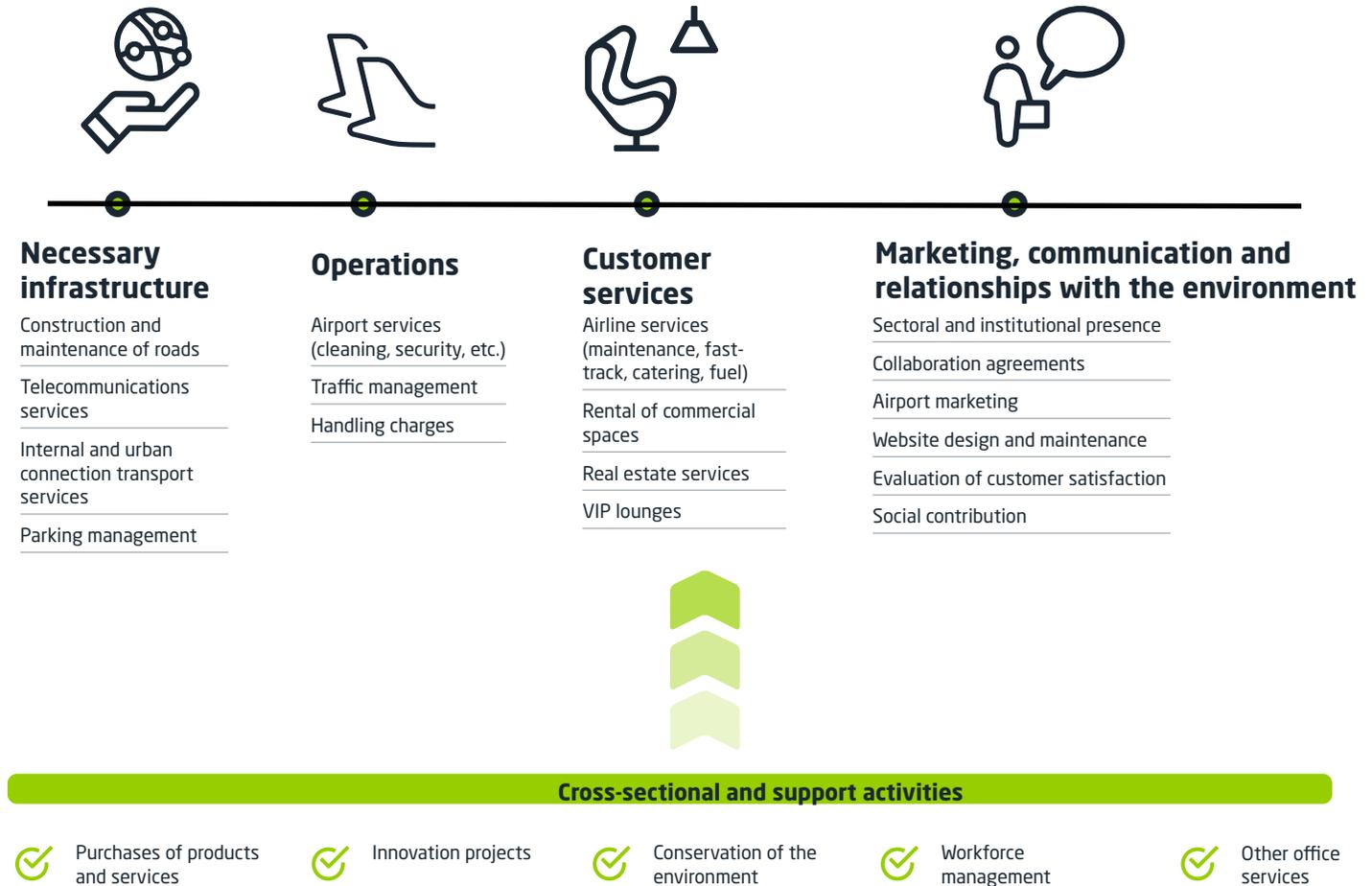
- 8** **SDG 8 Decent work and economic growth**
- 9** **SDG 9 Industry, innovation and infrastructure**
- 11** **SDG 11 Sustainable cities and communities**
- 16** **SDG 16 Peace, justice and strong institutions**
- 17** **SDG 17 Partnerships to achieve the goals**

Aena is subject to different regulations applicable in the countries where it operates, as well as its own internal regulatory framework. In Spain, The main rules governing procurement for Aena suppliers are: 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 taxes and tax litigation (hereinafter RDL 3/2020); and Act 9/2017, of 8 November, on Public Sector Contracts, whereby the Directives of the European Parliament and of the Council 2014/23/EU and 2014/24/EU of 26 February 2014, on procurement processes (hereinafter Act 9/2017), are transposed into the Spanish legal system,. In addition, both the Concession Company AIRM and ADI have approved their internal procurement guidelines.

At the same time, Aena’s “Commercial Procurement Regulation” regulates the tender procedures for commercial spaces in network airports, with full respect for the principles and values of transparency, competition, efficiency, legality, publicity, confidentiality and sustainability.

In accordance with both procurement regulations, the bidding specifications and other contractual documentation governing procurement include, for both the parent company and the Spanish subsidiaries, clauses on social and environmental matters that are compulsory after signing.

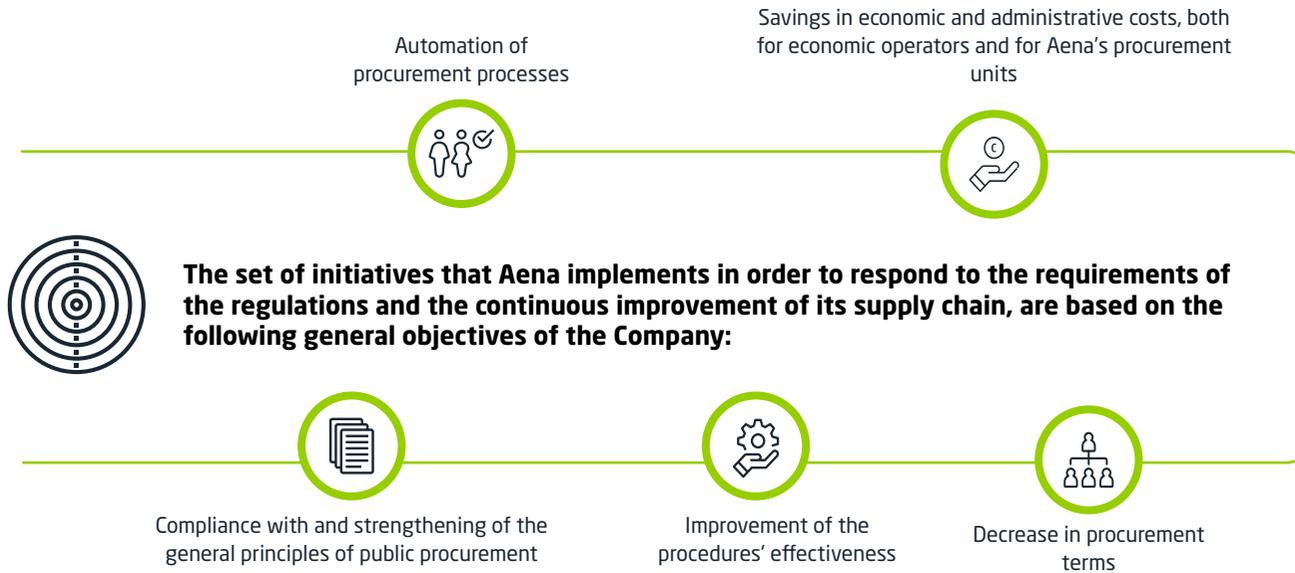
Aena’s value chain



In the United Kingdom, the Utilities Contracts Regulations of 2016, as well as the Contractors Code of Practice (CCoP), regulate public procurement. In the case of Brazil, the 2019 Procurement Regulation applies.

In all of its procurement processes, the Company demands, both of its suppliers and agents, **efficiency and respect for the principles of equality of treatment, non-discrimination, transparency, proportionality, competition, publicity, confidentiality and integrity**, all in accordance with applicable regulations, so that the contracts are awarded to the bidder who submits the best bid.

Sustainability is a differentiating factor in the management of the Company and is transversal to all processes, thus making its commitments and best practices applicable across its entire value chain. Efficiency, transparency, legality and respect for external and internal regulations, including clauses stipulating respect for environmental and social criteria, are the pillars on which Aena lays the foundations of its relations with third parties



RESPONSIBLE BUSINESS STRATEGIC PLAN

In addition, at London-Luton Airport, the Responsible Business Strategic Plan contains strategic objectives in terms of responsible contracting. Among other things, we can mention the preparation of a Code of Conduct for suppliers, improvement of communication and dialogue with suppliers through holding events and the improvement of Toolkit, promotion of hiring of local suppliers and progress in the analysis of risks associated with climate change and suppliers.

Special measures in connection with the health emergency and main results from 2020

In a scenario consumed by the global health emergency, Aena, due to its status as a state-owned and index-listed trading company that does not obtain revenue from the General State Budgets, has been forced to adopt a series of measures in the procurement area, which has posed a direct impact on its relationship with suppliers and lessees. The Company is well aware of the impact that the situation has generated in all areas of activity in 2020, and has prioritised close collaboration and cooperation with all stakeholders in the air transport value chain, aimed at minimising its effects and recognising the importance of establishing synergies. The goal is to improve management and efficiency in order to contribute to generating a scenario of a new normality that is more prosperous and fruitful.

In this sense, contracts in 2020 with both suppliers and lessees of commercial spaces were temporarily adapted to the de facto situation caused by COVID-19 and the regulatory framework that emerged to combat it. This includes the approval, among others, of Royal Decree 463/2020, of 14 March 2020, via which the state of emergency for the management of the health crisis situation caused by COVID-19 was declared; and Royal Decree 926/2020, of 25 October, via which the state of emergency to contain the spread of infections caused by SARS-CoV-2 was declared, as well as other

regulations related to the health crisis caused by the pandemic.

The actions and new developments implemented in 2020 include:

- Analysis and application 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 taxes and tax litigation.
- Preparation and dissemination of memos regarding Provisions related to the health crisis caused by the COVID-19 pandemic:
 - Internal memo (17 March 2020) related to procurement due to the entry into force of Royal Decree 463/2020 of 14 March 2020.
 - Internal memo regarding procurement (20 March 2020). Suspension of contracts and modifications with suppliers after the entry into force of Royal Decree 463/2020 (14 March) (declaration of COVID-19 state of emergency).
 - Internal memo regarding commercial procurement (25 March 2020). Criteria for processing modification and suspension requests for commercial contracts after the entry into force of Royal Decree 463/2020 (14 March) (declaration of COVID-19 state of emergency).
 - Internal memo regarding procurement (6 May 2020). Royal Decree Law 17/2020, of 5 May, approving measures to support the cultural and tax sector to address the financial and social impact of COVID-19.
- Internal memo regarding procurement (22 May 2020). Royal Decree 537/2020, of 22 May, which extends the State of Emergency declared by Royal Decree 463/2020, of 14 March, which declares the state of emergency to manage the health crisis situation caused by COVID-19.
- Internal memo regarding procurement (4 June 2020). Resumption of contracts with suppliers, detailing resumption procedures and agreement templates for supplier contracts that had been suspended within the exceptional and temporary framework of the de facto situation caused by COVID-19.
- Modification of the Commercial Procurement Regulation. Appendix of extraordinary and urgent procedures. Approved by the Board of Directors in a meeting held on 30 June 2020.
- The main actions taken in Aeroportos do Nordeste do Brasil were:
 - Implementing the procurement regulation.
 - Creating contract templates and specific bidding specifications.
 - Initiation of the Supplier due diligence process.
 - Implementation of procurement and contractual management processes.

Procurement volumes were significantly altered in 2020 as a result of the COVID-19 health emergency. Before this, the Company tried to maintain its commitment to its suppliers at all times, seeking balanced solutions. To this end, Aena has studied the effects of the crisis on different contracts, and has proceeded to negotiate and agree on the temporary and necessary suspensions of performance of its contracts, taking into account the specific circumstances and risks of each contract and considering the different risk mitigation levers. In addition, as a reflection of the Company's commitment to

procuring local suppliers for the performance of its activities, the percentages reached in 2020 were 98.73% in Spain (98.31% in 2019)¹, 32% in Luton (30% in 2019), and 100% in Brazil (same as in 2019).

In this way, the Company can maximise its financial contribution to the communities where it operates, thus strengthening their business network and social development through the creation of indirect jobs.

	SPAIN (includes AENA SME, AIRM, ADI)		UNITED KINGDOM ****		BRAZIL ****	
	2019*	2020	2019	2020	2019	2020
Suppliers (No.)	3,764	2,734	3,543	3,679	N/A	341
Of which are new (No.)	1,261	1,108	N/A	106	N/A	-
Files managed (No.)	1,146	1,281**	95	73	N/A	318
Amount awarded to tenders (€M)	1,176.78	1,077.8	77.8	31.02	N/A	19.04
Corresponding to services and works (%)	68.1%	89.2%	52%	52%	N/A	-
Corresponding to materials and equipment (%)	31.9%	10.8%	48%	48%	N/A	-
Centralised volume of procurement (€M)	1,050.3	982.1	60.5	22.95	N/A	19.04
Decentralised volume of procurement (€M)	126.4	95.7	4.5	1.98	N/A	0.000021
Total volume of procurement allotted associated with leases for commercial activity (€M)	111.19	32.4***	-	0.91	N/A	-
Allotment of minor contracts (€M)	22.02	15.7	15.57	6.2	N/A	0.000021

* Excluding taxes

** 365 centralised and 916 decentralised tenders awarded

***85 tenders awarded.

**** Exchange rates as of 31/12/2020 used for Balance Sheet accounts:
EUR vs GBP= 0.89903
EUR vs BRL= 6.3735

¹ Percentage awarded.

4.1. Sustainable value chain management

Sustainable acquisition and purchasing process

Transparency, competition, efficiency, legality, advertising, confidentiality, sustainability and respect for external and internal regulations.



Transparency and dialogue

Aena continuously updates relevant information regarding its procurement procedures on the Company's website and adapts its procurement system to digitisation² requirements. It thus makes the bidding specifications available to the bidders, along with other documentation associated with the tendered files, with virtually all of the supplier procurement procedures carried out in electronic format.

Other tools, such as the user manual, the support centre or the mailbox for real-time inquiries, reinforce mechanisms in the digitisation process and aim to facilitate communication with suppliers and lessees, and avoid potential issues arising from lack of familiarity with electronic resources.

- In Spain, Aena has an information page, the [Procurement Portal](#), and two specific management landing pages, [Aena Suppliers](#) and [Aena Companies](#)³, which redirect users to the **Public Sector Procurement Platform**. In addition, interested parties have specific mailboxes available to them:
 - Bid participation process: the Company makes available portalcontratacion@aena.es.
 - Tenders: contact addresses of the units responsible for the files.

In accordance with the requirements of the National Scheme for Interoperability to which Aena must adapt, for the coming financial years, the Company plans to complete the implementation

of the system for tenders and electronic notifications, together with a new internal digital communications system.

- AIRM: has its own procurement portal (<http://www.aeropuerto-de-murcia.es/Contratacion/index>). For any queries related to customers and invoicing, suppliers can contact rmu fabricacion@aena.es.
- London-Luton Airport: has its own procurement portal, [In-tend](#), which links to the Official Journal of the European Union (OJEU) and [the United Kingdom contract portal/search tool](#)⁴. Likewise, it has an interactive tool making all the information and documentation related to the procurement process available to third parties (www.knowledgemaps.co.uk/Ila/Processes/2/11EBC208C5C48ECBC9E1B44A0A11C5E.htm). It also periodically organises events to respond to issues raised by local companies and SMEs on issues and doubts that may arise in this regard⁵.
- Due to having recently started its activity, Aena Brasil, as of the date of this report, does not have any platform specifically enabled for the publication of procurement files, although their development is planned for fiscal year 2021. To date, all communications with suppliers have been made by direct invitation.



Continuous value chain risk assessment

The evaluation of risks that could stem from the procurement process and are associated with the supply chain is carried out through the risk management and control model. This is transversal and implicit in all sub-processes, aimed at guaranteeing the achievement of the Company's objectives and at minimising its impact (see chapter "2020. An unprecedented challenge"). During 2020, the health and safety-related risks of all airport users have become more relevant. Thus, Aena has developed a series of mechanisms and measures aimed at minimising them (see Chapter "2020: an unprecedented challenge" and Chapter 6, "Safe, high-quality services").

² In Spain, they are derived from the stipulations in Act 9/2017, of 8 November, on Public Sector Contracts.

³ 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 (<https://contrataciondelestado.es>) publishes all information related to the procurement of suppliers, the minor contracts awarded or Statistical data of awarded contracts.

⁴ It will also link to the tender search service that the UK Government will launch after Brexit

⁵ Due to the health emergency in 2020, no event could be held. The proposal will be relaunched for the next fiscal year.

Main tools related to the control, supervision and mitigation of possible risks associated with the supply chain

Code of Conduct	Includes the principles that should guide the actions of any Person subject to the Code in their relationship with third parties, expressly mentioning the Relationship with customers, suppliers and collaborating companies in order to avoid any kind of interference that	may affect their impartiality or objectivity, and in such contracting processes must act in a manner that avoids any conflict of their personal interests with those of Aena.
Corporate Responsibility Policy	Includes, among its general principles of action, transferring the criteria of Corporate Responsibility to the management of the value chain, ensuring the development of social and environmental	practices responsible in suppliers and contractors, and thereby minimising possible associated risks.
Anti-corruption and fraud policy	Establishes that none of Aena's suppliers will directly or indirectly offer or grant, to public officials, third parties or any employee of Aena, in the context of the business activity carried out for or on behalf of it, gifts, presents or other unauthorised advantages, in accordance with the provisions of the Code of Conduct, in order to obtain favourable treatment in the granting, or conservation, of contracts or benefits of a personal nature or for the supplier company. Likewise, among	the measures to prevent corruption, it is expressly indicated that the Company must choose its consultants, partners, suppliers, customers and representatives with due diligence, establishing relationships whenever possible with recognised and top-level entities in its respective market. If this is not possible, due diligence procedures will be adopted in accordance with the regulatory framework to which the Company is subject.
Human Rights Policy	Encourages its suppliers, contractors, business partners and other collaborating companies to formalise their commitment to Human	Rights and that, in the event that they do not have their own policy, they sign Aena's.
Integrated Quality, Environmental and Energy Efficiency Management Policy	One of the principles is communicating the Policy to all employees and companies that carry out their activity in the Company, and to make it available to interested parties.	
Occupational Risk Prevention Policy	Assumes the commitment to comply, among other things, with the objective of coordinating preventive activities with third parties,	including concessionaires, contractors and air operators, and to take care of their health and safety.
Inclusion of ESG issues in bidding procedures	They incorporate specific clauses on the supplier's corporate responsibility, social, environmental and governance performance and respect for human rights. Includes the obligation of the parties to act within the most demanding levels of safety, occupational risk	prevention and environmental respect. Specifies the rejection of any fraudulent practice or corruption.
Inclusion of ESG issues in the performance procedures	Includes specific requirements, in social, environmental and governmental matters, required in the execution of the contract,	whose breach may result in the imposition of penalties or contractual termination.

Mitigation measures

- Control measures in contracting, together with the implementation of specific measures to verify the qualification and integrity of each supplier and customer before entering into binding business relationships; suppliers and customers must have anti-corruption protocols and controls, to the extent possible; and the signing of an anti-corruption clause, unless, by the nature of the relationship or other circumstances in question, it is justifiable that it is not considered necessary by the unit proposing the contract.
- Obligation to comply with clauses 39, 40, 41 and 42 included in the contracting documents, relating to the prevention of occupational risks, environmental protection, operational and airport safety, and others including social conditions and labour and social obligations.
- Certificate of implementation of the Environmental Management System (ISO 14001 or similar) or 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 among the technical solvency criteria.
- Supplier evaluation system: evaluation of environmental and social programmes implemented by bidders in the technical assessment process.
- Supplier follow-up during the term of the contract and verification of compliance with the special conditions of execution.
- Civil liability policy and accident insurance, be up to date with Social Security, Tax Agency, Civil Registry payments, etc.
- Follow-up of indicators on health and safety.

Respect for human rights. Adherence to the Global Compact

In accordance with the provisions of the Human Rights Policy, suppliers who do not have a policy on this matter must sign the one drawn up by the Company. This implies signing the Principles of the Global Compact, an initiative to which Aena is a party and whose observance is expressly stipulated therein, as well as specific commitments related with:

- Eradicating child labour.
- Avoid discriminatory practices.
- Promote the development of people.
- Facilitate freedom of association and collective bargaining.
- Promote adequate working conditions and protect public health.
- Promote a respectful and dignified work environment.
- Commitment to customers.
- Respect for community rights.
- Promotion and awareness of Human Rights.

This is all reflected in the Company's Human Rights Policy as well, paying particular attention to conflict situations and those situations where there is a high risk of breaches occurring, as detailed in chapter 3 "Commitment to society and human rights".

Specifically, Aena airports in Brazil have high a number of outsourced services at the respective airports. Their performance is monitored and supervised through external audits (documentation, working hour logs, etc.), which helps to mitigate the risks of forced or compulsory labour. Due to the nature of its supply chain, the risk of child labour is considered insignificant. On the other hand, the legal frameworks applicable to the geographical areas where Aena operates makes it less likely for significant risks to appear, regarding violations of the rights of freedom of association and collective bargaining.

Principle 3 of the Global Compact: Freedom of association

Principle 5 of the Global Compact: Child labour

Principle 4 of the Global Compact: Forced labour

In addition, the Company has a privacy policy for the employees of collaborating companies that informs them of the personal data processing performed by companies in the Aena Group, and by Aena Group's supplier companies of services, where appropriate, in accordance with current legislation⁶. In relation to the health and safety protection of suppliers, the bidding specifications include specific clauses through which the successful bidder undertakes to comply with the obligations imposed by law⁷, other standards and applicable regulations. In addition, an Operational Safety Clause is included, whose main objective is to establish the requirements that apply to these third parties to comply with the Operational Safety Management System, and determine the actions that govern the relations between the airport and the external suppliers in this matter.

With regard to London-Luton Airport, the bidding documentation that is evaluated incorporates a series of issues related to health and safety, insurance, prohibition/rejection of slavery, the environment, financial stability and technical capacity. During the effective term of the contract, the service areas monitor and supervise potential risks arising from its performance.

At Aena Brasil, an external company is responsible for verifying compliance with labour requirements and obligations (related to health, safety and worker training), as well as the correct delivery of PPE and safety equipment to workers based on the associated risk. With regard to environmental aspects, audits are planned and will be comprehensively carried out during the next fiscal year.

Finally, it should be noted that in 2020, the Company has not identified any incident in any procurement agreement with suppliers related to the rights of freedom of association, collective bargaining, use of child labour, or forced or non-consensual labour, nor have any complaints been received for the aforementioned reasons. No suppliers with a significant negative social impact have been detected, nor have incidents been registered through the channels enabled for this purpose, which would lead to the cancellation of orders or contracts with suppliers of the group due to their negative social impact.

⁶Regulation (EU) 679/2016 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 Law 3/2018, on Personal Data Protection and Guarantee of Digital Rights.

⁷Act 31/1995, of 8 November, on Occupational Risk Prevention

The acquisition and purchasing process

Aena's commitment to sustainability permeates the entire value chain, incorporating qualitative and/or quantitative considerations of a social nature (including respect for human rights), of an environmental nature and for development and innovation. This occurs throughout the entire procurement process, from its initial phase (tendering, in which the need is defined) to the contract performance phase (contract performance process).

Inclusion of social and environmental issues in bidding procedures

Determination of the object of the contract

In Spain, both Royal Decree Law 3/2020 and Act 9/2017 establish that the object of the contract shall be determined and defined according to the specific needs or functionalities intended to be met —without being limited to a single solution.

Sustainable acquisition and purchasing process



Compliance with current legislation

Respect the regulations in force in all of the countries in which the Company operates.

Purpose of the agreement

With special consideration to those agreements in which technological, social or environmental innovations can be incorporated.

Definitive guarantee

Possibility of exempting the successful bidder from the obligation to create a definitive guarantee.

Economic and financial solvency

As a measure to ensure the ability to meet the commitments made.

Technical or professional solvency

In addition to the mandatory compliance criteria, additional technical solvency criteria may be included, at the discretion of 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.

Exclusion criteria

Essential and necessary for the proper execution of the agreement.

Technical evaluation

Through technical assessment criteria with which the technical evaluation of the bids will be carried out, which must be formulated objectively, with full respect to the principles of equality, non-discrimination, transparency and proportionality, also including environmental and social criteria.

Civil liability policy and accident insurance, Social Security, Tax Agency, Civil Registry payments, etc.

Necessary in certain contract awards that provide an adequate response to the circumstances.

This is especially the case for contracts for which it is believed that technological, social or environmental innovations could be incorporated to improve the efficiency and sustainability of the goods, works or services intended to be contracted.

In this regard, the technical bidding specifications must be prepared, as much as possible, by taking into account accessibility criteria for people with disabilities or inclusive design for all users by applying sustainability and environmental protection criteria⁸, provided that the purpose of the contract affects or may affect the environment.

In the File Initiation Report, the director of the file must state the possibility of reserving a contract for Special employment centres and social insertion companies, as regulated by Act 44/2007, of 13 December. In Spain, in 2020, a total of 96 files were tendered to Special Employment Centres, for a total amount of €73,059,546, to procure services like cleaning, repair and maintenance, or sale and distribution. The Company, thus, facilitates the labour integration of workers with disabilities, giving them the possibility of performing productive and paid work that is appropriate to their personal characteristics.

London-Luton Airport also incorporates sustainability standards in preparing the object of the contract.

Technical or professional solvency criteria

In accordance with applicable regulations in Spain (including Aena SME, S.A., and AIRM), in order to demonstrate technical solvency, qualitative criteria can be incorporated with environmental or social considerations as part of the award criteria of the bidding specifications. For example:

- **Environmental scope:** Experience or “good work” can be demonstrated by requesting management certificates from bidding companies. These include the certificate of implementation of the Environmental Management System or the Quality Management System (ISO 14001, ISO 9001 or similar), for activities similar to the object of the contract, or ones issued or approved by an entity accredited for this purpose by Spanish or European Union legislation. For commercial procurement, the technical bidding specifications for leases specify that the performance of works must include the monitoring of environmental procedures and requires the submission of the Environmental Monitoring Plan, duly completed with the bidding specifications.
- **Social affairs:** Certain supply bidding specifications may require a certificate of compliance with the fundamental conventions of the International Labour Organization through a declaration committing to apply supply chain management systems.
- In the case of **supply files**, certificates may be requested, as issued by official institutes or departments with recognised jurisdiction over quality control, which demonstrate the compliance of products with certain specifications or technical standards.

As part of the selection process, London-Luton Airport incorporates a set of technical requirements relating to accreditations, experience, references or methodologies, in social and/or environmental matters, which are subject to analysis and evaluation (certified in some cases by external certifications like ISO 14001/EMAS).

Aena Brasil carries out the so-called “authorisation” process, consisting of performing a background check of the supplier’s previous practices and records. This analyses whether the supplier has been sued for corruption, slavery practices or non-compliance with labour obligations (resulting in a high number of procedures and convictions), etc. Subsequently, the so-called “mobilisation” process is carried out, which verifies whether the employment links between the employer and the worker are lawful and compliant with current legislation. For example, this analyses if the worker receives the mandatory training to carry out the work (especially those exposed to high risks) or if they have received all the PPE required for the proper performance of their duties.

⁸ Articles 3 and 4 of Royal Legislative Decree 1/2016, of 16 December, via which the consolidated text of the Integrated Pollution Prevention and Control Act is approved.

Technical evaluation

Contracts are awarded based on the best quality-price ratio (financial and qualitative criteria)⁹. In cases where qualitative criteria of a social or environmental nature are not included to demonstrate technical solvency, the technical assessment phase could include social considerations (such as the insertion of people with disabilities, gender equality, work/life balance, job stability and salary improvement, among others), innovation and development, or other environmental considerations (such as the reduction of emissions, energy savings or renewable energies).

In the case of construction files, this is compulsory. Specifically, the following is required to assess these types of tenders:

- Environmental action programme, requesting a study of possible units with an environmental impact and planned corrective measures, as well as proposals for technologies to improve the sustainability of infrastructure, including energy and insulation systems, insulations, use of recycled materials, and having an environmental management system for the company.

- Health and safety report, which requires a review of the health and safety study, with a statement of alternatives or possible improvements applicable to the works. Concrete application of the contractor and proposed subcontractor's health and safety system to the corresponding areas of the works.

Both criteria account for 30% of the total evaluation (15% each), requiring a minimum of 70 points for technical approval. This shows the importance of these types of environmental and labour criteria in the tenders for works.

For its part, London-Luton Airport includes a set of requirements on sustainability and environmental matters in its procurement bidding specifications. Likewise, suppliers are also evaluated and scored on their compliance with key performance specifications and objectives.

• Inclusion of tiebreaker clauses

In Spain, when two or more offers obtain the same score (with a similar economic offer), Article 147 of Act 9/2017 and Article 66.11 of RDL 3/2020 foresee tiebreaker clauses, giving advantages to companies that ensure the implementation of sustainable and responsible practices in their everyday performances and management.

• Exemption from providing a definitive guarantee

In accordance with current legislation in Spain, in certain cases, the Company's Procurement Body can exempt the successful bidder from the obligation of providing a definitive guarantee. This especially affects supplies of consumable goods whose delivery and receipt must be made before payment of the price, and contracts whose purpose is the provision of social services or the social or labour inclusion of persons belonging to groups at risk of social exclusion.

⁹ If required, the request for quality certifications (ISO 9000 or similar) and environmental certificates (ISO 14001 or equivalent) by the company that

called the tender in order to demonstrate technical solvency cannot be assessed in the evaluation criteria.

Inclusion of social, gender equality and environmental issues in performance procedures

Special conditions of contract performance

In Spain, in order to comply with the provisions of the law, Aena has adapted its bidding procedures to incorporate special conditions of performance in the procurement documents related to social, labour, ethical or environmental conditions, which are compulsory for suppliers. These conditions, which must be stated both in the tender announcement and in the specific terms and conditions of bids (PCP [pliego de cláusulas particulares]) cannot be directly or indirectly discriminatory and must be compatible with European law.

100%

of Aena's procurement agreements include, among the special conditions of contract implementation, clauses related to the environment, labour or social issues that may give rise to penalties in the event of a breach. These clauses could also be of essential nature, meaning their breach could give rise to the termination of the agreement. The bidding unit will be responsible for supervising the proper performance of the tender, in accordance with the provisions of the special conditions of performance.

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 safety and health at work and compliance with sector agreements, as well as the implementation of measures to prevent workplace accidents.



Environmental obligations

They include aspects related to the reduction of greenhouse gas emissions; the maintenance or improvement of environmental values that may be affected by the execution of the contract; more sustainable water management; the promotion of the use of reusable containers; the promotion of product recycling.

Some examples of special execution conditions that appear in the tender documents

- Employ a percentage of fixed workers equal to or greater than 20% in the execution of the contract.
- Employ in the execution of the contract a percentage of workers who, on the total of new jobs that are performed, is equal to or greater than the national average in the construction sector, provided that the availability of the construction labour market allows it.
- Employ in the execution of the contract a percentage of workers with disabilities, or in a situation or at risk of social exclusion greater than 1%, provided that the availability of the construction market allows it.
- Prompt payment of wages to personnel and compliance with the applicable wage conditions derived from the collective agreement.
- Employ in the execution of the contract a percentage of workers (women) who, across all new jobs that are carried out, are equal to or higher than the national average in X's sector (engineering and technical study offices, etc.).
- The contractor must be up-to-date with the payment of subcontractors or suppliers participating in the contracts.
- Perform the work in strict compliance with the legislation on occupational risk prevention.
- Provide workers who perform the work with adequate information and training on the risks of the activity they are carrying out, with preventive measures and personal protective equipment or other means of protection necessary for their execution.
- Promoting the reduction, reuse and recycling of waste.
- Establishing an environmental monitoring system that guarantees compliance with the indications and protective and corrective measures, related to the purpose of the contract. The contractor will establish a series of indicators that provide a way to estimate the performance of these measures and their results.
- Recycling of products and the use of reusable containers.
- Sustainable water management.

Procurement regulations stipulate the monitoring to be carried out in relation to compliance with the conditions of public contracts and include the possibility of establishing, in case of a breach, economic penalties that could even result in the termination of the contract.



Formalisation of the contract

By signing the contract and accepting the content of the bidding specifications, which include the special conditions of performance, prevention of occupational risks or environmental protection, among other provisions¹⁰; all successful bidders take on a series of obligations:

- **Environmental Protection:** to comply with environmental legislation, as well as the conditions established in the bidding specifications regarding the proper management of waste, the storage of hazardous materials and substances, conditions of use of vehicles/machinery and atmospheric emissions or discharges.
- **Labour and social obligations:** having minimum percentages of fixed workers on the workforce, employees with disabilities, compliance with the wage conditions of workers as per their applicable sectoral collective bargaining agreement, or compliance with the legislation on labour, social security, safety and health matters.
- **Occupational risk prevention:** compliance with current legislation on prevention¹¹, aimed at ensuring that suppliers develop high quality and sustainable works, supplies and services.
- **Operational safety** (see Chapter 6 “Safety and high-quality services”).

In relation to commercial procurement, upon signing the agreement, the successful bidder undertakes to comply with the environmental regulations in force and those expressly mentioned in the legal bidding specifications, to comply with all regulations applicable to workers in labour, social security and occupational risk prevention matters, and to observe all provisions applicable to airport security matters. Their breach gives rise to penalties.

At the same time, the Company makes best practices regarding the environment (energy savings, water consumption, waste generation, etc) available to third parties (cleaning services, restaurants, commercial premises, etc), for the purpose of promoting the continuous improvement of the products/services provided by the Organisation and contributing to sustainable development, reconciling the organisation’s activity with environmental conservation.

Aeroportos do Nordeste do Brasil, in the bidding specifications and/or contractual documents, expresses obligations and requirements concerning labour and environmental matters, and expressly establishes, in the case of a breach by the supplier, the possibility of suspending and/or retaining payments until the compliance with the agreement is once again reached. In the case of London-Luton Airport, supplier performance is supervised through agreements regarding the level of services provided or key performance indicators. Likewise, all suppliers must comply with current regulations in the United Kingdom on labour (slavery, minimum wage, equality, etc.) and environmental matters.

¹⁰ In general, these are set out in clauses 39, 40, 41 and 42 of the procurement documents, corresponding to RDL 3/2020, and clauses 42, 43, 44 and 45, of the provisions of Act 9/2017.

¹¹ Act 31/1995, of 8 November, on the Prevention of Occupational Risks, and other standards and regulations applicable within the scope of this Prevention.



Supplier monitoring and evaluation

Valuation of the quality of services

In Spain, the bidding specifications determine the mechanisms for monitoring compliance with the clauses of the contracts, as well as the imposition of penalties in case of a breach. The File Director, responsible for monitoring the performance of the agreement, must monitor, supervise and verify that the requirements and quality levels defined in the file's technical bidding specifications are met. In addition, the file manager reviews and verifies the valuation report issued by the contractor and issues the corresponding certification of compliance of performance, with the frequency established in the agreement.

At Aena Brasil, performance of tender work is supervised monthly. To this end, the contractor digitally sends proof of being up-to-date with tax payments and other obligations stipulated in the agreement. In the

event of a breach, the agreement provides for the possibility of withholding payments.

In the case of London-Luton Airport, this supervision is carried out by the Services Areas, which, at the end of the contract, must report on the supplier's performance. This report also includes the valuation of the quality of the services, supplies and works performed during the year.

Negative supply chain impacts

The Company's evaluation system allows it to identify suppliers that can or do cause significant negative impacts at the environmental or social level, and to act accordingly. In accordance with the provisions of the contracts, it implements measures to mitigate these impacts, which can range from an improvement agreement with the supplier to the termination of its contract.

Supplier and customer satisfaction study

Aena's customer satisfaction assessment procedure describes the systematic approach that the Company's units/centres follow to assess customer satisfaction levels, including lessees and contractors. The main tool used for the evaluation is the completion of surveys. After their evaluations, it determines and implements the corresponding improvement actions.

London-Luton Airport has developed a system to continuously improve its processes, which is accredited by the Chartered Institute of Procurement and Supply (CIPS). In 2020, it received the United Kingdom's National Procurement Team award.

5

Staff and social issues

Aena has maintained its firm commitment to providing a work environment of quality and well-being.

