



Consolidated Management Report 2025



Extract corresponding to the Consolidated Non-financial
Information Statement (NFIS) and Sustainability Reporting
Sustainability Report

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Consolidated Non- Financial Information Statement and Sustainability Report

1. General Disclosures

Basis for preparation

Letter from the Chairman



Maurici Lucena Betriu - Chairman

Dear friends,

This year, once again, I am pleased to address you all with the satisfaction of sharing the accomplishments and progress we have made together in 2025. This was a key year for the Aena Group, during which we have not only achieved outstanding results, but also laid the foundations for a strong and sustainable future.

Throughout the fiscal year, we have faced and overcome significant challenges in an uncertain global environment. Thanks to the collective effort of everyone in this great family, we have achieved record traffic figures, closing the year with more than 384.8 million passengers, a 4.2% increase from 2024, and over 1.5 million tonnes of cargo transported, a 7.9% increase from last year. This growth compared to the previous year clearly reflects our adaptability and commitment to service, breaking the passenger record set in 2025 across the entire Aena network and at 23 airports in Spain.

Our commercial and real estate activities played a leading role in these positive results. Newly awarded contracts and commercial dynamism have allowed us to continue growing compared to recent years, both in our own car park and VIP lounge businesses, as well as in duty-free shops, food and beverage, and car rental, reaffirming our position as a benchmark in the sector.

Additionally, we have continued to expand our international operations with the purchase of 51% of the holding company that owns and manages 100% of Leeds Bradford airport and 49% of Newcastle airport. Likewise, at London Luton Airport, the number of passengers has been 4.9% higher than in 2024; and in Brazil, where 5.7% more passengers were recorded at ANB and 5.1% more at BOAB, compared to 2024.

These milestones have led to a very good economic-financial performance of our Company with an EBITDA of 3,785,032 thousand euros (3,510,332 thousand euros in 2024) and a net result of 2,136,676 (1,934,224 thousand euros in 2024).

These excellent economic-financial results are accompanied by high levels of quality, compliance with the investment plan, and a firm commitment to sustainability, which is a transversal factor in all of Aena's activities.

The present 2025 Sustainability Report of the Aena Group has been prepared in compliance with the requirements established in Act 11/2018, of December 28, for the disclosure of non-financial information and diversity. Additionally, as in 2024, the European Sustainability Reporting Standards (ESRS) defined in the Corporate Sustainability Reporting Directive (CSRD), have been taken into account, ensuring that our progress is measurable and verifiable in order to generate a real and positive impact.

The 2021–2030 Sustainability Strategy and Climate Action Plan are our inevitable roadmap to address the major ESG challenges and trends, aligned with the United Nations 2030 Agenda Sustainable Development Goals (SDG), which is reflected in the continuous improvement of Aena's ratings in our reference indices.

In 2025, we are once again included in the "A List" of CDP for climate change and we have remained in the S&P Global Sustainability Yearbook 2025, reaffirming our commitment to the United Nations Global Compact. Additionally, the three main airports of the Group —Adolfo Suárez Madrid–Barajas Airport, Josep Tarradellas Barcelona–El Prat Airport, and Palma de Mallorca Airport— have achieved ACA Level 4 from ACI Europe, and 10 airports in Spain have been included in this program for the first time.

It is worth highlighting the entry into force of the II Collective Bargaining Agreement of the Aena Group, which establishes a new regulatory framework that, in addition to improving working conditions for employees, responds to the needs and expectations of those of us who are part of Aena and will help us successfully face the challenges ahead. Likewise, the III Equality Plan has been implemented, reinforcing the company's commitment to effective equality between women and men and to non-discrimination on the basis of gender, integrating these principles into corporate policies and processes.

Looking to the future, Aena is moving forward with the planning of investments to be included in the proposal for the 2027-2031 Airport Regulation Document DORA, the main investment program of our company, to ensure, as has been done so far, that infrastructure is suitable for future demand. Sustainable growth of airports in operational, economic, and environmental terms will undoubtedly contribute to the generation of wealth and employment and the well-being of citizens in the territories where we operate.

I want to take this opportunity to express my gratitude to all the people who are part of the Aena Group. Your dedication, professionalism, and enthusiasm are the soul of this company and the engine that drives us towards the future.

I also want to thank our customers, airlines, lessees, shareholders, collaborators and suppliers for their trust and continued support. Together we will continue to build a more prosperous and sustainable future.

With our eyes set on the future, I invite you to continue accompanying us on this exciting journey.

BLOCK B

**Consolidated Non-
Financial
Information
Statement and
Sustainability
Report**





ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

Sustainability Report Structure¹

Section of the Sustainability Report	ESRS Coding	Designation
1. General disclosures	ESRS 2	General information, including the information provided in accordance with the application requirements of the thematic ESRS mentioned in Appendix C of ESRS 2.
2. Environmental Information	Not applicable	Disclosure of information under Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation). See Taxonomy section
	ESRS E1	Climate change
	ESRS E2	Pollution
	ESRS E3	Water and marine resources
	ESRS E4	Biodiversity and ecosystems
3. Social Information	ESRS E5	Resource use and circular economy
	ESRS S1	Own workforce
	ESRS S2	Workers in the value chain
	ESRS S3	Affected communities
4. Governance Information	ESRS S4	Consumers and end-users
	ESRS G1	Business conduct
5. Information Requirements of Act 11/2018 not considered or subject to transitional rules under ESRS - CSRD		
6. Index - Act 11/20218 vs CSRD vs GRI		
7. Appendix - ESRS 2	Appendix B: List of Data Points (DPs) included in cross-cutting standards and thematic standards derived from other EU Legislation Appendix C: Disclosure application requirements established in thematic ESRS that are applicable in conjunction with ESRS 2. General Information	
8. Sustainable Financing - Ratings		

¹ The Sustainability Report includes the Consolidated Non-Financial Information Statement and Sustainability Information.

1. ESRS 2 General Disclosures

Basis for preparation

- BP-1: General basis for preparation of sustainability statements
- BP-2: Disclosures in relation to specific circumstances

Governance

- GOV-1: The role of the administrative, management and supervisory bodies
- GOV-2: Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies
- GOV-3: Integration of sustainability-related performance in incentive schemes
- GOV-4: Statement on due diligence
- GOV-5: Risk management and internal controls over sustainability reporting

Strategy

- SBM-1: Strategy, business model and value chain
- SBM-2: Interests and view of stakeholders
- SBM- 3: Material impacts, risks and opportunities and their interaction with strategy and business model

Impact, risk and opportunity management

- IRO-1: Description of the processes to identify and assess material impacts, risks and opportunities
- IRO-2: Disclosure requirements in ESRS covered by the undertaking's sustainability statement

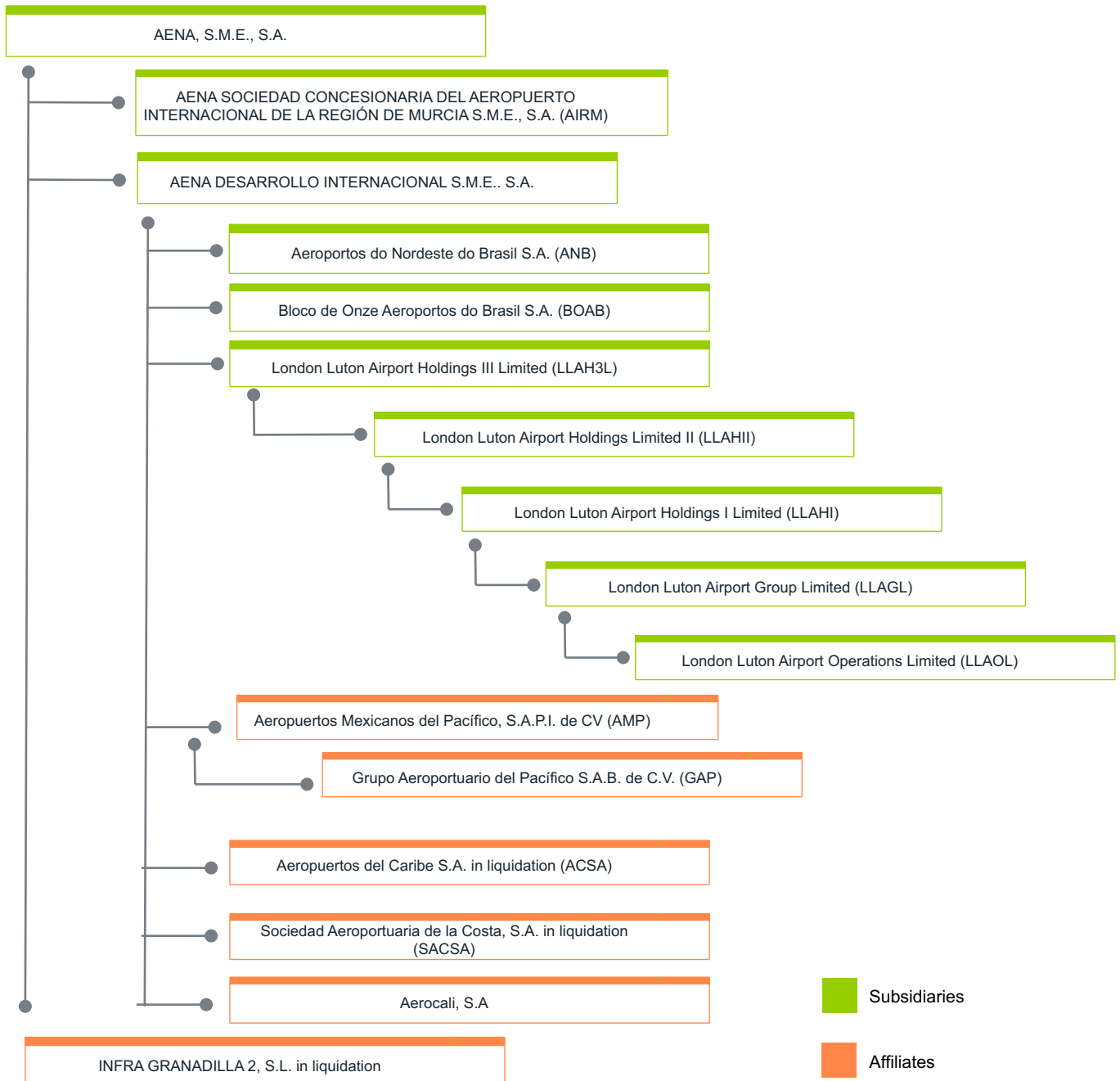
1. Basis for preparation

BP-1: General basis for the preparation of the sustainability report

BP-1 5 (a - e) - ESRS 1 - section 5.1

The 2025 Non-Financial Information Statement and Sustainability Report covers the environmental, social, and governance aspects of Aena S.M.E., S.A.'s own activities and value chain, including its dependent companies that consolidate their annual accounts in the Financial Statements of Aena S.M.E., S.A. (hereinafter "the Company" or "Aena"), which are those in which it holds more than 50% (dependent companies), hereinafter Aena Group (or "the Group").

The corporate structure of AENA, S.M.E., S.A., is as follows:





ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

No company within the Aena Group is exempt from presenting individual or consolidated sustainability information in accordance with Article 19a or Article 29a, paragraph 8, of Directive 2013/34/EU.

The content of the Sustainability Report has not omitted any specific information element regarding intellectual property, know-how, or innovation results, nor has it availed itself of any exemption regarding the disclosure of imminent events or matters under negotiation, in accordance with Article 19a, paragraph 3, and Article 29a, paragraph 3, of Directive 2013/34/EU; and it responds to the disclosure requirements of Commission Delegated Regulation (EU) 2023/2772 of 31 July 2023, supplementing Directive 2013/34/EU of the European Parliament and of the Council as regards sustainability reporting standards; and to what is indicated by Law 11 of 2018.

The Aena Group has prepared the 2025 Sustainability Report in compliance with the Non-Financial Information Statement disclosure requirements established by Law 11/2018, of December 28. This Report has been developed using the European Sustainability Reporting Standards (ESRS), defined by the Corporate Sustainability Reporting Directive (CSRD), as a reference framework.

Additionally, to address the requirements of Law 11/2018 that are not explicitly covered by the ESRS, indicators from the Global Reporting Initiative (GRI) have been used.