Diversity and equal opportunities

Specific mechanisms

- Equality Plan
- Disability Policy
- Code of Conduct
- Corporate Responsibility Policy
- Selection policy for Director candidates
- London-Luton Airport employee manual
- London-Luton Airport Disability Policy
- Responsible Business Strategy of London-Luton Airport
- Aena Brasil Code of Conduct
- Aena Brasil Equality Plan

Work-life Balance

- Improvements to the legal minimum: holidays, leave for serious illness or for childbirth
- Schedule flexibility: parents with children with disabilities or shift changes
- Employee aid: Employee Assistance Program (EAP), financial assistance, employee assistance programme at London-Luton Airport
- Measures for disconnecting from work and working remotely

MILESTONES

- Vocento Award for Equality
- Participation in gender equality meetings in the aeronautical sector
- Signing of protocol LGBTQ with the Ministry of Transport, Mobility and Urban Agenda, and Business Network for Diversity and Inclusion (REDI [Red Empresarial por la Diversidad e Inclusión])
- Academic internships for youth employment
- Participation in Employment Fairs at universities

33% OF BOARD MEMBERS ARE WOMEN
18 AGREEMENTS IN FORCE WITH UNIVERSITIES AND TEACHING CENTRES

Health and well-being of workers

Specific health emergency measures

- Work safety: remote work and adaptation of workplaces.
- Prevention and care: personal protective *kits*, diagnostic tests, medical evaluation of vulnerable personnel
- Psychological support: creation of the "Deploying Resources" programme

OVER 77,300 HOURS OF SAFETY TRAINING IN 2020

SIGNIFICANT DECREASE IN THE NUMBER OF ACCIDENTS IN 2020

Promotion and training of talent

- Self-learning platform and virtual classroom
- "Leadership in times of crisis" decalogue
- Telecommuting courses
- COVID-19 preventive training
- Mentoring Programme
- Coaching Programme

Policies governing Human Resources in matters of:

- Prevention of Occupational Risks
- Training
- Verification of Competition
- Trips
- Management hospitality and fuel costs policy
- Management Housing Policy
- Compensation and benefits of expatriate personnel
- Bases of the Performance Management System
- Best Practices Code: Outsourcing of services
- Disability

Commitment to SDGs

3

SDG 3 Health and well-being

4

SDG 4 Quality education

5

ODS 5 Gender equality

8

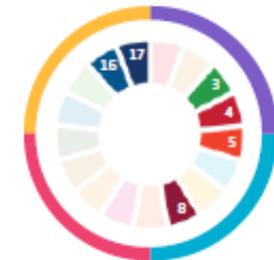
SDG 8 Decent work and economic growth

16

SDG 16 Peace, justice and strong institutions

17

SDG 17 Partnerships to achieve the goals



Given the severity of the crisis caused by the pandemic, in 2020, the Company decided to actively participate in the search for solutions adapted to the situation. The company took advantage the situation as an opportunity to reinforce its prevention, remote work and digitalisation, among others.

The Company has focused all its efforts on ensuring the health and safety —both physical and emotional— of workers; promoting a balance between work and family life, and minimising the impact of the pandemic on all its professionals. Management of “talent” has also been a priority, and a basic pillar for the management and performance of the organisation.

The team has been at its maximum capacity to guarantee airport activity, demonstrating, one more time, its commitment, flexibility and preparation.

Aena faces the new normality –in which new technologies and ways of working are flourishing– assimilating and reinforcing what we have learnt.



Priorities with employees

- Job stability and professional development.
- Continuous training and education.
- Work-life balance and social benefits.
- Work conditions and transparent remuneration model.
- Diversity, equality and non-discrimination.
- Health and safety.



Specific policies governing Human Resources

- | | |
|---|---|
| <ul style="list-style-type: none"> • Occupational Risk Prevention Policy. • Training Policy. • Competition Verification Policy. • Travel Policy. • Management hospitality and fuel costs policy. • Management Housing Policy. | <ul style="list-style-type: none"> • Compensation and benefits of expatriate personnel policy. • Bases of the Performance Management System. • Best Practices Code: Outsourcing of services. • Disability Policy. |
|---|---|



Action plans

- Career and succession plans: talent and commitment. “Employer branding” strategy.
- Training and development of skills: updating and motivation.
- Dialogue and negotiation: new Collective Agreement.
- Digital and cultural transformation.
- Health and safety.

Organisation and Human Resources Management is responsible for promoting a quality work environment and coordinating all actions in relation to the management of people to maintain the highest levels of motivation and commitment, retain talent and face the new challenges of the Company, for which different tools are available:

- Aena S.M.E., S.A. and SCAIRM. In addition to labour legislation, the 1st Collective Agreement of Aena¹, which is in force until 31 December 2021 (Spanish Official Government Gazette of 20 December 2011) and the Aena Integrated Management System are applicable.
- Aena Desarrollo Internacional. The Collective Agreement for Offices and Bureaus of the Community of Madrid is applicable.
- London-Luton Airport. All airport employees are governed by various human resources policies, the code of conduct and a manual covering all aspects of employment. All these policies have been created in accordance with UK legislation, primarily the Employment Rights Act of 1996.
- Aena Brasil. The 1st Collective Agreement, signed on 23 July 2020, is applicable.

To address the current technical (digital transformation, talent, health and safety, etc.) or regulatory challenges, the 2018-2021 Strategic Plan contains a specific line of action on the subject of human resources that places the focus on talent recruitment and retention, the development of the necessary capabilities and support for digital transformation.

Throughout 2020, the evolution and development of the corporate objectives of this Plan have been partially altered by the emergence of COVID-19 and the consequent requirements imposed by the new work reality, which have served for the Company to deploy a multitude of actions especially focused on the protection of health and safety and the promotion of the digital and cultural transformation of employees. All of this has enabled progress to be made in the commitments that had already been adopted and in those that arose as a result of the situation.

Organisation and Human Resources Management carries out the corresponding tasks taking into account the limitations caused by Aena's status as a state-owned public company, which implies restrictions on the hiring of personnel and talent, as shown on the Company's risk map. In this regard, the company, in addition to the Succession Plan, has Potential Detection and Employer Branding Programmes to mitigate the aforementioned risks.



¹ The validity of the 1st Collective Agreement of Aena Spanish Official Government Gazette of 20 December 2011 comes to an end on 31 December 2021. During this year, the collective negotiation for the organisation's

2nd Collective Agreement will be carried out, which in accordance with Spanish regulations may not be inferior overall to the current one.

Employment, equality and diversity²

In the face of the emergence of COVID-19 in 2020, Aena has prioritised keeping its employees' jobs, a decision aligned with the Company's commitment to providing a quality work environment. This is supported by the total workforce data at the end of 2020, composed of 8,771 professionals, 1.2% less than the previous year, of

which 94.3% of the positions are permanent contracts and 96% are full-time. In addition, 36.1% of the total workforce are women.

The majority of employees are located in Spain (Madrid, Canary Islands, Catalonia, Andalusia and Balearic Islands) and in the United Kingdom (London).



Total number and distribution of employment contract types (as of 31 December)*

	2019					2020				
	Total workforce	Permanent		Temporary		Total workforce	Permanent		Temporary	
		Part-time	Full-time	Part-time	Full-time		Part-time	Full-time	Part-time	Full-time
Aena, SME, S.A. (Spain)	7,867	218	6,850	80	719	7,690	165	7,031	51	443
Aena Sociedad Concesionaria del AIRM S.M.E., S.A. (Spain)	80	0	76	0	4	79	0	76	0	3
ADI, SME, S.A. (Spain)	24	2	18	1	3	24	1	21	0	2
London-Luton Airport (United Kingdom)	851	77	774	0	0	706	123	583	0	0
Aeropertos do Nordeste do Brasil, S.A. (Brazil)	56	0	56	0	0	272	0	270	0	2
Total	8,878	297	7,774	81	726	8,771	289	7,981	51	450

* All workers –except those who opted for reduced working hours– have full-time contracts.

² All the data presented corresponds to the end of the fiscal year, 31 December 2020, 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.

Total number and distribution of employees by gender, age, country and professional category (as of 31 December)

2020

	Aena, S.M.E., S.A. (Spain)						Aena Sociedad Concesionaria del AIRM S.M.E., S.A. (Spain)						ADI, S.M.E., S.A. (Spain)						TOTAL SPAIN						
	< 25 years		Between 25 and 45 years		> 45 years		< 25 years		Between 25 and 45 years		> 45 years		< 25 years		Between 25 and 45 years		> 45 years		< 25 years		Between 25 and 45 years		> 45 years		
	W	M	W	M	W	M	W	M	W	M	W	M	W	M	W	M	W	M	W	M	W	M	W	M	
Senior Management	0	0	1	2	4	4	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	1	2	4	5
Executives and Graduates	0	0	390	458	443	558	0	0	2	3	3	9	0	0	1	3	3	9	0	0	393	464	449	576	
Coordinators	0	0	70	171	256	669	0	0	0	1	1	6	0	0	0	0	0	0	0	0	70	172	257	675	
Technicians	0	0	430	1,225	965	1,621	0	0	8	19	4	18	0	0	0	0	0	0	0	0	438	1,244	969	1,639	
Support staff	0	0	100	74	122	127	0	0	0	1	1	2	0	0	4	0	3	1	0	0	104	75	126	130	
Total	0	0	991	1,930	1,790	2,979	0	0	10	24	9	36	0	0	5	3	6	10	0	0	1,006	1,957	1,805	3,025	

2020

	London-Luton Airport						Aena Brasil						Total							
	< 25 years		Between 25 and 45 years		> 45 years		< 25 years		Between 25 and 45 years		> 45 years		< 25 years		Between 25 and 45 years		> 45 years			
	W	M	W	M	W	M	W	M	W	M	W	M	W	M	W	M	W	M		
Senior Management	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	2	4	5
Executives and Graduates	0	0	9	26	7	18	0	0	5	16	3	4	0	0	407	506	459	598		
Coordinators	0	0	4	12	8	11	0	0	11	33	0	2	0	0	85	217	265	688		
Technicians	0	0	7	27	7	25	0	0	16	81	0	3	0	0	461	1,352	976	1,667		
Support staff	20	16	145	196	67	101	5	2	39	42	1	9	25	18	288	313	194	240		
Total	20	16	165	261	89	155	5	2	71	172	4	18	25	18	1,242	2,390	1,898	3,198		

Annual average of contracts according to their type* by gender, age, and professional category in 2020 (consolidated)

	2019						2020**					
	PERMANENT		TEMPORARY		TOTAL		PERMANENT		TEMPORARY		TOTAL	
	Full time	Part time	Full time	Time Part	Full time	Part time	Full time	Part time	Full time	Part time	Full time	Part time
Men	4,909	151	457	24	5,366	175	5,239	122	320	20	5,559	142
Women	2,528	270	299	53	2,827	322	2,782	235	199	45	2,981	280
Total by gender	7,437	421	756	77	8,193	497	8,021	356	519	65	8,540	422
Senior Management	11	0	0	0	11	0	12	0	0	0	12	0
Other executives and graduates	1,645	52	90	3	1,735	55	1,897	32	41	0	1,938	32
Coordinators	1,129	32	1	0	1,130	31	1,236	19	1	0	1,237	19
Technicians	3,782	161	574	56	4,356	217	3,953	118	416	48	4,369	166
Support Staff	870	176	91	18	961	194	923	188	61	17	984	205
Total by professional category	7,437	421	756	77	8,193	497	8,021	356	519	65	8,540	422
Over 45	4,292	183	205	22	4,497	205	4,658	165	174	23	4,832	188
25 - 45 years	3,072	217	545	54	3,617	271	3,330	174	344	42	3,674	216
Under 25 years	73	20	6	1	79	21	33	17	1	0	34	17
Total by age	7,437	420	756	77	8,193	497	8,021	356	519	65	8,540	422

(*) Note: Aggregated data of the total consolidated workforce.

(**) In the calculation of the average workforce of Aena SME SA (7,779), the employees who were in the Temporary Lay-Off Plan during 2020 have been taken into account, as they were receiving part of their salary from Aena in order to match 100% of their remuneration. The average workforce, applying the criterion set out in the ICAC response 221/20, amounts to 7,766.

Staff turnover rate* by age, gender and region

Turnover rate (%)	AENA S.M.E. SA			SCAIRM (Region de Murcia International Airport)			ADI			LLA			Aena Brasil		
	W	M	Total	W	M	Total	W	M	Total	W	M	Total	W	M	Total
	2020														
Over 45	0.83%	1.63%	1.33%	0%	2.86%	2.38%	0%	0%	0%	17.9%	40.0%	26.0%	0.00%	1.04%	0.73%
25-45	0.76%	1.85%	1.46%	0%	3.85%	2.63%	0%	0%	0%	15.5%	26.4%	19.8%	7.50%	10.41%	9.55%
Under 25	0%	0%	0%	0%	0%	0%	0%	0%	0%	32.6%	26.5%	29.2%	0.00%	0.00%	0.00%
Total	0.80%	1.72%	1.39%	0%	3.28%	2.50%	0%	0%	0%	17.0%	31.0%	22.60%	7.5%	11.5%	10.3%

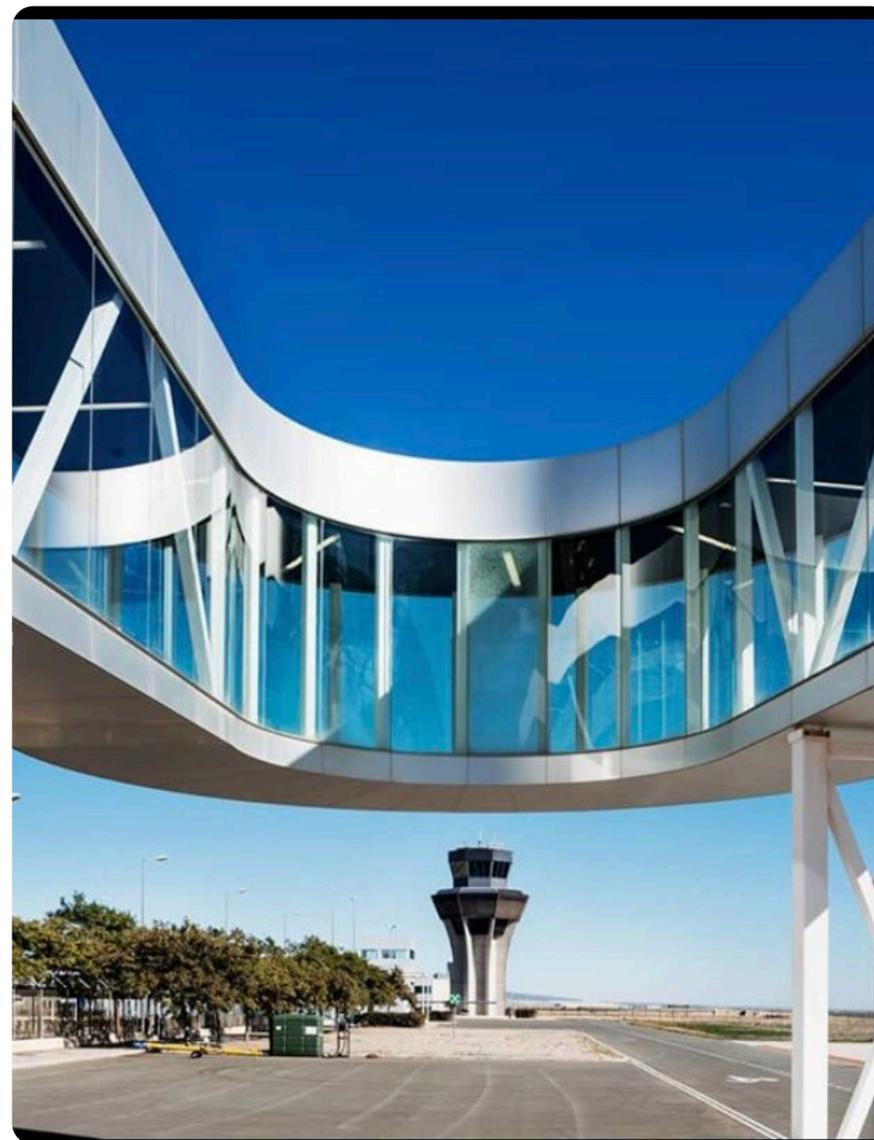
(*) Turnover: Number of employees who leave the organisation voluntarily or due to dismissal, retirement or death while in active status.



In response to reasons of force majeure arising from the health emergency, Aena has carried out a Temporary Lay-Off Plan (ERTE [Expediente de Regulación Temporal de Empleo]) that affects less than 0.5% of the jobs, which are directly linked to the increase in activity that is normally recorded in the summer season and that has not occurred in 2020, due to the health circumstances. In any case, Aena supplemented the income of the workers affected by the temporary lay-off plan up to 100% of the amount equivalent to their normal salary.

Temporary Lay-Off Plans (ERTE)

	Temporary		Permanent		Total	% of total workforce
	Women	Men	Women	Men		
Aena, SME, S.A. (Spain)	4	5	4	18	31	0.4%
Aena Sociedad Concesionaria del AIRM S.M.E., S.A. (Spain)	0	0	0	0	0	0
ADI, SME, S.A. (Spain)	0	0	0	0	0	0
London-Luton Airport (United Kingdom)	0	0	0	0	0	0
Aeroportos do Nordeste do Brasil, S.A. (Brazil)	0	0	0	0	0	0
Total	4	5	5	18	31	0.4%



Dismissals by gender, age, professional category and region

2019*

	Aena, SME, S.A. (Spain)						London-Luton Airport (United Kingdom)						Aeroportos do Nordeste do Brasil, S.A. (Brazil)						Total					
	< 25 years		Between 25 and 45 years		> 45 years		< 25 years		Between 25 and 45 years		> 45 years		< 25 years		Between 25 and 45 years		> 45 years		< 25 years		Between 25 and 45 years		> 45 years	
	M	M	M	M	M	M	M	M	M	M	M	M	M	M	M	M	M	M	M	M	M	M	M	M
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	1	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	1	0	0	1
Coordinators	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	1
Technicians	0	0	1	1	0	0	0	0	0	0	0	1	0	1	0	0	0	0	0	1	1	1	0	0
Support staff	0	0	0	1	0	0	0	0	0	3	0	0	0	0	0	0	0	0	0	0	0	4	0	0
Total	0	0	2	2	0	0	0	0	0	3	0	2	0	1	0	0	0	0	0	1	2	5	0	2

(* In 2019, there were no dismissals at SCAIRM or at ADI.

2020*

	London-Luton Airport (United Kingdom)						Aeroportos do Nordeste do Brasil, S.A. (Brazil)						TOTAL					
	< 25 years		Between 25 and 45 years		> 45 years		< 25 years		Between 25 and 45 years		> 45 years		< 25 years		Between 25 and 45 years		> 45 years	
	M	M	M	M	M	M	M	M	M	M	M	M	M	M	M	M	M	M
Senior Management	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Executives and Graduates	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	1	0
Coordinators	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Technicians	0	0	3	0	1	0	1	0	6	0	0	0	0	0	10	0	1	0
Support staff	0	1	6	7	4	2	0	0	5	2	0	0	0	1	11	9	4	2
Total	0	1	9	7	5	2	1	0	11	2	1	0	0	1	21	9	6	2

(* In 2020, there were no dismissals at Aena, SCAIRM or ADI.

Hires by gender, age, professional category and region*

2020

	Aena, SME, S.A. (Spain)						Aena Sociedad Concesionaria del AIRM S.M.E., S.A. (Spain)						ADI, SME, S.A. (Spain)						Total Spain						
	< 25 years		Between 25 and 45 years		> 45 years		< 25 years		Between 25 and 45 years		> 45 years		< 25 years		Between 25 and 45 years		> 45 years		< 25 years		Between 25 and 45 years		> 45 years		
	M	M	M	M	M	M	M	M	M	M	M	M	M	M	M	M	M	M	M	M	M	M	M	M	M
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	29	32	8	5	0	0	0	0	1	0	0	0	1	0	0	0	0	0	0	30	32	9	5
Coordinators	0	0	1	0	4	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	4	3	
Technicians	0	0	73	27	27	13	0	0	3	0	0	0	0	0	0	0	0	0	0	0	76	27	27	13	
Support staff	0	0	12	11	0	2	0	0	0	0	0	1	0	0	0	0	1	0	0	12	11	0	4		
Total	0	0	115	70	39	24	0	0	3	0	1	1	0	0	1	0	1	0	0	119	70	40	26		

549
NEW EMPLOYEE RECRUITMENT AT THE CONSOLIDATED GROUP

255
NEW EMPLOYEE RECRUITMENT IN SPAIN

50
NEW EMPLOYEE RECRUITMENT AT LONDON-LUTON AIRPORT

244
NEW EMPLOYEE RECRUITMENT AT AENA BRASIL

2020

	London-Luton Airport (United Kingdom)						Aeroportos do Nordeste do Brasil, S.A. (Brazil)						TOTAL					
	< 25 years		25-45 years		> 45 years		< 25 years		25-45 years		> 45 years		< 25 years		Between 25 and 45 years		> 45 years	
	M	M	M	M	M	M	M	M	M	M	M	M	M	M	M	M	M	M
Senior Management	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	
Executives and Graduates	0	0	1	2	1	0	0	0	7	2	3	0	0	0	38	36	13	5
Coordinators	0	0	1	0	0	2	0	0	28	6	3	0	0	0	30	6	7	5
Technicians	0	0	1	0	0	-	0	0	75	18	4	0	0	0	152	45	31	13
Support staff	2	4	10	13	9	4	2	4	45	39	7	1	4	8	67	63	16	9
Total	2	4	13	15	10	6	2	4	155	65	17	1	4	8	287	150	67	33

(*) Information regarding new hires in 2019 can be found in the Aena 2019 Corporate Responsibility Report, available at http://www.aena.es/csee/ccurl/164/377/Libro_ENG_interactivo_v4_VF.pdf

Remuneration model and wage gap

The Company's remuneration model is based on the principles of equality and non-discrimination –understood in its broadest sense (gender, age, nationality, etc.)–, in the applicable legal standards, and incorporates the standards and principles of national and international best practices on the matter.

This system combines:

- Fixed salary, established according to professional level, occupation, function and level of individual responsibility.
- Short-term variable, linked to the results of the performance evaluation and the achievements reached by the employees.

Through its system of remuneration, the Company promotes equal treatment for employees, with no gender or personal differences of any other kind.

In Brazil, in 2020, variable compensation was due to the achievement of the goals established in the Performance Management System (SGD [Sistema de Gestión de Desempeño]). Company goals, job goals,

and value goals were defined for all employees who perform their duties as coordinators, managers, and directors.

As for the London-Luton Airport, different occupations are included within each category, each of them has an equal base salary (does not include variables) for men and women and age ranges.

At the same time, the Company offers its professionals products such as health insurance, life insurance, pension plan, and restaurant vouchers, among others. In 2020, a total of €1.4 million was set aside in the parent company for social aid for employees aimed at covering child education expenses, for work-life balance (summer camps and infant schools), for health, births and exceptional disability, etc. At London-Luton Airport, employees are entitled to private medical coverage that may include coverage for up to 6 dependent children.

Compensation by professional category at AENA S.M.E, SA, SCAIRM is made public and can be consulted in the wage tables included in Annex II of Aena's Collective Bargaining Agreement³. As detailed in Annex II of the Collective Agreement, other applicable Supplements (night shifts, working hours, etc.) are added to this salary. This applies regardless of sex and

age; in other words, the same value corresponds to the same professional classification.

In the case of ADI, it is also public and can be consulted in the salary tables contained in the Collective Agreement for Offices and Bureaus of the Community of Madrid. Other applicable supplements (activity, availability, etc.) are added to this salary published in Annex I of the Collective Agreement.

As regards London Luton Airport, within each category, different occupations are included. Each of them has a base salary that is equal for men and women, and age ranges. A bonus payment of the same amount is made for each employee, regardless of occupation, once they reach 2 years of service.

Despite the crisis caused by the pandemic in the labour market and the strong drop in the Company's activity, Aena has kept the salary conditions of its employees intact

³ <https://www.boe.es/boe/dias/2019/10/30/pdfs/BOE-A-2019-15581.pdf>

Average remunerations and their evolution by professional classification

Professional category	AENA SME and SCAIRM*			ADI		
	Professional level*	Annual amount		Professional level	Annual amount	
		2020**	2019		2020	2019
Executives and Graduates	A	24,056.64	24,056.64	1	18,095.00	18,095.00
	B	20,240.16	20,240.16	2	17,497.38	17,497.38
Coordinators	C	17,960.64	17,960.64	-	-	-
Technicians	P	15,803.52	15,803.52	-	-	-
Support staff	E	14,987.40	14,987.40	5	14,997.48	14,997.48
	W	14,302.80	14,302.80	6	14,399.87	14,399.87

(*) Professional level classification according to the salary tables published in the Collective Agreement.

(**) The salary review included in Royal Decree-Law 2/2020, which approves urgent measures regarding compensation in the sector, is pending application.

In 2020, despite the crisis caused by the pandemic in the labour market, and the strong drop in the Company's activity, Aena has made an effort to guarantee the wages of the workforce.

London-Luton Airport has not implemented a salary increase for November 2019-20 and since November 2020. A proposal has been made for the salary negotiations with the union to be resumed in May 2021. For Aena Brasil, as 2020 is the first year of operation, this increase is not calculated.

Variable remuneration

There is also a percentage of variable compensation based on targets, whose compliance is evaluated through a Performance Management System. This system contains, among others, social and environmental efficiency and profitability objectives (Chapter IX). The percentage of employees who receive periodic performance and development evaluations has risen in 2020 to 14% of the total workforce.

AENA S.M.E, S.A. and SCAIRM: as for structural personnel (made up of middle management and directors) this variable remuneration reached 4.85% over the total of their gross remuneration. For other personnel, this variable reached 2.23%.

SCAIRM: in the case of personnel with a variable remuneration structure, it reaches 4.78% of the total of their gross remuneration. For other personnel, this variable reached 2.24%.

ADI: the variable remuneration reaches 9.79% in the case of structural staff and 7.02% for the rest of the staff.

London-Luton Airport: currently, there is no formalized performance management system, it will be a priority for the coming years.

Aena Brasil: at Aena's airports in Brazil, variable remuneration has different percentages per category of positions, from 10% to 40% of the employee's annual remuneration.

Wage gap

At Aena there are no salary differences based on gender. Aena's payment model and the wage tables that are recorded in the Company's 1st Collective Bargaining Agreement include employee compensation, with no discrimination being made based on gender or any other reason.

Royal Decree 902/2020, of 13 October, on remunerative equality between women and men includes, among others, the general rules for the assessment of positions and the remuneration registry. In this regard, Aena is working on analysing and developing the tools that are necessary for the application of said Royal Decree, which will enter into force six months after its publication in the Official State Gazette, that is, on 14 April 2021.

In the case of London-Luton Airport, the table of average remunerations by gender, age and professional category shows a wage gap of 26%. However, as already indicated, although the quantitative data on average salary shows the existence of this gap, there is no wage discrimination based on gender or age⁴

From the difference in average remunerations, from the Brazilian data, there is a wage gap of 8.1%.

Average remunerations by gender, age, professional category and region (euros)

LONDON-LUTON AIRPORT	2019							
	Women				Men			
	< 25 years	Between 25 and 45 years	> 45 years	Average remuneration	< 25 years	Between 25 and 45 years	> 45 years	Average remuneration
Executives and Graduates	0	67,724	69,622	68,809	56,961	64,171	65,199	64,342
Coordinators	37,535	45,406	40,617	41,424	37,893	51,875	52,569	51,661
Technicians	0	0	0	0	37,028	51,633	43,435	45,924
Support	20,012	25,268	21,383	22,488	22,857	27,482	29,163	28,037
General total	14,387	34,600	32,906	33,180	38,685	48,790	47,592	47,491
	2020							
	Women				Men			
	< 25 years	Between 25 and 45 years	> 45 years	Average remuneration	< 25 years	Between 25 and 45 years	> 45 years	Average remuneration
Executives and Graduates	0.00	86,424.13	68,246.49	78,471.41	0.00	73,982.71	93,151.05	82,139.45
Coordinators	0.00	45,755.68	41,624.00	43,001.23	0.00	50,814.59	52,224.98	51,489.13
Technicians	0.00	45,035.43	30,559.35	37,797.39	0.00	46,650.01	53,049.75	49,593.89
Support staff	16,873.17	23,499.14	27,218.52	24,002.07	19,276.40	30,497.01	29,238.47	29,514.18
Total	16,873.17	28,384.62	32,003.08	28,719.71	19,276.40	37,600.68	42,649.84	38,733.62

Note: Euro/Pound exchange rate in 2019: 0.8778

Euro/Pound exchange rate in 2020: EUR vs GBP= 0.88970

⁴ The British government requires companies to report on the gap between the salaries of men and women, however, in reference to the 2020 data, due to the COVID-19 pandemic, this requirement is currently suspended. It can be checked on the UK government page and on the London-Luton Airport page.

- <https://gender-pay-gap.service.gov.uk/Employer/MZGnz73O>
- <https://www.gov.uk/government/news/employers-do-not-have-to-report-gender-pay-gaps>

Average remunerations by gender, age, professional category and region (euros)

AENA BRAZIL	2020 (*)							
	Women				Men			
	< 25 years	Between 25 and 45 years	> 45 years	Average remuneration	< 25 years	Between 25 and 45 years	> 45 years	Average remuneration
Senior Management				0.00				0.00
Executives and Graduates	0.00	60,053.64	37,308.08	51,524.05	0.00	54,430.65	63,374.49	56,219.42
Coordinators	0.00	22,980.20	0.00	22,980.20	0.00	23,328.99	21,581.56	23,229.13
Technicians	0.00	4,480.05	0.00	4,480.05	0.00	4,480.05	4,480.05	4,480.05
Support staff	6,431.73	8,276.42	6,273.42	8,026.94	7,928.84	10,095.52	12,467.18	10,416.49
Total	6,431.73	13,345.23	29,549.41	13,723.35	7,928.84	14,114.20	23,461.44	14,926.07

EUR vs BRL= 5.8943

(*) Due to the recent acquisition in March 2019 of the management of six airports in Northeast Brazil (Aena Brasil) and their commissioning in January 2020, detailed information on this point cannot be provided for fiscal year 2019.

Comparison between Aena minimum wage and minimum guaranteed interprofessional wage⁵

Currently, Aena's minimum wage is higher than the minimum wage in all countries in which the group operates:

- In Spain, Aena exceeds the amount legally established for the interprofessional minimum wage, which is established in Royal Decree 231/2020, of 4 February, at €13,300. In accordance with the salary tables set out in Annex II of the Collective Agreement, and taking as a reference the amount of the salary for the professional level corresponding to

the lowest professional category (multiplied by 12 payments and adding the additional amount of 2 extra payments), this results in an annual salary of €17,489.42, which is 31.5% above the Minimum Interprofessional Salary. It should also be noted that workers receive the salary and non-salary related supplements to which they are entitled based on their seniority, position, work centre and if they work part or full-time.

For its part, London-Luton Airport complies with all the minimum & living wage requirements

established by the UK government, which are currently established at:

- **Minimum national wage (per hour):** £4.55 if under 18 years of age; £6.45 if between 18 and 20 years of age; £8.20 if between 21 and 24 years of age.
- **National Living Wage:** £8.72 for anyone over 25 years of age.

In addition, the Airport is committed to obtaining accreditation through the Real Living Wage Foundation. The Real Living Wage is not mandatory under UK legislation, however, it is considered a clear commitment to improving the wages of those

⁵ Note: Except for best paid person.

Note: Euro/Pound exchange rate in 2020: EUR vs GBP= 0.88970

Note: Euro/Brazilian Real exchange rate in 2020: 5.8943

Note: Locations that have significant operations are all those countries in which Aena is present, that is, those in which all the companies in which Aena has a stake and over which it exerts management control are located.

who are worst paid. In 2020, the Real Living Wage was set at £9.50 per hour.

Currently, all employees of London-Luton Airport are paid above this amount, and work is currently being done to ensure compliance throughout the supply chain, which would lead to obtaining the accreditation.

- In Brazil, the interprofessional salary is R\$1,100.00 and in Aena Brasil the lowest salary is R\$1,981.00.

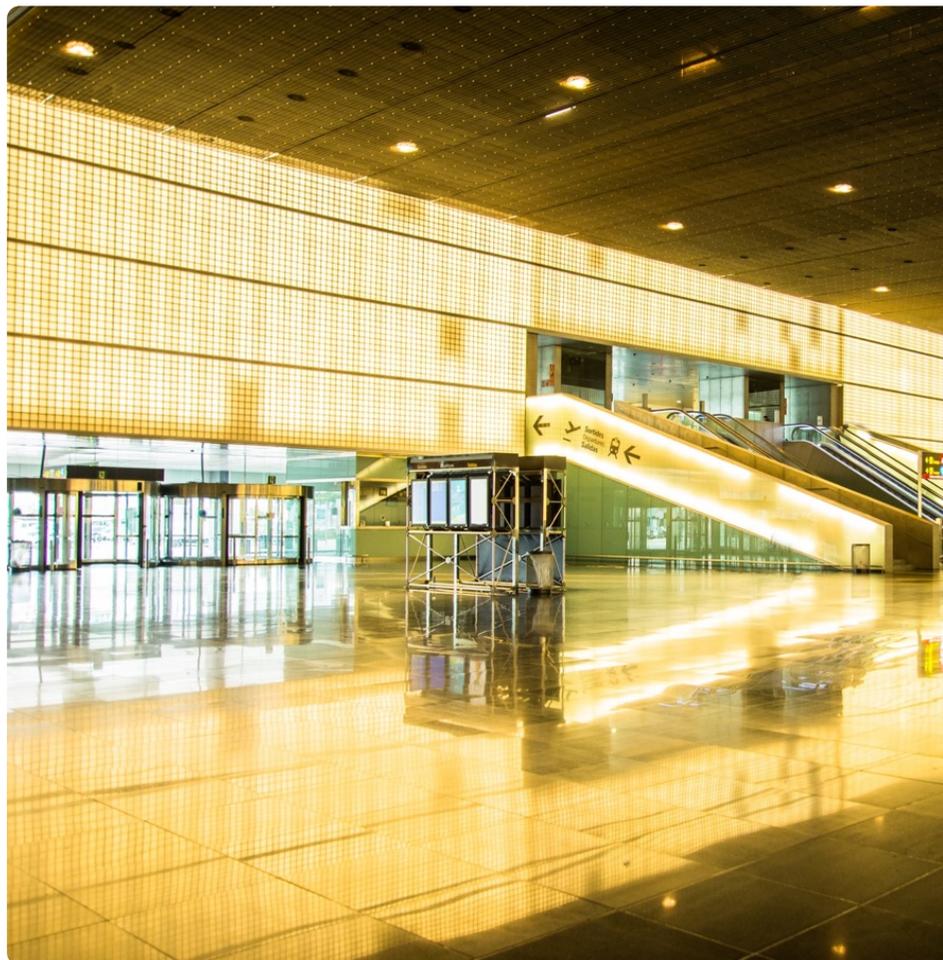
Opportunities for internal mobility

In addition to temporary changes in occupation for the performance of higher category functions, there are internal processes that enable the promotion of Aena's workers. These internal promotion processes are regulated in the Collective Agreement and offer the possibility to all workers to advance in their professional career, offering all authorized positions from levels C to F (coordinators, technicians and support) for such internal promotion and development of workers before selecting from external sources, and in the case of levels A and B (graduates), 51% of the positions offered. On a general basis, internal promotion calls are made every two years.

London-Luton Airport guarantees that all employees have access to all internal vacancies, which are sent by email, are communicated in the weekly briefings and more recently in the internal communication system.

To do this, employees are asked to fill in an internal request form, which is supported by their line manager and, if the employee has the required skills and

experience, they are included in the evaluation and interview process.



Work-life Balance

To achieve a commitment to equality and seeking a balance between professional and personal life, the Company has specific work-life balance measures in the different countries in which it operates.

All these actions have been agreed with the workers' legal representatives. As regards the measures that are already in place in the company, designed to facilitate the enjoyment of a work-life balance and encourage joint responsibility for these duties by both parents, the



Permits

Improvement in paid leave for childbirth, serious illness of relatives, breastfeeding.

Improvement in holiday days (23 working days).

Compensation for public holidays that fall on a Saturday.

Personal leave days / Personal leave by hours (normal workday staff).

Holiday leave by length of service. (After 20 years of service, one additional day for every 5 years).

Paid leave on 24 and 31 December.

At London-Luton Airport:

Paid maternity, paternity and adoption leave.

Annual holidays that include 5 days above the requirements demanded by the government.

Paid parental leave of up to 5 days, plus compliance with the parental leave required by the government.



following are worth noting: Flexi-time

Intensive working schedule during holiday periods (three months).

Two hours of daily flexibility for parents with children with disabilities.

Flexible schedule of clock-in and -out times.

Possibility of service changes for staff between shifts.

At London-Luton Airport:

Possibility of requesting flexible work, which may include part-time work, working from home or working with modified start and end times.



Employee aid

Flexible compensation (*restaurant tickets*).

Medical insurance. Life and accident insurance.

Medical examinations.

Financial aid for studies, health, disability, camps, nurseries, reimbursable advances.

Aena's Employee Services Programme (PAE [Programa de Atención al Empleado]). A set of counselling, facilitation and emotional support services for events that take place in the life of employees, offering services and advice in all aspects derived from certain situations (legal, fiscal, social, administrative, etc.).

Pension Plan contributions.

At London-Luton Airport:

Benefits include private health insurance for the whole family.

All the Group's companies also have action protocols in place to address special situations, such as those included in the Emotional Support Programme and the Prevention and Treatment of Addictive Behaviours, or to resolve possible conflicts of a professional nature through dialogue.

During 2020, in the context of COVID-19, through the Employee Care Programme, the Company has addressed specific employee demands related to family situations, medical advice, management of travel cancellations and domestic service contracts, emotional guidance for minors, legal and consumer guidance, document management and emotional support in mourning situations, as well as other requirements aimed at improving the physical or emotional well-being of employees in any case.

In turn, London-Luton Airport has an assistance programme available to all employees and their families. It is a confidential service that includes personal advice and legal assistance if necessary.

Employees who are on maternity/paternity leave

	AENA S.M.E., S.A.				SCAIRM (Region de Murcia International Airport)				ADI				LLA				Aena Brasil				Total		
	2019		2020		2019		2020		2019		2020		2019		2020		2019		2020		2019	2020	
	M	W	M	W	M	W	M	W	M	W	M	W	M	W	M	W	M	W	M	W	M	W	
Maternity	0	49	0	34	0	0	0	0	0	0	0	0	0	18	0	15	0	0	0	1	67	50	
Paternity	131	0	133	0	2	0	1	0	0	0	0	0	0	15	0	11	0	0	0	10	0	148	155
Adoption/Foster care	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	
Parental Leave	3	0	5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	3	5	
Total	135	49	138	34	2	0	1	0	0	0	0	0	0	15	18	11	15	0	0	10	1	219	210

Employees who have returned to work after parental leave

	AENA S.M.E., S.A.				SCAIRM (Region de Murcia International Airport)				ADI				LLA				Aena Brasil				Total	
	2019		2020		2019		2020		2019		2020		2019		2020		2019		2020		2019	2020
	M	W	M	W	M	W	M	W	M	W	M	W	M	W	M	W	M	W	M	W		
Maternity	0	35	0	30	0	0	0	0	0	0	0	0	0	18	0	15	0	0	0	0	53	45
Paternity	113	0	111	0	2	0	0	0	0	0	0	0	15	0	11	0	0	0	10	0	130	132
Adoption/Foster care	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0
Parental Leave	3	0	5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	3	5
Total	117	35	116	30	2	0	15	18	11	15	0	0	10	0	187	182						

87% Rate of return to work of employees who took parental leave by gender in 2020

	No. of employees returned to work			No. of employees who must return to work			Rate of return to work*		
	Men	Women	Total	Men	Women	Total	Men	Women	Total (%)
Maternity	0	45	45	0	50	50	-	90%	90%
Paternity	132	0	132	155	0	155	85.2%	-	85%
Adoption/Foster care	0	0	0	0	0	0	-	-	-
Parental Leave	5	0	5	5	0	5	100.0%	-	100%
Total	137	45	182	160	50	210	85.6%	90.0%	87%

(*) Rate of return to work: (Total number of employees who returned to work after parental leave/Total number of employees who must return to work after parental leave) x 100.

Organisation of working time

- **AENA S.M.E., SA, and SCAIRM:** the organisation of working time is regulated by the 1st Collective Agreement; in Legislative Royal Decree 2/2015, of 23 October, which approves the consolidated text of the Workers Statute Act; and in Royal Decree 1561/1995, of 21 September, on special workdays.
- **London-Luton Airport** complies with all legislation related to working hours, including the Working Time Regulations of 1998. This allows employees to limit their work time to 48 hours per week. Employees can apply for flexible work through family-friendly policies, which may include reducing working hours. In some operational departments, including Security and Cargo, the option of minimum hour contracts that support greater work flexibility around family commitments is allowed.
- **Aena Brasil:** regarding the activity of Aena Brasil, currently, the provisions set forth in Brazilian legislation and in the 1st Collective Agreement, which was signed on 23 July 2020, are applied.

Registering the workday and disconnecting from work

As a reflection of the Company's commitment to ensuring compliance with working hours and to control employees remaining at work beyond the established working hours/times, prior to the approval of Royal Decree-Law 8/2019, of 8 March, on urgent measures of social protection and the fight against precarious work during the working day⁶, Aena already had a system for recording working days for Spain.

London-Luton Airport complies with all current legislation related to working hours, including the Working Time Regulations 1998. This allows employees to limit their work time to 48 hours per week.

During 2020, the Company has made progress in the design of an application, which employees in Spain can access from the intranet to record the workday they have performed (entry and exit registration), check the daily movements and extract the history by periods. To make the link to the portal more accessible, they have been given several clarification documents and a direct link.

With regard to disconnecting from work and remote work, Aena is working on defining both internal policies.

During the pandemic, Aena has established measures related to disconnecting from work and remote work for health reasons. Likewise, during the health crisis, London-Luton Airport has remained committed to allowing its employees to work flexibly whenever possible, introducing additional levels of flexibility (employees who do not work in operational areas have worked from home, offering the necessary equipment to ensure its efficient and safe performance).

In turn, Aena Brasil is working on defining the remote work policy.



⁶ Article 10 of Royal Decree-Law 8/2019, of 8 March, on urgent measures of social protection and the fight against precarious work during the working day, available at: <https://www.boe.es/buscar/doc.php?id=BOE-A-2019-3481>

Diversity and non-discrimination

Aena adheres to the United Nations Global Compact, transferring to management the universally accepted Ten Principles to promote sustainable development in the areas of human and labour rights, environment and anticorruption.

The commitment and endorsement of diversity and inclusion are understood from the broadest and most plural sense. The Company is strongly committed to the defence of identity, dignity and equality, both internally with its workers and externally, by making it extendable to its supply chain and the services it offers, and by eliminating discrimination in employment.

This commitment to diversity and non-discrimination, in all its aspects, is reflected in the company's own management model, which promotes the defence of basic principles such as the identity, singularity, and dignity of all people, and the eradication of discrimination in employment. This management model is reinforced with different standards and tools, which serve as the framework for action in these areas, and among which the following can be highlighted:



Employees

- Rejection of any type of discrimination based on race, nationality, age, social origin, gender, marital status, sexual orientation, religion, political ideology, disability or any other personal, physical or social condition.
- Teams characterised by their multiple competencies, skills, experiences, knowledge, values and attitudes.
- Special attention to groups that are in a vulnerable situation, for which specific actions are carried out, such as the integration of young people in the labour market, or the contracting of services with special employment centres.
- All recommendations that are objectively necessary are incorporated so that workers with disabilities can develop professionally under equal conditions.



Supply chain

- Respect for the principles of transparency, non-discrimination and equal treatment among bidders.
- Aena requires, among other things, that all professionals and contractors adhere to the Company's health and safety practices, promote equal opportunities in their companies, and assume the commitment to exceed the minimum salary in the professional remuneration of all their employees.



Services

- Adaptation of airport facilities to make them suitable for everyone.
- Quality service that guarantees all people can enjoy air transport, whatever their degree of disability.
- Inclusive language through the PA system.

Likewise, in terms of diversity and non-discrimination, it assumes the commitment to apply, among others, the content of the fundamental agreements of the International Labour Organisation (ILO)



- AENA SME, SA, AIRM
- LONDON-LUTON AIRPORT
- AENA BRASIL

Anti-discrimination measures

Equality Plan

Included in the Agreement itself, and supervised by the Joint Commission, formed equally by Aena and the most represented trade unions, it pays special attention to the prevention of sexual harassment, having a specific protocol for the management of complaints.

Selection policy for Board Member candidates

Ensures the correct selection of candidates for the Board of Directors, in which diversity of knowledge, experiences and gender prevails and is prioritised.

Corporate Responsibility Policy

Includes, among the principles of action on which the corporate responsibility of the organisation is based: (i) providing a safe and healthy work environment, characterised by equal opportunities and non-discrimination, the promotion of diversity, talent management, and the reconciliation of professional and personal life; (ii) transferring corporate responsibility criteria to value chain management, encouraging the inclusion of social clauses, among themselves in terms of equality and diversity, in hiring, as well as responsible practices in suppliers and contractors.

Code of Conduct

Sets forth the commitment to "provide the same opportunities in access to work and in professional promotion, therefore rejecting any type of discrimination based on race, nationality, social origin, gender, marital status, sexual orientation, religion, political ideology, disability or any other personal condition of people, whether physical or social".

Applicable regulations on contracting (Act 9/2017)

Provides for the inclusion of diversity clauses in tenders, as well as monitoring mechanisms of the degree of compliance with them (and penalty measures, if applicable).

Employee manual and the obligations derived from the British Equality Act of 2010

The following reflect the Company's commitment to diversity:

- The provision of accessible services of high quality.
- The commitment to clients, local communities, staff, stakeholders and contractors to identify and implement improvements.
- The tackling of barriers that restrict access to services.
- The understanding of issues related to age, disability, gender reassignment, pregnancy and motherhood, marriage, race, religion or belief, sex and sexual orientation.
- The promotion of equal opportunities in all employment practices and the provision of services.

London-Luton Airport Disability Policy

It shows the Airport's commitment to, among other things, promoting the interests of people with special needs, whether they are users, visitors or employees, or guaranteeing access to the employment of any person regardless of their condition.

Responsible Business Strategy

Its objectives include the promotion of diversity and inclusion, especially focused on gender diversity.

Code of Conduct

Sets forth the commitment to "provide the same opportunities in access to work and in professional promotion, therefore rejecting any type of discrimination based on race, nationality, social origin, gender, marital status, sexual orientation, religion, political ideology, disability or any other personal condition of people, whether physical or social".

Equality Plan

Brazilian law establishes equal rights for men and women. The Collective Agreement of Aena Brasil has a clause to protect women from sexual harassment.

Gender diversity

Women account for 36.1% of the Group's workforce, hold 33% of positions on the Board, and 43.9% of director, middle management or graduate positions.

Among the most relevant actions carried out in the area of gender diversity in 2020, the following stand out:

- **Women's Day Conference:** on International Women's Day, a conference was organised with Mujeres&Cía, led by Mercedes Wullich, founder of Mujeres&Cía and creator of the Top 100 Women Leaders ranking, followed by a colloquium interview with three women from different work environments, in Aena's central services.
- **Vocento Award for Equality:** The Vocento Group has awarded Aena an award for its commitment to equality. This recognition highlights Aena's initiatives to ensure equal opportunities, boost the presence of women in management positions and develop inclusive language in the airports' PA system.
- Participation, with Aena's representation in various forums and meetings, **such as "Mujeres Líderes en el Transporte. Fomentando la Igualdad" (Women Leaders in Transport. Fostering Equality)**, organised by the Bar Association, "Mujeres en Movimiento. Liderazgo femenino en el transporte y la Sostenibilidad" (Moving Women. Women's leadership in transportation and Sustainability) and "Elas vuelan alto" (They fly high).
- Various acts carried out at different airports, on the occasion of the **International Day for the Elimination of Violence against Women**.
- Training for employees on content related to equality between women and men: 514 hours of training, 257 participating employees. A training programme was started in November 2020 at London-Luton Airport, with 60 hours of training and 39 participating employees.

Reports of harassment

The Collective Agreement includes an Equality Plan, which pays special attention to the prevention of sexual harassment, and it includes a specific protocol that incorporates a programme to manage possible complaints. During 2020, a harassment complaint was received through the specific channel, accessible to all employees in Spain, the United Kingdom and Brazil:

- One complaint, protocol activation date: 20/02/2020, end date: 05/08/2020, it was filed after the appropriate actions that were taken failed to confirm the existence of a workplace harassment situation.
- London-Luton Airport has received no complaints via established channels (*see chapter 1*).
- In Brazil, there were no reports of harassment in 2020.

Moreover, the Protocol for the Intervention of Structural Situations was activated at the following airports and centres:

- At Barcelona-El Prat Josep Tarradellas, Tenerife Sur and Vigo airports, interventions were carried out this year focused on improvements in aspects related to teamwork, conflict management and leadership.
- Other centres have monitored the actions conducted in 2019; in areas related to work team coordination, individual feedback, conflict prevention and communication improvements. The centres that have undergone this follow-up have been La Palma, Valencia and a Central Services Department.

Aena is committed to creating alliances that aim to highlight the role of working women and the promotion of equality, mainly in the aeronautical sector.

London-Luton Airport's Responsible Business Strategy includes specific objectives on the subject of promoting equality in the organisation, which will materialise in a future strategy with specific goals and actions.

Percentage of women/men in workforce (as of 31 December)

2019

	Aena, S.M.E., S.A. (Spain)		Aena Sociedad Concesionaria del AIRM S.M.E., S.A. (Spain)		ADI, S.M.E., S.A. (Spain)		London-Luton Airport (United Kingdom)		Aeroportos do Nordeste do Brasil, S.A. (Aena Brasil)		TOTAL	
	Employees	% total workforce	Employees	% total workforce	Employees	% total workforce	Employees	% total workforce	Employees	% total workforce	Employees	% total workforce
Men	4,995	63.49%	61	76.25%	12	50.00%	520	61%	40	71.43%	5,627	63.40%
Women	2,872	36.51%	19	23.75%	12	50.00%	333	39%	16	28.57%	3,251	36.60%
Total	7,867	100%	80	100%	24	100%	853	100%	56	100%	8,878	100%

2020

	Aena, S.M.E., S.A. (Spain)		Aena Sociedad Concesionaria del AIRM S.M.E., S.A. (Spain)		ADI, S.M.E., S.A. (Spain)		London-Luton Airport (United Kingdom)		Aeroportos do Nordeste do Brasil, S.A. (Aena Brasil)		TOTAL	
	Employees	% total workforce	Employees	% total workforce	Employees	% total workforce	Employees	% total workforce	Employees	% total workforce	Employees	% total workforce
Men	4,909	63.8%	60	76%	13	54%	432	61%	192	71%	5,606	63.9%
Women	2,781	36.2%	19	24%	11	46%	274	39%	80	29.41%	3,165	36.1%
Total	7,690	100%	79	100%	24	100%	706	100%	272	100%	8,771	100%

Universal accessibility to employment for people with disabilities

Aena offers job opportunities for people with different abilities. In its job offers, the Organisation favours the participation of people with different abilities, making the necessary adaptations to conduct the selection tests in an appropriate manner.

In 2020, the Company had 123 people with functional diversity in its workforce, 1.4%. Aena's facilities and work centres are adapted to facilitate and enhance the access of employees, customers, suppliers, in short, any other user, and have a specific service in the airports for persons with reduced mobility (PRM). In addition, in the event that new adaptations in the work environment are objectively necessary, Aena develops them to ensure professional development under equal conditions.

At the same time, on a biannual basis, in Spain, Aena launches a call for social entities, foundations or associations that carry out professional integration or job creation activities for a maximum amount of €100,000/year. Currently, six social entities benefit from this aid.

In addition, the Organisation maintains alliances with the main Spanish organisations in the industry such as the Spanish Committee of Representatives of Persons with Disabilities or the Spanish Autism Confederation, which reinforce the company's commitment to the accessibility of people with disabilities, or other specific ones in the United Kingdom.

Diverse and inclusive work environment

In June 2020, Aena and the rest of the public companies of the Mitma Group⁷ signed, together with other companies, a protocol between the Ministry of

Transport, Mobility and Urban Agenda, and the Business Network for LGBTI Diversity and Inclusion (REDI [Red Empresarial por la Diversidad e Inclusión LGBTI]).

By signing this protocol, the parties seek to promote the **diversity and inclusion of the LGBTI community** in the sphere of the State Public Sector and to promote awareness and the appropriate environment to carry out initiatives in this regard among the employees of the Ministry of Transport, Mobility and Urban Agenda, and its entities and dependent companies.

This protocol represents great political and social progress, by defending the visibility of the LGBTI community in the workplace and defending its civil rights. Through it, Aena reaffirms its commitment against discrimination and promotes awareness and the appropriate environment for the effective inclusion of this group in the work environment.

Employees with disabilities*

	Manpower		% over Total Workforce**		
	2019	2020	2020	2019	2020
Aena, S.M.E., S.A.	111	108	7,690	1.41%	1.40%
SCAIRM S.M.E S.A	6	7	79	7.5%	8.86%
ADI, S.M.E S.A	0	0	24	0%	0%
Aeroportos do Nordeste do Brasil, S.A.	-	8	272	-	2.94%
TOTAL	117	123	709		1.4%

(*) Currently, London-Luton Airport does not register staff with disabilities, as the UK government does not require it.

(**) Data from Aena S.M.E., S.A. corresponding to 2018. Data from Aena S.M.E., S.A. corresponding to the actual number of employees with disabilities in the workforce as of 21 December, without considering the equivalent number resulting from compensatory measures. According to current legislation, the percentage of employees with disabilities is calculated based on the actual number of people with disabilities in the workforce as of 31 December, and the equivalent number of people resulting from the compensatory measures approved by the Resolution of the General Directorate of the Public Service of State Employment on the Declaration of exceptionality and adoption of alternative measures for the fulfilment of the reserve quota in favour of workers with disabilities.

The actual number of employees with disabilities, as of 31 December 2019, is 115 and in 2020, it was 108. However, as of the date of publication of this report, the Resolution from the competent body regarding the Declaration of exceptionality corresponding to the 2019 financial period that allows the percentage of employees with disabilities to be included in the 2019 fiscal year is not available, nor is it available for 2020.

⁷ Adif, Adif-AV, ENAIRE, INECO, Puertos del Estado and Renfe Operadora.

Diversity in government bodies and employees

Aena strengthens the interrelationship, multiplicity and inclusion of the members of the Aena team, as well as the attraction and development of talent and commitment.

As part of the initiatives of the Employer Branding strategy, the aim is to create a network of brand and diversity ambassadors who will seek, among other tasks, to highlight the Company's heterogeneity.

To do this, the Company seeks maximum diversity in the selected people: covering all occupations and areas, seeking diversity in gender, age, seniority in the company, culture, etc.

	Women					Men				
	Age range (%)			Minority groups (%)		Age range (%)			Minority groups (%)	
	<25	>45	25-45	People with disabilities	Nationals of a non-E.U. member country	<25	>45	25-45	People with disabilities	Nationals of a non-E.U. member country
Companies based in Spain (Aena S.M.E., ADI, SCAIRM)										
Board of Directors	0.00%	66.67%	33.33%	0%	0%	0.00%	73.68%	26.32%	0%	5.26%
Senior Management	0.00%	80.0%	20.0%	0%	0%	0.00%	71.4%	28.6%	0.00%	0.00%
Other executives and graduates	0.00%	53.3%	46.7%	1.19%	0.36%	0.00%	55.4%	44.6%	1.63%	0.10%
Coordinators	0.00%	78.6%	21.4%	0.31%	0.31%	0.00%	79.7%	20.3%	1.77%	0.24%
Technicians	0.00%	68.9%	31.1%	2.35%	0.00%	0.00%	56.9%	43.2%	1.14%	0.03%
Support Staff	0.00%	54.8%	45.2%	0.43%	0.43%	0.00%	63.4%	36.6%	2.44%	
Total by professional category	0.00%	64.2%	35.8%	1.60%	0.18%	0%	60.7%	39.3%	1.41%	0.08%
London-Luton Airport										
Senior Management	0.00%	0.00%	0.00%	N/A	N/A	0.00%	0.00%	0.00%	N/A	N/A
Other executives and graduates	0.00%	43.75%	56.25%	N/A	N/A	0.00%	40.91%	59.09%	N/A	N/A
Coordinators	0.00%	66.67%	33.33%	N/A	N/A	0.00%	47.83%	52.17%	N/A	N/A
Technicians	0.00%	0.00%	0.00%	N/A	N/A	0.00%	48.08%	51.92%	N/A	N/A
Support Staff	8.62%	28.88%	62.50%	N/A	N/A	5.11%	32.27%	62.62%	N/A	N/A
Total by professional category	7.30%	32.48%	60.22%	N/A	N/A	3.70%	35.88%	60.42%	N/A	N/A
Aeropertos do Nordeste do Brasil										
Senior Management	0.00%	0.00%	0.00%	N/A	N/A	0.00%	0.00%	0.00%	N/A	N/A
Other executives and graduates	0.00%	37.50%	62.50%	N/A	N/A	0.00%	80.00%	20.00%	N/A	N/A
Coordinators	0.0%	0.00%	100.00%	N/A	N/A	0.00%	94.29%	5.71%	N/A	N/A
Technicians	0.00%	0.00%	100.00%	N/A	N/A	0.00%	96.43%	3.57%	N/A	N/A
Support Staff	11.11%	2.22%	86.67%	N/A	N/A	3.77%	79.25%	16.98%	N/A	N/A
Total by professional category	6.25%	5.00%	88.75%	N/A	N/A	1.04%	89.58%	9.38%	N/A	N/A

Generational diversity and promotion of the work integration of young people

The correct management of generational diversity in a workforce like Aena's, in which more than 58% of employees are over 45 years old, is essential. This is in addition to the reality of the social context itself, which encourages us to make an important effort to activate and increase the hiring of young people, and offer them new opportunities for professional insertion. In this regard, the following stand out:

- Agreements with universities (public and private), business schools and other teaching centres, to encourage the integration of young people into the labour market, through external academic practices (curricular and extra-curricular), with undergraduate and/or master's students in the company. Through this initiative:

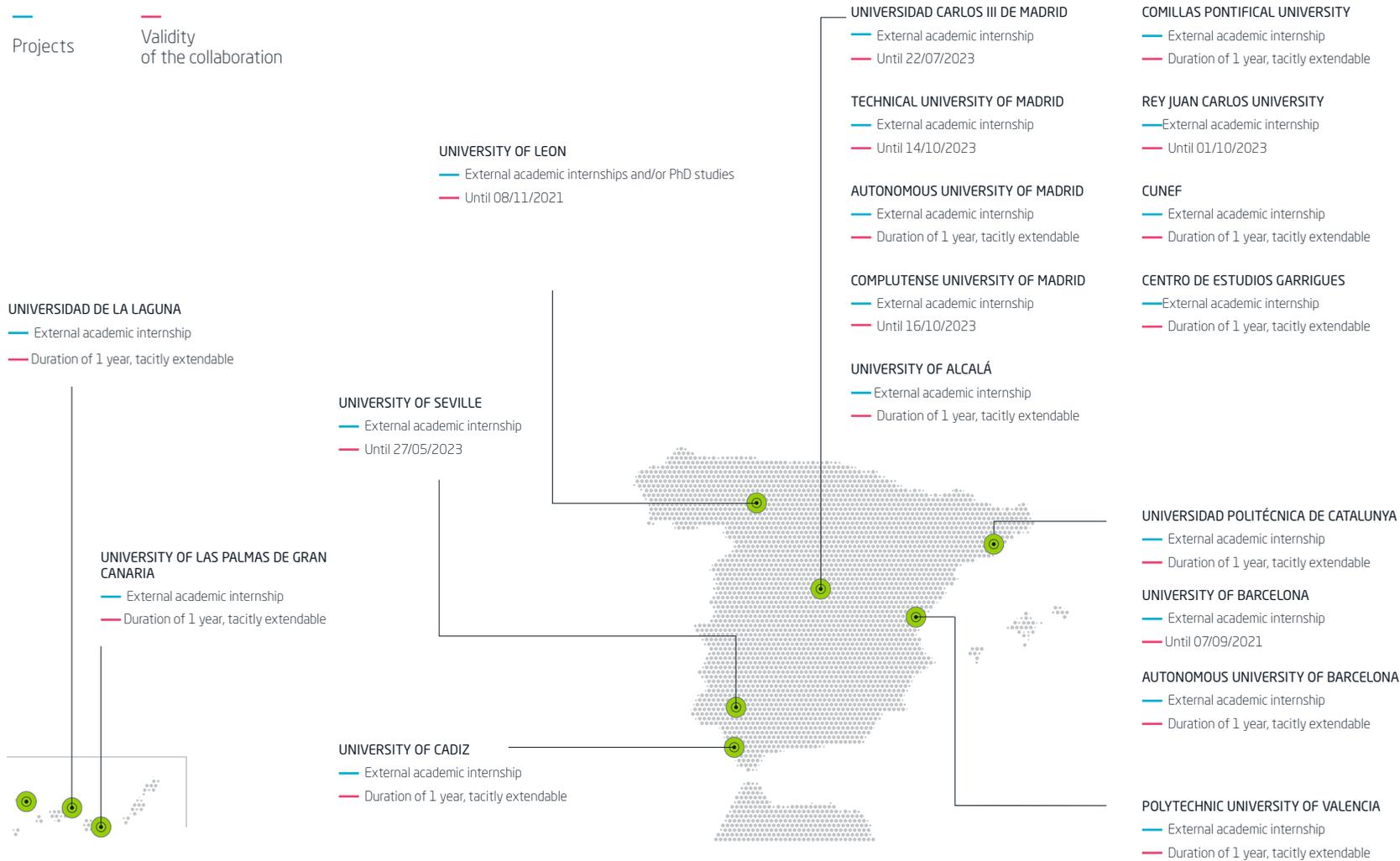
- Despite the situation experienced in 2020, with several months of lockdown, more than 55 undergraduate or master's students have completed curricular or extracurricular internships during 2020 in Spain (96 in 2019).
- 18 agreements in force in 2020 with universities and teaching centres.
- While London-Luton Airport does not currently have formal agreements in place regarding academic internships, it works closely with Cranfield University and the London Business School on aviation-related projects and business improvement opportunities.

In addition, in 2020, Aena participated in the following Job Fairs at different training centres:

- Complutense University of Madrid (Faculty of Computer Science) Job Fair.
- 15th Employment Forum of the Autonomous University of Madrid.
- Virtual Job Fair: 22nd Comillas Employment Forum.
- Virtual Job Fair: 20th Employment Forum of the Carlos III University.



— Projects
— Validity of the collaboration



Talent and training

The Company has advanced its Employer Branding Strategy, under which, among other things, Aena establishes action plans to:

- Improve the dissemination of job offers, selection processes, and internal communication and enhance Aena's brand image.
- Reinforce the feeling of pride and belonging in the workforce.
- Achieve greater talent attraction and find the most appropriate profiles, both externally and internally, in order to identify the organisation's potential, offer better opportunities for employee development, cover the needs of vacant structure positions and manage the processes with the appropriate quality and guarantee levels. In addition, Aena works on career and succession plans for key personnel.

For its part, London-Luton Airport's Responsible Business Strategy includes, among other objectives, the development of new strategies for attracting and recruiting talent and guaranteeing the professional development of employees, as well as contributing to the Luton Council's training academy and expanding the learning programme.

Training

In order to better adapt the training plans and involve the workers themselves, in 2020 a survey of "training needs" was launched, giving the employees the opportunity to transfer their ideas regarding training and development to the organisation and, along with their manager, address the design of their training plan in a more participative manner.

The unstoppable technological evolution constitutes a key element of the human resources strategy for the development of workers' skills. The training policy, which is detailed below, and the 2018-2021 Strategic Plan promote actions, programmes and operations aimed at attracting and retaining talent, while at the same time contributing to the transformation of the organisational culture, increasing the motivation, commitment and involvement of employees and the development of their professional skills.



With the purpose of accompanying and guiding the organisation's leaders, who are the people who in turn accompany and provide support for everyone else, and to manage to stay motivated and resilient in adverse situations, the Company developed the "Liderazgo en tiempos de crisis" (Leadership in times of crisis) Decalogue, which was sent to all the Company's executives and managers.

Employees who receive professional performance evaluations by gender, professional category and region

2019

	Aena S.M.E., S.A.			ADI			SCAIRM (Region de Murcia International Airport)			London-Luton Airport			Aena Brasil			Total aggregated	
	M (%)	W (%)	Total	M (%)	W (%)	Total	M (%)	W (%)	Total	M (%)	W (%)	Total	M (%)	W (%)	Total	M (%)	W (%)
Senior Management	100%	100%	100%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	88%	100%
Other executives and graduates	63%	61%	63%	64%	50%	59%	50%	60%	53%	0%	0%	0%	91%	100%	94%	61%	60%
Coordinators	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	60%	100%	80%	0%	1%
Technicians	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Support Staff	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Total	13%	17%	14%	58%	25%	42%	10%	16%	11%	0%	0%	0%	33%	69%	43%	12%	16%

2020

	Aena S.M.E., S.A.			ADI			SCAIRM (Region de Murcia International Airport)			London-Luton Airport			Aena Brasil			Total aggregated	
	M (%)	W (%)	Total	M (%)	W (%)	Total	M (%)	W (%)	Total	M (%)	W (%)	Total	M (%)	W (%)	Total	M (%)	W (%)
Senior Management	100%	100%	100%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	86%	100%
Other executives and graduates	62%	60%	61%	92%	100%	94%	50%	60%	53%	0%	0%	0%	95%	88%	93%	61%	59%
Coordinators	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	77%	73%	76%	3%	2%
Technicians	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Support Staff	0%	0%	0%	0%	71%	63%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	1%
Total	13%	18%	15%	85%	82%	83%	10%	16%	11%	0%	0%	0%	24%	19%	22%	13%	17%

Significant training actions in 2020⁸

The commitment to the development and training of employees is set out in the Aena Training Policy, the main objectives of which are:

- Develop the technical competencies of workers to promote the correct performance of their job, as well as to enhance their professional and human development.
- Facilitate the updating of workers' knowledge based on the regulatory, technological or organisational changes that occur.
- Increase the productivity, efficacy and efficiency levels.
- Contribute to projecting an excellent image of Aena through its professionals.

During 2020, Organisation and Human Resources Management, with the objective of contributing to minimise the impact of the pandemic on Aena's professionals, has joined efforts with Information Technologies and Communications Management to make it possible for its most regular activities to continue to be performed.

In line with this objective, and together with the challenge that was already initiated in 2019 of promoting cultural change and digital transformation, initiatives have been put in place that involve the use of new tools that streamline and enable virtual training and meetings for the entire workforce, in addition to promoting a culture of self-learning.

The activities carried out in 2020, set in motion in record time, have been largely planned in order to maintain the mandatory training and also contribute as much as possible to help other companies that provide services to Aena to continue working. Thus, the Company established mechanisms so that **the training could take place online**, which, up to the start of the lockdown, was taking place in person.

Another important aspect that has been implemented, with the idea of contributing to maintaining training in Aena, is the bonus from the State Foundation for Employment Training for training in Virtual Classrooms.

Development of new projects

- **Procedure for adapting and implementing in-person training in Virtual Classrooms:** with the aim of continuing to deliver training, the Training Units established a procedure for this adaptation, which was initially planned for the centralised and compulsory training, and was subsequently expanded to training actions with other characteristics.
- **Digital and Cultural Transformation Itinerary:** the proposal for cultural change and digital transformation at Aena is centred on training and development in elements that promote it in the medium-long term. To this end, the Company has started to develop training actions in this area, aimed at different groups in all areas of the organisation, thus promoting this transformation.

- **Self-learning platform:** Aena has a self-learning tool that will allow all Aena staff to access, on a voluntary basis, varied, dynamic and innovative online training. The subjects that can be accessed include training in skills, well-being and security, the communication tool, productivity and digital skills, etc. They all contribute to Aena's interest in strengthening its prevention, work-life balance and digitalisation measures and new ways of working:

This training will also be available in several languages, including English, so that workers can improve and practice their knowledge and take Business English monographic capsules.

- **Development and implementation of the new methodology for detecting training needs:** this year, a new questionnaire for detecting needs has been launched for all Aena staff, so that the requests are collected on a global basis, and all the training can be managed in a more agile manner.
- **Skills verification:** the first skills verification cycle has been completed with the specific tests associated with the Fire Rescue and Extinction Service, Operations in the Movement Area and Airport Maintenance groups.
- **Implementation of improvements in the training management application (SAP-SIGIF)** to facilitate

⁸ Throughout the document, the training courses provided in the different subjects (compliance, equality, quality of services, environment, security, data protection, etc.) are detailed.

the control of the courses of the training itineraries audited by the Spanish Aviation Safety and Security Agency in the airport certification process.

Update/Adaptation of training actions

- **Online training:** in line with the ordinary calls for online training, the usual strategic training has been maintained on the online courses platform during the State of Emergency and the following months.
- **Language training: English and Portuguese.** Language training has been particularly prominent in 2020 due to the speed in adapting to the virtual method. Throughout the year, the programmed classes of the different programmes have been maintained.

Specific training actions have been developed in some key areas of the Company, such as regulatory compliance.

In addition, 21 new courses have been developed and 68 already existing courses have been updated, for personnel from levels C to F.

In Aena Brasil, the following training stands out:

- Training to start operations at the airports of Recife, Maceió, João Pessoa and Aracajú.
- AVSEC training.
- Systems training.

Specific actions motivated by the COVID-19 pandemic

- **New courses:** general aspects and preventive measures in Aena (COVID-19) and Remote work course. These courses arise in the context of the pandemic, with the aim of providing training and transferring relevant information for the entire workforce and office staff in an online format.
- Preparation of an action protocol for the re-start of training in person with prevention measures regarding COVID-19.

In 2020, Aena allocated a total of €1,359,225 to the investment in employee training and education

	2019					2020					Total	
	Aena S.M.E, S.A.	ADI	SCAIRM	LLA	Aena Brasil	Aena SME, S.A.	ADI	SCAIRM	LLA	Aena Brasil		
Investment in training programmes and employee training (€)	1,987,120 *			315,473.88	18,651.20	1,099,064.8 *			250,905.9	9,254.1	1,359,224.8	
Investment in training per employee (€)	249	-	-	371	333	141.0	-	-	355.4	34.0	155.0	
Employees who have received training (%)	Women	100%	75%	100%	N/A	-	100%	100%	100%	N/A	100%	95%
	Men	100%	83%	100%	N/A	-	100%	100%	100%	N/A	100%	95%
Average training per year per employee (hours)	Women	46.4	33.4	25.7	N/A	-	27.0	31.8	27.8	N/A	40.3	25.0
	Men	64.4	40.8	44.3	N/A	-	49.3	35.8	50.9	N/A	62.3	46.0

(*) Total Expenditure on Training in Spain.
NOTE: London-Luton Airport does not record Training hours

Training hours by gender, professional category and region*

2020

Training hours	AENA S.M.E., SA			SCAIRM (Region de Murcia International Airport)			ADI			Aena Brasil			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	Online training	On-site training	Total
Men	163,492.4	78,749.5	242,241.8	2,600.0	452.5	3,052.5	79.0	387.0	466.0	2,970.0	8,985.5	11,955.5	169,141.4	88,574.5	257,715.8
Women	53,942.9	21,179.0	75,121.9	467.0	61.0	528.0	66.0	283.6	349.6	863.5	2,361.0	3,224.5	55,339.4	23,884.6	79,224.0
Total by gender	217,435.2	99,928.5	317,363.7	3,067.0	513.5	3,580.5	145.0	670.6	815.6	3,833.5	11,346.5	15,180.0	224,480.7	112,459.1	336,939.8
Senior Management	12.0	505.0	517.0	-	-	-	-	-	-	-	-	-	12.0	505.0	517.0
Executives and Graduates	34,804.9	19,982.6	54,787.5	341.0	67.0	408.0	74.0	519.5	593.5	357.0	77.0	434.0	35,576.9	20,646.1	56,223.0
Coordinators	32,235.8	14,327.0	46,562.8	418.0	77.0	495.0	-	-	-	1,105.5	561.5	1,667.0	33,759.3	14,965.5	48,724.8
Technicians	143,181.5	63,333.3	206,514.8	2,203.0	351.5	2,554.5	-	-	-	988.0	9,348.0	10,336.0	146,372.5	73,032.8	219,405.3
Support Staff	7,201.0	1,780.6	8,981.6	105.0	18.0	123.0	71.0	151.1	222.1	1,383.0	1,360.0	2,743.0	8,760.0	3,309.7	12,069.7
Total by professional category	217,435.2	99,928.5	317,363.7	3,067.0	513.5	3,580.5	145.0	670.6	815.6	3,833.5	11,346.5	15,180.0	224,480.7	112,459.1	336,939.8

NOTE: London-Luton Airport does not record Training hours

(*) Information regarding training in 2019 can be found in the Aena 2019 Corporate Responsibility Report, available at: http://www.aena.es/csee/ccurl/164/377/Libro_ENG_interactivo_v4_VF.pdf

Currently, London-Luton Airport does not record training by hours, gender or professional category. Mandatory and regulatory training is managed within the individual departments and is registered locally. Annually, Luton employees perform all necessary training and this generally includes more than 85% of employees undergoing training in a single year, and 100% of employees undergo training in the areas of Security, Firefighters, Operations and Technical Services.

Development programmes

- “Líderes desarrollando líderes” (Leaders developing leaders) **Mentoring Programme**

In 2020, the 8th Edition consisting of 24 mentor-mentee couples (48 participants in total) continues to be developed, as of March in online format, due to the impossibility of travel and meetings. The launch of the 9th Edition, scheduled for March, has been postponed until next year due to the state of emergency and the situation produced by the COVID-19 pandemic.

Since its inception, it has accumulated a total of 212 participants. This programme promotes the implementation of some key mechanisms for professional development:

- Transfer of knowledge and know-how, coupled with development of skills for leadership.
- Encouraging commitment, cultural transformation and internal networking.

- **Coaching programme.**

Beginning in 2007, with external coaches and, from 2011, continuing with internal coaches, it is a development strategy that focuses on enhancing behavioural skills (social interaction, directives, self-management and personal efficiency, mainly).

In 2020, the number of coaching hours accumulated has been reduced by around 18% and the drop in the number of clients has been around 16%, reaching 145.5 hours accumulated, from processes carried out on 16 clients: 11 women and 5 men (10 of them with internal coaches and 6 with external coaches).

Industrial relations

Aena guarantees that its employees can enjoy the rights of freedom of association, unionisation and collective bargaining within the framework of current labour regulations and the collective agreement that is applicable:

- Aena SME, SA, and SCAIRM: this social dialogue is articulated in the 1st Collective Agreement of the Aena Group of Companies, in its Chapter XIX. The State Union Coordinating Commission (CSE [Coordinadora Sindical Estatal]) is the representative body for the workers of the entities and/or companies that make up the Aena Group, included within the scope of application (Section 3 - Art. 161 of the 1st Collective Agreement of the Aena Group).
- London-Luton Airport: all employees have the opportunity to join a union recognised by the company

or any other union for the purposes of representation in the company's processes, not including the negotiation of payments and benefits.

- In July, Aena Brasil signed its first Collective Agreement, and negotiations were initiated for its development.

In addition, Aena's Human Rights Policy, which applies to all the companies of the group, endorses the corporate commitment to the right of freedom of association and collective bargaining of its workers:

“Aena recognises, without interferences, the right of its employees to constitute or participate in organisations for the defence and promotion of their interests, through union representation or through the forms of representation chosen in accordance with the legislation and practices that are in force in the different countries in which the employment relationship takes place.

Likewise, Aena recognises the value of collective bargaining as a preferred instrument for determining the contractual conditions of its employees, as well as for regulating relations between management and unions.”

In order to develop and deal with the specific issues of the Collective Agreement, as explained throughout the report, the corresponding joint commissions have been created, composed of the unions that are present in the State Union Coordinating Commission and the company.

- Joint Commission on Training.
- Joint Commission on Promotion and Recruiting.
- Joint Commission on Equality.
- State Health and Safety Committee.

- Joint Commission on Social Action.
- Commission on the interpretation, monitoring, conciliation and arbitration, and voluntary resolution of conflicts.

As legal representatives of the employees, Aena holds regular bilateral meetings with all the joint commissions provided for in the Agreement, to manage their respective matters. The information, participation, consultation and negotiation dynamics of the union representations are channelled through them. In short, the participation of workers in the management of the company through their legal representatives (centre committees and staff delegates) is quite broad as it extends to the main aspects of the employment relationship, based on extremely stable working conditions that provide extensive guarantees, as a consequence of the public nature of the company and the applicable Collective Agreement.