Through this report, the Aena Group demonstrates how it creates short, medium, and long-term value, and presents information truthfully, relevantly, and accurately, in accordance with new regulatory reporting requirements. Economic and financial information is complemented and integrated with the Sustainability Report, the Annual Corporate Governance Report, and the Annual Remuneration Report for Directors, corresponding to the 2025 financial year. Furthermore, [Aena's website](#) offers additional detailed information on various aspects relevant to different stakeholders.

Regarding sustainability information, in accordance with the new reporting regulations applicable to the Sustainability Report, this document develops material sustainability topics or aspects according to the double materiality assessment, which includes own operations and the value chain, with an approach based on the identification of key stakeholders, operational sustainability, and shared value creation.

The Aena Group presents its Sustainability Report on a consolidated basis, which allows it to reflect the global impact of its operations and offer a complete and accurate view of its performance. This approach integrates the policies and results of all group entities, reinforcing its commitment to sustainability.

Structure of the 2025 Sustainability Report

The structure of this report responds to the adoption of the European Sustainability Reporting Standards (ESRS) as the reference standard for reporting, while maintaining compliance with Law 11/2018. Thus, the Sustainability Report presents four distinct parts:

- General information on the bases for the preparation of the Report, describing aspects related to governance, strategy, business model and value chain, as well as the interests and opinions of stakeholders, and the management of identification and assessment of impacts, risks, and opportunities within the framework of the double materiality assessment.
- Environmental information, including a section on European taxonomy.
- Social information.
- Governance information.

In the last three parts, detailed information is provided on the following aspects:

- Management of impacts, risks, and opportunities
- Policies
- Parameters and targets
- Specific requirements.

BP-2: Information relating to specific circumstances

Time horizons

BP-2 9 (a - b), Section 6.4 ESRS 1 point 78

Regarding short, medium, and long-term time horizons, the Aena Group aligns with the horizons defined in the CSRD:

- Short-term: less than 1 year.
- Medium-term: 1 to 5 years.
- Long term: more than 5 years.



However, in some cases, the aforementioned time horizons have been adjusted due to the nature of certain impacts, risks, or opportunities; and the corresponding clarification is indicated in each ESRS, as is the case for those related to climate change (see [E1-ESRS 2 SBM-3](#) y [E1 ESRS 2 IRO-1](#)).

Value chain estimation

BP 2-10 (a - d)

The Aena Group has included information on its value chain, and in cases where direct data was not available, estimates based on sectoral sources and proxy variables have been used. This has been indicated in each of the relevant chapters of the ESRS, ensuring that the reflected information is representative and consistent with the required standards. Estimated parameters have been identified, describing the methodological basis used, and the degree of accuracy achieved has been evaluated, pointing out possible associated areas of uncertainty, for example, see section E-1 6, scope 3 greenhouse gas emissions. Furthermore, the Aena Group has defined specific actions aimed at improving data precision in future reports, including enhancing information collection systems and strengthening collaboration with the different actors in its value chain. With these measures, the Group reaffirms its commitment to transparency, data quality, and continuous improvement in sustainability management.

Sources of estimation and uncertainty of the outcome

BP 2- 11 (a - b)

When it has been necessary to make estimates or when uncertainty existed in any result, in each specific section of the ESRS, the Aena Group has detailed the estimates made, specifying whether these are based on hypotheses or approximations.

Changes in the preparation or presentation of sustainability information

BP 2- 13 (a - c)

During the current fiscal year, as in the previous one, the Aena group has prepared and submitted the Sustainability Report in compliance with Law 11/2018, adopting the CSRD and the standards established by the European Sustainability Reporting Standards as the reference framework for structuring and drafting the report, thus meeting the requirements of this directive.

The CSRD provides stakeholders with standardised and accurate sustainability information, in accordance with material impacts, risks and opportunities and their respective policies, actions, objectives and targets, thereby improving transparency and facilitating comparability with other actors in the European market. With regard to this information, changes have been made in the structure of chapters S1 and S4 to improve understanding compared with the 2024 Report, and for the same purpose, noise pollution information has been transferred from S3 to E2. Likewise, in application of Delegated Regulation (EU) 2026/73, the key performance indicators for Taxonomy have been reported in accordance with the new reporting tables set out therein.

In cases where it has not been possible to present comparative figures, this limitation has been reported, and explanatory notes have been provided to contextualize the data from the immediately preceding year, as well as any difference between the figure indicated in the previous period and the revised comparative figure.

Information on prior period errors

BP 2- 14 (a - c) - ESRS 1- section 7.5

No material errors have been detected in prior period sustainability reports, therefore no material corrections have been made to the data included in this Sustainability Report.

If an error is detected in the future, the Aena Group would provide the necessary corrections for each affected period, disclosing the nature of the error and explaining its impact on the reported data. If these errors could not be corrected, the Aena Group would detail the circumstances that made correction impossible.

Information derived from other legislation or generally accepted pronouncements on sustainability reporting

BP 2- 15; ESRS 1, section 8.2

The Aena Group includes a note in each section when it uses information derived from other legislation or generally accepted sustainability frameworks in this Report, in addition to the information prescribed by the ESRS. In case of partial application of other standards or frameworks, a precise reference to the specific sections of said standards or frameworks is provided. In this regard, in the preparation of this Sustainability Report, the following have been considered:

Legislation:



ESRS 2: General disclosures

E4: Biodiversity and ecosystems

S3: Affected communities

E1: Climate change

E5: Resource use and circular economy

S4: Consumers and end-users

E2: Pollution

S1: Own workforce

G1: Business conduct

E3: Water and marine resources

S2: Workers in the value chain

Act 11/2018

- Law 11/2018, of December 28: regulates non-financial information and diversity, and adapts Directive 2014/95/EU to the Spanish legal framework.
- Law 5/2021, of April 12: modifies the revised text of the Capital Companies Law, incorporating a requirement that obliges companies to establish mechanisms and procedures to foster employee involvement in company management, promoting their participation through information, consultation, and other means.
- Regulation (EU) 2020/852 of the European Parliament and of the Council, of June 18, 2020: establishes a framework to facilitate sustainable investments, requiring disclosure of how and to what extent the company's activities are linked to economic activities considered environmentally sustainable. This covers objectives such as climate change mitigation and adaptation, sustainable use and protection of water and marine resources, the transition to a circular economy, pollution prevention and control, as well as the protection and restoration of biodiversity and ecosystems.
- EU Guidelines 2017 /C125/01 on non-financial reporting, particularly the methodology for the disclosure of non-financial information.
- Royal Decree 214/2025 of March 18, which creates the carbon footprint, offsetting, and carbon dioxide absorption projects registry and establishes the obligation to calculate the carbon footprint and to prepare and publish greenhouse gas emission reduction plans.

Reference Framework:


- GRI Universal Standards : used to report part of the information included in this sustainability report, following the guidelines of the Global Reporting Initiative (GRI).
- The International Integrated Reporting Framework developed by the International Integrated Reporting Council (IIRC).
- United Nations Global Compact Principles.
- United Nations Guiding Principles on Business and Human Rights.
- United Nations Sustainable Development Goals (SDGs).
- Recommendations of the Task Force on Climate-Related Financial Disclosures (TCFD).
- Carbon Disclosure Project (CDP).
- *Comisión Nacional del Mercado de Valores (CNMV).*
- The S&P Global Corporate Sustainability Assessment (CSA).
- Sustainalytics.

Incorporation by reference

BP 2- 16, ESRS 1- section 9.1

The report incorporates information by reference to the consolidated financial statements:

Topic	Reference to consolidated annual accounts	ESRS
Information on greenhouse gas emission allowances	Note 26.1	E1 ESRS 2 IRO-1 of E1 (AR 1)
Management of operational, financial, and climate risks	Note 3	ESRS 2 - GOV-5 E1 ESRS 2 IRO-1
Employee benefit expenses - number of employees	Note 28	S1-6 50 (f) S1-12
Employee benefits	Note 22	S1-11
Description of main risks derived from climate change	Note 3.4	E1 ESRS 2 IRO-1
Information on average payment period	Note 19.1	G1-6
Income taxes - Tax information	Note 32	Act 11 vs CSRD
Provisions for environmental actions - Amount per number of isolated properties	Note 26	E2-2
Currency exchange rates	Medium - December 2025 EUR vs BRL = 6,3095 EUR vs GBP = 0,8568	

	ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
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Use of phase-in provisions in accordance with Appendix C of ESRS 1

BP 2- 17 (a - e)

In line with the phase-in options set out in Appendix C of ESRS 1, and in coherence with the “Quick Fix” recently adopted by the European Commission, which allows first-wave companies to maintain during 2025–2026 the same disclosure scope applied in 2024, the following presents the list of disclosure requirements for which the Group has decided to apply the temporary omission option.

ESRS	Disclosure requirement	Full name of the disclosure requirement	Phase-in date or effective date (including first year)	Remarks
ESRS E1	E1-9	Expected financial effects of material physical and transition risks and potential opportunities related to climate change	The undertaking may omit the information prescribed in ESRS E1-9 in the first year of preparing its sustainability report. The undertaking may comply with ESRS E1-9 by disclosing only qualitative information, for the first three years of preparing its sustainability report, if it is impossible to prepare quantitative disclosures.	The Group avails itself of the possibility to omit this information.
ESRS E2	E2-6	Expected financial effects of impacts, risks and opportunities related to pollution	The undertaking may omit the information prescribed in ESRS E2-6 in the first year of preparing its sustainability report. With the exception of the information prescribed in paragraph 40, letter b), on operating and capital expenditure incurred in the reporting period together with significant cases and deposits, the undertaking may comply with ESRS E2-6 by disclosing only qualitative information for the first three years of preparing its sustainability report.	The Group avails itself of the possibility to omit this information.
ESRS E4	E4-6	Expected financial effects of impacts, risks and opportunities related to biodiversity and ecosystems	The undertaking may omit the information prescribed in ESRS E4-6 in the first year of preparing its sustainability report. The undertaking may comply with ESRS E4-6 by disclosing only qualitative information, for the first three years of preparing its sustainability report.	The Group avails itself of the possibility to omit this information.
ESRS E5	E5-6	Expected financial effects of impacts, risks and opportunities related to resource use and circular economy	The undertaking may omit the information prescribed in ESRS E5-6 in the first year of preparing its sustainability report. The undertaking may comply with ESRS E5-6 by disclosing only qualitative information, for the first three years of preparing its sustainability report.	The Group avails itself of the possibility to omit this information.

2. Governance

GOV-1: The role of administrative, management, and supervisory bodies

GOV-1 21 (a - e), GOV-1 22 (a - d), GOV-1 23 (a - b)

The Aena Group conducts its business using a robust governance model, which in turn is supported by a set of internal policies, procedures, and tools that are guided by best practices in corporate governance. This ensures that the Aena Group complies with all applicable laws and, at the same time, guarantees value creation for stakeholders.

Aena S.M.E., S.A., is a state-owned commercial company incorporated as a listed public limited company and is the parent company of the Aena Group, which includes several subsidiaries and investees with a presence both nationally and internationally. 51% of Aena's share capital is held by its majority shareholder, ENAIRE (a State-owned Business Entity under the Ministry of Transport and Sustainable Mobility), while the remaining 49% corresponds to freely traded capital on the stock exchange (free float).

Since February 11, 2015, Aena S.M.E., S.A. has been listed on the stock exchanges of Madrid, Barcelona, Bilbao, and Valencia and, since June of the same year, has been part of the IBEX-35.



76,500,000 shares: Enaire (State administration)
 73,500,000 shares: Free float

1,500,000,000 shares with a par value of 1 € fully subscribed and disbursed.

1,500,000,000 shares

1,500,000,000 voting rights

Minimum number of shares to attend the Meeting: 1

The General Shareholders' Meeting and the Board of Directors constitute Aena's highest governing bodies. These bodies are responsible for the direction, supervision, and control of the Company. The Board of Directors is supported by four specialized committees: the Audit Commission, the Appointments, Remuneration and Corporate Governance Commission, the Sustainability and Climate Action Commission, and the Executive Commission. Regarding the General Shareholders' Meeting, it constitutes Aena's supreme sovereign corporate body, where all shareholders meet to deliberate and decide on matters within their competence according to the majorities required in each case, or to be informed of any additional matter that the Board of Directors deems necessary.