In 2020, the relationship with the union representation has been marked by the negotiation of all the measures implemented for the health and safety of the workers, as well as the guarantee of essential public air transport services, with the State Union Coordinating Commission playing an important role in the adoption of agreements within the scope of the Group's companies, and the State Committee on Health and Safety, as a result of COVID-19. In this regard, the Operational Recovery Plans of Aena's Work Centres have been agreed with the union representations.

Aena has various communication channels to ensure and facilitate a fluid relationship with employees, share

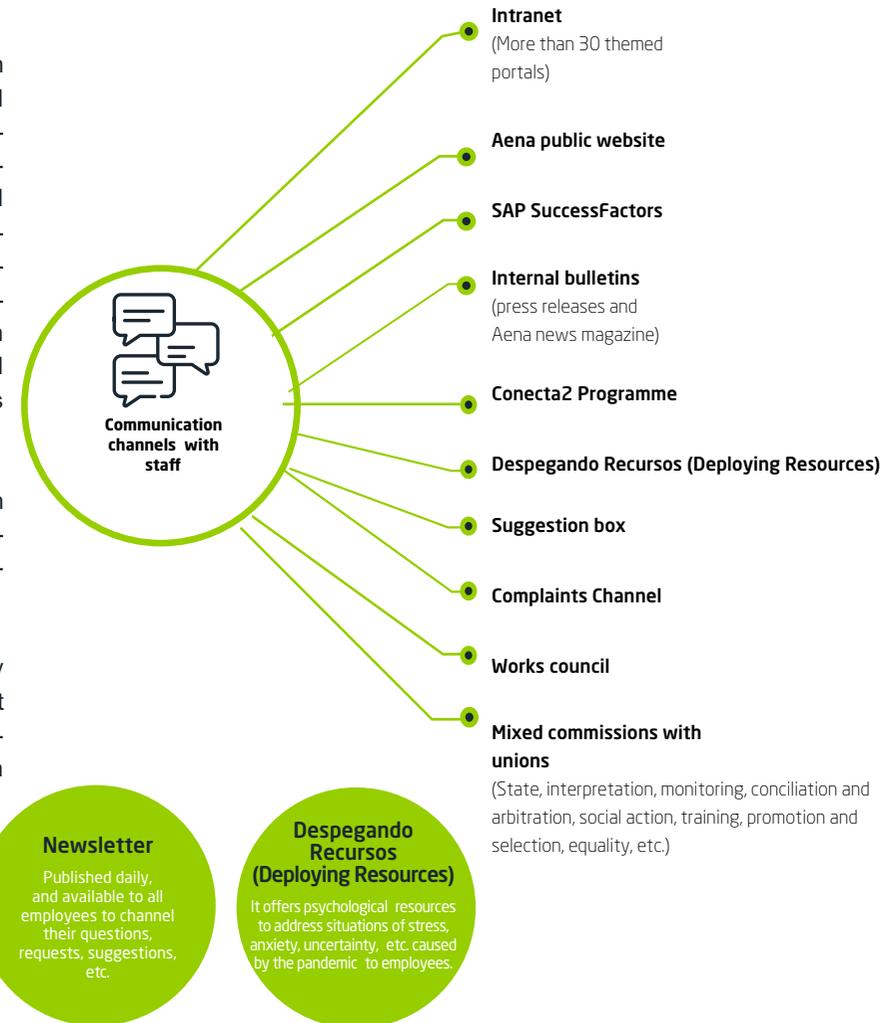
the Company's new objectives and encourage their involvement. As an example of this, in 2020, the new employee portal, SAP SuccessFactors, was launched. It is more dynamic and interactive, accessible from any web browser and mobile device and it not only makes their own personal information available to them, but it is also particularly focused on fostering communication and interaction between workers.

London-Luton Airport has its own internal communication channels. For example, "Engage Co: Lab" is an internal work group that aims to collaborate, debate and find effective solutions for improving communication, in a two-way manner, fostering a sense of pride in belonging and regular employee participation. At the end of 2020, London-Luton launched "LLA Hub". It is, together with Yammer, a tool to enable employees to review company information, share experiences and request information from peers and managers. Due to the pandemic, the usual communication was interrupted, although several surveys were carried out during the year.

Likewise, the offices of Aena's headquarters have been recently renovated with the aim, among others, of promoting collaborative work methodologies, as well as streamlining and promoting creativity and innovation.

In addition, due to the health emergency, the Company has exploited all the channels it has available to transmit corporate messages, foster dialogue with senior management and announce the health measures that have been adopted, among others.

Aena uses all of these tools to communicate, share and make all of the Company's policies and standards available to all employees, including those related to labour matters (Collective Agreement, Code of Conduct, etc.). Specifically, the corporate policies and regulations are available to employees on the intranet and on the Aena website for workers to check at any time.





Percentage of employees covered by collective agreements by country:

Many of the employee groups are covered by the collective labour regulations in the different countries in which Aena operates.

2019	2020	Country/Entity
99.86%	-	Spain
100%	-	Aena Desarrollo Internacional (ADI)
98.75%	98.73%	Sociedad Concesionaria del Aeropuerto Internacional de Murcia S.A. (SCAIRM)
40%	30%	United Kingdom (Luton)
-	100%	Aeroportos do Nordeste do Brasil (Aena Brasil)

Operational changes

In relation to operational changes, the procedure for making Substantial Modifications of the Working Conditions, both individual and collective, is already established in the Workers' Statute. Therefore, Aena cannot modify it in any way.

In Brazil, the work change procedure is guaranteed in the Consolidation of Brazilian Labour Laws (CLT, as it is known by its Portuguese acronym).

Freedom of association and collective bargaining in operations and suppliers

In Spain and London-Luton Airport, no significant risks have been identified associated with the violation of the

rights of freedom of association and collective bargaining in operations, suppliers, or in the supply chain (the latter, due to its eminently local nature).

Occupational health and safety

Protecting the physical and emotional health and safety of workers and users of the facilities, reducing accident rates and developing and enhancing a preventive culture are permanent and priority objectives for Aena, as reflected in its Health and Safety Policy. To put it into practice, the Company has a perfectly articulated management and tools system –with which it intends to go beyond legal compliance–. For its correct implementation, all areas of the Company and, of course, its employees, play a fundamental role. The global health emergency context has only served to reinforce the relevance of these issues in the Organisation. Thus, a multitude of specific actions have been developed to ensure the health and well-being of employees.

Prevention Policy, Prevention Management System and Prevention Plan

Aena has an **Occupational Risk Management System**, 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 Prevention Services Regulation). Responsibilities are defined and prevention is structured around it to ensure it works properly, as well as ensure compliance with the guidelines contained in the Occupational Risk Prevention Policy. This System is regulated by the Occupational Risk Prevention Management Manual, the

Procedures and Instructions that develop it, the preventive activities and bodies of the entities and/or companies of the Aena Group.

The Occupational Risk Prevention Management System is audited every four years by an external company certified to conduct audits in accordance with the applicable legislation. In the last audit of the Management System (2019), the result was **high compliance** regarding Occupational Risk Prevention, **good integration** of the preventive activity in the company and **good efficacy** to prevent, identify, evaluate, correct and control occupational risks in all phases of the company's activity. In the Joint Service, 100% of the Company's own employees are covered by the system.

Currently, a comprehensive review of the prevention management system is being conducted, updating the most relevant procedures, in order to assess the possibility of certifying the management system under the OHSAS Standard or another similar one.

The System integrates prevention at all levels of the company, which means they all have to bear in mind and undertake an obligation to include risk prevention in any activity and decision.



Through the Occupational Risk Prevention Policy, Aena assumes a commitment to meet the following objectives:

- To develop its management while committing to preventing damage and health deterioration, and promoting continuous improvement.
- To comply with the applicable internal and external regulations.
- To establish adequate information channels.
- To guarantee the participation, information and training of workers.
- To disseminate, explain and keep the Policy updated.
- To coordinate preventive activities with third parties, including concessionaires, contractors and airline operators.

100%
own employees
are covered by the
system

For its part, through Aena's Occupational Risk Prevention Plan, the Company ensures that the operation of the organisation's preventive activity complies with the Occupational Risk Prevention Policy, defining the prevention objectives, which also consider emergencies and third party (contractors, concessionaires, etc.) activities. These objectives are:

- Commitment to the prevention of damages to health and impairment and to continuous improvement in the management and performance of health and safety at work, establishing quantitative objectives for occupational accidents each year. (These objectives are indicated on page 42).
- Compliance with the requirements signed by the organisation in addition to the applicable legal requirements.
- The establishment of the appropriate information channels in the field of Occupational Risk Prevention (ORP).
- The participation, information and training of workers on the subject of ORP.
- The dissemination and updating of the ORP Policy.
- The coordination of preventive activities with licensees, contractors, air operators and Government Bodies.

These tools also include training, communication and awareness actions on employee obligations and responsibilities, which are essential to ensure compliance with current regulations, and to materialise the commitment that the entire workforce needs to have to this purpose.

To minimise and/or eradicate possible incidents and fatalities, the Company performs continuous reviews and improvements on the health and safety management

systems, the established monitoring procedures and the facilities.

For its part, London-Luton Airport has implemented a robust Occupational Health and Safety Management System, based on the applicable regulations (Health and Safety at Work Act 1974 and Management of Health and Safety at Work Regulations 1999), the nature of which is defined in its Health and Safety Policy. Through this Policy, the Airport shows its firm commitment to adopting a proactive approach to its safety culture, open and transparent reporting practices, and the intention to focus on achieving continuous improvement in its performance, among others.

London-Luton Airport's Health and Safety Policy can be found at the following link:

<https://www.london-luton.co.uk/corporate/health-safety-matters>

The ISO 45001 Occupational Health and Safety Management System provides a structure for effective management of health and safety throughout the Airport. This covers aspects for which we are directly responsible and the influence of which we can reasonably control. Among others:

- Identifying hazards.
- Follow-up, measurement, analysis and performance evaluation.
- Compliance evaluation.
- Opportunity for ongoing improvement.
- Performance analysis and evaluation.
- Inspections.

The Health and Safety objectives, defined in the 2020-2025 London-Luton Airport Responsible Business

Strategy, include the review and improvement of operations to address problems proactively, focusing not only on employees, but also on customers and suppliers. The purpose is clear: incorporate an excellent culture of safety and risk management throughout the airport. To this end, the following actions have been proposed:

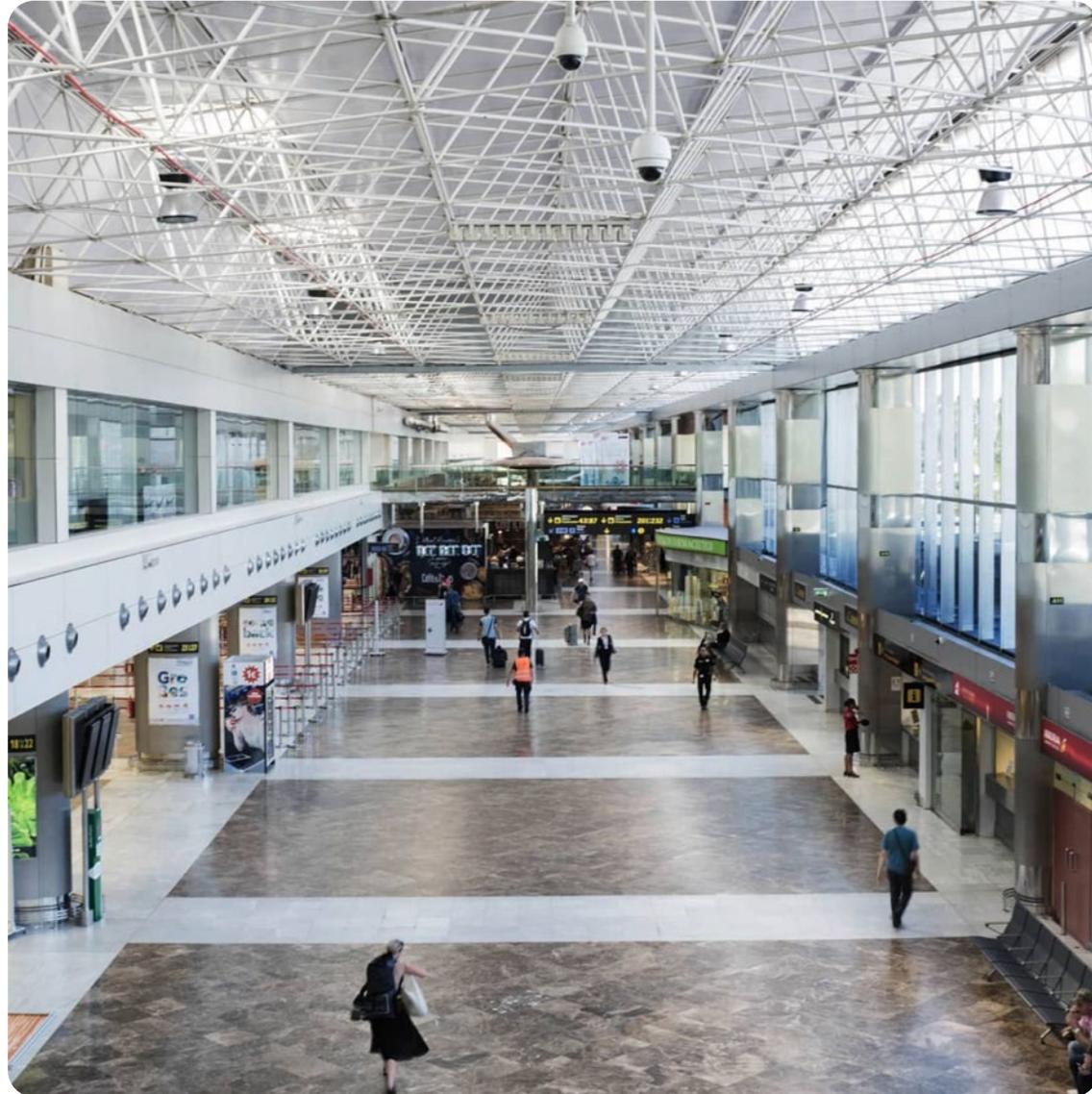
- Throughout 2020, share what has been learnt from at least 90% of the health and safety research in order to learn from past events and thus prevent other future events of the same nature.
- The completion of at least four training tours on health and safety by senior managers, as well as completing the training on "Seguridad Diferente" (Different Safety). (54% of the tours were suspended from the first to the third quarter due to the pandemic.)
- Attendance of executives and managers to, at least, 75% of the meetings on risk management during the year. (67% of the meetings scheduled at the beginning of 2020, 89% of the meetings were held due to priorities related to COVID-19 and personnel changes).
- Quarterly, conduct preventive evaluations in each department to identify opportunities for improvement.
- Quarterly, tours on continuous security improvements for key suppliers at the airport.

At Aeroportos do Nordeste do Brasil, the main programmes related to employee health and safety were implemented in 2020. The Environmental Risk Prevention Programme (PPRA [Programa de Prevenção de Riesgos Ambientales]) and the Occupational Medicine

Control Programme (PCMSO [Programa de Control de Medicina del Trabajo]) have been carried out for all six airports. Internal Accident Prevention Commissions (CIPA [Comisiones Internas de Prevención de Accidentes]) were also established, formed by representatives of the company and through the election of employee representatives in all work centres in Aena Brasil (corporate services and airports).

Throughout the year, various employee awareness actions were also carried out on how to avoid risks in their work activities.

In 2019, London-Luton Airport obtained the ISO 45001 certificate, receiving an excellent assessment from the evaluator regarding senior management's commitment to ensuring and improving the Health and Safety strategy, the resources allocated and the exemplary reporting practices.



Occupational health and safety management bodies

The Company's Organisation, as well as the functions and responsibility are established in such a way that a constant line of communication is maintained between the different levels.

Since 2019, Aena S.M.E., ADI and SCAIRM have the **Joint Prevention Service** (SPMA [Servicio de Prevención Mancomunado]), integrated with Aena S.M.E.'s Organisation and Human Resources Management, to effectively serve all of the work centres of the companies that are part of it in the area of occupational risk prevention, carrying out their activity in accordance with the provisions of Act 31/1995, of 8 November, on Prevention of Occupational Risks, in Royal Decree 39/1997, of 17 January, which approves the Regulation of Prevention Services and in concordant regulations. This Prevention Service covers all the preventive specialties or disciplines:

industrial hygiene, occupational safety, ergonomics and applied psycho-sociology and occupational medicine⁹ and guarantees the prevention and protection conditions of all workers, regardless of their level of exposure. The SPMA is composed of a team of 53 people with a support staff of 20 people, including service managers, Coordinating department managers, area managers, ORP technicians, occupational medicine doctors, technical health care assistants and administrative staff, all of them Aena S.M.E., ADI and/or SCAIRM workers. Its functions include monitoring the health of workers in relation to occupational risks and carrying out the investigation of occupational accidents and preparing accident statistics.

In addition, Aena has several committees that are experts in the field of health and safety, that are made up, in compliance with the provisions of current regulations, –Act 31/1995, of 8 November, on Prevention of Occupational Risks, as amended by Act 54/2003, of 12 December, on

the regulatory framework for the prevention of occupational risks–, as joint and collegiate participation bodies, intended for regular and periodic consultation of the company's actions in matters of occupational risk prevention. There are currently the State Health and Safety Committee (CESS [Comité Estatal de Seguridad y Salud]) and the Local Health and Safety Committees (CLSS [Comités Locales de Seguridad y Salud]) of the work centres. These are established as the participation and consensus bodies between the representatives of the workers and the Organisation.

As for the governance, supervision and review model for the risks associated with the health and safety of employees, as it is incorporated in the Company's Risk Map, it is subject to the same governance model as the rest. The Board of Directors defines, updates and approves the



⁹ Procedure PPRL/03.05. Health and Safety Committees. Group Collective Agreement.

Risk Control and Management Policy implemented in Aena and establishes the acceptable risk level. Subsequently, and supervised by the Audit Committee, the Aena Management Committee updates the risk map annually based on the monthly information provided by the different corporate management departments.

In the case of London-Luton Airport, the CEO has the highest responsibility in terms of health and safety, with the support of other senior managers, executives and supervisors, and advised and assisted by the Board (integrated by Aena and AMD). For its part, the Health, Safety and Environment Manager guarantees effective and direct lines of communication with all those involved in Occupational Health and Safety aspects, and with other areas of the airport. The system itself defines the roles and responsibilities of each of the units of the airports in the matter, including those of employees.

In Aena Brasil, responsibility lies with a joint committee established through company representatives and employee representatives chosen through direct elections. Those that are elected and appointed are duly trained in matters related to the prevention of occupational risks.

% of employees represented in the Health and Safety Committee



Identification of hazards, risk assessment, accident investigation and corrective actions

AENA S.M.E., S.A, ADI and SCAIRM

The Occupational Risk Prevention Management Manual defines the system for evaluating the risks associated with the work activity. The Company has a¹⁰ specific procedure in place to maintain the highest levels of security and minimise risk exposure. Specifically, the process is composed of the following stages:

- Identification and registration of legal requirements
- Risk evaluation, which involves the development of:
 - Risk analysis, which involves identifying the hazard and estimating the risk (type and severity).
 - Risk assessment.

This evaluation consists of a dynamic process, so it is continuously reviewed to comply with new regulatory requirements, detect possible harm to the health of employees, in the event of the introduction of new technologies or working conditions (work methods, organisation, etc.). Based on the evaluation of these risks, the need to adopt preventive measures is determined.

- Risk control, to eliminate or reduce risks and perform regular checks.

Once this initial risk evaluation has been carried out, the Joint Risk Prevention Service, as the body responsible for prevention, plans the preventive actions. In 2020, 213 general evaluations, specific evaluations and studies were carried out, with 1,651 preventive measures having been implemented out of a total of 1,986, which represents 83.13% of them.

More than 75% of the risks evaluated are considered tolerable, focusing the main preventive measures on the risks considered important (20%) and for which, once identified, urgent risk control measures are proposed, minimising the possible consequences derived from said risks.

The 213 indicated general and specific evaluations and studies include the safety inspections that have been performed.

Risk management at London-Luton Airport is based on a clearly defined risk governance structure that is part of the management system. It is designed to ensure the effective implementation of the Health and Safety policies of LLAOL (London Luton Airport Operations Limited), the LLAOL Safety Management System (SMS) and the Environmental/Energy Management Systems (EMS/ENMS). The main objective of the governance agreements is to provide an adequate framework for management to handle and lead the management of Health and Safety at London-Luton Airport.

The risk evaluation is carried out both at a local and at an airport level. The ongoing evaluation of Health and Safety is carried out at the department level by risk evaluators appointed by the department heads and by members of the Health and Safety team. At the airport level, the strategic risks are documented in the Airport Risk Log, which is periodically reviewed as defined in the HSMP001 "Risk Management" procedure.

The airport risk log has been reviewed quarterly during 2020. Of the airport risks, the departmental risk logs have been reviewed monthly.

The local risk evaluations are reviewed:

- Before undertaking a new task or work activity for the first time.
- After any accident, injury or almost major accident.
- Before any new equipment or substance is used or stored for the first time.
- After any change of role, material or process.
- After any change required by law.
- After any location change for a specific task.
- Annually.

¹⁰ PPRL/04.02

In the case of Aena Brasil, as required by Brazilian legislation, the following programmes have been implemented: the Environmental Risk Prevention Programme (PPRA), the Occupational Medicine Control Programme (PCMSO), and the Internal Accident Prevention Commissions (CIPA) have also been established.

Notification, registration and investigation of accidents

With regard to the accident report, Aena has a perfectly defined system for the notification of damages to health¹¹, which entails, in case of an occupational accident, both internal communication to HR and the SPMA (through the Employee Portal or on paper), as well as its registration through the DELTA System and the SAP-PRESAL application.

After notification, the accident is investigated. During this process, all necessary information is gathered to establish the causes, in order to prevent possible identical future situations. With this, a report is presented that also includes proposals for corrective and/or preventive actions.

Aena keeps the list of accidents/incidents that occur annually updated. These data are reported in the Accident Reports, for purposes of internal use and monitoring, and to the labour and health authority through the DELTA system.

During 2020, 41 occupational accidents with medical leave were reported, all of them minor, except for two.

Their causes were investigated in all of them and preventive actions and/or recommendations to the worker were implemented, in accordance with prevention procedure PPRL/07.10 Procedure for Notification, Registration and Investigation of Occupational Accidents and Incidents agreed upon by the State Health and Safety Committee (CESS) and available on the corporate intranet.

In the event of a serious accident, the same procedure is followed, and the labour and health authorities must be notified within 24 hours.

In the case of London-Luton Airport, all events (accidents/incidents/near accidents) are reported through the management system using the “opscom” platform and an investigation is initiated.

Everyone is responsible for reporting any unplanned event to their supervisor. This should be done as soon as reasonably possible without being exposed to any additional risk.

In 2020, a total of 94 accidents were recorded, including employees (32 in total), passengers and third parties. 4 of our employees' accidents were recorded as RIDDOR for the HSE. All accidents were investigated according to HSP004.

In Brazil, any occupational accident must be reported to the supervisory body through the CAT, Communication of Occupational Accidents.

Aena establishes its objectives in the field of accidents as a sign of its commitment to reducing accident rates and the development of a preventive culture. These objectives are reviewed and updated annually

In 2020, the following objectives were established:

- **Number of accidents: 62.**
- **incidence rate: 8.35.** [Incidence rate of occupational accidents = (Number of accidents x 103) / Average accumulated workforce].

This table shows the goals established and results obtained between 2016 and 2021, of the Incidence Index.

		2016	2017	2018	2019	2020	2021
Incidence rate of accidents	Goal	8.46	8.46	8.35	8.35	8.35	7.71
	Result	10.11	8.93	6.77	7.24	5.27	

¹¹ PPRL/07.10 Procedure for Notification, Registration and Investigation of Occupational Accidents and Incidents

Accident (own personnel)

	Aena S.M.E., S.A*				London-Luton Airport**				Aena Brasil***		
	2018	2019	2020	Δ 20/19	2018	2019	2020	Δ 20/19	2019	2020	Δ 20/19
Accidents (no.)****	163	151	100	-34%	52	55	33	-42%	0	3	0
Men	89	85	60	-29%	-	-	-	-	0	3	0
Women	74	66	40	-39%	-	-	-	-	0	0	0
With medical leave	51	56	41	-27%	-	-	-	-	0	0	0
Men	35	45	30	-33%	-	-	-	-	0	0	0
Women	16	11	11	0%	-	-	-	-	0	0	0
Without medical leave	112	95	59	-38%	-	-	-	-	0	3	0
Men	54	40	30	-25%	-	-	-	-	0	3	0
Women	58	55	29	-47%	-	-	-	-	0	0	0
With death	0	0	0	0%	0	0	0	0	0	0	0
Men	0	0	0	0%	0	0	0	0	0	0	0
Women	0	0	0	0%	0	0	0	0	0	0	0
Mild	162	150	98	-35%	0	0	0	0	0	0	0
Men	87	84	58	-31%	0	0	0	0	0	0	0
Women	75	66	40	-39%	0	0	0	0	0	0	0
Serious*****	1	1	2	100%	0	0	0	0	0	0	0
Men	1	1	2	100%	0	0	0	0	0	0	0
Women	0	0	0	0%	0	0	0	0	0	0	0
Death rate*****	0	0	0	0%	0	0	0	0	0	0	0
Men	0	0	0	0%	0	0	0	0	0	0	0
Women	0	0	0	0%	0	0	0	0	0	0	0

(*) PPRL/07,10 Procedure for Notification, Registration and Investigation of Occupational Accidents and Incidents.

Occupational health and safety rates of AENA SME, ADI SCAIRM, calculated according to Spanish regulations.

(**) London-Luton Airport does not record accidents differentiating between men and women.

Those indices not reported by the Airport in 2020, will be published in 2021.

(***) Aena was awarded the concession of Grupo Aeroportuario do Nordeste do Brasil in March 2019.

(****) Accidents are recorded based on Spanish legislation.

(*****) Any accidents that have had major consequences, not including deaths, are considered serious.

(*****) Death rate= Number of deaths resulting from an occupational accident injury / Number of hours worked × (200,000)

	Aena S.M.E., S.A*				London-Luton Airport				Aena Brasil		
	2018	2019	2020	Δ 20/19	2018	2019	2020	Δ 20/19	2019	2020	Δ 20/19
Number of days lost	1,768,00	2,162,00	1,620,00	-25%	-	-	84	-	0	0	-
Men	888.00	1,506.00	1,215.00	-19%	-	-	-	-	0	0	-
Women	880.00	656.00	405.00	-38%	-	-	-	-	0	0	-
Incidence rate of occupational accidents**	6.76	7.24	5.27	-27%	-	28.07	-	-	0	11.02	-
Men	7.12	9.11	6.06	-33%	-	-	-	-	0	11.02	-
Women	5.95	3.94	3.89	-1%	-	-	-	-	0	0	-
Frequency rate***	3.92	4.23	3.08	-27%	-	17.01	23.90	-	0	6.4	-
Men	4.16	5.32	3.54	-33%	-	-	-	-	0	9.1	-
Women	3.478	2.3	2.27	-1%	-	-	-	-	0	0	-
Severity rate****	0.14	0.16	0.12	-26%	-	-	0.06	-	0	0	-
Men	0.11	0.18	0.14	-19%	-	-	-	-	0	0	-
Women	0.19	0.14	0.08	-39%	-	-	-	-	0	0	-

NOTE:

- In 2018, 2019 and 2020 ADI had no recorded accidents.
- In 2019, SCAIRM had two accidents without sick leave.
- Aena Brasil: Aena was awarded the concession of Grupo Aeroportuario do Nordeste do Brasil in March 2019. With respect to 2020, Aena Brasil has three accidents without sick leave. As a result, the severity index is 0.

London-Luton Airport: does not record accidents differentiating between men and women, they will record them starting in 2021.

(*) PPRL/07,10 Procedure for Notification, Registration and Investigation of Occupational Accidents and Incidents. Occupational health and safety rates of AENA SME, ADI SCAIRM, calculated according to Spanish regulations.

(**) Incidence rate of occupational accidents = (Number of accidents x 10³) / Average accumulated workforce.

(***) Frequency rate = (Number of accidents x 10⁶) / (Total number of hours actually worked), where:
Total number of hours actually worked = (Average accumulated workforce x 1,711 h/year).

For London Luton airport and Aena Brasil, the Frequency Rate has been calculated taking into account the total number of accidents.

(****) Severity rate = (No. of workdays not worked due to an occupational accident with medical leave x 10³) / (No. of hours actually worked)

Absenteeism (own personnel)

	Aena S.M.E., S.A. ¹				Aena Desarrollo Internacional (ADI)				SCAIRM				London-Luton Airport ²				Aena Brasil ³
	2018	2019	2020	Δ 20/19	2018	2019	2020	Δ 20/19	2018	2019	2020	Δ 20/19	2018	2019	2020	Δ 20/19	2020
No. of hours lost due to absenteeism	669,071.18	754,854.41	789,310.64	4.6%	-	1,727	539.15	-69%	6,847.15	8,231.35	4,964.10	-40%	78,555.63	87,582.31	59,413.98	32%	4,335.00
Men	362,094.97	431,243.29	454,667.04	5.4%	-	1,618	491.00	-70%	5,488	3,270.10	3,833.80	17%	46,088.63	51,798.00	23,884.02	54%	2,250.00
Women	306,976.21	323,611.12	334,643.60	3.4%	-	109	48.15	-56%	1,359.15	4,961.25	1,130.30	-77%	32,467.00	35,784.31	35,529.95	-1%	2,085.00
Absenteeism rate	6.05	6.59	7.14	8.3%	-	4.83	1.59	-67%	5.91	6.77	4.65	-31%	5.4	5.51	3.84	30%	-
Men	5.11	5.94	6.55	10.3 %	-	8.44	2.71	-68%	6.43	3.71	4.91	32%	6.36	5	3.57	29%	-
Women	7.72	7.72	8.14	5.4%	-	0.66	0.3	-55%	4.46	14.87	3.94	-74%	4.89	6.45	4.31	33%	-

¹ Aena S.M.E., S.A., ADI, AIRM: 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

² London-Luton Airport: Absenteeism rate = Number of accidents x10⁹/number of hours worked (Number of hours worked annually x number of workers).

³ Aena Brasil does not calculate the absenteeism rate.

Communication, dialogue and participation of employees in occupational safety

Aena establishes active and bidirectional communication with all employees of the organisation, with which it tries to raise awareness of the importance of complying with the prevention policy, and detect and learn about the concerns of employees in matters related to health and safety, as defined in the procedure prepared for that purpose¹². The tools available include the human resources portal of the intranet, the Company newsletter and information notes, among others.

In addition, employees may report their concerns through the SPMA e-mail inbox and through direct communication with the Prevention officers and expert health and safety committees, which, as mentioned

above, are the bodies for participation and consensus between the workers' representatives and the Organisation.

The Health and Safety Committees are joint and collegiate participation bodies intended for regular and periodic consultation of the company's actions on the subject of ORP, and are composed of representatives appointed by the Organisation's Management, on the one hand, and representatives of the workers, on the other, to participate in the following actions:

- Identification of hazards, risk evaluation and determination of checks
- Accident investigation
- Development and review of policies and objectives in the field of ORP

- Consultation when there is any change affecting ORP
- Representation in ORP-related issues

The Health and Safety committees, both State and Local in the different centres, meet periodically every three months. Their composition is equal between the union or representatives of the workers specialised in ORP (Prevention Officers) and the representatives of the company. The health and safety committees are attended by members of the Joint Occupational Risk Prevention Service (SMPRL [Servicio Mancomunado de Prevención de Riesgos Laborales]) as well as expert advisors in the field. The topics to be addressed are those specific to ORP and are agreed upon through the corresponding agenda. The minutes of each meeting, once agreed upon and signed by all the members

¹² PPRL/03.01. Communication

of the health and safety committee, are published on the Aena website, thus being accessible to all workers.

Within the framework of health and safety management during the COVID-19 pandemic, Aena has been in permanent contact and coordination with the health authorities and workers and their representatives, in order to implement new measures based on current legislation and the evolution of the health emergency. Among these measures, the design of an action protocol (PRO) aligned with the recommendations of the Ministry of Health and made available to the entire workforce, which includes all the measures that have been implemented to safeguard the health of workers in the work centres, is worth highlighting.

For its part, London-Luton Airport has its own employee consultation and participation procedure, which shows how the airport establishes, implements and maintains employee consultation and participation processes at all levels and functions, and which includes representatives of the workers for the development, planning, execution, and evaluation of performance and opportunities for improvement of the health and safety management system. To this end, they start with the premise that “safety is not the absence of accidents, but rather the presence of truth, commitment and positivity”, using an “appreciative safety investigation” methodology. In this way, practically all the members of the organisation get involved with the objective of updating and improving, thus creating opportunities for improvement.

Likewise, the Airport has its own internal and external communication procedure regarding its management and performance systems, in terms of health and safety, environment and energy. Internally, through training courses and the distribution of procedures. At the external level, the airport is committed to the dissemination of documentation (policies) through the website, and the organisation of meetings with interested parties.

At Aeroportos do Nordeste do Brasil, communication takes place through the dissemination of newsletters on health and safety information to all employees.

Occupational health and safety training

As defined in the procedure¹³ created for this purpose, Aena guarantees that each worker receives theoretical and practical training that is sufficient and adequate in preventive matters, both at the time of their hiring —regardless of the type or duration of their contract— as well as when facing changes in the organisation, in their duties or the introduction of new technologies or work equipment.

	2020				
	AENA S.M.E.	SCAIRM	ADI	LLA	AENA BRASIL
Number of training activities	54	7	3	-	3
Number of employees	7,638	81	24	-	272
Number of hours	75,550	805	95	-	873

In order to provide training specifically focused on the position held by each worker, health and safety training needs are identified on a regular basis when the risk evaluation reviews of each worker's tasks are conducted. These courses, which are mandatory and are counted for the purposes of the annual variable remuneration, take place during the working day.

For London-Luton Airport, training and education on the subject is essential. The Health & Safety Policy describes the commitment to employee training and the HMSP005 training and competency procedure outlines how to work in this regard.

As indicated, to ensure that employees receive an appropriate level of training, all of them are initially provided with an overall initiation on Health and Safety, Environment and Energy in which they are informed of the profile of associated risks, hazards, control measures, possible impacts associated with their specific positions, etc. In addition, this training must be supplemented by specific learning exercises.

At Aena Brasil, all employees are trained in aspects related to risks and the prevention of occupational accidents when they are hired. This training is part of the employee's integration into the company. In addition, training has been given to members of the Internal Accidents Prevention Commission —CIPA.

¹³ PPRL/03.02 “Training and awareness”

Promoting the health and well-being of workers

Employee health monitoring activities include, among other elements, the promotion of the worker's overall health with actions aimed at improving their conditions, and the monitoring of the workers' health to ensure early detection and individualise the risk and impairment factors that may affect their health, as defined in the Procedure prepared for this purpose¹⁴. In this regard, Aena develops and contemplates a wide range of health prevention and promotion activities for its workers. These actions, prepared by the technicians, are submitted for consultation and participation in the State Health and Safety Committee prior to their approval. These include, in addition to the performance of medical examinations¹⁵ and providing the protective equipment required according to the risks of each job, other types of preventive programmes, the dissemination of the health culture, the monitoring of occupational diseases, etc.

Other actions in relation to the promotion of the health and safety of employees in 2020 include the following:

- Maintenance of the Joint Prevention Service (parent company, Aena Desarrollo Internacional, Aena Sociedad Concesionaria del Aeropuerto Internacional de la Región de Murcia).
- Continuing implementation of the collaboration protocol with centres, aimed at identifying and implementing areas of improvement in communication skills, conflict management, decision-making, and leadership in a collaborative manner based on dialogue; and with monitoring, evaluation and impact agreements, in response to the results of the working environment survey.
- Health and Safety Management Measures on Personal Protective Equipment (PPE).
- Advisory services for the entire staff.
- Increase in the dissemination of the risk sheets for each position to employees via the corporate Intranet.
- Management of more than 11,740 records of Coordination of Business Activities (CAE [Coordinación de Actividades Empresariales]).
- Completion of more than 8,807 medical tests (examinations, clinical analyses, certificates of aptitude, etc.).
- In addition to training activities on the subject, through internal communication channels, the Company distributes relevant information among employees to prevent accidents and preserve safety and health, and promote healthy living habits. The intranet, newsletters, e-mail, digital screens in the building are some examples, in addition to the “Despegando recursos” programme.
- Ensuring the health of workers, subcontracted personnel and passengers: adoption of sanitary measures aimed at preventing the spread of COVID-19 and protecting the health of workers, suppliers and external personnel. To this end, remote work and partial attendance have been facilitated when possible, reorganising shifts and following all recommendations of the health authorities —minimum safety distance, disinfection of facilities, reduction of crowds of people, etc.
- The experience of teleworking, implemented over a short period of time, and applied to a high percentage of the workforce with different positions and profiles, while guaranteeing the provision of services, has been a truly unprecedented challenge successfully overcome.

¹⁴PPRL07/04. Health monitoring

¹⁵These examinations are carried out by an external company authorised by the Ministry of Labour, and the results are analysed and supervised by Aena's Medical Services, and made available to the workers.

Measures implemented in Aena in 2020 for the safety of its employees in the face of COVID-19*



Safety at work

In-person telework/Remote work: telework in positions where it is possible, and limited and duplicated rotations and face-to-face placements to preserve essential positions.

Closure of canteens and cafeterias at the workplaces.

Adapting workplaces to ensure hygiene, ventilation and social distancing measures.

London-Luton Airport

Remote work.

Disinfectants at offices and airports.

Social distancing.

Screens placed in offices, desks, security, etc.

Disinfecting of trays.

Work bubbles.

Improvement in the cleaning regime.



Prevention and care

Providing personal protection kits for each employee: masks, wipes and gloves.

Implementation of two **phases** of diagnostic tests, during reinstatement and after leave).

Possibility of **carrying out diagnostic tests at any time**, with the prescription of the company's medical service.

Specific medical evaluation of **vulnerable personnel** to adapt specific measures to their case (such as telework extensions).

Vaccination campaign against the flu.

Regular communications on the importance of prevention.

Mandatory use of masks at all workstations.

London-Luton Airport

Promotion of weekly staff tests.

Distribution of Personal Protective Equipment.

Temperature check.

Aeroportos do Nordeste do Brasil

Kits and masks have been distributed.

Employees have been tested and all employees are monitored daily.



Psychological support

Creation of the "**Deploying Resources**" portal in order to offer resources to address situations of stress, anxiety or uncertainty caused by the pandemic.

This resource provides the employee with guidance and information related to the human factor. How we deal with situations of uncertainty, fear, adaptation processes and changes in our personal family and work environment.

London-Luton Airport

Regular communications.

Health and well-being review meetings.

Wellness plan for line managers.

Support for workers at home via DSE assessments.

Each week, employees receive an **informative article** via email along with a link to other complementary resources such as videos, readings, and music related to the person's biopsychosocial aspects.

A team of six people in the field of psychology, sociology and social work offer this resource to all Aena employees.

Aeroportos do Nordeste do Brasil

Employees are constantly informed about actions to mitigate the risks of contamination and the application of safety protocols.

*Some examples of the latest measures agreed upon with the Sub-committee of the State Trade Union Coordinator are included in the General Framework of the Operational Recovery Plan of the Aena Workplaces.

It should be noted that due to the COVID-19 pandemic, all Company workers have completed a course on the general aspects and preventive measures of the disease, and well-being prevention measures for employees that are working remotely.

AENOR has granted the Certification for Action Protocols against COVID-19 in AENA workplaces. This certificate is the result of the work carried out in implementing all the measures and protocols put forth in the Operational Recovery Plans (ORPs) of each work centre, their alignment with the recommendations of the Ministry of Health and their effectiveness. A certificate that corroborates Aena's efforts to adapt the workplaces to the new circumstances and that endorses all the work done to create a safe work environment for employees

No. of occupational diseases per region

During 2020, the following occupational diseases declared by the mutual insurance company were recorded:

	Aena S.M.E., S.A			Aena Desarrollo Internacional (ADI)			SCAIRM (Region de Murcia International Airport)			London-Luton Airport			Aeroportos do Nordeste do Brasil, S.A. (Aena Brasil)	
	2018	2019	2020	2018	2019	2020	2018	2019	2020	2018	2019	2020	2019	2020
No. of deaths due to occupational disease or illness	0	0	0	0	0	0	-	0	0	0	0	0	0	0
Men	0	0	0	0	0	0	-	0	0	0	0	0	0	0
Women	0	0	0	0	0	0	-	0	0	0	0	0	0	0
No. of cases of occupational diseases or illnesses	0	0	0	0	0	0	-	0	0	0	0	0	0	0
Men	0	0	0	0	0	0	-	0	0	0	0	0	0	0
Women	0	0	0	0	0	0	-	0	0	0	0	0	0	0

Commitment to companies (external/concurrent)

In terms of occupational health and safety with external/concurrent companies, and in compliance with current regulations, Aena has a system for the Coordination of Business Activities in operation in all work centres, where the risks of the companies that work in Aena's facilities are communicated, thus promoting coordination among all of them.

This Coordination of Business Activities with third parties is carried out in accordance with procedure PPRL 03-03 Coordination of Business Activities, which establishes the coordination requirements and mechanisms pertaining to Occupational Risk Prevention between Aena S.M.E., S.A. and all those companies that carry out some type of activity in the facilities managed by Aena S.M.E., S.A. The purpose is to improve actions in the area of occupational risk prevention and to promptly comply with the obligations established in Article 24 of Act 31 of 1995, on Occupational Risk Prevention, and its subsequent development through Royal Decree 171 of 2004, and other concordant legislation.

Therefore, Aena S.M.E., S.A. is committed, as a public law entity, to taking the initiative and promoting the coordination of business activities pertaining to occupational risk prevention, in all areas and in all activities carried out in its work centres. The relation between Aena and the external companies may be through a direct relationship (when a job, lease, assignment of facilities or any other agreement has been established that formalises a contractual relationship between

Aena and said external company), or through an indirect link, i.e., when there is no contractual relationship between Aena S.M.E., S.A. and any other company, but the latter carries out its business activity in whole or in part in the facilities of Aena S.M.E., S.A.

This commitment is articulated through the exchange of information related to the generation of risks to third parties produced by the activity developed by the companies that work together in the Aena centre. This exchange is generated on the website <http://www.aena.es/en/corporate/occupational-risk-prevention.html>. In it, the companies proceed to download the "Centre's risk map" document which records, in real time, the risk statements generated by the companies that carry out an activity in the Aena centre at that moment in time. Then, the companies proceed to declare the possible risks to third parties generated by their activity. This information becomes part of the "Centre's risk map", so that other companies can obtain it in an updated and real-time manner; all companies have the duty to transmit this information to their workers.

London-Luton Airport works in collaboration with suppliers to ensure that the risks to which third parties and employees are exposed are reduced as much as possible.

Periodic meetings are held with stakeholders to review risks and, if they can have an impact on the business, they are escalated through the risk governance structure.

Any communication that is relevant to our providers is shared through our community application to which they have access. This includes any COVID-19-related advice, guidance and recommendation.

6

Safe, high-quality services

A culture of security and a dedication to service have been key to successfully meeting the challenges of 2020

Operational safety

- Certified management programmes and systems
- Emergency plans
- Periodic reviews and audits Corrective actions
- Training and communication
- Coordination with all agents involved to ensure the health and safety of all users

+2,150
EMPLOYEES TRAINED IN 2020

AT SPANISH AIRPORTS
54 INTERNAL MONITORING
22 EXTERNAL AUDITS

Cybersecurity

- Cybersecurity plan 2018-2022
- Periodic security level audits
- Strategic Information Security Plan
- ISO 27001

NEW CORPORATE INFORMATION SECURITY POLICY APPROVED IN 2020

Health safety

- Calls for compliance with health measures
- Recommendations for the trip
- Security in all airport areas and services
- Coordination with all agents involved to ensure the health and safety of all users

THE HEALTH OF CITIZENS HAS BEEN KEY IN AENA'S ACTIONS IN 2020

Excellent management

- Strategic airport maintenance plan
- Integrated quality and environmental management system
- Spain: Commitments set forth in DORA
- Specific training and supplier commitments
- Measuring customer experience

4.06 SATISFACTION INDEX FOR AIRPORTS IN AENA'S SPANISH NETWORK IN 2020

Airport security

- Preventing acts of illicit interference
- Surveillance and control: airport security programmes
- National security programme
- Training and drills

AT SPANISH AIRPORTS
33 AUDITS
15 VERIFICATIONS



Commitment to SDGs

3
SDG 3 Health and well-being

9
SDG 9 Industry, innovation and infrastructure

11
SDG 11 Sustainable cities and communities

16
SDG 16 Peace, justice and strong institutions

17
SDG 17 Partnerships to achieve the goals

6.1. Safety Guarantee in the provision of services

In order to prevent risk situations from occurring, Aena continuously evaluates possible contingencies that may affect the normal development of activities. The Company works in each of its sites to minimise threats and risks, always aware of the fact that adapting infrastructure —both physical and digital— to detected risks is always slower than the speed at which new threats appear. This need to respond to contingencies and reduce risks to a sufficient and reasonably achievable level means that Aena's safety-related procedures are constantly evolving and adapting, both as a result of the Company's own assessments, as well as possible regulatory changes. To this end, the Company has mechanisms, measures, and human and material resources aimed at guaranteeing Airport, Operational and Information Safety.

In 2020, as a result of the health emergency, the concept of Health Safety is particularly relevant, focused on minimising the risk of contagion, promoting and preserving the health of society.

HEALTH SAFETY

Focused on the application of health measures that contribute to avoiding the possibility of contagion as much as possible, and reducing the exposure of all users, as well as guaranteeing their safety at all times.

AIRPORT SECURITY

Against illegal acts is "the combination of measures, and human and material resources aimed at protecting civil aviation against acts of illegal interference".

OPERATIONAL SAFETY

The minimisation of the risks of accidents and serious incidents occurring in aircraft (prevention).

CYBERSECURITY OR INFORMATION SECURITY

Covers a series of safety measures to prevent and detect the unauthorized use of computer systems.



Operational Safety

In order for all the services it provides at its airports to be safe, the Company has integrated the management of Operational Safety into the airport processes and activities, in compliance with the applicable rules and regulations¹, with one priority objective: ensuring that the activities that enable the airport's aeronautical operation contribute in an optimal manner to the Operational Safety of aviation as a whole.

In Spanish Airports, the **Operational Safety Policy** establishes the Organisation's commitment to achieve, maintain and promote the safe provision of the services assigned to it, integrating the management of Operational Safety within the airport processes and activities. Its aim is the responsibility to comply with the applicable legal requirements and regulations in the matter, to take into account good practices, to provide the necessary resources and to make operational safety one of the main responsibilities of all executives and personnel of the airport in general. The update of the Operational Safety Policy carried out in 2020 has had an impact on the active 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.

The strong commitment acquired by senior management, through the General Airports Directorate, to achieve, maintain and improve, if possible, the level of Operational Safety in the Aena airport network is formalised through the Policy, which guides the implementation of the related Operational Safety Management Systems at airports.

Said Operational Safety Policy has given rise to the gradual implementation in network airports of **Operational Safety Management Systems (OSMS)** that allow for the proactive identification of problems, risks and dangers related to airport operations safety, applying all necessary measures to anticipate any accident or incident:

- Identifying the organisation's weaknesses, classifying its risk level and taking measures to reduce it: hazard identification, risk analysis and risk mitigation.
- Analysing and monitoring the operation of the airport globally.
- Establishing indicators to monitor the safety conditions of airport activity to anticipate possible problems and their solutions.
- Analysing accidents and incidents to define measures that minimize their consequences.
- Creating a culture based on safety through the dissemination of its results and conclusions.

- Improving the airport's overall safety through an operational safety program with clear objectives.

London-Luton Airport has its own Operational Safety Policy, contained in the Aerodromes Manual, which is distributed annually through the corresponding Airport Management Notice (AMN), and which is in line with the objectives included in the policy governing Spanish airports.

It also has its own Operational Safety Management System, to ensure that the aerodrome complies with the requirements established in current regulations, allowing it to record, identify and manage the risks in the matter, which are regularly evaluated. This system is evaluated by the Civil Aviation Authority (CAA), and is also audited.

The Airport also has an Operational Safety Program, which includes its own indicators and objectives, set by the operational safety team in collaboration with third parties.

¹ 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.
- AESA (Spanish aviation safety and security agency): 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 both Spanish airports and London-Luton Airport), which establishes the administrative requirements and procedures relating to airports, 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 philosophies and principles with regard to operational safety, referred to as the Safety Policy, which must be signed by the manager.

Thus, and in accordance with the ICAO definition, the **OSMS** is a systematic approach designed for the management of Operational Safety —adapted to each aerodrome—, which includes the necessary organic structure, lines of responsibility, policies and procedures; and which seeks, above all else, to **reduce risks to a sufficient and reasonably achievable level**.

To achieve the principle of continuous improvement of the system, an Operational Safety Programme is periodically developed for the airport with a proposal of Operational Safety objectives and goals, in accordance with the resources allocated for this purpose.

Likewise, through a series of ratios and indicators, which are periodically evaluated and analysed —according to reference values—, as defined in EXA-PGS-03 type of Procedure (specific for each airport), the level of Operational Safety reached at each airport is periodically monitored. These indicators are related to weather, maintenance, the environment, vehicles/drivers or incidents, among others.

In order to continuously evaluate and improve the Operational Safety Management System, the following are carried out²:

- **Internal monitoring**, at all Aena network airports, with the objective of verifying the correct implementation, suitability and effectiveness of the Operational Safety Management systems. These monitoring activities, carried out by personnel from outside

Aena Brasil airports have their own Operational Management System, which is included in the Aerodrome Operations Manual (MOPS). The purpose of this Manual is to adopt a systematic approach to aerodrome operations, through the establishment of rules and standards —established in the policies, processes and procedures— to be complied with by all those involved in the Operations of the Aeronautical Zone, in addition to presenting other applicable administrative measures, and complying with the requirements of the National Civil Aviation Agency and recommended international best practices.

The OSMS lays out the basic pillars, procedures and operational safety requirements applied at Aena Airports in Brazil, in order to standardise the operational safety activities for which the airports are responsible.

These pillars are:

- Operational Safety Policy and Objectives
- Hazard and Risk Management
- Operational Safety Guarantee
- Promotion of Operational Safety

the airport, are carried out with a maximum frequency of two years.

In the case of London-Luton Airport, they also conduct internal audits of the Management System.

INDICATOR OF INCIDENTS INVOLVING AIRCRAFT IN MOVEMENT (ACI TYPE B)

AENA	LLA	AENA BRASIL
88 2020	0 2020	2 2020
252 2019	2* 2019	

* Both incidents were minor

TOTAL AIRPORT INCIDENTS INDICATOR

(Spanish airports, AIRM, LLA, Aena Brasil)

AENA	LLA	AENA BRASIL
528 2020	118 2020	20* 2020
1,419 2019	259 2019	

* Runway incursions and runway excursions are considered

- **External audits**, conducted by AESA, in the case of airports in Spain, in order to ensure that Aena has appropriately implemented the OSMS at each airport. Aena's Spanish airport network was certified by AESA for Operational Safety before 31 December 2017. In general,

² At the Brazilian airports, internal and external monitoring, and drills are planned from 2021 onwards.

network airports receive an average of 45 visits from auditors annually, with a greater presence in Group I airports. To avoid the detection of non-conformities flagged during these audits, Aena has set up an internal team that carries out internal monitoring processes. In the case of London-Luton Airport, it is audited, twice a year, by the Civil Aviation Authority (CAA) and by the British Standards Institution.



- **Drills.** In 2020, six general aeronautical drills were carried out at Spanish Aena network airports, out of the 30 initially scheduled according to regulations. The rest of the pending general aeronautical drills are planned to be performed as soon as the health situation returns to normal. Meanwhile, mitigating measures approved by the Aeronautical Authority will be carried out, which guarantee that an equivalent level of Operational Safety is maintained. For its part, London-Luton Airport also carries out drills on a regular basis, following the scheme established by

	2019			2020		
	Spanish airport network	AIRM	LLA	Spanish airport network	AIRM	LLA
Internal monitoring (no.)	27	1	46	54	1	19
External audits (no.)	29	1	1	22		2

the CAA, although in 2020, due to the health crisis and the lack of availability of the interested parties, none have been carried out.

Other mechanisms that help maintain excellent levels of Operational Safety at Aena's airports are outlined below.

Emergency Plan

All Aena Airports and Heliports—including London-Luton Airport— have an Emergency Plan (self-protection), which is updated and structured in accordance with European sector regulations (Regulation 139/2014), with Royal Decree 862/2009—in the case of Spanish airports—the technical instructions of AESA, the standards and recommendations of the International Civil Aviation Organization (ICAO) and the National Civil Protection regulations. This is done in order to deal with emergencies arising from aircraft operations, as well as emergencies that occur in passenger terminals and other airport buildings and facilities.

Aena's Airports in Brazil have the Airport Emergency Response System (AERS), which is updated and structured in accordance with the regulations that apply to them³. They include the user alert, and communication mechanism and system. In this regard, the airports have, for example, emergency telephones to guarantee immediate communication of possible incidents to agents, such as the fire service or the operations control centre, among others.

The Emergency Plan identifies the elements that can cause an emergency at an airport, as well as the key areas from the point of view of continuity of service. It also includes the action coordination procedures to respond to emergencies at airports and in the surrounding areas. Thus, the possible risks (natural, technological or anthropogenic hazards, etc) are evaluated, and mitigating measures are associated to them.

³ Annex 14 ICAO - Provides Airport Emergency Service, Decree no 87,249, of 06/06/82 of the Aeronautical Command, RBAC no 153 - ANAC - 2012 - Establishes criteria in Aerodromes for Operation, Maintenance and Emergency Response; Res. No 279 / ANAC / 2013 - Establishes regulatory criteria for the implementation, operation and maintenance of the Prevention, Salvage and Fire Extinguishing Service in Civil Use Aerodromes. (SESCINC)

These Plans are living documents that are continuously updated, in order to cover any change that occurs at airports. They are distributed to all the stakeholders that are involved with or affected by them, both internal and external.

The Emergency Plans (self-protection) also foresee actions that should be taken in emergency safety situations, although there is also information related to these situations that is collected in safety procedures, which have restricted circulation and are independent from the Emergency Plan.

In order to increase the level of safety in the Spanish airport network, there is also an Emergency Drill Plan and a policy for conducting drills, which applies to both buildings and facilities, as well as to matters related to aeronautical emergencies. In addition, in order to facilitate the performance of drills during the COVID-19 health emergency, the use of virtual drills using blueprints has been given priority and documentation has been developed to support the organisation of this type of Emergency Plan drills.

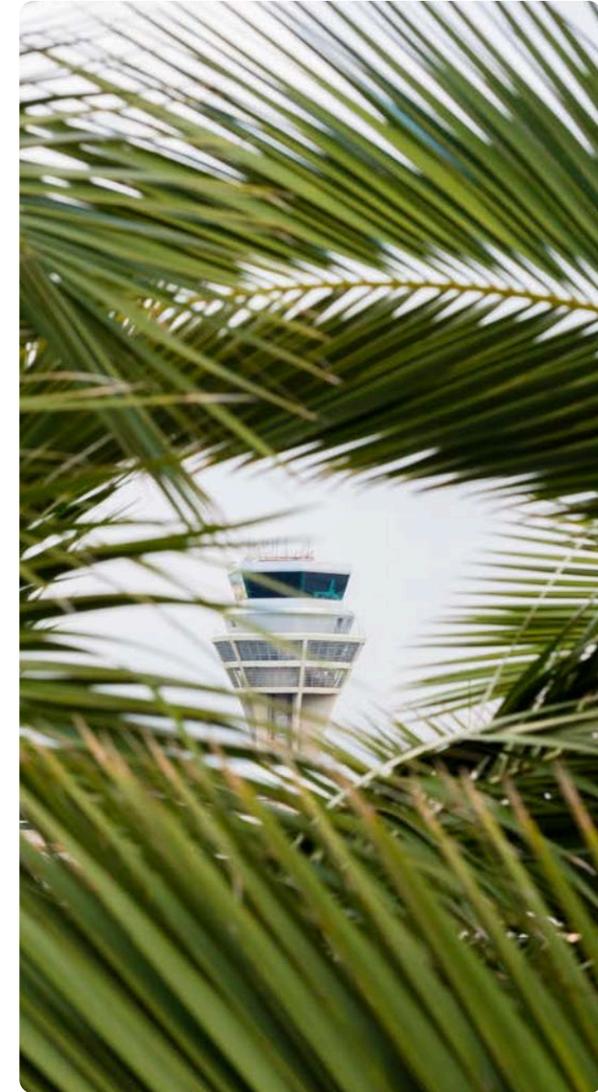
For their part, Aena Brasil also have Procedures for the Removal of Inoperative Aircraft and Unblocking of Runways, procedures for mitigating negative psychological effects derived from an aviation accident, firefighting plans and contingency plans for public health emergencies. All of them are reviewed in the event of a drill exercise, of an emergency that requires the activation of the Emergency Response System, of a significant

change in the operational characteristics of the aerodrome or in the event of a transmissible disease at a regional, national and/or international level.

Investigation, handling of accidents and incidents, and corrective actions

In order to take the appropriate measures to prevent an accident/incident from happening again, Aena network airports have a procedure for communicating and analysing the accidents and incidents that occur in the airside area of the airport or that affect Operational Safety. When one occurs, all the data related to the event must be communicated to the control department that has been established for this purpose. In this regard, the Company has a 24-hour network management centre for operational incidents, CGRH24, which continuously monitors the operational status of the entire Airport Network, coordinated with SYSRED (ENAIRE) and the incidents affecting flight operations, in addition to generating the corresponding monitoring reports. In the case of London-Luton Airport, all accidents, incidents and corrective actions are reported through their own system, following their specific accident and incident management procedure (HSP004)⁴.

London-Luton Airport has adopted a model of best practices for accident reporting and investigation, focused on obtaining new learning opportunities (learning from errors)



⁴ This procedure is similar to that followed in the event of an accident in the area of occupational health and safety.

For its part, airports at Aena Brasil, through the processes established by their OSMS, Operational Safety Events (OSE) are managed by the Operational Safety area and the Airport Operations area. In the event of an investigation of any operational safety event, the main objective is to prevent future events and not to point out blame or responsibility. Therefore, the information obtained in the investigations is for the exclusive use of the Safety Management, under the supervision of the Aeronautical Accident Prevention and Investigation System (SIPAER [Sistema de Prevención e Investigación de Accidentes Aeronáuticos]) (Air Force Command).

Within the scope of the Operational Safety Management System, each airport identifies hazards, analyses the risks they generate and implements the corresponding mitigation measures. By using an **Operational Safety Communication Procedure**, a system is established that allows internal and external communications, queries and complaints to be received, documented and responded to, as well as having an **internal communication channel** regarding issues related to Operational Safety.

In relation to serious accidents and incidents, the CGRH24 in Spain lists incidents that affect operational conditions within the network as Level 1 and 2. In 2020, 102 N1 was established, due to the state of emergency, as well as 21 N2. In addition, within the framework of the OSMS, 13,795 communications that can be regarded as incidents have been made.

At London-Luton Airport, in 2020 there were no serious accidents/incidents, while seven serious accidents/incidents occurred at the Northeast Brazil Airports. When



events occur, they are all reviewed, sharing possible proposals for improvements.

At London-Luton Airport, employees have participated in the “Safety differently” (tours and visitors) training, which promotes a proactive methodology and is focused on learning based on opportunities (prevention).

The Company requires that external suppliers have an Operational Safety Officer, as well as guarantees of compliance with Operational Safety Regulations. In this regard, they must ensure that they are aware of and apply the applicable regulations on the matter, provide the airport with the necessary information about their activity, continuously collaborate with the File Manager and communicate accidents/incidents, among others.

At London-Luton Airport, these providers are given access to publications related to Operational Safety through the airport's own Management Portal, and they

must, in turn, provide information related to Operational Safety and cooperate with the airport in all of these aspects.

Finally, in Brazil all suppliers of the Aena Network who provide continuous services have specific contractual clauses aimed at ensuring operational safety. These relate to clauses of mandatory compliance that must be included in all contracts that affect operational safety, such as: provision of services, acquisition or installation of equipment or systems that intervene in the area of movement, affect the protection area of the aerodrome, interfere with the operation of the aeronautical services, may cause any alteration in the physical or operational characteristics, etc.

- **Staff training.** In order to reach the highest levels of Operational Safety at the airports, it is essential to ensure the training and awareness of all those involved. This training is determined based on the identification of competencies and detection of needs, on which a series of proposals related to the OSMS and Operational Safety are carried out.

In 2020, two types of training courses on Operational Safety were given:

- Regulatory Framework for Aerodrome Certification and Operational Safety: this course, which is mandatory for the itineraries of some of the organization's positions, has been adapted to be given in a virtual classroom in order to meet the deadlines and training needs regarding Operational Safety.
- Description of the Operational Safety Management System. Risk Management System: its adaptation to a virtual classroom has been applied to five editions for airport staff.

Operational Safety Objectives

In the Spanish airport network, each airport establishes its Operational Safety objectives within the Operational Safety Program. The leaders, at all organisational levels of the airports, promote increasingly safe operating conditions, executing consistent and innovative actions. To this end, the most effective policies and actions are applied, ensuring that all activities maintain the highest operational safety performance level and comply with national and international standards.

OPERATIONAL SAFETY TRAINING IN 2020				
	AENA SME SA	AIRM	LLA	Aena Brasil
Total hours	10,626	36	N/A	5,179.5
Number of employees	1,771	6	53	328

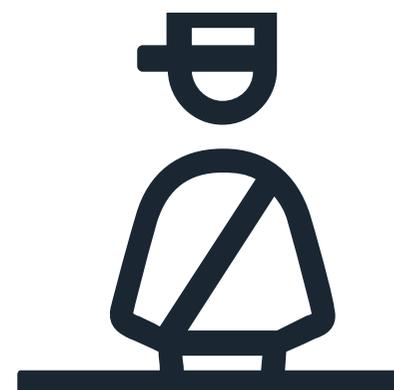
Therefore, operational safety requires permanent attention within the scope of the activities carried out by airports.

For its part, London-Luton Airport has defined six health and safety objectives aligned with the Operational Safety principles, which seek to prevent accidents. The objectives are focused on improving training on safety and lessons learned, reinforcing the tours and visits programme for employees, as well as the organisation of meetings and workshops on the subject. In addition, a series of internal objectives are also established.

At Aena Brasil, nine main commitments have been defined, with the priority being the management of operational safety, all matters related to the operational activities of the airports are secondary to this.

Airport security

At Aena airports, the ability to prevent acts of illicit interference depends mainly on the surveillance systems and on the measures adopted in matters of security, as well as their implementation, staff training and continuous improvement. The objective of proper Airport Security is to ensure the safety and protection of passengers, the general public, crews, aircraft, ground personnel, and airports and facilities in general, beyond the minimum established by the corresponding authority.



Factors on which Airport Security depends

Airports subject to national and international reference regulations (contains guidelines for the structural design of airport infrastructures with the aim of defending against and preventing acts of illicit interference)	AENA SME AIRM	ICAO: Annex 17 to the Chicago Convention of 1944: establishes the general rules and recommendations on security for air transport.	ECAC: European Civil Aviation Conference (ECAC): Document 30, which establishes safety recommendations for air transport at the European level.	COMMUNITY: Regulation (EC) No. 300/2008: Establishes common civil aviation security rules, which are mandatory in all States belonging to the European Union. Implementing Regulation (EU) 2015/1998: establishes detailed measures for the implementation of the common basic standards, thus developing Regulation 300/2008.	NATIONAL: Act 21/2003, of 7 July, on Aviation Security: establishes the legal regime for aeronautical inspections and obligations regarding aviation security, including the adoption of the National Security Programme (NSP) for Civil Aviation. Royal Decree 550/2006. Designates the Competent Authority, responsible for coordinating and monitoring the National Security Program for civil aviation. It also determines the organisation and functions of the National Security Committee.
	LONDON-LUTON AIRPORT		ANAC: Brazilian Civil Aviation Regulation No 107- Civil aviation security in the event of acts of illicit interference - Aerodrome operator. This regulation applies to the operator of the public civil aerodrome, shared or not, whose responsibilities related to the security of civil aviation against acts of illegal interference (AVSEC) are provided for in Article 8 of the National Civil Aviation Safety Program against Acts of Illicit Interference (PNAVSEC).		National Civil Aviation Security Programme. Single Consolidated Direction 2/2019.
	AEROPORTOS DO NORDESTE DO BRASIL				NATIONAL: Decree No. 7,168, of 5 May 2010 - National Civil Aviation Security Programme against Acts of Illicit Interference (PNAVSEC).
Qualified staff	AENA SME AIRM	State Security Forces, Civil Guard and National Police Corps.	Autonomous and/or Local Security Forces.	Private Security Personnel, hired by Aena.	Security personnel of the airport itself.
	LONDON-LUTON AIRPORT	UK Security Services, Department of Transportation, CPNI.	Counter terrorism police.	Regional and Airport Police. Civil Aviation Authority (inspection).	Airport Security Department.
	AEROPORTOS DO NORDESTE DO BRASIL	Federal Police, AVSEC Security Sector of Aena Brazil and its security subcontractors.	AVSEC Security Sector of Aena Brazil and its security subcontractors.	AVSEC Security Sector of Aena Brazil and its security subcontractors.	AVSEC Security Sector of Aena Brazil and its security subcontractors.
Existence of technical resources	AENA SME AIRM	Perimeter security.	.Integrated access control and CCTV systems.	Inspection equipment for people and screening machines for baggage, packages or bags.	Procedures (employee inspection, accreditation of individuals, vehicle authorisation, etc).
	LONDON-LUTON AIRPORT	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, ACA-accredited training, general awareness, vehicle access control, security management systems (SeMS).
	AEROPORTOS DO NORDESTE DO BRASIL	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.		

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.

Aena coordinates and collaborates with all groups involved

in safety to ensure its effectiveness and efficacy.

Airport SECURITY

(RE 2017/458)

100%

of Aena's international airports with Schengen border (the border security force complies with this RE on behalf of London-Luton Airport)

Airport SECURITY

(RE 300/2008, 2015/1998 and PNS)

100%

of Aena's airports in Spain (London-Luton airport with RE 300/2008 and SCD 2/2019)

Airport Security at Aena focuses on different types of measures:

- Communication and collaboration between all the agencies and groups involved.
- Surveillance of vulnerable areas of the airport, differentiating public, controlled access, and restricted security areas. This surveillance is carried out by means of security guard patrols, together with those also carried out by State Security Forces.
- Control of the movement of persons and vehicles at the accesses to restricted security areas. This control is carried out by checking the documentation necessary for access (boarding passes for passengers and airport accreditations for workers).
- Inspection of persons and property. The inspections are carried out with technical resources such as metal detector arches for people, packages and baggage using x-ray screening equipment, or using trace detection or liquid inspection systems.
- Creation and update of the measures of the Airport Security Program. Aena has at its disposal, in its 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 Security⁵.
- The National Security Program has measures that must be applied in the event of an act of illicit interference (AI). Some of the most representative of these are aircraft hijackings or bomb threats.

To this end, the airport is required to establish resources to manage these types of incidents, and, of course, in the event that a threat arises, they are designated to the airport's Emergency Plan.

In addition to the foregoing, London-Luton Airport is working tirelessly on the full inspection and control of cargo, in accordance with CAA standards and in accordance with the standards required in the United Kingdom for operators (surveillance and patrols), passengers and in relation to transported items.

For their part, the airports of Aena Brasil participate in the Brazilian Aviation Security Group (BAsSeT), as active members, with the objectives of: (i) planning and guiding the civil aviation sector through the definition of an agenda of actions and national Civil Aviation Security projects against Acts of Illicit Interference - AVSEC, in accordance with the Global Aviation Security Plan - GASeP, instituted by the International Civil Aviation Organization - ICAO; (ii) promoting collaborative interaction, the production of technical material and the development of joint AVSEC projects between ANAC, their regulators and other interested parties; and (iii) enabling the collection and exchange of information, data and indicators by agents in the sector, in order to provide better analysis, diagnosis and definition of goals for the AVSEC system.

⁵ Airport security procedures are not made public in order to safeguard the information.

- **Airport Security Training**

Likewise, Aena carries out training and awareness activities in matters of Airport Security, aimed at employees who require access to airports:

	2019			2020		
	AENA SME SA	LLA*	Aena Brasil	AENA SME SA	LLA	Aena Brasil
Total hours	2,985	4,200	N/A	3,236	2,100	1,311
Number of employees	1,384	490	N/A	1,815	359	217

* Unlike Spanish Airports, where private security is carried out by an outside company, at London-Luton Airport, private security personnel are airport staff. Estimated data is provided.

- **Airport Security Audits, Verifications and Drills**

In accordance with the previously cited current regulations, Aena is immersed, every year, in an airport security audit process conducted by the European Commission and AESA, —in the case of Spanish airports—, or by the CAA and external suppliers —in the case of London-Luton Airport—, as well as internal verifications:

In Spanish airports, in 2020, 33 audits were carried out by AESA (54 in 2019, and 1 by the European Commission), and 15 internal verifications (while in 2019, 36 were carried out). These audits and verifications include overt and covert tests.

- For its part, London-Luton Airport conducts, on a daily or weekly basis, its own quality control audits, by checking the documentation and individual evaluations of security officers. All of this is supported by visits from the CAA auditor (unannounced) who verifies compliance with the requirements of SCD 2/2019. The CAA conducts a full annual audit or inspection. In the last two inspections/audits, the Airport received 96% and 98% compliance, respectively.
- At Aena Brasil, 14 internal checks were carried out in 2020 by the Quality Control team of Aena Brasil, and three external audits by ANAC.

Likewise, the airports of the Spanish network comply with the drill regulations of the National Security Pro-



gramme to ensure appropriate training in case of emergency⁶. Likewise, London-Luton Airport conducts periodic drills on airport security matters in accordance with the CAA provisions in CAP1168, as an alternative for compliance. At Aena airports in Brazil, no drills were carried out for airport security in 2020.

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.

Airport Security Objectives

Guarantee the operation with the highest levels of security for people and property:

- **Security Equipment:** supply of inspection equipment, as well as access control and CCTV systems, in accordance with current Regulations and the needs of Network airports (in the case of London-Luton Airport, in accordance with the DfT, Department for Transport, which certifies the equipment that can be installed in UK airports).
- **Analysis and monitoring of the Private Security service at Network airports.** In addition, the private security companies at London-Luton Airport are subject to audits, both by the CAA and internally.
- **Quality Control:** Verifications and tests covering the application of security procedures, the preparation of reports and the follow-up of Corrective Action Plans.
- **Training:** development of courses for airport security officers, both at Spanish airports and London-Luton.
- **Regulations:** participation with the Spanish Aviation Safety and Security Agency (AESA) in different work groups and in the planning of tasks to be included in the permanent commissions of the national security committee along with the rest of the actors involved, such as the Security Forces, ENAIRE or the General Directorate of Civil Aviation.



⁶ 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.

Cybersecurity or information security

Aena depends on information and communication technologies to carry out multiple procedures and processes, in all its areas of activity. As part of the rapid development of these new systems and infrastructure, and fully aware of all related risks as well as of the potential for the growth of cyber-attack threats, the Company has implemented a series of mitigation measures.

Aena is firmly committed to ensuring information security and has established a strategy aimed at enhancing the centralised response to safety events and establishing processes that allow the Company to avoid the occurrence of such incidents

As specified in Chapter 1, in January 2020, the Aena Board of Directors approved the information security Policy of Aena S.M.E., S.A., which includes Directors, Managers and, in general, all employees of Aena.

Likewise, the Company has a Cybersecurity Plan for 2018-2022, approved by the Board of Directors, aimed at reinforcing the Company's Information Security by strengthening existing controls and improving the ability to respond to threats. This Plan outlines the priorities, persons responsible and resources used to improve the level of security in the digital world, as well

as the planning of activities to be carried out in this regard. To date, its implementation has entailed:

- The improvement of the ICT Safety Office to cover the actions provided for in the Cybersecurity Plan.
- The automation of the management of the Data Centre's infrastructure, through tools for the management and automation of ICT processes with the objective of improving efficiency and Information Security.
- The implementation of tools that control access to the network with policies that prevent attacks, detect the lack of antiviruses, patches and/or intrusion prevention software, which improve protection against advanced persistent threats and manage security information events.
- The provision of access management procedures that establish the mechanisms for granting users permission to access systems and applications. Similarly, criteria for periodic audits of user permissions in systems and applications are also established.
- The prevention of information losses and management of mobile devices.
- The implementation of a new tool for detecting and responding to possible security incidents.
- Red Team Service to improve resilience, simulating an external agent who achieves unauthorised access to the information systems, focused on preventing Aena's normal operations from being compromised.

- **Aena's certification** of the Information Security Management System **according to standard ISO 27001:2013**, an international certification that is valid internationally and involves periodic reviews being carried out.

Aena conducts periodic audits to verify compliance of the IT and OT infrastructures, and Aena's level of security maturity.

Following the definition of an Information Systems Strategic Plan, various actions have been planned with the aim of improving the level of information security and its management mechanisms.

To this end, consulting services have been hired to review and update the Information Security Strategic Plan, in order to analyse and evaluate its current level, define the appropriate state and identify the gap between both states.

For its part, London-Luton Airport is in the process of implementing ISO 27001. Likewise, it is making progress to comply with the new Information Security Directive (NIS). As a result of this, there were no system breaches in 2020. All of this reflects the importance that the Airport places on Information Security for employees, customers and other users.

With regard to Aena Brasil, Act 13,709, of 14 August 2018, on Data Protection —LGPD (Lei Geral de Proteção de Dados Pessoais)— has been established.

Health safety

This year specifically, the main focus has been on the actions undertaken by Aena to address the demands that have arisen in all facilities to guarantee Health Safety and, thus, stop the progress of the pandemic caused by COVID-19, such as the installation of barriers in certain areas of the airport, the reinforcement of cleaning and disinfection services or the control social distancing in areas where clusters of people may occur.

These are, mostly, measures whose effectiveness depends on the collaboration of all the users of the airport infrastructures. This is why their implementation has been reinforced with signage and messages issued through the public address system, in addition to the creation of a specific website that allows passengers—most passengers being occasional users of airports and, therefore, are less familiar with some protocols—to be informed of the safety measures that have been specially designed for the use of certain services. The information has been organised according to the different phases of the journey, as well as the spaces and services of the airport



At the destination
airport

Before going
to the airport



On the plane

At the airport

SPANISH AIRPORTS AND AIRM

LONDON-LUTON AIRPORT

AEROPORTOS DO NORDESTE DO BRASIL

Before going to the airport



- Companions of travellers cannot enter.
- Do not go to the airport if you have symptoms such as cough, fever or shortness of breath.
- Use of a mask is mandatory for people over six years of age.
- Have enough masks and disinfectant gel for the trip.
- Check the sanitary control requirements and the entry documentation of the country to which passengers are travelling.
- Review the services available at the airport and the information provided by the airline.

Specific website, which records information and advice to guarantee maximum protection against COVID-19 for travellers.

- Supplementary entry restriction.
- Do not go to the airport if you have symptoms such as cough, fever or difficulty breathing.
- Mandatory use of a mask.
- Supply of enough disinfecting gel for the journey.
- Check the health control requirements according to the standards established by the Ministry of Health.