ESRS 2: General disclosures

E1: Climate change

E2: Pollution

E3: Water and marine resources

E4: Biodiversity and ecosystems

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S3: Affected communities

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G1: Business conduct

Act 11/2018

The General Shareholders' Meeting:

The rules governing the organisation and functioning of the General Shareholders' Meeting are set out in the Articles of Association and in the Regulations of the General Shareholders' Meeting of the Aena group, which include the rights of shareholders, such as the right to complete the agenda and submit new proposals, to receive information prior to the General Shareholders' Meeting, to attend and be represented at it, as well as to delegate representation to intermediary entities. These latter measures are also mechanisms that encourage attendance, participation, communication, and interaction with all shareholders and uphold their rights, such as proxy voting or advance remote voting, live streaming of the General Shareholders' Meeting through the Company's website, and the possibility of attendance and holding meetings via telematic means.

Additionally, constant and direct interaction is maintained with its shareholders, including institutional investors, proxy advisors, and other market participants. This relationship is strengthened through frequent participation in conferences, roadshows, and various sectoral meetings, which facilitate open and continuous dialogue. Likewise, the Company offers various communication channels for shareholders and investors, such as the telephone service, the specific investor portal on its corporate website, and the email address of the Shareholder and Investor Relations Office (ir@aena).

The main principles and commitments that guide Aena's actions with this stakeholder group are set out in the following Policies:

- The **Code of Conduct** establishes the fundamental principles that should guide the Aena Group's relationships with its investors and shareholders, emphasizing transparency, trust, and the pursuit of sustainable reciprocal benefit.
- The **Policy on Communication and Contacts with Shareholders, Institutional Investors and Proxy Advisers** determines, among other aspects, the Board of Directors' competence in the management and supervision at the highest level of the information provided to shareholders, institutional investors, markets, and other stakeholders. This policy aims to ensure the protection, safeguarding, and facilitation of the exercise of the rights and interests of these groups, always within the framework of defending the company's interest and in accordance with general principles such as transparency, veracity, immediacy, equality, homogeneity, coherence, integrity, and symmetry in information disclosure. It also ensures equal treatment in the recognition and exercise of the rights of all shareholders in similar situations. Finally, it establishes the main communication channels, such as the corporate website and the Shareholder and Investor Relations Office, among others.
- The **General Policy for the Communication of Economic-Financial, Non-Financial and Corporate Information** with the aim of developing a comprehensive strategic approach to communication with its stakeholders, defining general and specific principles that govern such interaction as a strategic value to achieve its corporate and business objectives. In this regard, the main channels for disseminating economic-financial, non-financial, and corporate information have been established, in order to guarantee the highest quality, accessibility, and transparency of the information directed to the market, investors, and other stakeholders.
- The **Stakeholder Relations Policy** reflects Aena's commitment to responsible and sustainable management of these groups, recognizing their ability to influence the achievement of the Group's strategic objectives or to be affected by its activity. This policy establishes principles and guidelines aimed at fostering a relationship of trust, transparency, and dialogue with these groups, contributing to the creation of shared value and the fulfilment of the company's interest.
- The **Shareholder Remuneration Policy** aims to align shareholders' interests with the Company's economic performance, establishing that 80% of the individual net profit generated in each financial year is allocated to dividend distribution. This measure reinforces Aena's commitment to generating sustainable and equitable value for its shareholders.

During 2025, contact with the markets was maintained following usual practices, summarized in the following activities, with both investors and analysts:

- Participation in conferences, roadshows, and reverse roadshows. 24 (14 in 2024) events of this type
- Additionally, 417 (289 in 2024) interactions with investors and analysts were held through in-person or virtual meetings, phone calls, and emails.

The Board of Directors:

The Board of Directors is responsible for approving the aforementioned corporate policies. For its part, the Appointments, Remuneration and Corporate Governance Commission is responsible for supervising the correct application of the General Policy for the Communication of Economic-Financial, Non-Financial and Corporate Information, as well as the Policy on Communication and Contacts with Shareholders, Institutional Investors and Proxy Advisers, and the Stakeholder Relations Policy. Furthermore, this Committee is responsible for supervising and evaluating the interaction processes with the different stakeholders, ensuring compliance with the principles of transparency and good governance.

Additionally, the Board of Directors is the highest administrative and representative body of the Company, empowered to carry out any act or legal transaction of administration or disposition, under any legal title, except for those that the law, the Company Bylaws, or the Regulations of the General Shareholders' Meeting exclusively reserve for the competence of the General Shareholders' Meeting.



ESRS 2: General disclosures

E4: Biodiversity and ecosystems

S3: Affected communities

E1: Climate change

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E2: Pollution

S1: Own workforce

G1: Business conduct

E3: Water and marine resources

S2: Workers in the value chain

Act 11/2018

In addition to its administrative function, the Board of Directors acts as a supervisory and control body, always guided by Aena's company interest. Its functions are exercised with unity of purpose and independence from management, ensuring equitable treatment for all shareholders. In this regard, its competencies include, among others:

- Establishing the Company's strategies and management guidelines, as well as the bases for corporate organization and information procedures for shareholders and the markets in general.
- Evaluating the management of executives by monitoring the fulfilment of established objectives and respect for Aena's purpose and company interest.
- Adopting appropriate decisions on business and financial operations of special relevance.
- Deciding the Company's tax strategy and monitoring internal information and control systems.
- Approving the Company's strategic or business plan, as well as sustainability policies.
- The determination of the Risk Control and Management Policy, including tax risks, the Regulatory Compliance Policy and the supervision of internal information and control systems.
- Entrusting the management team and the corresponding executive bodies with the ordinary management of the Company's business.

At the close of the 2025 financial year, Aena's Board of Directors was composed of 15 members (15 in the 2024 financial year), whose profiles contribute significant diversity in terms of knowledge, capabilities, ages, backgrounds, experiences, and gender.



ESRS 2: General disclosures

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Act 11/2018

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



The Corporate Governance tools comply with national and international best practices and recommendations, including the Code of Good Governance of the Securities Market (CNMV).

- Company Bylaws
- Board of Directors Regulations
- General Shareholders' Meeting Regulations
- Internal Code of Conduct for the Securities Market
- Corporate Governance Policy
- Board Member Selection Policy
- Shareholder Remuneration Policy
- Code of Conduct
- Code of Conduct for Third Parties
- Regulatory Compliance Policy
- Anti-bribery Policy
- Internal Reporting and Whistleblower Protection
- System Policy
 - Business Courtesies Policy
- Antitrust Compliance Policy
- Conflict of Interest Compliance Policy
- General Policy for the Communication of Economic-Financial, Non-Financial and Corporate Information
- Policy on Communication and Contacts with Shareholders, Institutional Investors and Proxy Advisers
- Sustainability Policy
- Policy on Integrated Quality, Environment, Energy Efficiency, and Occupational Health and Safety
- Management
 - Human Rights Policy
 - Stakeholder Relations Policy
 - Information Security Policy
 - Data Policy
 - Corporate Tax Policy
 - Risk Control and Management Policy
- Royal Legislative Decree 1/2010, of July 2, approving the revised text of the Capital Companies Law, Law 6/2023, of March 17, on Securities Markets and Investment Services, and other applicable Spanish legislation.
- CNMV Code of Good Governance
- Technical Guide 1/2019 on Appointments and Remuneration Committees of Public Interest Entities of the CNMV
- Technical Guide 1/2024 on Audit Commissions of Public Interest Entities of the CNMV
- Principles of the International Corporate Governance Network (ICGN)
- OECD Principles of Corporate Governance

	ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
	E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
	S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

Composition

Diverse and balanced Board of Directors in terms of skills, backgrounds, experiences, age, and gender (as of December 31, 2025)

Promotes the participation of shareholders and other stakeholder groups.
Integrates sustainability, in its social, environmental, and corporate governance aspects, as the basis for Aena's actions.
Oversees risk assessment and management, and the integrity of reporting systems, to ensure sustainable value creation, among others.

40.0% Women (46.7% in 2024) (6 of 15 members) (7 in 2024)	Term of office: 4 years ^(A) (Same in 2024) 4.25 years average term of office (4.15 in 2024)	54.7 years: average age of the Board (54.9 years in 2024) (20.0% between 25 and 45 year and 80.0% more than 45 year) (13.3% and 86.7% in 2024)	1 Lead independent Director (same as 2024)	9 Directors with sector experience (10 in 2024) 11 with financial experience (12 in 2024)
Number of Board meetings: 13 98.97% attendance (same in 2024)	10 Directors are members of Boards of Directors in other entities ^(B) (8 in 2024)	Annual performance evaluation of the Board of Directors carried out by an external advisor	Individual election of Board members (C) 2 Vice-Chairmen (same in 2024)	

^(A) After the first 4 years, Directors may be re-elected following the indicated procedure, for equal periods, as long as the General Shareholders' Meeting does not agree to their removal or they do not resign from their position. In the case of Independent Directors, their term as members of the Company's Board of Directors may not exceed twelve years (Art. 11 of the Board Regulations).

^(B) In accordance with the provisions of the Board Regulations, Directors may not be members of more than five (5) Boards of Directors (Art. 29 (xii)) or more than three (3) Boards of Directors of other companies whose shares are admitted to trading on national or foreign stock exchanges.

^(C) All Directors were appointed by Aena's General Shareholders' Meeting, with the exception of Mr. Roberto Angulo Revilla and Ms. Alicia de Haro Acosta who, due to 2 vacancies on the Board of Directors caused by the resignation of 2 Board members, were appointed on October 28, 2025, by the Board of Directors through the co-optation procedure, whose ratification and re-election must be carried out at the next General Shareholders' Meeting.



ESRS 2: General disclosures

E4: Biodiversity and ecosystems

S3: Affected communities

E1: Climate change

E5: Resource use and circular economy

S4: Consumers and end-users

E2: Pollution

S1: Own workforce

G1: Business conduct

E3: Water and marine resources

S2: Workers in the value chain

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	President and CEO	Executive Director	7 Independent Directors 46,67% Independent Directors							6 Nominee Directors 40% Nominee Directors					
	Maurici Lucena	Javier Marin Second Vice-Chairman	María del Coriseo González-Izquierdo Independent Director	Leticia Iglesias Independent Director	Amancio López Independent Director	Juan Río Independent Director	Jaime Terceiro Lead Independent Director and First Vice-Chairman	Ramon Tremosa i Balcells Independent Director	Tomás Varela Independent Director	Beatriz Alcocer Pinilla Nominee Director	Roberto Angulo Revilla Nominee Director	María del Carmen Corral Nominee Director	Alicia de Haro Acosta Nominee Director	Manuel Delacampagne Nominee Director	Ainhoa Morondo Quintano Nominee Director
Sex	Male	Male	Female	Female	Male	Male	Male	Male	Male	Female	Male	Female	Female	Male	Female
Year of appointment	2018	2020	2022	2019	2015	2020	2015	2025	2022	2024	2025	2023	2025	2021	2024
Member of other expert committees	CE (P)	—	CS (P) CN (M)	CA (M) CS (M)	CN (P)	CS (M) CN (M)	CA (M) CE (M)	CS (M)	CA (P) CN (M)	CE (M) CS (M)	CE (M) CN (M)	CA (M)	—	CA (M)	CE (M)
Education	E/F	AE, E/F	E/F,O	E/F, AUD, CIB	E/F	E/F, CC/IN	AE, E/F	E/F	E/F	CC/IN	CC/IN	CC/IN	O	E/F, O	O
Experience	SF, AD, IT, AER, UN, O	IT, SF, AUD, AER, INFRA, AD, UN, T, ESG, O	IT, SF, ESG, CU, O, AD	SF, AUD, ESG, AD, CU, O	SF, T. AD, ESG, O	IT, AUD, SF, INFR, AD, ESG, O	SF, AUD, UN, AER, AD, O	SF, ESG, O,	SF, AUD, ESG, AD, O	INFR, ESG, T, O, AD	INFR, O, AD	SF; INFR., O, AD	INFR, O, AD	IT, AUD, SF, AD, O	INFR, O, AD
Directors in other listed entities (no.)	—	—	—	1 ^(A)	—	—	—	—	1 ^(B)	—	—	—	—	—	—
% Attendance at Board meetings	100%	100%	100%	100%	100%	100%	92,30% ^(C)	100%	100%	100%	100%	100%	100%	100%	100%
% Attendance at Committee meetings^(D)	—	—	CN: 100% CS: 100%	CA: 100% CS: 100%	CN: 100%	CN: 80% CS: 100%	CA: 100%	CS: 100%	CN: 100% CS: 100%	CS: 100%	CN: 100%	CA: 100%	—	CA: 100%	—
Shares (no.) or (%)	—	3,400 shares	—	—	—	—	—	—	—	—	—	—	—	—	—

Member of Committees: CE: Executive Commission; CA: Audit Commission; CN: Appointments, Remuneration and Corporate Governance Commission; CS: Sustainability and Climate Action Commission; (M): Member; (P): Chairman
Education: Economic/Financial: E/F; Audit and risks: A/R; ESG Matters: ESG; Non-financial risks: RNF; Aeronautics: AE; Other Sciences and Engineering: CC/IN; Cybersecurity: CIB; Others: O

Experience: Innovation/New technologies/Digital Transformation: IT; Data Protection: PD; Audit/Risk Management: AUD; Compliance: CU; Academic/University/Research Sector: UN; Financial Sector: SF; Aeronautics: AER; Infrastructure and transport: INFR; Senior Management (other sectors): AD; Sustainability/Corporate Responsibility: ESG; Tourism: T; Others: O

^(A) Independent Director of ACERINOX, S.A.

^(B) Independent Director of Julius Baer Gruppe AG.

^(C) The meeting she did not attend did not contain points for decision.

^(D) No Executive Commission meeting was held in 2025.



ESRS 2: General disclosures

E1: Climate change

E2: Pollution

E3: Water and marine resources

E4: Biodiversity and ecosystems

E5: Resource use and circular economy

S1: Own workforce

S2: Workers in the value chain

S3: Affected communities

S4: Consumers and end-users

G1: Business conduct

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As provided in the Company Bylaws and the Board of Directors Regulations, Directors are classified as Executive and Non-Executive or External. With respect to Non-Executive or External Directors, these can, in turn, be Nominee, Independent or other External Directors. The Board of Directors must, in any case, ensure that External Directors represent a majority over Executive Directors; and Independent Directors represent, at least, one-third of the total number of Directors, with the number of Executive Directors being the minimum necessary for the proper functioning of the Company.

The Chairman and CEO (Articles 39.2 of the Bylaws and 15.2 of the Board Regulations) of Aena, Mr. Maurici Lucena Betriu, has delegated all powers that are legally and statutorily delegable (except those reserved by the Board of Directors itself) and ensures the effective functioning of the Board of Directors. His functions, which include exercising the highest management of the Company and its representation, leading debates, ensuring the proper functioning of the Board of Directors, and promoting the participation of all Directors in meetings and deliberations, are set out in Article 15 of the Board of Directors Regulations.

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

- 1 Employees or Executive Directors of Aena Group companies, unless 3 or 5 years, respectively, have passed since the cessation of that relationship.
- 2 Those who receive any amount or benefit from the Company for a concept other than Director's remuneration.
- 3 Those who are or have been during the last 3 years partners of the external auditor or the person responsible for the audit report, whether it is the audit of the Company or any other company in its group during that period.
- 4 Those who maintain or have maintained during the last year a business relationship with the Company or with any company of the Aena Group (own name, supplier of goods or services, advisor, consultant...).
- 5 Those who have been Directors of the Aena Group for a continuous period exceeding 12 years.

The selection of Board of Directors members is based on a prior analysis of the Company's needs, in accordance with the provisions of the Board of Directors members selection Policy. This analysis includes the advice and report of the Appointments, Remuneration and Corporate Governance Commission (hereinafter, ARCGCC) which, in turn, collaborates with external advisors for the selection processes of Independent Directors.

Their assessment is carried out considering the diversity of knowledge, capabilities, experiences, age, and gender on the Board of Directors, avoiding, in any case, any type of implicit bias that may imply discrimination based on race, nationality, social origin, sex, age, marital status, sexual orientation, religion, political ideology, disability, or any other personal, physical, or social condition of individuals.

In accordance with the provisions of Royal Legislative Decree 1/2010, of July 2, which approves the revised text of the Capital Companies Law and the Company Bylaws, proposals for the appointment and re-election of Directors are submitted for approval at the General Shareholders' Meeting or, in the case of appointment by co-optation, to the Board of Directors.

After the first 4 years, Directors may be re-elected following the established procedure, for equal periods, as long as the General Shareholders' Meeting does not agree to their removal or they do not resign from their position. In the case of Independent Directors, their term as members of the Company's Board of Directors may not exceed 12 years (Art. 11 of the Board Regulations).

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

- Ensuring that the Board of Directors has an adequate composition, taking into account gender and age diversity as important factors for obtaining diverse viewpoints;
- Promoting diversity in its different aspects (knowledge, capabilities, experiences, age, and gender);
- Rejecting all forms of discrimination based on racial, national, social, or sexual origin, regardless of gender identity, sexual orientation, religion, political opinions, or any other personal, physical, or social condition of individuals.
- The Board of Directors is the body responsible for determining the Policy for the selection of Board members, taking into consideration good governance recommendations, as well as ensuring that said Policy:



- Is concrete and verifiable;
- Ensures that proposals for appointment or re-election are based on a prior analysis of the Board of Directors' needs; and
- Promotes diversity of knowledge, experiences, age, and gender on the Board of Directors².

Furthermore, in terms of gender diversity, the Appointments, Remuneration and Corporate Governance Commission has among its competencies: establishing a representation objective for the underrepresented gender on the Board of Directors, developing guidelines on how to achieve said objective, as well as annually verifying compliance with said Policy and; ensuring that this is reported in the Annual Corporate Governance Report submitted to the General Shareholders' Meeting along with the Management Report.

The Appointments, Remuneration and Corporate Governance Commission has developed the Board of Directors' skills matrix, which is aligned with the most advanced recommendations in corporate governance and is updated according to the needs of the sector in which Aena operates, its main business lines, and its special legal nature as a state-owned commercial company listed on the stock market. This matrix reflects the aptitudes, knowledge, and key experience of each of its Board of Directors members, facilitating the supervision of comprehensive diversity in the composition of the Board of Directors, as well as the making of the most appropriate and informed decisions at all times.

The Board of Directors members selection Policy establishes that Aena must ensure that the Board of Directors has a composition that ensures the presence of at least forty percent (40%) of individuals of the underrepresented gender. At the end of the 2025 financial year, the percentage of individuals of the underrepresented gender (women) on the Board of Directors is 40.0% (46.7% in 2024).

It should be noted that Aena provides specific training sessions for new directors joining Aena, including sessions on good governance. It also promotes knowledge among Aena's governing bodies on sustainability-related topics and emerging trends.

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

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

For the evaluation of the different Committees, the report they submit to the Board of Directors is used as a starting point, and for the latter, the report submitted by the Appointments, Remuneration and Corporate Governance Commission. Currently, the evaluation of the Board and its Committees is carried out by an independent external consultant. Thus, the following main **conclusions** have been obtained from the evaluation carried out:

- The responses obtained to the questions posed to the Directors regarding the evaluation of the Board of Directors have been very positive, as 95% (93% in 2024) of the questions asked to the Directors were answered with an "excellent" or "adequate".
- The preparation of meetings is positively valued, and debates show a free, fluid, and critical exchange of opinions.
- Positive interaction between executives and directors is considered to exist. Transparency and closeness are especially valued, facilitating the contrast of positions.
- Adequate participation and involvement of the management team are evident in both Board of Directors meetings and Committee meetings, especially in the Audit Commission meetings, which are regularly attended by executives related to matters within its competence, such as the Economic-Financial Director, the Internal Audit Director, the Accounting and Internal Control Director, and the Compliance Director.
- The members of the Board of Directors, in general, positively value the degree of compliance with the 2025 Action Plan, considering that the Company has carried out various actions for its compliance, highlighting positively that training in sustainability has been deepened, progressively incorporating more specialized content and promoting, as far as possible, the participation of external experts, in order to reinforce the technical knowledge of the Board in this area.

Additionally, an Action Plan for the 2026 financial year has been prepared to reinforce the areas for improvement detected in the evaluation. During 2025, the Board of Directors held a total of 13 meetings, and 3 Board meetings were held by written procedure and without a session (13 meetings in 2024), maintaining an attendance rate of 98.97% (the same as in 2024).

²Art 9 of the Board of Directors Regulations.



ESRS 2: General disclosures

E1: Climate change

E2: Pollution

E3: Water and marine resources

E4: Biodiversity and ecosystems

E5: Resource use and circular economy

S1: Own workforce

S2: Workers in the value chain

S3: Affected communities

S4: Consumers and end-users

G1: Business conduct

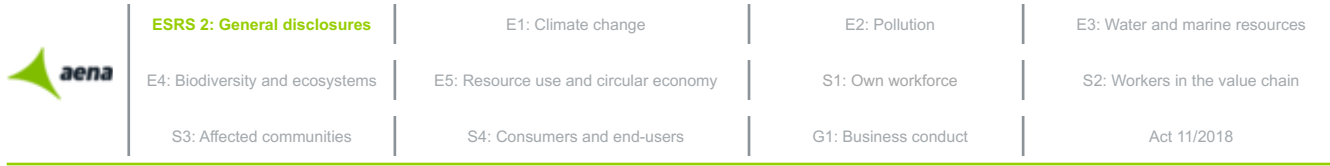
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Among the matters discussed, those related to ESG aspects stand out, including:

- The formulation of the 2024 Consolidated Non-Financial Information Statement and Sustainability Information (Sustainability Report).
- The approval of the 2024 Updated Climate Action Plan Report.
- The review of Corporate Policies, such as the Policy on Integrated Quality, Environment, Energy Efficiency and Occupational Health and Safety Management.
- The novation of the EIB Loan "Aena Covid-19 Green Energy Loan FL".
- The current regulatory situation in the European Union and aviation commitments.
- The planning of actions for the preparation of the 2025 Consolidated Non-Financial Information Statement and Sustainability Information.
- The assessment of the double materiality of 2025.
- The Board of Directors has four committees with **specific function**³: the Executive Commission, the Audit Commission, the Appointments, Remuneration and Corporate Governance Commission, and the Sustainability and Climate Action Commission. ESG competencies are not only held by the latter, but the other Committees also have ESG-related competencies, which are **detailed below**⁴.

³ Detailed information on the functioning of these bodies can be consulted on the corporate website. The Board of Directors Regulations detail their specific competencies, composition, performance evaluation process for their members, and their rights and duties.

⁴To learn more about the matters discussed by the different Committees during the 2025 financial year, the corresponding Activity Reports can be consulted on the corporate website.