At the airport



- Follow the instructions given at all times.
- Reinforcement of cleaning protocols in check-in areas and installation of protective screens at counters.
- Recommendation to check with the airline regarding the check-in policy.
- Arrive at the airport with enough time to go through the check-in process and security check.
- Disinfection of trays for personal items.
- Control of social distancing measures.
- Protective screens at the entrance to the boarding gate.
- Procedures to minimise the use of buses and, if used, maintain sufficient safety measures.

- Reinforcement of cleaning services.
- Installation of hydroalcoholic gel dispensers.
- Marks on the floor to maintain social distancing.
- Protective screens in customer service areas.
- Posters.
- Use of PA system.
- Mandatory use of a mask.
- Guidelines of the British authorities.
- State of the provision of the different airport services.

- Reinforcement of cleaning protocols in check-in areas and installation of protective screens at counters.
- Recommendation to check with the airline regarding the check-in policy.
- Protective screens in customer service areas.
- Reinforcement of cleaning services.
- Control of social distancing measures.
- Blocking seats to avoid physical proximity among passengers waiting for their flights.
- Arrive at the airport with enough time to go through the check-in process and security check.

CAR PARK

- Informational posters with all the measures established to guarantee a Safe Car Park. These include contactless payment, maintenance of social distancing and the provision of hydroalcoholic gels at points such as ATMs, manual cashiers, lifts and others.
- Contactless entry and exit from the car park by automatically opening barriers if payment by license plate or a prior reservation (prepaid or postpaid reservation) method is used.
- Reduction of lift capacity and placement of floor markings to ensure social distancing inside.
- Greater distance between payment stations and social distancing signs at manual and automatic cash registers.

SHOPS AND FOOD AND BEVERAGE

- Mandatory: use of masks and maintenance of social distancing measures (2 metres).
- Separate entrances and exits to avoid passengers crossing each other.
- Provision of hydroalcoholic gels.
- Increased cleaning frequency of the facilities.

CAR PARK

- Reduction of capacity for transportation to and from the car park.
- Social distancing markers.
- Installation of hydroalcoholic gel dispensers.
- Specific signage.
- Reinforcement of cleaning service.
- Avoid the presence of users (not travellers) at the arrival terminal.

VIP LOUNGES

- Reduction of capacity.
- Mandatory use of a mask. Availability of packs with hygiene and protection items.
- Automatic hydroalcoholic gel dispensers.
- Card/contactless payment only.
- Press in digital format. Satisfaction surveys via QR codes.
- Individual distribution of trays, napkin and cutlery dispensers.

CAR RENTAL

- Informational posters with the adopted prevention measures.
- Provision of hydroalcoholic gels and increase in the cleaning frequency of the facilities.
- Card/contactless payment recommended.
- The personnel of the vehicle washing and cleaning area will not provide any service inside the vehicle while the customer is inside. Once the cleaning is completed, the protective equipment and materials used will be safely disposed of in the buckets with lids enabled for their disposal and subsequent management.
- If it is confirmed that a customer has been in contact with COVID-19, the vehicle will be isolated for 10 days. Once this period is over, a deeper cleaning will be performed using a specialised service.
- Installation of security screens at customer service desks.
- Limitation and control of capacity in offices and placement of floor markings to ensure compliance with social distancing measures and fluid transit of passengers.

SHOPS AND FOOD AND BEVERAGE

- Screens placed at reception desks.
- Protective masks and screens.
- Guest registration via NHS tracking.
- Reduction of capacity.
- Removal of bar stools.
- Ice served with tweezers.
- Specific signage.

CAR RENTAL

- Installation of security screens at customer service desks.
- Social distancing markings Disinfection stations.
- Cleaning of each vehicle after each use.

On the plane



Hygiene and movement recommendations inside aircraft.
Attention to cabin crew instructions.

Airlines must comply with UK Government regulations.
<https://www.gov.uk/guidance/coronavirus-covid-19-safer-aviation-guidance-for-operators#on-board-aircraft>

Hygiene and movement recommendations inside aircraft.
Attention to cabin crew instructions.

At the destination airport



Obligation to pass an External Health control for travellers from other countries, upon arrival in Spain: forms, temperature measurements and visual control.
Temperature controls via thermal screening cameras that are imperceptible to the passenger.
Maintaining social distancing in baggage collection areas.
Obligation for passengers to have a PCR test if they come from a high-risk zone/country.

Other measures aimed at improving facilities and safety in 2020

The management report includes details of the main initiatives undertaken in 2020 in terms of Operational and Airport Security, such as: the revision of the annual Prevention, Salvage and Fire Extinguishing Service's Category; the extension of the private security concessions; the actions of two pilot projects to perform equipment tests at security checkpoints; or the supply and installation of EDS (Standard 3) Checked Baggage Screening Equipment at Spanish network airports. It should also be noted that, at the end of 2020, the protocol on drones had been implemented in 45 airports of the Aena Spanish network. At Aena Brasil, the use of drones in the airport environment requires authorisation from the Aeronautical Command.

For its part, the main advances carried out at London-Luton Airport have been: the launch of a new Health and Safety strategy at the beginning of the year, which continues to be implemented in 2021; keeping the ISO 45001 accreditation; the implementation of measures against COVID-19 throughout the Airport as well as training and workshops on safety, which were very well received by the staff that attended them.



6.2 Dedication to service

Aena's search for excellence implies providing all services with the highest quality and excellence. Aena **focuses on the customer**, adapting, improving and personalising both the commercial offering and the services provided to passengers, as well as promoting innovation and digital transformation within the Company towards the Smart Airport model.

Everyone who passes through Aena's airport network is a potential user of some of its services and, as such, always deserves the utmost attention.

- **Passengers:** Passenger facilitation and experience, evaluation of their perceptions and accessibility services, which represent a growing segment.
- **Airlines:** ground handling and other handling services, pursuant to Royal Decree 1161/1999, of 2 July, which governs the provision of airport ground handling services.
- In general, **all airport users:** maintenance services, and planning and management services, which includes establishing common rules to ensure uniform provision of the service.

Airports



Increasing and adapting the capacity of airports

Services



Compliance with high levels of quality of service

Innovation



Development of innovative digital solutions and technologies



Passengers

Passenger facilitation and experience, evaluation of their perceptions and accessibility services, which represent a growing segment.



Airlines

Ground handling and *other handling services*, pursuant to Royal Decree 1161/1999, of 2 July, which governs the provision of airport ground handling services.



All users

In general, all airport users: maintenance services, and planning and management services, which includes establishing common rules to ensure uniform provision of the service.

Tools for quality management and collaborations with third parties

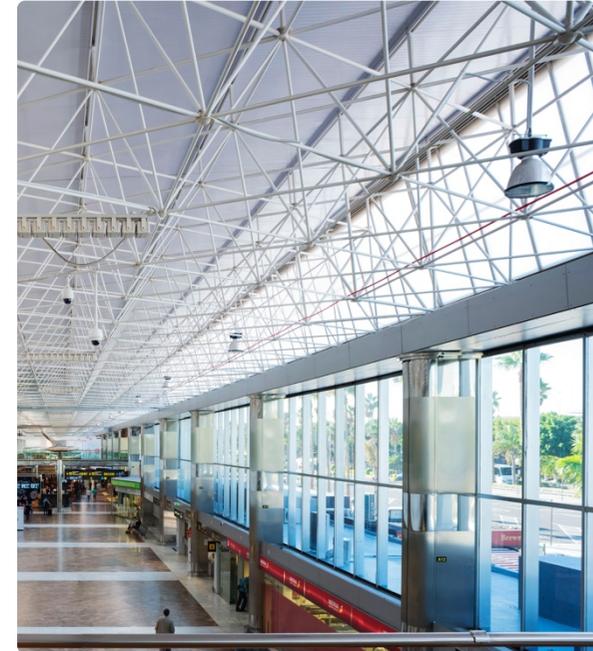
The objectives included in the Company's own Strategic Plan (and in future Innovation and Sustainability Strategic Plans), as well as in the 2020-2025 Responsible Business Strategy for London-Luton Airport⁷, and in the objectives set by Aena Brasil in the Service Quality Plan (PQS)⁸ and the Airport Exploration Plan (PEA); include permanently ensuring the best service for all users, and guaranteeing their satisfaction, as well as utmost compliance with the highest levels of service quality. This requires simultaneous use of multiple tools: current regulations and frameworks of reference for decision-making; corporate management systems, policies and procedures and communication mechanisms with all users. From all of the above, the Company deduces and extracts the different actions that it will carry out each year, aimed at improving the facilities and their maintenance with one goal in mind: continuous optimisation focusing on the customers and services.

In this way, we can highlight Aena's first Strategic Airport Maintenance Plan (PEMA [Plan Estratégico de Mantenimiento Aeroportuario]), which runs for four years, from 2017 to 2021, and seeks to implement the

reference framework used to provide maintenance services for the infrastructure and facilities of Aena's network of airports in a homogeneous, safe (compliance) and sustainable manner, with high levels of quality and efficient. The main pillars on which PEMA is based on are the following:

- Streamlining of maintenance services.
- Knowledge Management Plan.
- Asset Management Plan.
- Digitisation of maintenance services.

The implementation in 2021 of the PEMA action plans concerning each of these pillars will entail a deep transformation of the maintenance management processes and tools that will put Aena at the forefront of the maintenance sector, and will provide it with the appropriate mechanisms for continuous improvement. This will be an advantage for Aena when facing future challenges: sustainability, quality, compliance, efficiency and digitalisation.



2018-2021 STRATEGIC PLAN



AENA STRATEGIC AIRPORT MAINTENANCE PLAN



INNOVATION AND SUSTAINABILITY STRATEGIC PLANS



- Current regulations
- Management systems
- Corporate policies and procedures

- Actions to improve and maintain facilities

- Satisfaction surveys
- Complaints and grievances
- Activity data (passenger traffic, operations, cargo, commercial activity, real estate activity, other services)

⁷ It has six strategic lines, one of which is "Offering an excellent customer experience", with seven specific objectives.

⁸ In Brazil, one of the most important commitments established in the Northeast Airports Concession Agreement with the Regulatory Agency ANAC, was the PQS. Service Quality Indicator measurements started to be taken as of January 2021, in accordance with the Concession Agreement — ANAC.

Aena's Integrated Quality and Environmental Management System, implemented and certified in accordance with the ISO 9001 and ISO 14001 international standards⁹, is the internal reference framework for the development and provision of the different services that are provided at the airports managed by Aena, which are the responsibility of the services, maintenance and airport quality department. In Spain, DORA 2017-2021 requires that the Company obtain a high level of customer satisfaction in the different processes in which they are involved when they use the Company's facilities and services. Beyond the goals and objectives outlined in the Company's Strategic Plan and in the Innovation and Sustainability Strategic Plans, the DORA includes different goals and objectives (qualitative and quantitative) in terms of quality, which are both demanding and competitive. The qualitative ones include the following:

- Improved passenger satisfaction: general, cleanliness, security, orientation, comfort and PRM.
- Reduced waiting times at security checkpoints and baggage collection.
- Availability of equipment (electromechanical, baggage processing, connection between terminals, etc).
- Competitive fares.

At a quantitative level, for example, in the case of Aena's airports in Spain with traffic in excess of 100,000 passengers per year, the objective for the general satisfaction, cleanliness, security, orientation,

comfort and PRM indicators has been set at a value of four out of five (very good).

The fulfilment of these objectives is verified through a report issued by AESA. Based on the level of compliance with objectives, bonuses or penalties are established in accordance with the rates that remunerate the services provided by Aena.

Looking ahead, one of the main challenges that Aena faces in Spain is preparing the proposal for the 2022-2026 DORA. Its approval by the Council of Ministers is scheduled for the third quarter of 2021. In this regard, the Company has already started to work on preparing this proposal, which involves defining the different traffic scenarios, adapting the investment plan to future

needs, infrastructure capacity indicators, service quality ratios and operating costs.

For London–Luton Airport, its quality standards are designed taking best practices into account, with the aim of going beyond what is established by the European Civil Aviation Conference, ECAC. Thus, the Airport has been accredited by the Airport Service Quality program of the Airports Council International (ACI), achieving Level 1.

At Aena Brasil, through the Integrated Management System¹⁰ and Integrated Quality, Environmental and Energy Efficiency Management Policy, have ratified their firm commitment to excellence in the management of the services provided, with the aim of promoting the safe, effective and sustainable development of

Services, maintenance and airport quality responsibilities

Maintenance of facilities with maximum efficiency, enhancing best practices.



Service planning and management, with common rules for the different airports.

Ground handling, with common rules for the different airports.

Passenger facilitation and experience: measurement of perceptions and tracking of passenger expectations.

Accessibility: coordination and guidelines to serve persons with restricted mobility uniformly in all airports.

⁹ Certification under ISO standards is scheduled at Aeroportos do Nordeste de Brasil in 2021.

¹⁰ The Integrated Management System Committee will hold meetings dedicated to monitoring Indicators and Objectives, including the Service Quality Plan (PQS). The overall follow-up of the plans, programmes and actions, defined by Aena and included in the Concession Agreement, will also be carried out in order to comply with applicable requirements (customer, legal, regulatory, the organisation's own requirements, etc) ensuring the integrity of the system.



air transport, and maintaining excellent results for the organization's stakeholders over time. To do this, continuous and constant actions are carried out through the planning and implementation of different strategic lines of action, aimed at contributing to the sustainable development of air transport, making it compatible with Environmental conservation.

Each year, the Company's budget, approved by the Board of Directors, reflects the planned actions in terms of quality. These actions include both those required by regulations (the DORA or the concession agreements) and those that have been detected and contribute to improving the quality of services. For their part, the tender contracts include certain mechanisms to ensure the quality of the contracted product or service. There are also collaboration agreements established with some suppliers, projects that

take the form of alliances in which, together with Aena, the collaborating companies explore and develop tools to satisfy the demands that have been detected, but for which a clear response has not been identified on the market. Thus, for example, a new computer application has been developed to manage maintenance from mobile phones. Improvements have also been introduced in other existing applications (for example, the Management System for Persons with Reduced Mobility [SGPMR], the computer application that manages and monitors Service for PRM) and work continues on new solutions that optimise the management and control of the different services. These mechanisms favour the future viability of the most innovative suppliers and, above all, guarantee a quick and effective response to the demands of customers and users¹¹.

London-Luton Airport includes sustainability, environmental, corporate social responsibility, quality, and health and safety criteria in the selection processes, — beyond merely looking at estimates—, providing special support for local companies. Using key performance indicators, the suppliers' work is overseen and monitored, serving as the basis for improving efficiency and the service provided.

For its part, in Brazil, the PQS will detail the activities of the Concessionaire with a view to complying with the service quality indicators provided for in the Airport Exploration Plan (PEA). These Indicators —related to direct services, equipment availability, facilities in the operations area, and passenger satisfaction surveys (PSP)— have already been defined by the ANAC Regulatory Agency and must be monitored monthly. To improve the response to stakeholder's expectations, Aena considers the general guidelines published by specialised bodies and entities, like the General Directorate of Civil Aviation of the Government of Spain, ACI, the Spanish Committee of Representatives of Persons with Disabilities (CERMI), or the Spanish Autism Confederation; or Alzheimer's, hearing impairment, autism or diabetes associations at London-Luton Airport, among others, by actively collaborating with them.

Aena collaborates with social organisations and entities to adapt their facilities to people with special needs

¹¹ Chapter 6 contains detailed information on Aena's contracting processes.

Training and awareness of employees and third parties

Employees play an essential role in delivering the best service. Aena is aware of the relevance that up-to-date and high-quality training has in this context.

London-Luton Airport also proactively promotes teamwork and the interrelation between the different areas. To do so they have a specific work platform. Moreover, they seek to ensure that employees that deal with customers meet a series of characteristics and possess a set of specific competencies (empathy, patience, etc).

At Aena Brasil, instructions are being developed that provide guidance for the teams directly and indirectly

involved in services that have an influence on the quality of the services provided at the airports. These airports promote the involvement of all employees in the strategies, objectives and results through virtual meetings, gatherings and transparency of Senior Management. They are also investing in training and capacity building programmes. Thus, starting in 2021, new actions focused on awareness will be provided to promote better service, receive feedback from users, and guarantee quality and safety standards, as well as continuous improvement.

Infrastructure accessible to everyone

Aena ensures universal accessibility to its facilities and offices, guaranteeing their use in terms of comfort, safety and equality for all people, and paying special attention to satisfying the requirements of people with special needs. In this regard, the Company strives to reduce or eliminate limitations on mobility, communication and understanding¹²:

- **Mobility:** airports offer high-quality, personalised and free services for persons with reduced mobility (PRM). Therefore, the Company provides all the financial, material and human resources necessary to ensure that everyone can enjoy air transport between any point of Europe's geography, covering all needs. Assistance is provided throughout the entire journey through the airport's facilities, both in departures, as well as in arrivals and connections, as well as in the different processing points to be followed (check-in, security checks, boarding and disembarkation, baggage collection, transfers to the terminal, placement in the assigned seat of the aircraft, etc.). In 2020, due to the situation caused by the pandemic, and high-level hygienic and sanitary requirements, it has been especially important for passengers to reserve the service with the indicated advance notice, as well as to make use of it only if it

		AENA SME SA	AIRM	ADI	Aena Brasil
Customer experience training	Total hours	3,080	32	-	-
	Number of employees	134	2	-	-
Training in Environmental Awareness	Total hours	12,824	68	4	258.5
	Number of employees	3,206	17	4	104
Training in Quality and Environmental Management System	Total hours	-	-	-	750
	Number of employees	-	-	-	250

¹² In Brazil, throughout 2021, a series of improvement works and actions will be undertaken, focused, among other things, on improving accessibility.

is really necessary, in order to avoid reducing and wasting the resources focused on passengers who require additional help to overcome the barriers that exist in an airport environment¹³.

- **Communication:** Aena has a chat information and service line for passengers with hearing and/or speech disabilities. This service allows users with disabilities to contact the Information and Service Telephone Line from their computer, tablet or smartphone, accessing a chat, and without the need for other people to act as intermediaries.

Aena, at Ibiza Airport, participated in the campaign organised by the Spanish Confederation of Deaf People (FIAPAS) for the International Day of the Deaf in 2020. The campaign called 'Nuestro talento suma' (Our talent adds), promotes the inclusion of people with hearing disabilities in work environments.

In some Spanish airports and at London-Luton, there are also magnetic induction loops in order to improve accessibility and service for people with hearing disabilities. 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 (London's airport has more than 100 points). This Airport also has two electric mobility vehicles in the



air zone to transport customers, with capacity to transport six people. The compact size of the vehicle for persons with reduced mobility allows passengers to enjoy a safe and comfortable journey despite the reduced size of the vehicle. There are also a total of 28 vehicles available at four of the main Spanish airports (Adolfo Suárez Madrid-Barajas, Barcelona-El Prat Josep Tarradellas, Palma de Mallorca and Málaga–Costa del Sol).

- **Understanding:** To facilitate the orientation of users and guide them in their journey through airports, Aena has signage, made using a guide of basic system symbols, which allows users to locate the areas, facilities and services of the airport. These symbols,

which are universally recognised, have been designed and installed at all of the company's airports, in accordance with internationally established safety and accessibility criteria. All of this is completed with the information that Aena provides to users, related to the correct use of the facilities, as well as with the different advertising media that promote their commercial and real estate activity.

¹³ 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 Aena's website (www.aena.es), through Aena's Information and Care Service (91 321 10 00) or through Aena's 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 relation to London-Luton Airport, reservations can be made as explained in: <https://www.london-luton.co.uk/special-assistance-landing/getting-the-special-assistance-you-need>

At Aena Brasil, the service can be requested through the private link enabled for each of the six airports:

[Internacional do Recife Guararapes - Gilberto Freyre](#); [Internacional de Maceió - Zumbi dos Palmares](#); [Internacional de João Pessoa - Presidente Castro Pinto](#); [Aracaju - Santa Maria](#); [Juazeiro do Norte - Orlando Bezerra de Menezes](#); [Campina Grande - Presidente João Suassuna \(CPV\)](#)

In 2020, despite the drop in traffic and new operational difficulties, Aena has continued to offer the best service for people with different needs, adapting to the safety requirements associated with the health emergency. Thus, travellers have been asked to reduce paper documentation and come to the airport as far in advance as possible, among other recommendations. At the end of 2020:

In addition, within the framework of continuous improvement that is part of Aena's culture, and after detecting that people with Autistic Spectrum Disorder (ASD) require different needs, a project focused on this group was launched. Málaga-Costal del Sol, César Manrique-Lanzarote and Tenerife Sur airports took part in this pilot project, in order to design and implement appropriate measures in terms of the operational and training needs of the different groups that come

into contact with passengers. As a result of the success of this pilot project, and always considering the lessons learned from the same, Aena continues this line of work to standardise and optimise the programme in all airports where its implementation is possible (including technological developments that supplement the already initiated pilot projects).

In this regard, there are collaborations with associations such as CERMI and the Spanish Autism Confederation that help to jointly assess other passenger needs (passengers with autistic spectrum disorders, Alzheimer's disease, and other neurological disorders and diseases) in terms of accessibility, such as the needs of people with ASD and their families, seeking mechanisms that contribute to improving their mobility and approach to public services, transportation and tourism.

Aena has been in permanent collaboration with the Spanish Committee of Representatives of Persons with Disabilities (CERMI) with the aim of offering, to all passengers who need it, the highest quality service adapted to their needs, converting Spanish airports into inclusive spaces

	2019			2020			Aena Brasil
	AENA SME SA	AIRM	LLA	AENA SME SA	AIRM	LLA	
PRM requests (no.) (*)	1,878,044	16,484	133,180	517,115	3,704	35,685	5,105

(*) With regard to this data, we must take into account the reduction of passenger volume experienced at a general level in 2020 due to the COVID-19 pandemic.



London-Luton Airport works tirelessly to achieve the best score in the evaluation of the service for the improvement of accessibility for persons with reduced mobility, which is carried out by the Civil Aviation Authority



Airlines

- Promotion of facial recognition services.
- Self-check-in of luggage.
- Possibility of carrying out boarding by groups.
- Progress in the implementation of autonomous vehicles for handling luggage on the apron.
- Remote Towers at Vigo Airport and Menorca Airport.
- “A-CDM” (Airport-Collaborative Decision Making) and Advanced Tower programmes, sponsored by Eurocontrol.
- Extraordinary incentive package focused on the recovery of operations.

Aeroportos do Nordeste do Brasil:

- Establishment of consultations with airlines and definition of SLA.
- Promotion campaigns.
- Collaboration in the implementation of health safety measures.

London-Luton Airport:

Installation of *digital* check-in.

For its part, at London-Luton Airport, this action includes all of the so-called “**hidden disabilities**” focusing especially on the development and training of employees.

This Airport also has an **Accessibility Focus Group** with representatives from social entities related to functional diversity (Alzheimer’s, autism, hearing disability, etc). The airport accessibility forum took place in October 2020, and the third one will be held in March 2021.



Passengers

- Extraordinary health safety measures.
- Development of the Strategic Cleaning Plan.
- Since the last quarter of 2020, all airports have carried out ASQ surveys using Tablets, thus minimising contact between the pollster and the passenger, guaranteeing the safety of both.
- The devices for real time feedback on customer perception (Happy or Not) have been adapted to avoid contact, through QR codes, and the Company has started placing antiviral protectors on the devices.

Aeroportos do Nordeste do Brasil:

Start of the Service Quality Indicators measurements.

London-Luton Airport:

- Improved real time *customer* feedback system.
- Usage counters in all bathrooms to improve cleaning standards and efficiency.
- Translator for the customer service staff to provide better care.
- ASQ digital surveys (from the second half of the year).
- Mobile phone charging points.

Main actions in 2020 aimed at improving customer experience

Throughout 2020, despite the drop in activity, various actions have been carried out, detailed in the Management Report, including improvements in services aimed at both airlines and passengers. With these, the Company has continued to make progress in the quality commitments established in the DORA, especially in the area of service



Licensees

- Adaptation of agreements to the situation caused by the health emergency.
- Promotion campaigns.
- Collaboration in the implementation of health safety measures.
- New concessions awarded in restaurant areas (Valencia Airport, Barcelona-El Prat Josep Tarradellas Airport, Málaga-Costa del Sol Airport, Tenerife Sur Airport, F.G.L. Granada-Jaén Airport and A Coruña Airport).

Aeroportos do Nordeste do Brasil:

- Promotion campaigns.
- Collaboration in the implementation of health safety measures.

London-Luton Airport:

New contract for the persons with reduced mobility service.

digitisation, facility cleaning, connectivity and Wi-Fi for users, baggage collection, etc.

With regard to Brexit, following its culmination on 31 December 2020, Aena’s airports in Spain and the United Kingdom had already been preparing the necessary adaptations in their traveller, cargo and pet controls. Specifically, London-Luton Airport had adapted its customs infrastructure to comply with the new provisions before 31 December 2020.

Communication and evaluation of customer satisfaction

Aena has different tools to permanently monitor the opinions and expectations of its customers. By applying cutting-edge technologies, the Company evaluates the quality of the services it provides and finds itself in

an ideal starting point to implement market advances to fully satisfy its users, in line with its commitment to continuous improvement and providing best customer experience. This commitment is realised, as already indicated, through excellent management, understood as maximum efficiency management aimed at continuous improvement and intelligent dialogue with stakeholders. In addition to evaluating user satisfaction, the

Company considers quality in the execution of the organisation's internal processes, the management of customer complaints, suggestions and compliments, and the certification of the Company's systems to be of enormous importance.





Passenger satisfaction and perception



Satisfaction and perception of airlines: airport marketing



Relationship with concession companies: commercial marketing

SOME OF THE DETECTED EXPECTATIONS

- Competitive prices in restaurants.
- Staff efficiency.
- Minimum wait time (check-in, security control, etc).
- Discounts on services.
- Comfortable facilities.
- Recharging points for electronic devices.
- Absence of unexpected costs.
- Cleaning.
- Friendliness of the staff.

- 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.

SPANISH AIRPORT NETWORK

- ASQ (*Airport Service Quality*) surveys endorsed by the ACI (Airports Council International).
- Instant Feedback devices (currently, Happy or Not), which conduct surveys on bathroom cleanliness, the courteousness of the security staff and baggage claim time in 33 airports of the network.
- Complaints, suggestions and compliments tracking and management.
- EMMA surveys.
- Monitoring of process indicators.
- DORA indicators.

- 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.
- Loyalty Club (more than one million customers in 2019).
- Workgroups for information exchange and service improvement.
- Analysis of the results of the service provided (commercial attributes of ASQ surveys, and complaints suggestions and compliments management monitoring).
- Business service surveys.

LONDON-LUTON AIRPORT*

- Customer Experience Strategy developed in 2019.
- Customer Experience Board/ Customer Comments Board.
- London-Luton Airport Accessibility Forum for inquiries from PRM users and charitable organisations.
- ASQ surveys (during the second half of 2020).
- Real-time collection of comments from customers (FeedbackNow) on different aspects (security, check-in, bathrooms, immigration and baggage claim).
- Mystery Shopper Programme.
- Quality walkarounds.

- Airport operators' committee.

AEROPORTOS DO NORDESTE DO BRASIL

- PSP surveys (Passenger Satisfaction Surveys) recommended by ANAC (Agência Nacional de Aviação Civil do Brasil [National Civil Aviation Agency of Brazil]). From November 2020.

- Airport operators' committee. From November 2020.
- Establishment of consultations with airlines and definition of SLA as of November 2021.



* At London-Luton Airport, the use of some of these tools has ceased due to COVID-19.

The Company also uses some of the mentioned tools to share and comply, at all times, with the commitment to keep all its customers and suppliers informed of their rights and obligations. In particular, in the case of its third-party relationships, the Company undertakes to fully inform customers about their rights before signing any contract. At London-Luton Airport these are indicated at different points to keep all customers informed.

Based on the responses provided by users, the following conclusions have been drawn for 2020, in relation to the quality indicators ^(14, 15, 16):

Quality assessment rated out of 5



¹⁴ At Aena Brasil, records for the calculation of these indicators begin in November 2020, and, at London-Luton, they were not monitored during 2020.

¹⁵ To obtain these results, the properly weighted ASQ (Airport Service Quality) surveys in the two quarters that were carried out (Q1 and Q4) are considered as the basis. ¹⁶ Due to the volatility of the situation, there are indicators for which the goals for 2021 have not been set.

6.3. Complaint mechanisms

The Company provides its users with the following mechanisms for reporting complaints or claims to the Company related to its services:

- Through [the Online Services Portal](#), which features a specific section for complaints, suggestions and compliments¹⁷.
- Through the use of complaint sheets, provided mainly at airport information points, as well as VIP lounges and car parks.
- London-Luton Airport has a specific website ([Feedback-form London Luton Airport](#)), with email addresses and an online form.
- Aena's Airports in Brazil have the [Canal de Ovidouria](#) available through the website to receive proposals for improvements related to the offered airport services. The following email address is also enabled ouvidoria@aenabrasil.com.br for this purpose¹⁸.

In order to process them, the Spanish airports of Aena have established a Procedure for the Management of

Complaints and Claims, and a Department for Passenger Facilitation and Experience.

Aena's objective is to answer initial claims regarding its airport management in less than five days¹⁹. The financial compensation derived from pecuniary claims in Brazil, Spain and Luton totalled €67,864.17 in 2020²⁰,²¹.

Additionally, both in Spain and at London-Luton Airport, as well as at Aena Brasil²², complaints and claims are collected through the company's profiles on Twitter and Facebook. A total of 2,134 complaints were collected at Spanish airports in 2020²³. These channels are not included in the Complaints and Claims Management Procedure, so the complaints that are received are generally answered by informing the affected parties that they should process them through official channels.

In addition, customers and users can access the information to exercise their right to make a claim through the Company's website²⁴.

In particular, in relation to the offer of services to airlines, handling agents, concessionaires of commercial

activities or real estate customers, Aena prepares specific documentation that summarises the main characteristics of the services on offer and their prices, although the specific details are based on specific individual negotiations²⁵.

¹⁷ In the case of environmental inquiries, the Company has the [Environmental Assistance Office \(Noise enquiry or complaints\)](#) at London-Luton Airport).

¹⁸ The Management System also addresses the relationship with Aena's Brazilian Airport users, its objective is to provide information to citizens about the Ombudsman and their relationship with consumers, suppliers, employees, the community and users of airports of Aena Brasil. Aena Brasil has 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".

¹⁹ London-Luton Airport does 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 follow-up.

²⁰ The amount includes possible expenses incurred from expert and/or legal counsel services. This includes both civil liability claims for personal injuries and for property damages greater than €9,000. The resolution of personal injuries does not occur until the claimant has been medically discharged. In cases that wind up in court, the resolution does not occur until a final ruling is issued.

²¹ Aena's airports in Brazil have not provided any financial compensation to date arising from pecuniary claims.

²² Aena Brasil only has a Twitter account.

²³ Data not available for London-Luton Airport or Aena Brasil.

²⁴ Although the London -Luton Airport website does not have this, all the information regarding noise complaints can be found on the website.

²⁵ In Brazil, they will begin in January 2021.

Main complaints and claims received

Indicator	AENA SME, AIRM			LONDON-LUTON AIRPORT			AEROPORTOS DO NORDESTE DO BRASIL*
	2019	2020	% Variation	2019	2020	% Variation	2020
Transport agreement	1,748	496	-71.6%	674	66	-90.21%	7
Handling	458	110	-75.98%	1,785	336	-81.18%	-
Information systems	637	183	-71.27%	-	-	-	14
Facilities	469	280	-40.29%	-	-	-	71
Security services	1,826	709	-61.17%	912	237	-74.01%	49
Supplementary services	830	427	-48.55%	-	-	-	-
Access	73	11	-84.93%	-	-	-	-
Damage and theft	326	102	-68.71%	610	66	-89.18%	3
Miscellaneous	143	90	-37.06%	-	-	-	171
Commercial and food & beverage services	503	62	-87.67%	662	347	-47.58%	5
Car parks	2,094	575	-72.54%	1,049	630	-39.94%	2
							-
TOTAL AIRPORT MANAGEMENT CLAIMS AND COMPLAINTS	6,901	3,045	-55.87%	5,692	1,682	-70.45%	322

* Start of activity as of March 2020.

Other specific indicators

In 2020, Aena had no record of breaches of regulations or voluntary codes related to:

- The information that is provided to users about the service, in none of the companies of the Group.
- Marketing communications, in none of the companies of the Group.

There was a notification of infringement for Recife Airport related to health systems and a notification of infringement for João Pessoa Airport related to the air conditioning system.

7

Innovation
for fostering
opportunities

We develop innovative solutions that allow us to offer the best service under any circumstances

Investments for the development of solutions

- Training and communication
- Training in employee innovation:

2,044 HOURS
175 EMPLOYEES

MORE THAN 20 COLLABORATIVE
PROJECTS WITH DIFFERENT PARTNERS

MORE THAN €10m
INVESTED IN R&D IN 2020

254 PROJECTS FROM **33** COUNTRIES
IN THE "AENA VENTURE" CALL

HORIZON 2020: PROJECTS
WITHIN THE FRAMEWORK OF
THE EU

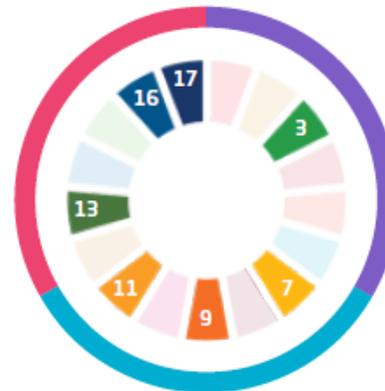
Service guarantee

- Reorganisation and digitisation of processes
- Passenger and worker safety
- Essential flight maintenance

IMPLEMENTATION OF THE SPAIN
TRAVEL HEALTH-SPTH PLATFORM
AT MORE THAN **40** AIRPORTS
THROUGHOUT SPAIN

Commitment to the future

- Airports 4.0
- Digital transformation of internal processes
- BIM
- Drones
- New business lines
- Intelligent operations and maintenance management
- Remote towers
- Cargo digitalisation



Commitment to SDGs

3
SDG 3 Health and well-being

7
SDG 7 Affordable and non-polluting energy

9
SDG 9 Industry, innovation and infrastructure

11
SDG 11 Sustainable cities and communities

13
SDG 13 Climate action

16
SDG 16 Peace, justice and strong institutions

17
SDG 17 Partnerships to achieve the goals

Innovation management at Aena

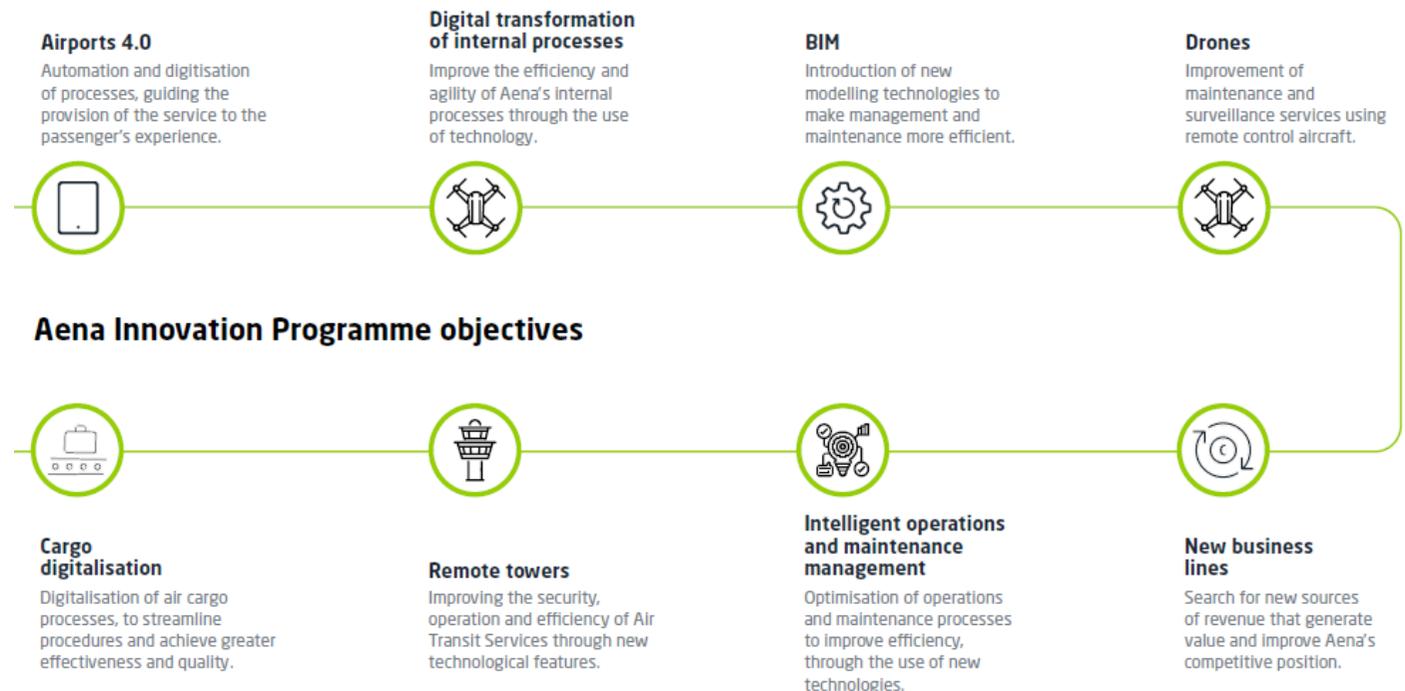
Aena is committed to innovation as a competitive advantage and a clear opportunity. It, therefore, continues to maintain a firm commitment to advancing its strategic lines and is undertaking, more than ever, to continue focusing on the strategic priorities to which it was already committed before the outbreak of the health crisis: sustainability, **innovation and digital transformation**. The objective is clear: to become a leader and international benchmark in airport management innovation.