	 Audit Commission	 Appointments, Remuneration and Corporate Governance Commission	 Sustainability and Climate Action Commission	 Executive Commission
Some ESG competencies	<p>Monitor and control the financial and non-financial information reporting system, as well as the evaluation of risks related to operations, technology, law, society, the environment, politics, and reputation.</p> <p>Establish and supervise irregularities confidentially, communicated by employees.</p> <p>Coordinate the compliance bodies, as well as review the regulatory compliance policy and other policies and procedures to curb inappropriate conduct.</p> <p>Supervise the management of the Whistleblower Channel.</p>	<p>Specify objectives for gender diversity.</p> <p>Ensure compliance with the Company's internal codes of conduct and corporate governance, as well as periodically evaluate and review the corporate governance system.</p> <p>Supervise communication policies.</p> <p>Monitor and evaluate methods for building relationships with different stakeholders.</p> <p>Organize the process for reporting diversity and non-financial data.</p> <p>Recognize, support, and supervise the company's strategies and practices related to innovation.</p>	<p>Understand, promote, guide, and supervise Aena's objectives, action plans, practices, and policies in environmental and social matters.</p> <p>Evaluate and verify the performance and compliance of the strategy and practices in environmental and social matters.</p> <p>Monitor that the company's environmental and social practices comply with the established strategy and policies.</p> <p>Support and supervise Aena's contribution to achieving the SDGs.</p> <p>Promote a coordinated strategy for social action, sponsorship, and patronage.</p> <p>Review and supervise compliance with the Climate Action Plan, as well as its reporting.</p>	<p>Review and supervise compliance with the Climate Action Plan, as well as its reporting.</p> <p>Authority to make general decisions and, consequently, with express delegation of all powers corresponding to the Board of Directors, except those considered non-delegable by virtue of law, applicable corporate governance regulations, the Company Bylaws, or the Board of Directors Regulations.</p>
Composition I: Independent D: Nominee E: Executive	    	    	    	    
Independent Directors (%)	60%	80%	80%	20%
Presence of women	40% in 2025 y 2024	20% in 2025 60% in 2024	60% in 2025 80% in 2024	40% in 2025 60% in 2024
Meetings	11 in 2025 y 2024	8 in 2025 7 in 2024	4 in 2025 5 in 2024	0 in 2025 and 2024
Other relevant information	<p>All members have experience in the financial sector and in audit and risks.</p> <p>3 members with experience in listed companies.</p> <p>2 members with ESG experience.</p>	<p>5 members with senior management experience.</p> <p>4 members with ESG experience.</p> <p>2 members with experience in innovation, new technologies / digital transformation.</p>	<p>All members have ESG experience.</p> <p>3 members with experience in innovation, new technologies / digital transformation.</p>	<p>All members with experience in the aeronautical / infrastructure and transport sector.</p> <p>3 members with experience in Audit and Risks.</p>

Note: The information regarding the composition of the Committees corresponds to December 31, 2025. In addition to the 11 sessions held by the Audit Commission, three Audit Commission meetings were held by written procedure and without a session. During 2025, following the recommendation of Technical Guide 1/2024 on Audit Commissions of public interest entities from the National Securities Market Committee, 2 joint sessions of the Sustainability and Climate Action Commission and the Audit Commission were held.



ESRS 2: General disclosures

E1: Climate change

E2: Pollution

E3: Water and marine resources

E4: Biodiversity and ecosystems

E5: Resource use and circular economy

S1: Own workforce

S2: Workers in the value chain

S3: Affected communities

S4: Consumers and end-users

G1: Business conduct

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Executive Management Committee

Aena's organizational structure is geared towards value generation and strengthening its strategic pillars, with a special focus on international expansion, innovation, and sustainability, always ensuring compliance with its regulatory obligations. Within this framework, sustainability is conceived as a transversal element that permeates all of the Company's activities, while innovation, technology, digitalization, customer focus, corporate culture, and talent development are identified as key factors to enable and enhance its growth.

The Executive Management Committee is composed of the Chairman-CEO, the Executive Vice-President, and eight directors. These directors are: the Commercial and Real Estate General Director, the Airports General Director, the Innovation, Sustainability and Customer Experience Director, the Office of the Chairman, Strategy and Public Policies Director, the General Secretary of the Board of Directors, the Economic-Financial Director, the Organization and People Director, and the Communication Director.

It is worth noting that 60% of the Committee members are women (six in total), all of whom are professionals with extensive experience in key sectors such as aviation, finance, transport, commerce, real estate, and sustainability. Their main responsibilities include defining and executing the corporate strategy, ensuring the achievement of strategic objectives approved by the Board of Directors through the Company's different business areas, and supervising operations and promoting key projects for sustainable development. Among their main functions are:

- Ensuring compliance with the strategic objectives established by the Board of Directors.
- Promoting value creation for shareholders and ensuring the Company's long-term sustainability and viability.
- Reviewing Corporate Policies before their submission to the competent Committees for subsequent approval by the Board of Directors.

To ensure effective management, the members of the Executive Management Committee, along with the Internal Audit Director, regularly report to the Board of Directors and its Committees on performance, project execution, and matters under their responsibility.

In particular, during 2025, it is important to highlight the participation of the Economic-Financial Director in all sessions of the Board of Directors, as well as the intervention of the Internal Audit Director in the meetings of the Audit Commission. Furthermore, the Innovation, Sustainability and Customer Experience Director and Chief Green Officer has presented reports to the Board of Directors regarding the progress of sustainability actions and the update of the 2024 Climate Action Plan report, assuming responsibility for promoting and consolidating a sustainable culture within the Company. On the other hand, the Organization and People Director has informed the Board about business objectives and those of the management team, as well as the degree of compliance with said objectives.

The Executive Management Committee is responsible for implementing the corporate strategy and ensuring the achievement of strategic objectives approved by the Board of Directors, through the Company's different business areas.

GOV-2: Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies

GOV-2 26 (a - c)

Sustainability Governance

Aena's Board of Directors' commitment to sustainability is formally enshrined in the Group's Sustainability Policy. This document establishes the principles and guidelines that govern the Aena Group's actions in this area, with the Board of Directors being the body responsible for promoting, deploying, and ensuring the implementation of said regulatory framework.

With regard to accountability, each Committee of the Board of Directors has specific responsibilities, including the supervision and reporting of sustainability-related information. In this regard, the Board of Directors is responsible for preparing, publishing, and keeping updated Aena's Climate Action Plan, as well as validating the annual updated Reports that reflect the progress made in relation to the defined objectives. These reports are prepared in accordance with the recommendations of the Task Force on Climate-Related Financial Disclosures (TCFD) and are submitted annually for advisory vote by the General Shareholders' Meeting (GSM).



ESRS 2: General disclosures

E1: Climate change

E2: Pollution

E3: Water and marine resources

E4: Biodiversity and ecosystems

E5: Resource use and circular economy

S1: Own workforce

S2: Workers in the value chain

S3: Affected communities

S4: Consumers and end-users

G1: Business conduct






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To ensure the effective materialization and proper development of Aena's 2021-2030 Sustainability Strategy, the Board of Directors is supported by the Sustainability and Climate Action Commission. In addition, Aena has the figure of the Chief Green Officer, whose mission is to integrate sustainability into strategic and operational decisions, thus reinforcing the Aena Group's commitment to all its stakeholders and consolidating this area as an essential pillar of its business model.

Complementarily, coordination between the different transversal areas involved in the deployment of Aena's 2021-2030 Sustainability Strategy is carried out through an internal working group. This team plays a crucial role in supporting the implementation of the strategy and requires the active and direct participation of all areas of the Company, as well as the commitment and involvement of employees.

Additionally, following the recommendation of Technical Guide 1/2024 on Audit Commissions of public interest entities, the Audit Commission and the Sustainability and Climate Action Commission jointly review the entire double materiality assessment process and therefore all impacts, risks, and opportunities (see **IRO-1**) detected during the development of this work. Once the impacts, risks, and opportunities have been identified and evaluated by both committees, the final results are presented to the Board of Directors for approval. Additionally, the Board of Directors, the Audit Commission, and the Sustainability and Climate Action Commission manage the IROs in accordance with the provisions of the Regulations of the Board of Directors of Aena S.M.E., S.A.

Regarding Aena's 2021-2030 Sustainability Strategy, it defines five strategic programs and 16 lines of action, aligned with the Sustainable Development Goals (SDGs), with quantifiable targets backed by KPIs. Progress towards achieving these targets is reviewed semi-annually and annually, evaluating the achievements made and establishing new challenges to ensure the constant evolution of the strategy.

Sustainable Governance at Aena Airports		
Functions	Area of Responsibility	Frequency and Evaluation Mechanisms
 Approval	Board of Directors <ul style="list-style-type: none"> • Approval of the Climate Action Plan and its Updated Reports. • Guidance and control of the strategy, objectives, risks, and results in sustainability-related matters. • Support from the Audit Commission in the process of supervising the risk management system, ensuring the identification, management, and communication of key risks within planned levels. • Monitoring of the progress of the Sustainability Strategy / Climate Action Plan (including actions and associated risks). 	Annual and ad-hoc supervision
 Supervision, monitoring and evaluation	Sustainability and Climate Action Commission <ul style="list-style-type: none"> • Promote, guide, and supervise environmental and social policies. • Monitoring of the main strategic lines of sustainability and collaboration with the Audit Commission in supervising associated risks. • Evaluate and verify the performance and compliance of the environmental and social strategy and practices, ensuring that they are focused on achieving greater sustainability, promoting the company's interest and long-term value creation, and taking into account the legitimate interests of other stakeholders, and report on this to the Board of Directors. • Validation of the future evolution of the sustainability strategy. 	Quarterly meeting to ensure periodic monitoring
 Commitment and decision-making	Chief Green Officer <ul style="list-style-type: none"> • Make Sustainability a fundamental element in decision-making. • Strengthen commitment in this area with all stakeholders. 	Permanent
 Coordination and support	Internal working group <ul style="list-style-type: none"> • Coordination of business areas for the deployment of the strategy. • Support to the Sustainability and Climate Action Commission. 	Bi-monthly monitoring of action progress
 Implementation	<ul style="list-style-type: none"> • All organizational areas and employees with direct and active involvement in the actions. 	Implementation and development



The airports in the United Kingdom and Brazil have specific and local governance for their sustainability and climate change strategies, consisting of:

In 2021, London Luton Airport established the Sustainability Committee (SusCo) to review and adequately advise the Board of Directors on the group's practices and performance related to sustainability. This committee, which meets quarterly, is chaired by the Chief Green Officer, a member of Aena's Executive Management Committee, the main shareholder of London Luton Airport Operations Limited (LLAOL). The SusCo is composed of representatives from London Luton Airport, including the CEO, CFO, Corporate Affairs Director, Operations Director, General Counsel, and Head of Sustainability, as well as shareholders from Aena and InfraBridge. Additionally, the airport has an additional committee that meets quarterly and includes members from Luton Council and Luton Rising.

London Luton Airport's sustainable governance structure is designed to oversee an approach to responsible business. The ultimate responsibility lies with the CEO and the London Luton Airport Board of Directors. A key element of this governance is the annual review that evaluates the strategy's progress and identifies opportunities for improvement.

In Brazil, sustainability governance is structured as follows, along with the corresponding distribution of functions:

- Aena Brasil Board of Directors:
 - Approve the Climate Action Plan and Sustainability Strategy.
 - Guide and control the strategy, policies, objectives, risks, and results.
- Aena Brasil Sustainability and ESG Committee:
 - Propose and ensure the consolidation and alignment of principles and policies related to sustainability and ESG, and guide initiatives and businesses related to the topic.
 - Monitor the progress of the CAP actions.
- International Relations, Communication and ESG Directorate:
 - Develop and coordinate the Action Plan and Sustainability Strategy.

These supervision and control mechanisms are complemented by those established in the Aena Group's Risk Control and Management Policy.

This model establishes a clear and coordinated structure that aligns goal setting with progress monitoring, thus ensuring the effective implementation of strategies in response to the risks and opportunities identified in the double materiality process, and strengthening accountability to all stakeholders.

In this context, the sustainability due diligence process is based on the principles of the Sustainability Policy and is present in all the Company's processes. This serves, together with the double materiality process, as a basis for evaluating the main impacts, risks, and opportunities related to the Company's own operations and the different phases of its value chain. Likewise, the climate change variable is integrated into internal decision-making processes, as well as in the analysis and management of short, medium, and long-term risks and opportunities, incorporating appropriate adaptation mechanisms.

GOV-3: Integration of sustainability-related performance into incentive schemes

GOV-3 29 (a - e)

Spain is subject to the regulatory frameworks and remuneration models applicable to capital companies, as well as the regulations applicable to senior executives in the public sector. The application of public regulations on remuneration implies that:

- The contracts of the executives who are part of Aena's Executive Management Committee, as well as those of the Internal Audit Director, the General Director of *Aena Desarrollo Internacional*, and the General Director of *Aena Sociedad Concesionaria del Aeropuerto Internacional de la Región de Murcia* (AIRM), are subject to Royal Decree 451/2012, of March 5, which regulates the remuneration regime for top executives and managers in the public business sector and other entities.



- The remuneration of the Directors is regulated by Royal Decree 462/2002, of May 24, on indemnities for services rendered; the aforementioned Royal Decree 451/2012; the Communicated Order from the Ministry of Finance, of March 30, 2012, by which the classification of state-owned commercial companies is approved in accordance with Royal Decree 451/2012, of March 5; the Communicated Order from the Ministry of Finance, of January 8, 2013, by which the maximum amounts of compensation for attendance at the boards of directors of state-owned commercial companies are approved; and the Communicated Order from the Minister of Finance of October 1, 2025, by which the maximum amounts of compensation for attendance to be received by Independent Directors in state-owned commercial companies listed on official stock exchanges are approved.

Consequently, Aena Spain has no discretion to determine remuneration in accordance with the provisions of Article 217 of Royal Legislative Decree 1/2010, which approves the revised text of the Capital Companies Law. For more information, please consult the [Annual Report on Directors Remuneration](#).

However, for members of Senior Management, the variable component depends on the achievement of the Company's objectives, among which is a sustainability objective, which accounts for 25% of the 50% and 40% weighted company objectives for Senior Management.

Furthermore, regarding executives, a variable component is contemplated (maximum 60% of the basic remuneration of the group in which the company is classified) which depends on the achievement of company objectives, among which are sustainability objectives (Climate Action Plan for Aena Spain), which account for 25% of the 100% of company objectives for the Chairman-CEO (25% of 100% in 2024), and 25% of the 50% of company objectives for the Executive Vice-President (25% of 50% in 2024).

Aena Spain's Performance Management is governed as a necessary tool for identifying areas of improvement in employees for development and for identifying the degree of achievement of annually set objectives, competencies, and professional behaviours. Performance evaluation is carried out annually and is measured, mainly, through three types of objectives:

- **Company objectives:** These link each professional to the results of the company's general activity, fostering a common vision of the Company. They are constituted by those objectives of the Strategic Plan determined by the Management Committee, based on strategic lines, economic and market recommendations, as well as the results of the previous year. Within these, sustainability objectives are established each year with a weighting of 25%. In 2025, within the Climate Action Plan for Aena Spain, the achievement of the strategic objective of emission reduction and Airport Carbon Accreditation certification in 19 Airports of the Aena Network were established.
- **Team objectives:** These must be aligned with the Company's objectives, and in turn, both are set taking the Strategic Plan and the Operational Plans of the different units as a starting point.
- **Personal objectives:** These are related to the performance of each professional. They are structured into specific job objectives, values, and training.

The weighting of the different types of objectives is not fixed but is determined annually by the Management Committee, taking into account the strategic priorities defined for each financial year. Likewise, the professional's organizational level and their capacity to influence the achievement of these objectives directly influence their assignment and weighting.

It should be noted that 100% of the workforce in Spain participates in the performance management system, which reinforces the Group's commitment to continuous improvement and the professional development of its employees.

Annually, the Board of Directors approves, first, the Company and Management Team Objectives for the current year and subsequently the achievement of the objectives of Aena's Chairman-CEO, which in turn are the Company Objectives, and the objectives of the members of the Management Team for the current year.

At London Luton Airport, all board members and the executive team include sustainability objectives within their performance compensation plans, ensuring accountability for action on material sustainability issues by airport management. Likewise, certain members of the Senior Management Team have specific sustainability objectives linked to the Management Bonus Objectives, with a greater weighting for those who are part of the Sustainability team. Sustainability objectives are also included in employees' Annual Performance Reviews.

In Aena Brasil, currently, the Director of Institutional Relations, Communication and ESG, as well as the individuals who are part of this directorate, have sustainability objectives formally linked to the Performance Management System (PMS), reinforcing leadership responsibility for material sustainability issues.

As a result of the approval of Aena Brasil's Sustainability Strategy in 2025, the possibility of gradually extending the establishment of sustainability objectives in the PMS to other Directors, such as Airport Directors, is being evaluated.



ESRS 2: General disclosures

E1: Climate change

E2: Pollution

E3: Water and marine resources

E4: Biodiversity and ecosystems

E5: Resource use and circular economy

S1: Own workforce

S2: Workers in the value chain

S3: Affected communities

S4: Consumers and end-users

G1: Business conduct

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GOV-4: Statement on due diligence

GOV-4 32

The Aena Group has implemented procedures to identify, prevent, mitigate, and remedy potential adverse effects on human rights and the environment, both in its own activities and throughout its value chain. This includes the identification of actual and potential risks through previously conducted impact analyses, based on internal and external reference materials, such as the consolidated management report and the Aena Group's risk map.

The Aena Group's due diligence process is based on the "protect, respect, and remedy" pillars of the UN Guiding Principles. This process includes the identification and assessment of risks, considering both actual negative and positive impacts, as well as the adoption of prevention and mitigation measures when necessary, in addition to the provision of grievance mechanisms to address potential violations.

The Sustainability and Climate Action Commission, along with other key areas of the Group, oversee and manage compliance with these practices, supported by internal and external communication mechanisms, such as the whistleblowing channel, which allows for reporting potential non-compliance. Furthermore, a double materiality assessment has been carried out to ensure the alignment of identified material risks and impacts with the Group's sustainability priorities.

Additionally, the Directors have participated in a sustainability session on technologies for aviation sustainability in 2025.



Aena Group and Human Rights

Having formalized the Aena Group's commitment to human rights, the Group assesses and evaluates the existence of potential non-compliance and seeks solutions for its eradication



Commitments

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



Due Diligence

Identify, prevent, mitigate, and respond to potential human rights and environmental risks



Communication Mechanisms

Internal and external whistleblowing channel



Training and Communication

Through awareness-raising actions for employees



Commitments transferred to the value chain, which must subscribe to the Aena Group's Code of Conduct for Third Parties, if they do not have their own



Governance and areas involved in the human rights due diligence procedure

- Sustainability and Climate Action Commission
- Appointments, Remuneration and Corporate Governance Commission
- Corporate and Operational Areas
- Audit Directorate
- Compliance and Legal Affairs Directorates
- Innovation, Sustainability and Customer Experience Directorate
- Company employees



Due Diligence in the Management of Ethical and Financial Risks

The Aena Group has implemented due diligence measures aimed at identifying, assessing, and mitigating risks related to corruption, fraud, money laundering, and conflicts of interest. For example, in 2025, a new Conflict of Interest Compliance Policy for the entire Group was defined and published. This process is designed to ensure that the Aena Group's operations are conducted under ethical, legal, and transparency standards, aligning with international best practices and current regulatory frameworks.

Due Diligence in Relation to Third Parties

The Aena Group has developed due diligence measures applicable to commercial operations with partners and in the international sphere, addressing issues such as the type of transaction to be carried out, the type of agreement or contract to be signed, the identity of the third party or its shareholders, the jurisdiction, etc. This process examines:

1. The identity of the counterparty and its de facto or de jure administrators.
2. The identity of the ultimate beneficial owner, understood as the one who is so by virtue of the provisions of the current regulations on the prevention of money laundering and the financing of terrorism, and the economic activity within which the corresponding business relationship is established.

In relation to the contracting of suppliers, commercial clients, representatives, and agents, the Aena Group applies the principles of legality, efficiency, transparency, publicity, competition, confidentiality, equality, and non-discrimination in its contracting processes, in order for contracts to be awarded to the supplier presenting the best offer.

Likewise, the Aena Group is committed to maintaining commercial relationships with qualified, reliable, and integral suppliers and clients who guarantee the best technical and economic offer. To fulfil this commitment, measures will be implemented to verify the qualification and integrity of each supplier and client before initiating binding commercial relationships, when deemed appropriate by the proposing Unit of the commercial relationship, always taking into account the applicable contracting regulations in each case.

Additionally, the inclusion of anti-corruption clauses is required in all contracts and specifications governing commercial relations with third parties, thus ensuring a solid and transparent compliance framework.

Training and Awareness

The Aena Group recognizes the importance of continuous training as a key tool to ensure the effective application of due diligence procedures.

In order to facilitate the understanding of these due diligence practices, the correspondence between essential elements of the process, in accordance with Chapter 4 of ESRS 1, and the sections of the Sustainability Report where information regarding its main aspects and stages can be found, is detailed below.



ESRS 2: General disclosures

E4: Biodiversity and ecosystems

S3: Affected communities

E1: Climate change

E5: Resource use and circular economy

S4: Consumers and end-users

E2: Pollution

S1: Own workforce

G1: Business conduct

E3: Water and marine resources

S2: Workers in the value chain

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Essential elements of due diligence

Sections of the Sustainability Report

a) Integration of due diligence into governance, strategy, and business model

ESRS 2 GOV-2
ESRS 2 SBM-2

b) Collaboration with affected stakeholders at all key stages of due diligence

ESRS 2 GOV-2
ESRS 2 SBM-2
ESRS 2 IRO-1
ESRS 2 MDR-P
Thematic ESRS: reflects the different stages and objectives of stakeholder collaboration throughout the due diligence process

c) Identification and assessment of adverse impacts

ESRS 2 IRO-1
ESRS 2 SBM-2

d) Taking action to address these adverse impacts

ESRS 2 MDR- A
Thematic ESRS: reflects the range of actions, including transition plans, through which impacts are addressed

e) Monitoring the effectiveness of these efforts and communication

ESRS 2 MDR-M
ESRS 2 MDR-T
Thematic ESRS: in relation to parameters and targets

GOV-5: Risk management and internal controls over sustainability reporting

GOV-5 36 (a - e)

The Aena Group has a Risk Control and Management System (hereinafter, the Risk Management System or the System), whose purpose is to ensure compliance with the Group's strategies and objectives by guaranteeing that the risks that could affect those objectives are identified, analysed, assessed, managed and controlled in a systematic manner and according to uniform criteria.

This system enables the Aena Group to adapt to the complexity of its business activity in a globalized competitive environment, where risks materialize more rapidly. The system develops the principles defined in the Risk Control and Management Policy approved by the Board of Directors of the Aena Group. The purpose of the Risk Control and Management Policy is to establish a general framework for action, as well as the principles and responsibilities that reasonably ensure that any type of risk faced by the Aena Group is identified, assessed, managed, communicated and monitored through an adequate and effective risk control and management system.

The system is based on the main reference standards and best international practices in risk control and management (ISO 31000 Risk Management Standard and COSO III Committee of Sponsoring Organizations of the Treadway Committee). It is also aligned with the national regulatory framework in this field (requirements of the Spanish Corporate Enterprises Act, the recommendations of the Good Governance Code for Listed Companies and the CNMV Technical Guide 1/2024 on Audit Commissions of Public Interest Entities).

The adopted Risk Control and Management System covers all risks to which the Aena Group is exposed, paying special attention to those that may affect its viability and sustainability.

The risk management methodology is a continuous and cyclical process that includes the following stages:



ESRS 2: General disclosures

E1: Climate change

E2: Pollution

E3: Water and marine resources

E4: Biodiversity and ecosystems

E5: Resource use and circular economy

S1: Own workforce

S2: Workers in the value chain

S3: Affected communities

S4: Consumers and end-users

G1: Business conduct

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RISK MANAGEMENT SYSTEM

Develops the basic principles defined in the Risk Control and Management Policy
Based on the integrated framework for Corporate Risk Management COSO III (Committee of Sponsoring Organizations of the Treadway Commission)

PHASES	RESPONSIBILITIES			GOALS
IDENTIFICATION OF RISKS Strategic Operational Financial Technological Legal and compliance Information Social, environmental and good governance	Corporate areas	Internal Audit Department	Board of Directors	Achieving the strategic objectives
RISK ASSESSMENT Prioritization according to their criticality based on their impact and probability of occurrence				Performance of operations with the appropriate security and quality required
RISKS MANAGEMENT Actions or responses aimed at mitigating, accepting, sharing or avoiding the identified risks				Upholding the rights of shareholders and other significant stakeholders
RISK REPORTING AND MONITORING Each risk must have a monitoring system with controls and indicators				Protecting financial robustness and sustainability
RISK UPDATE At least annually, identified risks are reviewed and assessed.	Management Committee			Protecting reputation
SUPERVISION OF THE RISK MANAGEMENT AND CONTROL SYSTEM Evaluation of the suitability of the risks included in the risk management system and the operation of the systems implemented for control and management.	Audit Commission			

Risk Control and Management Policy

The Aena Group's [Risk Control and Management Policy](#), updated in December 2024 (reviewed in May 2025 with no changes), aims to establish an adequate general framework for the control and management of threats and uncertainties of any nature that could affect the Aena Group, setting out the general guidelines of the Risk Management System.