As the main lever for sustainable development in Aena, innovation aims to develop technological solutions that improve the user experience, the Company's competitiveness and productivity, optimise management processes and operations, protect the environment and ensure the safety of all users.

Innovation at Aena is open, dynamic and transversal. It attempts to incorporate the participation of all related stakeholders (users, customers, suppliers, partners, entrepreneurs, universities, research centres) and learn from them by working jointly to search for solutions to new challenges and existing problems, by sharing risks in pilot projects and by using the best as inspiration.

In 2020, the Innova awards added two new categories to the existing best innovative idea, best practice and best solution to the proposed challenge categories, these are best sustainable idea and best idea designed to increase

Innovation, digital transformation, new technologies and digital solutions are levers or tools for recovery.



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 of testing new technologies and processes at its airports, in order to find innovative solutions and alternatives for the airport's business. Likewise, in 2020, Aena launched the "Aena Ventures" call for start-ups (see below). The Aena Ventures call attracted more than 254 proposals from 33 countries, five of which will be accelerated in the Aena Ventures programme to deploy a prototype (www.aenaventures.com).

In addition, to try to make the most of the internal knowledge within the Company, it decided to hold, in 2020, the third edition of the Innova Awards for all Spanish network airports, Luton and the Brazilian airports; in which the workers themselves present ideas and best practices. In the 2020 edition, more than 300 ideas were presented, almost doubling those presented in 2019.

Training

As one of the main levers of innovation and cultural change, in 2020, Aena launched training activities that allowed Aena 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 and "agile" project management procedures. These include postgraduate master's degrees, seminars and internal technical training courses, among others.

Specifically in 2020, 175 Aena employees were trained in different innovation methodologies and tools. This is a 99% increase, nearly double the number of participants, with respect to the previous year. With regards to training hours dedicated to innovation, Aena employees received 2,044 hours of training, which is triple the amount of hours received in 2019.

The value of employees, as the main source of idea generation to promote innovation, requires training in specific subjects that are currently of high value. Aena is committed to improving employee training in order to drive towards the future of the sector. Digitisation, e-commerce, the Internet of Things and autonomous systems or artificial intelligence are some of the technological areas in which Aena will invest to grow.

Work and collaboration with specialised companies

The investment made in R&D&I projects during fiscal year 2020 exceeded €10 million.

Even though it was lower than the investment made in 2019, due to the strong impact of the State of Emergency, investments into innovation with respect to turnover represented 0.5%. Nonetheless, throughout 2020, Aena has continued to work on searching for synergies with numerous entities in the technological and innovation sector in order to improve its global competitive position. As a result, it signed more than 20 collaboration projects, in addition to the acceleration programme.

Aena Airport 4.0.

Aena's innovation strategy includes development programmes allowing it to achieve objectives in this area in a stronger way than ever, due to the present situation. The Aena Airport 4.0 project is one of its most important, its purpose being to improve passenger experience in airport flow through different lines of action, which will implement the latest technologies and take societal trends into account.



Developments in 2020

In 2020, the Company's main objective has been **guaranteeing the operation of essential flights while maintaining the highest health and safety standards** for both Aena workers, external professionals and users generally involved in coordinated operations. Nonetheless, this has not prevented it from moving forward with planned innovation-related objectives and projects.

With this focus in mind, Aena has been developing actions both internally, with the reorganisation and digitisation of processes for the remote work of its employees (see *chapter 5*), and externally, with the implementation and development of systems that ensure the safety of passengers and the public health of citizens on national and international levels, without leaving aside the strategic objectives planned to date. Thus, several innovation programs were developed and implemented in 2020, including the following most relevant ones:

- **Digital identity systems.** The aim of this project is to test biometric and digital identity technology in order to allow passengers to transit through airport facilities without stopping, through a "contact-less" system.
- **Geolocation System:** Within this project, Aena, in collaboration with various partners, launched the "**AenaMaps**" application, which offers travellers assistance in finding their way through the Adolfo Suárez Madrid-Barajas Airport by using maps. This not only allows passengers to know their location at all times within the facilities, but also to navigate using terminal maps, look for points of interest (such as boarding gates, restaurants or shops) and, above all, calculate the best route to reach their destinations, as it also includes the distance and approximate duration of the journey. This tool is available at the Adolfo Suárez Madrid-Barajas Airport and will be progressively extended to other airports of the Aena network.
- **Aena Ventures:** Deployment and advancement of internal entrepreneurship proposals, through pilot projects and collaborative work in our programme to accelerate "start-ups" and more closely associate Aena with companies and projects with greater innovative profiles. The announcement of "**Aena Ventures**" accelerator allows the Company to accelerate five airport and commercial management projects start-ups, with the aim of promoting disruptive technologies in our airports in an innovative, sustainable and efficient way. In total, 263 proposals have been presented to the initiative with more than 50% international participation.
- **Pilot Projects:** Demonstrative projects that are measurable and produce tangible short-term results, carried out through collaboration agreements with different technological partners. This allows us to attract external innovation and provides mutual benefits. For example:
 - **HALCODRON:** The project will confirm the functionality of unmanned aircraft or RPAS (Remotely Piloted Aircraft) to control wildlife in essential areas, in order to ensure operational safety at heliports and airports. The objective is to study, in situ, the true effectiveness of the drones camouflaged as falcons in order to scare away surrounding birds and, thus, minimise the risk of impacts with aircraft. It is an addition to the wildlife control service, which is usually carried out with birds of prey. The flights are carried out in compliance with all security requirements and with the approval of the Spanish Air Staff.
 - **ESPIRAL:** This project, framed within the concept of circular economy, aims to minimise the volume of textile waste from Aena employee uniforms by recycling them into raw materials for new garments or other materials, thus decreasing their environmental footprint and extending their lifecycle.

- **Horizon 2020:** In 2020, new projects were started within the framework of the European Union:
 - **TRANSIT** (Travel Information Management for Seamless Intermodal Transport) is a research project funded by SESAR 2020 Exploratory Research. Its goal is to develop a set of multi-modal key performance indicators, mobility data analysis methods and transport simulation tools allowing the evaluation of the impact of innovative intermodal transport solutions on the quality, efficiency and resilience of the door-to-door passenger journey.
 - **IMHOTEP**, its goal is to develop a concept of operations and a set of data analysis methods, predictive models and decision support tools that allow information sharing, common situational awareness and real-time collaborative decision-making between airports and ground transport stakeholders.

ASPRID, which aims to address the problem of protecting airport operations against drone intrusion (careless or malicious), from an operational point of view. The project aims to investigate the vulnerability of the airport to different types of threats and possible forms of response, as well as to study interrelations between the aspects involved in different scenarios.

- **SESAR WAVE 2** has continued with the participation of the SESAR programme (Single European Sky ATM Research), a project of the European air transport community, which is responsible for developing and implementing the future common air traffic management system. Its objective is to implement a high-performance European ATM network, born from the need to create an integrated vision on the evolution of the European traffic management system.

Future outlook

In the current situation, Aena maintains its commitment to innovation, digital transformation and R&D&I as the main levers for the recovery and improvement of the company's competitiveness, both in the quality of the service provided and in the efficiency of internal processes. Innovation is a competitive advantage that will allow Aena to be a benchmark in the international airport sector.

Aena is committed to continuing its strategy of validating innovative technologies and products in airports, while also focusing on the global development of R&D&I by approaching companies, technological centres and universities to bring R&D closer to the real production field.



About this report



This 2020 Consolidated Management Report has been conceived to inform Aena's stakeholders of its performance in economic, social and environmental matters in 2020, as well as to comply with the reporting requirements of Act 11/2018 of 28 December, on Non-Financial Information and Diversity, with the drawing up of the NFIS. A year in which the Company's challenges, strategies and future prospects have been marked by the emergence of the COVID-19¹ pandemic.

As recommended by the IIRC's International Integrated Reporting Council's Framework, the report integrates into a single document the information on financial and non-financial impacts, risks and opportunities, providing a complete and transparent view of how the Company has continued to create value in 2020 for its stakeholders, in a scenario marked by uncertainty due to the extraordinary global situation in 2020.

This Report has been drawn up in accordance with GRI Standards, in its comprehensive option. This section includes the corresponding GRI Content Index, which this year incorporates the 303:2018 standard on water and effluents and the 207:2019 standard on taxation. As an additional new feature, information is also included in accordance with the SASB (*Sustainability Accounting Standards Board*) reporting standards relating to the Professional and Business Services, Logistics and Air Freight Services, Airlines and Real Estate Services industries.

For the content of the Non-Financial Information Statement, in addition to Act 11/2018, different frameworks and guidelines have been taken into account, such as the GRI (*Global Reporting Initiative*) standards, including supplement G4 *Airport Operators Sector Disclosures*.

In addition, reference is made to the United Nations Global Compact, the United Nations Guiding Principles on Business and Human Rights, the United Nations Sustainable Development Goals, the *Carbon Disclosure*

Project (CDP), the guide published by the AECA (Spanish Accounting and Auditing Association), as well as the recommendations of the CNMV and ESG rating agencies.

The main management areas of Aena have participated in drawing up the report, under the coordination of the Corporate Responsibility area. The scope of the information included in it covers the companies in which Aena has a holding of more than 50%, as included in the Annual Accounts by virtue of the control criterion; including the data available for Aena Desarrollo Internacional S.M.E., S.A.; Aena Sociedad Concesionaria del Aeropuerto Internacional de la Región de Murcia S.M.E.; and the subsidiaries in the United Kingdom and Brazil on a consolidated basis, while the remaining holdings, which are not fully consolidated, are not included in the non-financial performance indicators included in this document.

¹ See Section: "2020: An unprecedented challenge".

Reporting principles used

Quality of the report

- Accuracy
- Balance
- Clarity
- Comparability
- Reliability
- Timeliness

Definition of contents

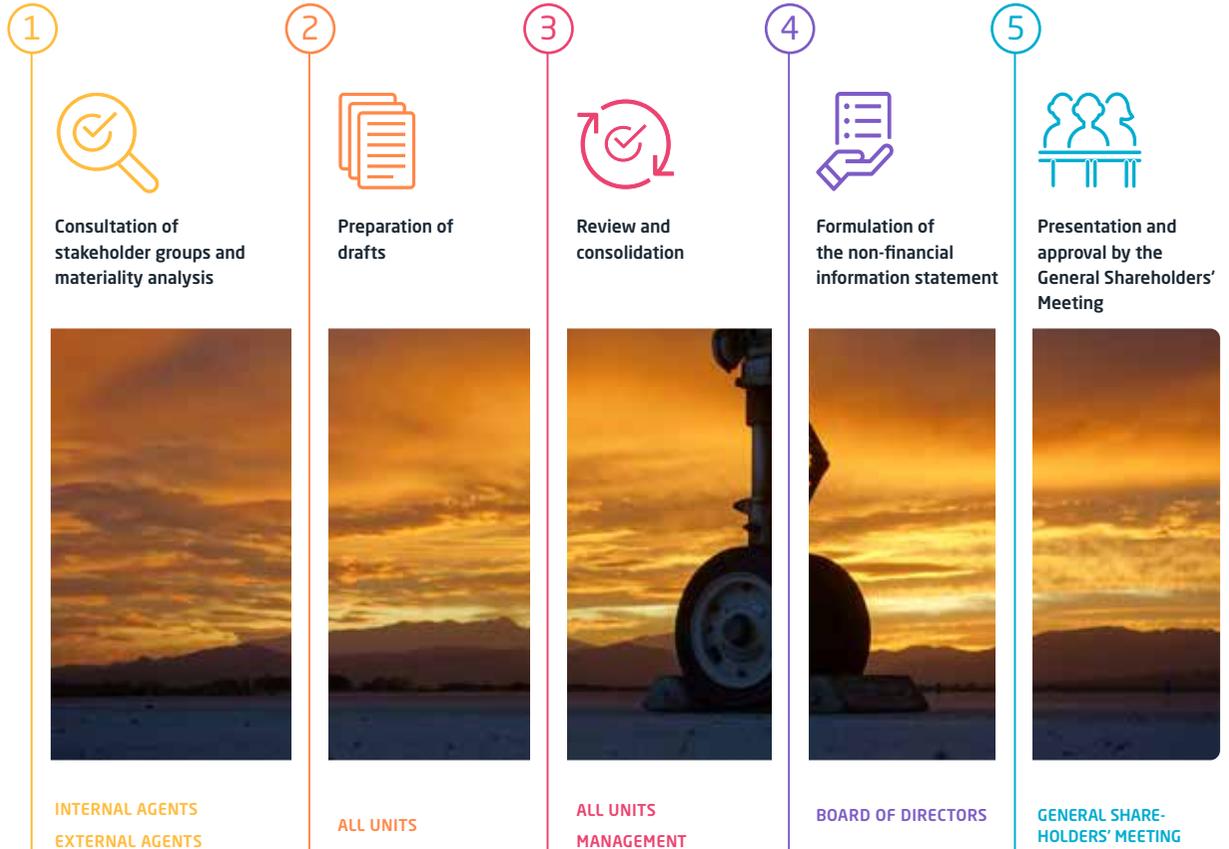
- Inclusion of stakeholders
- Sustainability context
- Materiality
- Completeness

Reporting principles included in GRI Standard 101 "Foundations 2016"

In order to reflect the Company's sustainability performance over the last few years and to enable its assessment, the report provides data from previous years or has external references to help its readability. In addition, in the event that a value or indicator has been updated, the corresponding change is specified.

For more information about the Company's performance, readers can access the Aena corporate website where they can find: reports related to Corporate Governance, remunerations, the Environmental Sustainability Report, among others. Finally, if you have any questions or concerns about this report, please contact the Corporate Responsibility department: rc@aena.es

Phases for preparing the report and groups involved



1. References to other sections of the Consolidated Management Report

The following table summarizes the non-financial information required by Act 11/2018, which is described in the introduction to the document and in the section "2020: an unprecedented challenge", these contents being part of Aena's 2020 Non-Financial Information Statement.

Subjects Act 11/2018

Answers with references to other chapters of the Integrated Annual Report

Business model description	GRI
<p>Business environment. In 2020, the activity of the Aena Group's companies and the evolution of their businesses was affected by the mobility restrictions in force since March both in Spain and in the rest of the world to avoid the spread of COVID-19.</p> <p>By 2021, air traffic is expected to recover to 51% of 2019 European traffic volume, accelerating from the summer onwards. Traffic would only return to 92% of 2019 levels by 2024, and figures would not recover completely until 2026. Moreover, ACI Europe (20/01/2021) has lowered its traffic forecast at European airports for 2021 to -56% of the 2019 level (base scenario) compared to -43% in its previous forecast.</p> <p>In the long term, there is a lot of uncertainty regarding the return of traffic to levels recorded in 2019, which these bodies predict for Europe sometime between 2024 and 2027.</p> <p>The main macroeconomic indicators point to a slower recovery than initially expected. Thus, the latest estimates of the Spanish Government indicate that 2020 will see a fall in GDP of 11.2% (in 2019, GDP grew by 2.0%). For 2021, GDP is expected to recover with growth of 7.2%, although sustained growth will depend on the future development of the pandemic.</p> <p>For further information on this matter, please refer to pages 15 and 16 of Section: "2020: An unprecedented challenge".</p>	GRI 102-2
<p>Markets where it operates. The Aena group is made up of Aena, Sociedad Concesionaria del Aeropuerto Internacional de la Región de Murcia (the concession company of the Región de Murcia International Airport, "SCAIRM"), Aena Internacional, the companies of the London Luton Airport Group, as well as the Concession Company Aeroportos do Nordeste do Brasil, S.A. (the concession company of the Northeast Brazil airport group, "Aena Brasil").</p> <p>As detailed in Note X of the Consolidated Annual Accounts, the Group conducts its business activities centred on the following segments: Airports, Real Estate Services, International and SCAIRM.</p> <p>For further information on this matter, please see the section "AENA Airport Network" in the introduction to the Management Report.</p>	GRI 102-6
<p>Objectives and strategies. In the coming years, Aena will continue to focus on the strategic priorities to which it was already committed before the health crisis: sustainability, innovation, digitization and the 2022-2026 DORA.</p> <p>In addition, it is essential to: The harmonization of the measures to be adopted by the different governments of the European Union in the face of potential outbreaks of the disease, including common, coordinated actions based on clear epidemiological criteria for all member countries; Maintaining a close relationship with the airlines and other companies that carry out their activity in the airports of the network and other stakeholders; Responding to the new challenges for the air sector: Society's growing concern for the environment, more stringent regulatory requirements, especially in terms of safety, the environment and passenger rights, along with the new health requirements imposed by COVID-19 and passengers' greater demand for quality of service.</p> <p>For further information on this matter, please refer to the section "Future Challenges: Adaptation to the New Context" in Section: "2020: An unprecedented challenge".</p>	GRI 102-14

Factors and trends that may affect its future evolution.	Aena's activity has been subject to: global macroeconomic and political risks; risks related to the Group's business and operations; mergers and competition risks; operational risks (cybersecurity, third-party dependence); health and safety risks; regulations; sustainability, climate change and energy transition; risks related to the Company's business nature, its regulation and compliance; and risks related to stakeholder involvement.	GRI 102-15
For further information on this matter, please refer to the section "Risks and their management" in Section: "2020: An unprecedented challenge" .		
Description of the policies the Group applies		GRI
Due diligence procedures applied to the identification, evaluation, prevention and mitigation of risks.	Aena's risk management system develops the principles defined in the Risk Control and Management Policy, based on the integrated COSO III (Committee of Sponsoring Organizations of the Treadway Commission) Integrated Corporate Risk Management Framework, incorporating the relevant liabilities and procedures. Moreover, with the declaration of the state of emergency in March, a period of inactivity began that caused an almost total collapse in traffic levels. With the aim of adapting to this sudden decline in activity, the company adopted a series of operational, economic and financial measures that would allow for a more efficient management of the business, including the following in particular: adjusting capacity and services to the specific needs of current operations; in order to strengthen the Company's liquidity, Aena has signed loans with various financial institutions between April and May; health safety; guaranteeing the health of workers, subcontracted personnel and passengers; commitment to suppliers, customers and society in general.	GRI 103-2
For further information on this matter, please see the sections "Measures adopted in AENA" and "Structure, management and control of risks" in the Section: "2020: An unprecedented challenge".		
Significant impacts, and verification and control. Measures taken.	The Aena risk map includes strategic, operational, technological, legal and compliance -related, informational, financial and non-financial risks. Specific instruments and mitigating activities to cope with them have been established in each category. Moreover, the 2020 Materiality Analysis involves an update of the issues identified in the previous fiscal year, achieved through an analysis of the presence of Aena in external sources, the identification and characterization of the stakeholders involved, and the preparation of a "material topics thermometer" - taking the Mitchell model as a reference, assessing the relevance of the groups based on their power, legitimacy and the urgency of claims - and proceeded to a reformulation with the aim of adapting it to the 2020 context. The list of relevant topics in 2019 has been updated, adapting them to the 2020 context and incorporating the following issues: Merging aspects related to transparency and management; reinforcement, in all definitions, of the most cross-section issues: customer orientation, sustainability and environmental considerations, talent management, safety culture from a broader point of view incorporating the context of health emergency, and business exposure to the risks of the technological environment (cybersecurity); presence of innovation and technology in all processes; inclusion of the SDG perspective and social contribution in the context of health emergency at all levels: risk management or opportunities, governance, alliances, security, solidarity, etc.	GRI 103-1
For further information on this matter, please see the sections "Measures adopted in AENA" and "Risks and their management" in the Section: "2020: An unprecedented challenge" and also consult the "Materiality" section of the introduction to the Management Report.		
Main related risks linked to the activities of the group		GRI
Commercial relationships, products or services that may have negative effects.	As stated above, Aena's activity is subject to different types of risks. For further information on this matter, please refer to the section "Risks and their management" in Section 2020: An unprecedented challenge.	GRI 102-2
How the group manages these risks.	Aena's risk management system develops the principles defined in the Risk Control and Management Policy, and incorporates the responsibilities and procedures to manage risks and thus determine the mitigating activities and action plans that enable the accepted risk level to be reached.	GRI 103-2
For further information on this matter, please see the section "Structure, management and control of risks" in the Section 2020: An unprecedented challenge.		

<p>Procedures used to detect and evaluate them.</p>	<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 prioritize them according to their criticality, based on their impact and probability of occurrence.</p> <p>For further information on this matter, please see the section "Structure, management and control of risks" in the Section 2020: An unprecedented challenge</p>	<p>GRI 103-3</p>
<p>Information on the impacts that have been detected and their breakdown, particularly the main short-, medium- and long-term risks.</p>	<p>The Aena risk map includes strategic, operational, technological, legal and compliance -related, informational, financial and non-financial risks.</p> <p>For further information on this matter, please see the sections "Measures adopted in AENA", "Operational recovery plan", and "Risks and their management" in the Section 2020: An unprecedented challenge</p>	<p>GRI 102-46, GRI 102-47</p>
<p>Information about the company</p>		<p>GRI</p>
<p>Commitments from the company on sustainable development.</p>	<p>The Company formalises the principles on which it bases its relationship with stakeholders in the Corporate Responsibility Policy, the Code of Conduct and the Communication Policy. The Integrated Management System (IMS) includes the process to follow in order to understand the needs and expectations of stakeholders, as well as the materialisation of requirements and the use of tools for assessing compliance. On an annual basis, the Management Review of the IMS analyses the possible changes that may exist in the needs and expectations of the stakeholders, and evaluates the degree of satisfaction in order to improve the services provided and adapt them accordingly. In the most recent review of stakeholder parent companies, audited by Aenor within the framework of ISO 9001:2015, the Company has identified 26 different groups that can influence it, or that affect Aena's decisions.</p> <p>To ensure effective two-way communication, the Company makes a series of communication channels available to all its stakeholders. These include the Company's website and social networks.</p> <p>For more information on this matter, see the section "Relationship and dialogue with stakeholders." of the introduction to the Management Report.</p>	<p>GRI 102-43 GRI 413-1 GRI 413-2</p>

2. Table of contents Act 11/2018

Table of contents required by Act 11/2018, of 28 December, which modifies the Commercial Code, 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

CLARIFICATION NOTE:

The information collected in this Non-Financial Information Statement is supplemented, as indicated in the text, by other documents published by Aena, such as

the Annual Accounts or the Corporate Governance Report, both included in the Company's 2020 Integrated Annual Report. In addition, some of the information re-

quirements laid down by Act 11/2018 on non-financial information and diversity are included in the following chapters of this Integrated Report, as detailed below:

Subjects Act 11/2018	Chapter / Response	Framework used (Unless expressly indicated, the framework used is the GRI 2016 Standards)
Business model description		
Business environment.	Section: 2020, An unprecedented challenge. Section: "Impact of COVID-19"	GRI 102-2
Organization and structure.	Chap. 1. Sustainable governance model. Sections: "Governing bodies" and "Management committee"	GRI 102-18
Markets where it operates.	Chap. 1. Aena: Sustainable governance model. Section: "Capital and organizational structure"	GRI 102-6
Objectives and strategies.	Section: 2020, An unprecedented challenge. Section: "Future challenges: adapting to the new context". Chap. 2 Commitment to the environment; Chap. 3 Commitment to society and human rights, Chap. 5 Staff and social issues, Chap. 6 Safe, high-quality services, Chap. 7 Innovation.	GRI 102-14
Factors and trends that may affect its future evolution.	Section: 2020, An unprecedented challenge. Section: "Risks and risk management"	GRI 102-15
Description of the policies the Group applies		
Due diligence procedures applied to the identification, evaluation, prevention and mitigation of risks.	Section: 2020, An unprecedented challenge. Section: "Structure, management and control of risks" (infographics) Chap. 1. Aena: Sustainable governance model. Section: "Anti-corruption and anti-fraud policy"	GRI 103-2
Significant impacts, and verification and control. Measures taken.	Section: 2020, An unprecedented challenge. Section: "Risks and risk management". Section: "Risks in 2020".	GRI 103-1
Results of the policies		
Key indicators of relevant non-financial results that allow the monitoring and evaluation of progress and favour comparability between companies and sectors.	Section: Introduction; Section: 2020, An unprecedented challenge Cover Chap 1. Aena: Sustainable Governance Model; Cover Chapter 2. Commitment to the environment; Cover Chap. 3. Commitment to society and human rights; Cover Chap. 4 Social management of our value chain; Cover Chap. 5. Staff and social issues; Cover Chap. 6 Safe, high-quality services, Cover Chap. 7 Innovation	GRI 103-3
Main related risks linked to the activities of the group		
Commercial relationships, products or services that may have negative effects.	Section: 2020: an unprecedented challenge: "Risks and risk management". The potential negative impacts associated with each area of work are included in the different chapters of this non-financial information statement (Chap 2. Commitment to the environment; Chap. 4 Social management of our value chain; Chap. 6 Safe and quality services).	GRI 102-2
How the group manages these risks.	Section: 2020, An unprecedented challenge. Section: "Structure, control and management of risks" (infographics).	GRI 103-2
Procedures used to detect and evaluate them.	Section: 2020, An unprecedented challenge. Section: "Structure, control and management of risks" (infographics)	GRI 103-3
Information on the impacts that have been detected and their breakdown, particularly the main short-, medium- and long-term risks.	Section: 2020, An unprecedented challenge: "Risks and their management", "Risks in 2020"	GRI 102-46 GRI 102-47
Information on environmental issues		
Current and foreseeable effects of the company's activities on the environment.	Chap. 2. Commitment to the environment. Section: "Environmental risks and opportunities", and "Climate risk analysis" infographic	GRI 103-2
Current and foreseeable effects of the company's activities on health and safety.	Chap. 6 Safe and quality services, section "Security guarantee in the provision of services"	GRI 103-2
Environmental evaluation or certification procedures.	Chap. 2. Commitment to the environment. Sections: "Management instruments" and "Infrastructure planning stage"	GRI 103-3
Resources dedicated to the prevention of environmental risks.	Chap. 2. Commitment to the environment. Section: "Progress and indicators" (table: "Other indicators related to environmental management and resources dedicated to the prevention of environmental risks")	GRI 103-3
Principle of precaution.	Chap. 2. Commitment to the environment. Sections: "Environmental risks and opportunities" and "Policies, strategy and objectives"	GRI 102-11
Environmental risk provisions and guarantees.	Chap. 2. Commitment to the environment. Section: "Progress and indicators" (table: "Other indicators related to environmental management and resources dedicated to the prevention of environmental risks")	GRI 103-3
Pollution	Chap. 2. Commitment to the environment. Sections: "Effective mitigation and adaptation actions and measures to achieve decarbonisation objectives", "Carbon footprint", "Efficiency in the use of energy and of renewables", "Emission reduction thanks to renewable energy facilities"	GRI 305-1 GRI 305-2 GRI 305-4 GRI 305-5
	Chap. 2. Commitment to the environment. Section: "Pollution"	GRI 305-7 GRI A07

		(Unless expressly indicated, the framework used is the GRI 2016 Standards)	
Circular economy, and prevention and waste management	Prevention, recycling, reuse, recovery and elimination of waste.	Chap. 2. Commitment to the environment. Section: "Initiatives for the reduction, reuse, recycling of waste and the correct treatment of hazardous waste"	GRI 306-2
	Actions to combat food waste.		Not applicable
Sustainable use of resources	Water consumption and water supply in accordance with local limitations.	Chap. 2. Commitment to the environment. Section: "Initiatives for responsible water consumption" (table: "Water consumption")	GRI 303-5 (GRI 303:2018)
	Consumption of raw materials and measures adopted to improve the efficiency of their use.	As a company providing airport services, the consumption of raw materials is not relevant in the Aena value chain	Not applicable
Climate change	Direct and indirect energy consumption.	Chap. 2. Commitment to the environment. Section: "Main indicators"(graph and table "Breakdown of energy consumption and total consumption")	GRI 302-1 GRI 302-2
	Measures taken to improve energy efficiency.	Chap. 2. Commitment to the environment. Section: "Efficiency in the use of energy and use of renewable energy" (table)	GRI 302-3 GRI 302-4
	Use of renewable energies.	Chap. 2. Commitment to the environment. Sections: "Efficiency in the use of energy and use of renewable energy," "Reduction of emissions thanks to renewable energy facilities"	GRI 302-1
	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. Sections: "Environmental risks and opportunities", "Effective mitigation and adaptation actions and measures to achieve decarbonisation objectives" "Carbon footprint"	GRI 305-1 GRI 305-2
	Measures taken to adapt to the consequences of climate change.	Chap. 2. Commitment to the environment. Section: "Policies, strategy and objectives", section "Progress and indicators". Section: "Reduction of emissions thanks to renewable energy facilities"	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. Sections: "Policies, strategy and objectives"	GRI 305-5
Protecting biodiversity	Measures to preserve or restore biodiversity.	Chap. 2. Commitment to the environment. Section: "Protecting biodiversity"	GRI 304-1
	Impacts caused by activities or operations in protected areas.	Chap. 2. Commitment to the environment. Subsection: "Studies on the fauna of the environment and control services"	GRI-A09
Information on staff and social issues			
Employment	Total number and distribution of employees by gender, age, country and professional classification.	Chap. 5. Staff and social issues. Section: "Employment, equality and diversity"	GRI 102-8
	Total number and distribution of employment contract types.	Chap. 5. Staff and social issues. Section: "Employment, equality and diversity"	GRI 102-8
	Annual average of open-ended contracts, temporary contracts and part-time contracts by sex, age and professional category.	Chap. 5. Staff and social issues. Section: "Employment, equality and diversity"	GRI 102-8
	Number of dismissals by sex, professional category and age.	Chap. 5. Staff and social issues. Section: "Employment, equality and diversity"	GRI 401-1
	Average remuneration and its evolution disaggregated by sex, age and professional categories or equal value.	Chap. 5. Staff and social issues. Section: "Remuneration model and wage gap"	GRI 202-1
	Wage gap.	Chap. 5. Staff and social issues. Section: "Remuneration model and wage gap"	GRI 405-2
	The remuneration of equal or average jobs in the company.	Chap. 5. Staff and social issues. Section: "Remuneration model and wage gap"	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 disaggregated by sex.	Chap. 1. Aena: Sustainable governance model. Section: "Remuneration of the Board"	GRI 102-38
	Implementation of right to disconnect policies for employees.	Chap. 5. Staff and social issues. Subsection: "Registering the workday and disconnecting from work"	GRI 401-2
	Employees with disabilities.	Chap. 5. Staff and social issues. Section: "Diverse and inclusive work environment"	GRI 405-1

Organisation of work.	Organisation of working time.	Chap. 5. Staff and social issues. Section: "Registering the workday and disconnecting from work"	GRI 401-2
	Number of absentee hours.	Chap. 5. Staff and social issues. Section: Notification, recording and investigation of accidents (table: "Absenteeism (own personnel)", row: "No. of hours lost due to absenteeism")	GRI 403-9 (GRI 403:2018)
	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: "Work-life Balance"	GRI 401-2
Health and safety.	Health and safety conditions in the workplace.	Chap. 5. Staff and social issues. Sections: Policy, Prevention Management System and Prevention Plan; "Bodies for the management of health and safety at work"	GRI 403-2 (GRI 403:2018) GRI 403-3 (GRI 403:2018) GRI 403-4 (GRI 403:2018)
	Work accidents, in particular their frequency and severity, as well as occupational diseases; broken down by gender.	Chap. 5. Staff and social issues. Sections: Notification, registration and investigation of accidents; "Promoting the health and well-being of workers"	GRI 403-3 (GRI 403:2018) GRI 403-9 (GRI 403:2018) GRI 403-10 (GRI 403:2018)
Industrial relations	Organisation of social dialogue, including procedures for informing and consulting with staff, and negotiating with them.	Chap. 5. Staff and social issues, Sections: Industrial relations; "Communication, dialogue and employee participation in occupational safety"	GRI 403-1 (GRI 403:2018) GRI 403-4 (GRI 403:2018)
	Percentage of employees covered by collective agreements by country.	Chap. 5. Staff and social issues. Section: "Industrial relations"	GRI 102-41
	The balance of collective agreements, particularly in the field of health and safety at work.	Chap. 5. Staff and social issues. Sections: "Industrial relations"; "Communication, dialogue and employee participation in occupational safety"	GRI 403-4 (GRI 403:2018)
Training	The policies implemented in the field of training.	Chap. 5. Staff and social issues. Sections "Talent and training"; "Relevant actions in 2020 in the field of training"	GRI 404-2
	Total amount of training hours by professional categories.	Chap. 5. Staff and social issues. Section: "Relevant actions in 2020 on training" (table: "Training hours by gender, professional category and region")	GRI 404-1
Universal accessibility for people with disabilities		Chap. 5. Staff and social issues. Section: "Universal accessibility to employment for people with disabilities"	GRI 405-1
Equality	Measures taken to promote equal treatment and opportunities between women and men.	Chap. 5. Staff and social issues. Sections: "Diversity and non-discrimination"; "Gender diversity"	GRI 405-1 GRI 103-2
	Equality plans (Chapter III of Organic Law 3/2007, of 22 March, for the effective equality of women and men).	Chap. 5. Staff and social issues. Section: "Diversity and non-discrimination"	GRI 405-1 GRI 103-2
	Measures taken to promote employment.	Chap. 5. Staff and social issues. Sections: "Diversity and non-discrimination"; "Diversity in governing bodies and employees"; "Generational diversity and promotion of the integration of young people in the workplace"	GRI 405-1 GRI 103-2 GRI 413-1
	Protocols against sexual and gender-based harassment, integration and universal accessibility for people with disabilities.	Chap. 5. Staff and social issues. Sections: "Harassment complaints"; "Heading Diverse and inclusive work environment"	GRI 405-1 GRI 103-2
	The policy against all types of discrimination and, where applicable, management of diversity.	Chap. 5. Staff and social issues. Sections: "Diversity and non-discrimination";	GRI 405-1 GRI 103-2
Information on the respect for Human Rights			
Application of due diligence procedures in the field of Human Rights.		Chap. 3. Commitment to society and human rights. Section: "Due diligence and prevention of risks of Human Rights violation"	GRI 102-16 GRI 102-17
Prevention of risks related to human rights violations and, where appropriate, measures to mitigate, manage and redress possible abuses committed.		Chap. 3. Commitment to society and human rights. Sections: "Human Rights"; "Transferring Human Rights protection into the value chain"	GRI 102-16 GRI 102-17
Human rights violations complaints.		Chap. 3. Commitment to society and human rights. Section: "Complaints on violation of Human Rights"	GRI 102-17
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: "Commitments" (Infographic); "Transferring Human Rights protection into the value chain"	GRI 102-16 GRI 407-1 GRI 408-1 GRI 409-1
The elimination of discrimination in employment.		Chap. 5. Staff and social issues. Section: "Diversity and non-discrimination"	GRI 102-12

The elimination of forced labour.	Chap. 3. Commitment to society and human rights. Sections: "Principles and Commitments" (Infographic); "Transferring Human Rights protection into the value chain"	GRI 102-12 GRI 102-16 GRI 102-17	
The effective abolition of child labour.	Chap. 3. Commitment to society and human rights. Sections: "Principles and Commitments" (Infographic); "Transferring Human Rights protection into the value chain"	GRI 102-12 GRI 102-16 GRI 102-17	
Information on combating corruption and bribery			
Measures taken to prevent corruption and bribery.	Chap. 1. Aena: Sustainable governance model. Section: "Anti-corruption and anti-fraud policy"	GRI 102-16 GRI 102-17	
Measures to combat money laundering.	Chap. 1. Aena: Sustainable governance model. Section: "Measures to combat money laundering"	GRI 102-16 GRI 102-17	
Contributions to foundations and non-profit entities.	Chap. 3. Commitment to society and human rights. Section "Investment in the community. Contributions to foundations and non-profit entities"	GRI 201-1 GRI 413-1	
Information about the company			
Commitments from the company on sustainable development.	The impact of the company's activity on employment and local development.	Chap. 3. Commitment to society and human rights. Sections: "Commitments to sustainable development and to society", "Commitments to the 2030 Agenda", "Impact of the business on society and the environment. Creating social value"	GRI 413-1 GRI 413-2
	The impact of the company's activity on local populations and in the territory.	Chap. 3. Commitment to society and human rights. Section: "Impact of the business on society and the environment"	GRI 413-1 GRI 413-2
	The relationships maintained with local communities actors and modalities of dialogue with them.	Introduction. Section: "Relationship and dialogue with stakeholders"	GRI 102-43 GRI 413-1 GRI 413-2
	Association or sponsorship actions.	Chap. 3. Commitment to society and human rights. Section: "Investment in the community. Contributions to foundations and non-profit entities"	GRI 102-13 GRI 413-1
Subcontracting and suppliers.	The inclusion of social issues, gender equality and environmental issues in the purchasing policy.	Chap. 4 Social management of our value chain. Sections: "Inclusion of social and environmental issues in tendering processes"; "Inclusion of social, gender equality and environmental issues in contract execution processes"	GRI 308-1 GRI 414-1
	Consideration in relations with suppliers and subcontractors of their social and environmental responsibility.	Chap. 4 Social management of our value chain. Sections: "Inclusion of social and environmental issues in tendering processes"; "Inclusion of social, gender equality and environmental issues in contract execution processes"; "Continuous assessment of risk in the value chain"; "Supplier monitoring and evaluation"	GRI 308-1 GRI 414-1
	Supervision and audit systems, and their results.	Chap. 4 Social management of our value chain. Sections: "Ongoing risk assessment of the value chain", "Technical or professional solvency criteria"; "Technical evaluation"; "Assessment of the quality of services"	GRI 308-1 GRI 414-1
Consumers.	Measures for the health and safety of consumers.	Chap. 2. Commitment to the environment. Section: "Noise"; Chap. 6 Safe, high-quality services. Sections: "Guarantee of safety in the provision of services"; "Complaint mechanisms".	GRI 416-1 GRI 416-2 GRI 103-2
	Systems for claims and complaints received, and their resolution.	Chap. 6 Safe, high-quality services. Section: "Complaint mechanisms"	GRI 103-3
Tax information.	Profits obtained, country by country.	Chap. 1. Aena: Sustainable governance model. Section: "Tax paid"	GRI 207-4 (GRI 207:2019)
	Taxes paid on profits.	Chap. 1. Aena: Sustainable governance model. Section: "Tax paid"	GRI 207-4 (GRI 207:2019)
	Public grants received.	Chap. 1. Aena: Sustainable governance model. Section: "Tax paid"	GRI 201-4 This information is available in the Annual Accounts

3. GRI Table of Contents

This report has been developed in accordance with the GRI Standards, exhaustive option.