The Policy outlines the different phases that make up the risk management process, in addition to detailing the fundamental principles that must guide this process:

- Risk management creates and protects value. It must contribute to the achievement of the Aena Group's objectives.
- It must be integrated into the Aena Group's strategy and into all Aena Group processes.
- It must form part of decision-making at all levels.
- It must ensure the appropriate use of control mechanisms to mitigate risks.
- Risk management must adopt a comprehensive approach.
- It must collect and report the Aena Group's risks in a transparent manner, as well as the functioning of the system developed for risk control and management.
- It must be participative: involvement ensures that management remains applicable and up to date.
- It must include clear and interactive communication with all parties involved.
- It must act in accordance with the law and applicable regulations.



The Risk Control and Management System is established as a control and management model that operates in an integrated and continuous manner, with its management centralized in the different corporate business and support areas. The methodological approach of the System is based on the COSO III framework and comprises the following stages:

1. Risk identification.
2. Risk assessment.
3. Risk control and management.
4. Risk reporting and monitoring.
5. Risk updating.
6. Oversight of the Risk Control and Management System.

This system covers the various types of financial and non-financial risks faced by the Group, including, to the extent they are significant, the main strategic, operational, financial, legal and compliance (including those related to corruption), information, technological, social, environmental and good governance risks.

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

The corporate Risk Map is updated annually by the Executive Management Committee, based on information provided by the Corporate Directorates, and is supervised and evaluated by the Audit Commission. The map is ultimately approved annually by the Board of Directors.

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

Likewise, the fundamental principles of risk management applicable to the foreign subsidiaries are consistent with those contained in the Aena Group's Risk Control and Management Policy, adapting enterprise risk management to their size and economic context.

Responsibilities in the development and execution of the Risk Control and Management System

The Risk Control and Management Policy establishes the roles and responsibilities of the areas involved in the control and management of risks within the Group:

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

Response to the main risks and to new challenges

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



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

- Operational Safety Management System (SMS).
- Internal Control System for Financial Information with ISAE 3000 certification.
- Internal Control System for Sustainability Information (in development).
- Compliance System, including anti-corruption and anti-fraud procedures and policies, and corporate governance policy.
- Cybersecurity Plan and Information Security Master Plan.
- ICT security reviews under ISO 27001 and the National Security Framework.
- Climate change strategy (Climate Action Plan).
- Integrated Quality, Environmental and Energy Efficiency Management System.
- External and internal airport security audits (safety & security).
- Corporate Tax Policy.
- Occupational Risk Prevention Management System.

Promoting a risk management culture

The Aena Group actively promotes risk management at all levels of the Company, through actions aimed at strengthening its culture and prevention practices. The main initiatives include:

- Linking Aena's key challenges and risks to the establishment of strategic objectives tied to employee performance, particularly those in roles with significant responsibility.
- The incorporation of performance-related criteria in this area into variable remuneration (employee evaluation).
- The design and implementation of training and awareness initiatives in the field of risk control and management for all levels of the Group. Specifically, monthly monitoring of risk indicators (KRIs) and quarterly monitoring of risk measures are carried out. During these follow-ups, necessary actions are coordinated with those responsible, such as reminders, updates in the use of the reporting application (SAP-GRC), and training of new staff in the system, among other measures. In this regard, a total of 9 specific training initiatives were carried out in 2025 (11 in 2024), 6 aimed at Aena staff in Spain (6 in 2024) and 3 aimed at ANB staff in Aena Brasil (5 in 2024).
- Investment in technological platforms that facilitate and make more efficient the identification, management and monitoring of key risks (SAP GRC), serving as a fundamental resource in the quarterly reporting and monitoring process in which the Corporate Directorates responsible for each risk participate, documenting the effectiveness of mitigation activities, action plans and contingency plans, as well as periodically assessing the indicators associated with each risk.

Finally, it should be noted that the risks associated with the international development of the Aena Group form an integral part of the Risk Control and Management System, thereby contributing to the protection of the Group's financial and operational stability in a globalized environment.

Taken together, these actions strengthen the Aena Group's commitment to effective risk management, enhancing its ability to respond to current and future challenges, and ensuring proactive control through innovative tools and continuous training.

Risks in 2025

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

In 2025, the Risk Map was updated taking into account both internal sources (update of the Strategic Plan) and external sources (competitor benchmarks, World Economic Forum and The Global Risks Report). Thus, following the appropriate review, the Risk Map has maintained the number of risks at a total of 15, classified as: strategic, operational, financial, legal and compliance, information, technological and social, environmental, and good governance. The list of the main risks included in the Aena Group's Risk Map is detailed in Section E of the IAGC and in the corresponding Note of the Consolidated Annual Accounts.

Within the Executive Management Committee, several sessions and workshops have been held with the aim of assessing the criticality of the risks based on their impact (economic, operational and reputational) and their likelihood of occurrence. These sessions have also addressed the review of the definition of the existing risks and the identification of potential emerging risks that may not have been detected in earlier phases of the process.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018



Following the approval of the 2025 risk map, the Corporate Directorates responsible for the risks assessed the adequacy of the controls (mitigation activities, action plans and contingency plans) and the indicators associated with each risk, making the appropriate updates where necessary.

Emerging challenges and risks, control mechanisms and mitigation activities

With regard to the procedures followed by the Group to ensure that it responds to new challenges that arise (emerging risks), the Risk Control and Management Policy establishes that the Corporate Risk Map shall be reviewed at least annually, and evaluations of the identified risks shall be carried out, mainly through the information on the defined risks provided in the monitoring system, which must be reported by those responsible based on the management carried out during the year.

Beyond these periodic updates, both the Executive Management Committee and the Board of Directors regularly analyse the new risks faced by the Group, obtaining from the relevant management areas the action plans, contingency plans, mitigation activities and indicators of the main risks.

During 2025, the Corporate Directorates carried out quarterly evaluations of the effectiveness of mitigation activities, action plans and contingency plans, as well as the periodic evaluation of the indicators (KRIs) associated with each risk in the Corporate Risk Map.

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



ESRS 2: General disclosures

E1: Climate change

E2: Pollution

E3: Water and marine resources

E4: Biodiversity and ecosystems

E5: Resource use and circular economy

S1: Own workforce

S2: Workers in the value chain

S3: Affected communities

S4: Consumers and end-users

G1: Business conduct

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RISKS CATEGORIES

TYPE OF RISKS	DESCRIPTION	CONTROL MECHANISMS AND MITIGATING ACTIVITIES
<p>STRATEGIC</p>	<p>Risks that can arise from the chosen business strategy, as well as from external and internal factors that could have a significant direct or indirect impact on the Aena Group achieving its long-term vision and objectives. This category includes risks associated with changes in the operating environment in which the Aena Group operates (political, economic and social), in the competitive environment (aeronautical and non-aeronautical market), and changes that affect charges and operations, among others.</p>	<p>Master Plans. Plan to attract air traffic and boost loyalty of airline companies. Commercial activity monitoring controls (CICO) Monitoring the planning and marketing of Airport Cities. Policy on Integrated Quality, Environmental, Energy Efficiency and Occupational Health and Safety Management Annual consultation process involving charges for the next fiscal year. Potential detection programmes in personnel and Employer Branding.</p>
<p>OPERATIONAL</p>	<p>These risks refer to potential losses or reduced activity resulting from weaknesses or failures in internal systems, controls or processes. Operational risks include those, among others, resulting from failures in the execution of investments, coordination of operations and air control, and those related to employment and human resources.</p>	<p>Operational Safety Management System. Self-protection plans and contingency, preparation and response procedures to emergencies, winter contingencies, etc. External and internal airport security audits (safety and security). Network Management Centre and Airport Management Centres for communication, identification, follow-up and coordination of impact. Procedures and tools for handling management. Corporate innovation strategy and collaboration with external companies in terms of innovation. Civil aviation liability policy for airport operator + war and terrorism civil liability. Policy for all risks, material damage, loss of profit and breakdown of machinery + excess coverage from the Insurance Compensation Consortium for terrorist acts. Air navigation meteorological services contract at Aena airports. Action plan for bomb threat management. Management of noise pollution and action procedures to ensure the correct management of plans and projects with an environmental impact. Investment planning, control and execution procedure. Employee protection policy (life, safety and health).</p>



ESRS 2: General disclosures

E4: Biodiversity and ecosystems

S3: Affected communities

E1: Climate change

E5: Resource use and circular economy

S4: Consumers and end-users

E2: Pollution

S1: Own workforce

G1: Business conduct

E3: Water and marine resources

S2: Workers in the value chain

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RISK CATEGORIES

TYPE OF RISKS	DESCRIPTION	CONTROL MECHANISMS AND MITIGATING ACTIVITIES
<p>FINANCIAL</p>	<p>This category encompasses financing risks, changes in interest rates and exchange rates, liquidity risk and credit risk, as well as those related to contingent liabilities and other off-balance sheet risks.</p>	<p>Corporate Tax Policy. Interest rate hedging instruments, guarantees and bonds. Internal Control over Financial Reporting System (ICFR). Request to the External Auditor to examine, with a reasonably independent security scope, the Internal Control over Financial Reporting System (ICFR) of Aena S.M.E., S.A. (controlling company) and its subsidiaries (the Aena Consolidated Group or the Group) as of 31 December 2024, based on the criteria established in COSO. Internal regulations and contracting control systems.</p>
<p>LEGAL AND COMPLIANCE</p>	<p>These are risks stem from the mandatory compliance with legal provisions established by national and international bodies and institutions in relation to compliance with general legislation (environmental, commercial, criminal, tax, labour, etc.), and sector and internal regulations, as well as risks that may affect the reputation of the Aena Group, especially risks related to corruption.</p>	<p>Regulatory compliance system including policies and procedures to combat corruption and fraud, and the corporate governance policy. Monitoring of agreements and litigation with commercial operators. Management and oversight of compliance risks through the SAP-RICUM application and complaints channel. Corporate Tax Policy. DORA II. Code of Conduct. Information Security Policy that includes risks related to personal data protection</p>
<p>INFORMATION</p>	<p>These are risks related to the reliability of the preparation, obtainment and communication of financial and non-financial information, both internal and external, that are significant for the Aena Group.</p>	<p>Internal Control over the Financial Reporting System (ICFR) with certification ISAE 3000. Internal Control System for Sustainability Information (under development). Supervision of financial and non-financial information by governing bodies. General Policy for the Communication of Financial, Non-Financial and Corporate Information. Policy on Communications and Contacts with Shareholders, Institutional Investors and Proxy Advisers.</p>



ESRS 2: General disclosures

E4: Biodiversity and ecosystems

S3: Affected communities

E1: Climate change

E5: Resource use and circular economy

S4: Consumers and end-users

E2: Pollution

S1: Own workforce

G1: Business conduct


E3: Water and marine resources

S2: Workers in the value chain

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RISK CATEGORIES

TYPE OF RISKS	DESCRIPTION	CONTROL MECHANISMS AND MITIGATING ACTIVITIES
<p>TECHNOLOGICAL</p>	<p>These are risks related to the security of infrastructures and systems in the technological field.</p>	<p>Cybersecurity Plan and Information Security Director Plan. Disaster Recovery Plans (DRPs) for information systems. Information Security Policy and Management Procedures for incidents and security stopgaps. ICT security reviews under ISO 27001. Technology protection policy (loss or damage to computer systems and loss of stored data).</p>
<p>SOCIAL, ENVIRONMENTAL AND GOOD GOVERNANCE</p>	<p>These are risks associated with employee social rights and other people connected to the activity of the Aena Group; those related to potential environmental impacts (including those related to climate change) and to the possibility of noncompliance with an adequate direction and management of Corporate Governance and transparency standards.</p>	<p>Climate change strategy (Climate Action Plans) and analysis of climate scenarios, and evaluation of needs to adapt airports with monitoring of indicators. Integrated Management System for Quality and the Environment, certified by an accredited external entity in accordance with the UNE-EN ISO 9001 and UNE EN-ISO 14001 standards. Occupational Risk Prevention Management System. HR processes and programmes (planning and organisation, training management, personnel recruitment and development). Action procedures to ensure the correct management of plans and projects with an environmental impact. Management of the acoustic impact on the surrounding populations: preparation of strategic noise maps, noise monitoring systems and flight paths, sound insulation plans. Employee protection policy (life, safety and health). Directors' and Officers' Liability Insurance policy. Environmental Liability Insurance policy. Sustainability Policy. Aena's Sustainability Strategy. Established presence in ESG index, such as FTSE4good, DJSI. Participation in the Airport Carbon Accreditation programme and ACI Europe's Net Zero initiative Reporting to Carbon Disclosure Project (CDP) Collaboration with third parties.</p>

	ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
	E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
	S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

Information control

The sustainability information generated at the Aena Group's airports is integrated, reviewed and consolidated by the central units. Subsequently, this information is presented to the Sustainability and Climate Action Commissions, the Audit Commission, and the Appointments, Remuneration and Corporate Governance Commission for their evaluation and validation. Finally, the Board of Directors approves the information and, additionally, the Internal Audit unit carries out an exhaustive annual review of the process.