GRI Contents	Description	Global Compact	SDGs	Location / Content
GRI 101: Foundation 2016				
GRI 102: General disclosures 2016				
1. Organizational profile				
102-1	Name of the organization			Chap. 1, P. 2. Section "Capital and organizational structure"
102-2	Activities, brands, products, and services			Introduction, p. 1, section "Document focus"
102-3	Location of headquarters			C/ Peonias, 12. 28042 Madrid, Spain
102-4	Location of operations			Introduction, p. 2, "Aena Airport Network" section
102-5	Ownership and legal form			Chap. 1, P. 2. Section "Capital and organizational structure"
102-6	Markets served			Introduction, p. 2, "Aena Airport Network" section; Chap. 1, P. 2. Section "Capital and organizational structure"
102-7	Scale of the organization			Chap. 1, P. 2. Section "Capital and organizational structure"; Chap. 5, P. 111. Section "Employment, equality and diversity"
102-8	Information on employees and others workers	3, 4, 5, 6	5, 8, 10	Chap. 5, P. 111-113. Section "Employment, equality and diversity" Sources of data: SAP RH, internal sources, London-Luton Airport. Aena Brasil. On the other hand, at Aena S.M.E., S.A., there are no workers from temporary employment agencies.
102-9	Supply chain	7	8	Chap. 4, P. 94. The value chain at Aena
102-10	Significant changes to the organization and its supply chain		8	Chap. 4, pp. 96-97, section "Special measures in connection with the health emergency and main results from 2020".
102-11	Precautary principle or approach	7		Chap. 2, P. 33. Section "Environmental risks and opportunities"
102-12	External initiatives		17	Chapter 3, p. 80, section "Investment in the community. Contributions to foundations and non-profit entities"
102-13	Memberships of associations		17	Chapter 3, p. 80, section "Investment in the community. Contributions to foundations and non-profit entities"
2. Strategy				
102-14	Statement from senior decision-maker			
102-15	Key impacts, risks, and opportunities	1, 2, 6, 7, 10	8, 9, 11	Chapter 2020, an unprecedented challenge, pp. 15-16. Lead paragraph and section "The impact of COVID-19 on air transport and at the airports managed by Aena"; p. 18-19, section "Future challenges".
3. Ethics and integrity				
102-16	Values, principles, standards, and norms of behavior	1-10	16	Chap. 1, P. 17. Section "Code of Conduct"

GRI Contents	Description	Global Compact	SDGs	Location / Content
102-17	Mechanisms for advice and concerns about ethics	1, 2, 10	16	Chap. 1, p. 19, section "Regulatory Compliance Policy", and p. 22-23, section "Policy against corruption and fraud"
4. Governance				
102-18	Governance structure		16	Chap. 1, P. 3, section "Governing bodies"; p. 12, section "Management committee"; p. 20, section "Complaints Channel"
102-19	Delegating authority			Chap. 1, p. 3, section "Governing bodies"; p. 12, section "Management committee".
102-20	Executive-level responsibility on economic, environmental, and social topics			Chap. 1, p. 3, section "Governing bodies"; p. 12, section "Management committee".
102-21	Consulting stakeholders on economic, environmental, and social topics		16	Introduction, pp. 9-10, section "Relationship and dialogue with stakeholders."
102-22	Composition of the highest governance body and its committees		5, 16	Chap. 1, p. 8, section "The Board of Directors". See also Aena's Corporate Governance Report and Aena's website.
102-23	Chair of the highest governance body			Chap. 1, p. 8, section "The Board of Directors"
102-24	Nominating and selecting the highest governance body		5, 16	Chap. 1, p. 6, section "The Board of Directors"
102-25	Conflicts of interest	10	16	Chap. 1, p. 14, section "Corporate culture and ethics". Section regulated in the Regulations of the Board of Directors and in the Code of Conduct.
102-26	Role of highest governance body in setting purpose, values, and strategy			Chap. 1, p. 6, section "The Board of Directors"
102-27	Collective knowledge of highest governance body		5	Chap. 1, pp. 11-12, section "Committees supporting board".
102-28	Evaluating the highest governance body's performance			Chap. 1, p. 11, section "Committees supporting board".
102-29	Identifying and managing economic, environmental, and social impacts	1, 7, 10	16	Chapter 2020, an unprecedented challenge, pp. 24-27, section "Risks and their management".
102-30	Effectiveness of risk management processes	1, 2, 7, 10	16	Chapter 2020, an unprecedented challenge, p. 29, section "Structure, management and control of risks".
102-31	Review of economic, environmental, and social topics			Chapter 2020, an unprecedented challenge, p. 29, section "Structure, management and control of risks".
102-32	Highest governance body's role in sustainability reporting			Chap. 1, p. 11, section "Committees supporting board".
102-33	Communicating critical concerns			Chapter 2020, an unprecedented challenge, p. 29, section "Structure, management and control of risks".
102-34	Nature and total number of critical concerns			Chapter 2020, an unprecedented challenge, p. 32 section "Risks in 2020".
102-35	Remuneration policies	1.6	5	Chap. 1, pp. 9-11, section "Board remuneration".
102-36	Process for determining remuneration	1.6	5, 16	Chap. 1, pp. 9-11, section "Board remuneration".
102-37	Stakeholders' involvement in remuneration			Chap. 1, pp. 9-11, section "Board remuneration".
102-38	Annual total compensation ratio			Chap. 1, pp. 9-11, section "Board remuneration".
102-39	Percentage increase in annual total compensation ratio			The salary review under Royal Decree-Law 2/2020, which approves urgent measures regarding remuneration in the public sector, is pending application.
5. Stakeholder engagement				
102-40	List of stakeholder groups			Introduction, pp. 9-10, section "Relationship and dialogue with stakeholders".

GRI Contents	Description	Global Compact	SDGs	Location / Content
102-41	Collective bargaining agreements	1, 3, 4, 6	8	Chap. 5. pp. 140, 142, section "Industrial Relations"
102-42	Identifying and selecting stakeholders			Introduction, p. 8, section "Relationship and dialogue with stakeholders".
102-43	Approach to stakeholder engagement			Introduction, p. 8, section "Relationship and dialogue with stakeholders".
102-44	Key topics and concerns raised			Introduction, pp. 6-7, "Materiality" section.
6. Reporting practice				
102-45	Entities included in the consolidated financial statements			Chap. 1, P. 2. Section "Capital and organizational structure"
102-46	Defining report content and topic boundaries			Introduction, pp. 4-7, "Materiality" section.
102-47	List of material topics			Introduction, pp. 6-7, "Materiality" section.
102-48	Restatements of information			Any re-expression of information given in previous reports is explained in each case.
102-49	Changes in reporting			Beyond certain nuances in the information report due to the COVID-19 health emergency, there have been no substantial changes in criteria that affect comparability with previous reports.
102-50	Reporting period			Fiscal year 2020 (From 1 January to 31 December 2020)
102-51	Date of most recent report			Fiscal year 2019 (From 1 January to 31 December 2019)
102-52	Reporting cycle			Annual
102-53	Contact point for questions regarding the report			rc@aena.es
102-54	Claims of reporting in accordance with the GRI Standards			This report has been developed in accordance with the GRI Standards, exhaustive option.
102-55	GRI content index			Chap. On this report, p. 199. Section "GRI Content Index".
102-56	External assurance			Introduction, pp. 3-4, section "Level of review by external auditors"

GRI Contents	Description	Global Compact	SDGs	Location / Content	Omissions
GRI 103: Management approach 2016					
103-1	Explanation of the material topic and its boundary			Chap. Introduction, p. 6-7. "Materiality" section	
103-2	The management approach and its components	1-10		<p>Economic Topics (201, 203, 204, 205, 206, 207): Chap. Introduction, p. 8. Section "Relationship and dialogue with stakeholders"; Chap. 2020, an unprecedented challenge, p. 21-22. Section "Future challenges: adapting to the new context"; Chap. 1, p. 13-14. Section "Corporate culture and ethics". Chap. 3, p. 85. Section "Impact of activity on society at large"; Chap. 2, p. 33. Section "Model for sustainable environmental management"; Ch. 4, pp. 94 and 98, section "Sustainable value chain management"; Ch. 7, p. 188. Section "Innovation management at Aena".</p> <p>Environmental Issues (302, 303, 305, 306, 307, 308): Chap. 2. p. 33, section "Sustainable environmental management model"; pg. 36, section "Policies, strategy and objectives"; p. 47, section "Aena and the climate emergency"; p. 60, section "Noise"; p. 66, section "Water"; p. 74, section "Waste management and circular economy in airport facilities".</p> <p>Social Issues (401, 402, 403, 404, 405, 406, 407, 408, 409, 410, 411, 412, 413, 414, 415, 416, 417, 418, 419): Chap. 3. p. 78, section "Commitments to sustainable development and society"; Ch. 3, p. 85. Section "Impact of activity on society at large"; Chap. 3, p. 88. Section "Human Rights"; Chap. 5, p. 109, introduction; p. 123, section "Reconciliation"; p. 127, section "Diversity and non-discrimination"; p. 135, section "Talent and training"; p. 140, section "Industrial relations"; p. 143, section "Health and safety in the workplace"; Chap. 6, p. 159,</p>	

GRI Contents	Description	Global Compact	SDGs	Location / Content	Omissions
				section "Guarantee of safety in the provision of services"; p. 160, section "Operational safety"; pp. 165-166, section "Airport safety"; p. 170, section "Cybersecurity"; p. 171, section "Health safety"; p. 174, section "Service vocation".	
				Economic Topics (201, 203, 204, 205, 206, 207): Chap. 2020, an unprecedented challenge, p. 31-32, section "Risks in 2020"; Chap. 1, p. 3, 13, paragraph "Governing bodies"; p. 20, section "Complaints channel" and pp. 22-24, section "Policy against corruption and fraud". Chap. 4, p. 96, section "Special measures for the purpose of the health emergency and main results of 2020" and p. 102, section "The acquisition and purchasing process"; Chap. 7, p. 189. Section "Innovation management at Aena"	
				Environmental Issues (302, 303, 305, 306, 307, 308): Chap. 2, p. 38, section "Management instruments"; p. 53, section "Efficiency in the use of energy and use of renewables"; pp. 50 and 52, section "Aena and the climate emergency"; p. 60, section "Measurement, reduction and control"; p. 65, section "Environmental consultations"; p. 70, section "Indicators on water consumption"; pp. 75-76, section "Initiatives for the reduction, reuse, recycling of waste, and the correct treatment of hazardous waste"	
103-3	Evaluation of the management approach	1-10		Social Issues (401, 402, 403, 404, 405, 406, 407, 408, 409, 410, 411, 412, 413, 414, 415, 416, 417, 418, 419): Introduction, p. 11-13; Chap. 3, pp. 78 and 81, section "Commitments to sustainable development and society", p. 83-84, "Commitments to the 2030 Agenda"; Chap. 3, p. 85. Section "Impact of activity on society at large"; Chap. 3, p. 91. Section "Complaints of Human Rights Violation"; Chap. 5, p. 129, section "Harassment complaints"; p. 137, section "Relevant 2020 actions on training"; p. 141, section "Industrial relations"; p. 149, section "Notification, registration and investigation of accidents"; Chap. 6, p. 160, 161, 162, 165 of the section "Operational security"; pp. 167, 168 of the section "Airport security"; p. 178 of the section "Training and awareness of employees and third parties"; p. 184, section "Communication and evaluation of customer satisfaction"; p. 185, section "Complaint mechanisms".	
GRI 201: Economic performance 2016		Material topics: Demands and restrictions arising from the regulatory framework, Excellent management, Aena global agent			
201-1	Direct economic value generated and distributed		5, 8, 9	Chap. 3, p. 85, Section "Business Impact on society at large. Creating social value".	
201-2	Financial implications and other risks and opportunities due to climate change	7, 8, 9	13	Chap. 2, pp. 33-36 Section "Environmental risks and opportunities". During 2020, Aena has gone beyond this, using the recommendations of the Task Force on Climate-related Financial Disclosure (TCFD) as a tool to analyse and show how the Company is working on the path towards decarbonisation and integrating climate change at all levels.	
201-3	Defined benefit plan obligations and other retirement plans	3	8	The Joint Promotion Pension Plan of the Aena Group Entities is applicable to all employees of the Group as of 360 days of recognized service. See detail in annual accounts point 2.19 and note 22.	(1)
201-4	Financial assistance received from government	10	16	Chap 1, p. 30, section "Public subsidies received". See Annual Account.	
GRI 203: Indirect economic impacts 2016		Material topics: An actor who generates value for the community, Sustainability, Excellent management, Innovation and technology, Aena global agent			
203-1	Infrastructure investments and services supported		5, 9, 11	Consolidated Management Report 2020: - Block A: Financial Information	
203-2	Significant indirect economic impacts		1, 3, 8	Chapter 3, p. 81, section "Investment in the community. Contributions to non-profit foundations and entities"; p. 82-84, section "Commitment to the 2030 Agenda";	
GRI 204: Procurement practices 2016		Material topics: A stakeholder that generates value for the community, Excellent management			
204-1	Proportion of spending on local suppliers		8	Chap. 3, p. 80, Section "Business Impact on society at large. Creating social value".	
GRI 205: Anti - corruption 2016		Material topics: Excellent management, Transparency			
205-1	Operations assessed for risks related to corruption	10	16	Chap. 1, p. 22-23, section "Anti-corruption and fraud policy".	

GRI Contents	Description	Global Compact	SDGs	Location / Content	Omissions
205-2	Communication and training about anti-corruption policies and procedures	10	16	Chap. 1, p. 22-23, section "Anti-corruption and fraud policy".	
205-3	Confirmed incidents of corruption and actions taken	10	16	Chap. 1, p. 23, section "Anti-corruption and anti-fraud policy".	
GRI 206: Anti-competitive behavior 2016		Material topics: Excellent management, Transparency			
206-1	Legal actions for anti-competitive behavior, anti-trust, and monopoly practices		16	None have been identified.	
GRI 207: Tax 2019		Material topics: A stakeholder that generates value for the community, Excellent management, Transparency			
207-1	Approach to tax		16	Chap. 1, p. 29, section "Fiscal transparency".	
207-2	Tax governance, control, and risk management	10	16	Chap. 1, p. 29, section "Fiscal transparency".	
207-3	Stakeholder engagement and management of concerns related to tax		16	Chap. 1, p. 29, section "Fiscal transparency".	
207-4	Country-by-country reporting		16	Chap. 1, p. 30, section "Tax contribution".	
GRI 302: Energy 2016		Material topics: Climate change			
302-1	Energy consumption within the organization	7, 8, 9	7, 8, 12, 13	Chap. 2, pp. 56-57, section "Main indicators".	
302-2	Energy consumption outside of the organization			Chap. 2, p. 57, section "Main indicators".	
302-3	Energy intensity	7, 8, 9	7, 8, 12, 13	Chap. 2, pp. 56-57, section "Main indicators".	
302-4	Reduction of energy consumption	7, 8, 9	7, 8, 12, 13	Chap. 2, p. 57, section "Main indicators".	
302-5	Reductions in energy requirements of products and services			Not applicable.	(2)
GRI 303: Water and effluents 2018		Material topics: Sustainability			
303-1	Interactions with water as a shared resource	7, 8, 9	6, 14	Chap. 2, pp. 67-69, section "Water".	
303-2	Management of water discharge-related impacts	7, 8, 9	6, 14	Chap. 2, p. 67-69 "Initiatives for responsible water consumption".	
303-3	Water withdrawal	7, 8, 9	6, 14	Chap. 2, p. 67-68 "Initiatives for responsible water consumption".	
303-4	Water discharge	7, 8, 9	6, 14	Chap. 2, p. 70 "Initiatives for responsible water consumption".	
303-5	Water consumption	7, 8, 9	6, 14	Chap. 2, p. 70 "Initiatives for responsible water consumption".	
GRI 305: Emissions 2016		Material topics: Climate change, Sustainability			
305-1	Direct (Scope 1) GHG emissions	7, 8, 9	3,12,13,14,15	Chap. 2, p. 51, section "Carbon footprint".	
305-2	Energy indirect (Scope 2) GHG emissions	7, 8, 9	3,12,13,14,15	Chap. 2, p. 52, section "Carbon footprint".	
305-3	Other indirect (Scope 3) GHG emissions	7, 8, 9	3,12,13,14,15	Chap. 2, pp. 48-49 "Aena and the climate emergency".	
305-4	GHG emissions intensity	7, 8, 9	13, 14, 15	Chap. 2, p. 50, section "Carbon footprint".	
305-5	Reduction of GHG emissions	7, 8, 9	13, 14, 15	Chap. 2, p. 50, section "Carbon footprint".	

GRI Contents	Description	Global Compact	SDGs	Location / Content	Omissions
305-6	Emissions of ozone-depleting substances (ODS)	7, 8, 9		Not applicable	(3)
305-7	Nitrogen oxides (NOX), sulfur oxides (SOX), and other significant air emissions	7, 8, 9	13, 14, 15	Chap. 2, p. 59, section "Air pollution".	
GRI 306: Waste 2020		Material topics: Sustainability			
306-1	Waste generation and significant waste-related impacts	7, 8, 9	11, 12	Chap. 2, p. 74, section "Waste Management and Circular Economy in airport facilities".	
306-2	Management of significant waste-related impacts	7, 8, 9	11, 12, 13, 15	Chap. 2, pp. 75-76 "Initiatives for the reduction, reuse, recycling of waste and the correct treatment of hazardous waste". Data on waste is collected and controlled within the framework of the Aena Integrated Quality and Environment System.	
306-3	Waste generated	7, 8, 9	11, 12	Chap. 2, p. 76 section "Initiatives for the reduction, reuse, recycling of waste and the correct treatment of hazardous waste".	
306-4	Waste diverted from disposal	7, 8, 9	11, 12	Chap. 2, p. 76 section "Initiatives for the reduction, reuse, recycling of waste and the correct treatment of hazardous waste".	
GRI 307: Environmental compliance 2016		Material topics: Sustainability, Excellent management			
307-1	Non-compliance with environmental laws and regulations	7	16	Upon closing this report, Aena was not aware of any non-compliance with environmental legislation and regulations.	
GRI 308: Supplier environmental assessment 2016		Material topics: Climate change, Sustainability			
308-1	New suppliers that were screened using environmental criteria		5, 8, 12, 16	Chap. 2, p. 45, section "Progress and indicators".	
308-2	Negative environmental impacts in the supply chain and actions taken		5, 8, 12, 16	Chap. 4, pp. 45-46, section "Progress and indicators". The Company's evaluation system allows it to identify suppliers that can or do cause significant negative impacts at the environmental or social level, and to act accordingly. In accordance with the provisions of the contracts, it implements measures to mitigate these impacts, which can range from an improvement agreement with the supplier to the termination of its contract. None have been reported in 2020.	
Airport operators sector disclosures		Material topics: Sustainability			
A07	Noise emissions		11	Chap. 2, pp. 60-64, section "Noise".	
A09	Total annual number of wildlife strikes per 10,000 aircraft movements	7	15	Chapter 2, pg. 72, section "Protection of biodiversity".	
GRI 401: Employment 2016		Material topics: Professional culture based on talent and commitment, Demands and restrictions derived from regulatory framework			
401-1	New employee hires and employee turnover	6	5,8,10	Chap. 5, pp. 114 and 117, section "Employment, equality and diversity". The annual data on dismissals is provided.	(4)
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	6	3,5,8	All employees, regardless of the type of contract, have the same benefits.	
401-3	Parental leave	6	5,8,	Chap. 5, pp. 124-125, section "Work-life Balance"	
GRI 402: Labor/management relations 2016		Material topics: Professional culture based on talent and commitment			
402-1	Minimum notice periods regarding operational changes			Chap. 5, p. 142, section "Industrial Relations".	
GRI 403: Occupational health and safety 2018		Material topics: Professional culture based on talent and commitment, Health and safety			
403-1	Occupational health and safety management system	3	3, 8	Chap. 5, pp. 143-147, section "Health and safety at work"	
403-2	Hazard identification, risk assessment, and incident investigation		3, 8	Chap. 5, pp. 148-149, section "Health and safety at work"	
403-3	Occupational health services		3, 8	Chap. 5, pp. 143-147, section "Health and safety at work"	

GRI Contents	Description	Global Compact	SDGs	Location / Content	Omissions
403-4	Worker participation, consultation, and communication on occupational health and safety	3	3, 8	Chap. 5, pp. 146-147, section "Health and safety at work".	
403-5	Worker training on occupational health and safety	3	3, 8	Chap. 5, p. 153, section "Occupational health and safety training" Chap. 6, pp. 168, 170 "Ensuring safety in the provision of services"	
403-6	Promotion of worker health	3	3, 8	Chap. 5, pp. 154-155, section "Promoting the health and well-being of workers"	
403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships		3, 8	Chap. 5, pp. 148-149, section "Health and safety at work"	
403-8	Workers covered by an occupational health and safety management system		3, 8	Chap. 5, pp. 143 and 157, section "Health and safety at work".	
403-9	Work-related injuries		3, 8	Chap. 5, pp. 150-151, section "Health and safety at work"	
403-10	Work-related ill health		3, 8	Chap. 5, p. 156, section "Health and safety at work"	
GRI 404: Training and education 2016		Material topics: Professional culture based on talent, commitment, innovation and technology			
404-1	Average hours of training per year per employee		4,5,8,10	Chap. 5, pp. 138-139, section "Talent and training"	
404-2	Programs for upgrading employee skills and transition assistance programs		8	Chap. 5, pp. 137-138, section "Talent and training"; Chap. 6, p. 178, section "Training and awareness of employees and third parties"	
404-3	Percentage of employees receiving regular performance and career development reviews		5,8,10	Chap. 5, p. 136, section "Talent and training"	
GRI 405: Diversity and equal opportunities 2016		Material topics: Professional culture based on talent and commitment			
405-1	Diversity of governance bodies and employees	6	5, 8, 10	Chap. 1, p. 7, section "The Board of Directors"; Chap. 5 p. 132, section "Diversity in governing bodies and employees"	
405-2	Ratio of basic salary and remuneration of women to men	6	5, 8, 10	Chap. 5, pp. 120-121, section "Payment model and wage gap"	
GRI 406: No discriminaci3n 2016		Material topics: Professional culture based on talent and commitment			
406-1	Casos de discriminaci3n y acciones correctivas emprendidas	6	5, 8, 10	Chap. 5, p. 129, section "Gender diversity"	
GRI 407: Freedom of association and collective bargaining 2016		Material topics: Professional culture based on talent and commitment, Excellent management			
407-1	Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	3	8	Chap. 5, p. 140, section "Industrial relations" Chap. 3, pp. 89, 91-92, section "Human Rights"	
GRI 408: Child labor 2016		Material topics: Professional culture based on talent and commitment, Excellent management			
408-1	Operations and suppliers at significant risk for incidents of child labor	2, 5	8	Chapter 4, p. 101, section "Sustainable value chain management" Chap. 3, pp. 89, 91-92, section "Human Rights"	
GRI 409: Forced or compulsory labor 2016		Material topics: Professional culture based on talent and commitment, Excellent management			
409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labor	2, 4	8	Chapter 4, p. 101, section "Sustainable value chain management" Chap. 3, pp. 89, 91-92, section "Human Rights"	
GRI 410: Security practices 2016		Material topics: An actor who generates value for the community, Customer orientation, Health and Safety			
410-1	Security personnel trained in human rights policies or procedures	1, 2	16	Security is a concession (except at London-Luton Airport, where it is a service contract) and it is outside the scope of the organization to control the training in human rights of the employees of the concessionaire.	
GRI 411: Rights of Indigenous peoples 2016		Material topics: A stakeholder that generates value for the community, Aena global agent			
411-1	Incidents of violations involving rights of indigenous peoples	1, 2	3, 10, 11, 15, 16	Chap. 3, p. 91, section "Due diligence and prevention of risks of human rights violations"	

GRI Contents	Description	Global Compact	SDGs	Location / Content	Omissions
GRI 412: Human rights assessment 2016		Material topics: A stakeholder that generates value for the community, Transparency, Aena global agent			
412-1	Operations that have been subject to human rights reviews or impact assessments	1, 2	8	Chap. 4, p. 102, section "The acquisition and purchasing process" Chap. 3, p. 91, section "Due diligence and prevention of risks of human rights violations". All operations are subject to the Aena Code of Conduct and the Corporate Human Rights Policy.	
412-2	Employee training on human rights policies or procedures	1, 2	4	Chap. 3, p. 88, section "Human Rights." Data on training hours and percentage of employees trained in Human Rights are not available at the close of this report.	
412-3	Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening	1, 2	8	Chap. 3, p. 90, section "Human Rights" Chap. 4, pp. 102-103, section "The acquisition and purchasing process". All operations are subject to the Aena Code of Conduct and the Corporate Human Rights Policy.	
GRI 413: Local Communities 2016		Material topics: An actor that generates value for the community, Sustainability, Innovation and technology			
413-1	Operations with local community engagement, impact assessments, and development programs		8, 17	Chap. 3, p. 86, section "Impact on local populations and territory"	
413-2	Operations with significant actual and potential negative impacts on local communities	1, 2	11	Chap. 3, p. 87, section "Impact on local populations and on the territory" and p. 91, section "Due diligence and prevention of risks of human rights violation"; Chap. 2, pp. 60-64, section "Noise"	
GRI 414: Supplier social assessment 2016		Material topics: Excellent management, Health and safety			
414-1	New suppliers that were screened using social criteria	2	5, 8, 16	Chap. 4, p. 105 "Inclusion of social, gender equality and environmental issues in performance procedures"	
414-2	Negative social impacts in the supply chain and actions taken	2	5, 8, 16	Chap. 4, p. 107, section "Monitoring and evaluation of suppliers". The Company's evaluation system allows it to identify suppliers that can or do cause significant negative impacts at the environmental or social level, and to act accordingly. In accordance with the provisions of the contracts, it implements measures to mitigate these impacts, which can range from an improvement agreement with the supplier to the termination of its contract. None have been reported in 2020.	
GRI 415: Public policy 2016		Material topics: Requirements and restrictions derived from the regulatory framework, Transparency			
415-1	Political contributions	10	16	The Aena Code of Conduct prohibits the financing of political parties and/or representatives.	
GRI 416: Customer health and safety 2016		Material topics: Customer oriented, Excellent management, Health and safety			
416-1	Assessment of the health and safety impacts of product and service categories		3	Chap. 2, pp. 60-64, section "Noise". 100% of Aena airports carry out evaluations of their impact on noise"; Chap. 6 pp. 159, 161-162, 167, 171, section "Guarantee of safety in the provision of services"	
416-2	Incidents of non-compliance concerning the health and safety impacts of products and services		3, 16	Chap. 6 p. 186, section "Claim mechanisms".	
GRI 417: Marketing and Labeling 2016		Material topics: Customer oriented, excellent management			
417-1	Requirements for product and service information and labeling		12, 16	Chap. 6 p. 182-184 section "Communication and evaluation of customer satisfaction"	
417-2	Incidents of non-compliance concerning product and service information and labeling		16	Chap. 6 p. 186 section "Claim mechanisms"	
417-3	Incidents of non-compliance concerning marketing communications		16	Chap. 6 p. 186 section "Claim mechanisms"	
GRI 418: Customer privacy 2016		Material topics: Customer oriented, excellent management, Health and safety			
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	1	16	Chap. 6 p. 186 section "Claim mechanisms"	
GRI 419: Socio-economic compliance 2016		Material topics: An actor that generates value for the community, Professional culture based on talent and commitment, Requirements and restrictions derived from the regulatory framework, Excellent management, Transparency, Aena global agent			

GRI Contents	Description	Global Compact	SDGs	Location / Content	Omissions
419-1	Non-compliance with laws and regulations in the social and economic area		16	Upon closing this report, Aena was not aware of any non-compliance with social and financial legislation and regulations	

OMISSIONS:

- (1) This information will be expanded on in future reports.
- (2) The services offered by Aena do not entail energy consumption by the end user.
- (3) Ozone-layer depleting substances direct emissions are not significant, and neither are nitrogen oxides (NOX) or sulphur oxides (SOX). Air quality is monitored by means of emission measurements, and it is not possible to discern how much of the pollutants come directly from Aena's activities.
- (4) This report does not provide information on terminations other than dismissals. It will be provided in future reports.

4. Content Index Sustainability Accounting Standards Board (SASB)

The Sustainability Accounting Standard Board (SASB) is a US-based non-profit organization whose mission is to help companies around the world identify, manage, and report on the sustainability issues most relevant to investors.

In order to further its commitment to transparency towards all stakeholders, for the first year Aena has extended its sustainability reporting framework by adopting the SASB reporting standard, in an attempt to quantify its creation of value and its impact on the environment.

Due to the heterogeneity of the activities framed in its business model, Aena has considered in this first

adaptation exercise, in addition to the indicators of the sector to which it belongs (Professional and commercial services), those of the Air Freight & Logistics and Real Estate sectors, which complement the set of activities carried out by the Company. As a result of the analysis of the indicators associated with the three industries and their relationship with Aena's business, only the indicators of the SASB framework that are substantive and/or apply to Aena have been selected, taking into account its ordinary business.

These indicators are detailed below:

Topics	Indicator No.	Description	Page/Section
Professional and commercial services sector	SV-PS-230a.1	Description of approach to identifying and addressing data security risks	Chap. 1, p. 25-28, section "Data protection" Chap. 6, p. 170, section "Cybersecurity or information security"
	SV-PS-230a.2	Description of policies and practices relating to collection, usage, and retention of customer information	Chap. 1, p. 26-27, section "Data protection"
	SV-PS-230a.3	Number of data breaches Percentage involving customers' confidential business information (CBI) or personally identifiable information (PII) Number of customers affected	Chap. 1, p. 28, section "Data protection"
Workforce Diversity & Engagement	SV-PS-330a.1	Percentage of gender and racial/ethnic group representation for (1) executive management and (2) all other employees	Chap. 5, p. 127-133, section "Diversity and non-discrimination"
	SV-PS-330a.2	Voluntary and involuntary turnover rate for employees	Chap. 5, p. 114, section "Employment, equality and diversity"
Professional integrity	SV-PS-510a.1	Description of approach to ensuring professional integrity	Chap. 1, p. 13-24, section "Corporate Culture and Ethics"

	SV-PS-510a.2	Total amount of monetary losses as a result of legal proceedings associated with professional integrity	0 € Chap. 1, p. 23, section "Anti-corruption and anti-fraud policy"
Air Freight & Logistics	Indicator No.	Description	Page/Section
Greenhouse gas emissions	TR-AF-110a.1	Gross global Scope 1 emissions	Chap. 2, pp. 50, 51 section "Carbon footprint"
	TR-AF-110a.2	Discussion of long-term and short-term strategy or plan to manage Scope 1 emissions, emissions reduction targets, and an analysis of performance against those targets.	Chap. 2, p. 37, 41, 42, section "Policies, strategy and objectives"; 47 and 50, section "Aena in the face of a climate emergency"
Air quality	TR-AF-120a.1	Air emissions of the following pollutants: (1) NO _x (excluding N ₂ O), (2) SO _x , and (3) particulate matter (PM ₁₀)	Chap. 2, p. 59, section "Air pollution"
Employee Health and Safety	TR-AF-320a.1	(1) Total recordable incident rate (TRIR) and (2) fatality rate for (a) direct employees and (b) contract employees	Chap. 5, pp. 149-150 "Notification, registration and investigation of accidents"
Accident & Safety Management	TR-AF-540a.1	Description of implementation and outcomes of a Safety Management System	Chap. 6, pp. 160-165, section "Operational Safety"
Real Estate	Indicator No.	Description	Page/Section
Energy management	IF-RE-130a.2	(1) Total energy consumed by portfolio area with data coverage, (2) percentage grid electricity, and (3) percentage renewable, by property subsector	Chap. 2, p. 56, "Main indicators" section
Water management	IF-RE-140a.2	(1) Total water withdrawn by portfolio area with data coverage and (2) percentage in regions with High or Extremely High Baseline Water Stress, by property subsector	Chap. 2, p. 70, section "Water."
	IF-RE-140a.4	Description of water management risks and discussion of strategies and practices to mitigate those risks	Chap. 2, pp. 66-69. Actions to be carried out within the framework of the Aena Strategic Plan for Water Management published in February 2020.
Management of Tenant Sustainability Impacts	IF-RE-410a.3	Discussion of approach to measuring, incentivizing, and improving sustainability impacts of tenants	Chap. 2, pp. 45-46, section "Green leases and value chain" Chap. 4, pp. 102-103, section "Inclusion of social and environmental issues in tendering processes"
Climate change adaptation	IF-RE-450a.2	Description of climate change risk exposure analysis, degree of systematic portfolio exposure, and strategies for mitigating risks	Chap. 2, p. 34-35, section "Environmental risks and opportunities"

External verification Report

AENA S.M.E., S.A. and its subsidiaries

Independent assurance report on the
consolidated Non-Financial Information
Statement for the year ended
31 December 2020

Translation of a report originally issued in Spanish. In the event of a discrepancy, the Spanish language version prevails

INDEPENDENT ASSURANCE REPORT ON THE CONSOLIDATED NON-FINANCIAL INFORMATION STATEMENT FOR THE YEAR ENDED 31 DECEMBER 2020 OF AENA S.M.E., S.A. AND ITS SUBSIDIARIES

To the Shareholders of AENA S.M.E., S.A.:

Pursuant to article 49 of the Spanish Code of Commerce, we have performed the verification, with a scope of limited assurance, on the consolidated Non-Financial Information Statement (hereinafter “NFIS”), for the year ended 31 December 2020 of AENA S.M.E., S.A. and its subsidiaries (hereinafter “the Group”), which forms part of the Group’s Consolidated Management Report.

The contents of the NFIS includes additional information to that required by prevailing Spanish mercantile legislation on non-financial information, which has not been the subject of our verification work. In this regard, our work was limited solely to verification on the information identified in the chapter “Table of contents Act 11/2018” included in the NFIS.

Responsibilities of the Directors

The preparation and content of the NFIS included in the Consolidated Management Report are the responsibility of the Directors of AENA S.M.E., S.A. The NFIS has been prepared in accordance with the contents specified in the prevailing Spanish mercantile legislation and following the criteria of the Sustainability Reporting Standards of the Global Reporting Initiative (GRI standards) selected, as well as those other criteria described as indicated for each subject in the NFIS " Table of contents Act 11/2018".

These responsibilities also include the design, implementation and maintenance of internal control deemed necessary to enable the NFIS to be free from material misstatement, whether due to fraud or error.

The Directors of AENA S.M.E., S.A. are also responsible for defining, implementing, adapting and maintaining the management systems from which the necessary information for preparing the NFIS was obtained.

Our independence and quality control

We have complied with the independence and other ethical requirements of the Code of Ethics for Professional Accountants issued by the International Ethics Standards Board for Accountants (IESBA), based on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

Our firm applies International Quality Control Standard 1 (IQCS 1) and accordingly maintains a comprehensive quality control system that includes documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

The engagement team was comprised of professionals who are experts in reviews of non-financial Information and, specifically, in information about economic, social and environmental performance.

Our responsibility

Our responsibility is to express our conclusions in an independent limited assurance report based on the work performed. We have carried out our review in accordance with the requirements established in International Standard on Assurance Engagements 3000 Revised, currently in force, "Assurance Engagements other than Audits or Reviews of Historical Financial Information" (ISAE 3000 Revised), issued by the International Auditing and Assurance Standards Board (IAASB) of the International Federation of Accountants (IFAC), and with the Performance Guide on assurance engagements on non-financial information statements issued by the Spanish Institute of Certified Public Accountants.

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 provided is also substantially lower.

Our work has consisted of making inquiries to Management, as well as of the different units of the Group that were involved in the preparation of the NFIS, in the review of the processes for compiling and validating the information presented in the NFIS, and in the application of certain analytical procedures and sample-based review testing described below:

- Meetings with the Group's personnel to gain an understanding of the business model, policies and management approaches applied, the main risks related 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 NFIS for 2020 based on the materiality analysis performed by the Group and described in the NFIS, considering the contents required in prevailing Spanish mercantile legislation.
- Analysis of the processes used to compile and validate the data presented in the NFIS for 2020.
- Review of the information concerning risks, policies and management approaches applied in relation to the material matters described in the NFIS for 2020.
- Verification, through sample-based testing, of the information relating to the contents included in the NFIS for 2020 and its adequate compilation from the data provided by information sources.
- Obtainment of a representation letter from the Directors and Management.

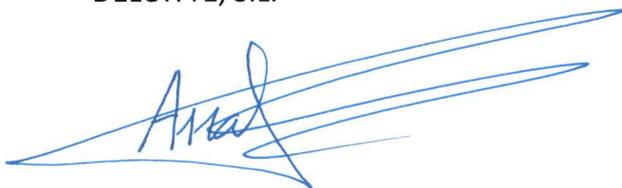
Conclusion

Based on the procedures performed in our verification and the evidence obtained, nothing has come to our attention that causes us to believe that the consolidated Non-Financial Information Statement of AENA S.M.E., S.A. and its subsidiaries for the year ended 31 December 2020 has not been prepared, in all material respects, in accordance with prevailing Spanish mercantile legislation and the criteria of the selected GRI standards, as well as other criteria, described as indicated for each matter in the “Contents index 11/2018 Law” table of the 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 and jurisdictions.

DELOITTE, S.L.



Ana Sánchez Palacios

February 23, 2021