Reporting principles used	
Quality of the Report	Defining Content
Accuracy Balance Clarity Comparability Reliability Timeliness	Inclusion of stakeholders Sustainability context Materiality Completeness
Reporting principles	




All the processes involved in preparing sustainability information developed by the Aena Group are carried out with the aim of accurately reflecting the sustainability metrics, assessing them in accordance with the applicable regulations and presenting the information in line with regulatory requirements and market needs.

As detailed in this report, a large part of the sustainability information is managed through IT systems that assign clear responsibilities for the generation and documentation of the data. In addition, certain aspects of this information are managed through specific management systems, which include independent audits where applicable.

The Aena Group currently has internal controls in place in the process of disclosing sustainability information, designed to ensure the integrity and reliability of the reported data.

However, these controls are not currently formalised under a specific Internal Control System for Sustainability Information (SCIIS), as required by the new EU Corporate Sustainability Reporting Directive EU/2022/2464 (CSRD). For this reason, during the 2025 financial year, the Aena Group has continued working on the progressive implementation of the SCIIS as a measure to strengthen the reliability of the information and comply with the requirements established in the CSRD, with implementation planned for completion in the 2026 financial year.

During the 2025 financial year, the Aena Group carried out the following actions related to the implementation of the SCIIS, with the aim of defining an SCIIS model that ensures the characteristics of sustainability information required by the applicable regulations (relevance, faithful representation, comparability, verifiability and understandability):

	ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
	E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
	S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

- SCIIS Manual, which first sets out the regulatory context applicable in the field of Sustainability information, as well as the reference and applicable standards for the preparation of the Sustainability Report, describing the risks associated with sustainability information, the types of controls, the scope of the indicators included therein, and the roles and responsibilities of each of the three lines established to ensure compliance with the defined control model.
- Scope Matrix, considered the first component for the implementation of the SCIIS, in which the scope of the SCIIS is identified. This scope is defined based on the same consolidation perimeter as the Aena Group's consolidated financial statements and the Sustainability Report, that is, Spain, Brazil and the United Kingdom, comprising their respective airports. Likewise, the process began with the double materiality assessment, which includes all aspects of the value chain and has made it possible to identify the SCIIS topics or processes. Once this was completed, a corporate criterion was defined to determine the criticality of the airports, taking into account the representativeness of certain parameters within each of the SCIIS topics or processes identified.

The Aena Group's SCIIS is being structured around the COSO (Committee of Sponsoring Organizations of the Treadway Commission) model and the Institute of Internal Auditors' Three Lines Model, providing an integrated view of how the different parts of the organisation interact effectively and in a coordinated manner, making the processes for managing and internally controlling the relevant risks in the preparation and reporting of the Aena Group's sustainability information more effective.

In accordance with the model mentioned in the previous section, the Aena Group's SCIIS defines the following responsible bodies, whose functions will be established in the SCIIS Manual:

- Board of Directors
- Sustainability and Climate Action Commission
- Audit Commission
- Process owners involved in the generation of sustainability information (First line). The main tasks to be carried out by those responsible for preparing the sustainability information are as follows:
 1. Define the criteria for preparing indicators and metrics.
 2. Compile the information needed to prepare the metrics, indicators and the remaining qualitative information published.
 3. Establish and execute the controls that ensure the quality of the indicators prepared.
 4. Ensure the effective performance of control evaluations in each of the processes for which they are responsible, as well as the associated documentation.
- Unit responsible for advising, monitoring and supervising the internal control model for sustainability information (Second line). It is responsible for advising, monitoring and supervising the internal control model for sustainability information. The main tasks to be carried out are as follows:
 1. Ensure the integrity and coherence of the SCIIS.
 2. Evaluate the presence and sufficiency of the controls and their design to reasonably ensure the reliability of sustainability information, considering its relevance (according to the double-materiality matrix) and its complexity.
 3. Monitor the compliance with and execution of the controls according to the definition set out in the risk and control matrices, through the inspection of the evidence provided and inquiries to the executors.
 4. Prepare and update the SCIIS supporting documentation together with the relevant functional management unit or airport.
- Internal Audit (Third line). Responsible for providing assurance of the model. The Internal Audit Function, as the third line, carries out its tasks completely independently from the other two lines of defence.



3. Strategy

SBM-1: Strategy, business model and value chain

Business Model

SBM-1 40 (a i-iii), SBM-1 40 (b - c), SBM-1 40 (e - g), SBM-1 42 (a - c)

Aena S.M.E., S.A. is a leading state-owned commercial company in airport services management, operating a total of 46 airports and 2 heliports in Spain. It stands out for its extensive experience, operational capacity, and the high professional level of its team. Through its subsidiary *Aena Desarrollo Internacional S.M.E., S.A. ("Aena Internacional")*, the Aena Group participates in the management of 32 airports located in countries such as the United Kingdom, Brazil, Mexico, and Jamaica.

The Company offers a comprehensive service to its clients (including passengers, airlines, handling agents, and other user) ensuring full accessibility and providing an assistance service for persons with reduced mobility (PRM), internationally recognized for its excellence.

Markets Served and Changes in 2025

Below is a comparison between 2024 and 2025 of the Aena Group's operational performance in the three countries where it has operational control: Spain, the United Kingdom, and Brazil. The comparison covers the number of employees, passenger traffic, the number of airport operations, and the volume of cargo (in tons) managed in each country.

These data allow for observing the evolution in each country, highlighting the significant growth in passenger volume and operations, as well as adjustments in the employee workforce to support the increase in activity. The comparison also reflects Aena's ability to maintain operational continuity and service quality amid changing demand levels. The comparison evidences the strategic role played by each market in the Aena Group's international expansion and its capacity to adapt to local needs.

SPAIN		UNITED KINGDOM		BRAZIL	
2024	2025	2024	2025	2024	2025
Number of employees		Number of employees		Number of employees	
8,714	9,141	944	999	851	913
Passengers		Passengers		Passengers	
309,371,619	321,587,316	16,735,984	17,562,426	43,375,976	45,687,441
Operations		Operations		Operations	
2,590,962	2,696,414	131,972	134,769	480,914	448,681
Cargo (tonnes)		Cargo (tonnes)		Cargo (tonnes)	
1,280,333	1,372,394	30,666	27,534	110,804	133,972



ESRS 2: General disclosures

E4: Biodiversity and ecosystems

S3: Affected communities

E1: Climate change

E5: Resource use and circular economy

S4: Consumers and end-users

E2: Pollution

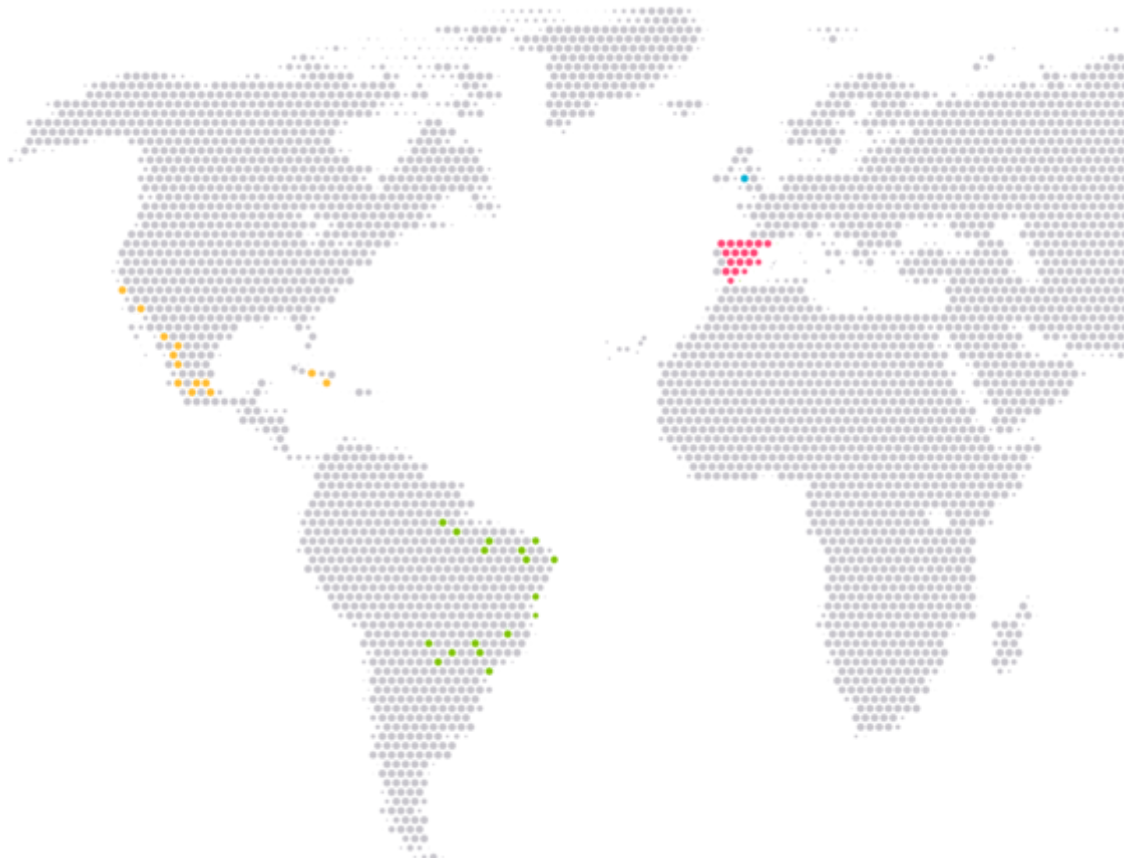
S1: Own workforce

G1: Business conduct

E3: Water and marine resources

S2: Workers in the value chain

Act 11/2018



Spain (#48)	A Coruña (LCG)	La Palma (SPC)
	Adolfo Suárez Madrid-Barajas (MAD)	León (LEN)
	Albacete (ABC)	Logroño-Agoncillo (RJL)
	Alicante-Elche Miguel Hernández (ALC)	Madrid - Cuatro Vientos (LECU)
	Almería (LEI)	Melilla (MLN)
	Asturias (OVD)	Menorca (MAH)
	Algeciras / Heliporto (AEI)	Málaga-Costa del Sol (AGP)
	Badajoz (BJZ)	Palma de Mallorca (PMI)
	Bilbao (BIO)	Pamplona (PNA)
	Burgos (RGS)	Reus (REU)
	César Manrique-Lanzarote (ACE)	Sabadell (QSA)
	Córdoba (ODB)	Salamanca (SLM)
	Ceuta / Heliporto (JCU)	San Sebastián (EAS)
	El Hierro (VDE)	Santiago-Rosalía de Castro (SCQ)
	Federico García Lorca Granada-Jaén (GRX)	Seve Ballesteros-Santander (SDR)
	Fuerteventura (FUE)	Sevilla (SVQ)
	Girona-Costa Brava (GRO)	Son Bonet (LESB)
	Gran Canaria (LPA)	Tenerife Norte-Ciudad de La Laguna (TFN)
	Huesca-Pirineos (HSK)	Tenerife Sur (TFS)
	Ibiza (IBZ)	Valencia (VLC)
Internacional Región de Murcia (RMU)	Valladolid (VLL)	
Jerez (XRY)	Vigo (VGO)	
Josep Tarradellas Barcelona-El Prat (BCN)	Vitoria (VIT)	
La Gomera (GMZ)	Zaragoza (ZAZ)	
United Kingdom (#1)	Londres-Luton (LTN), United Kingdom.	
Brazil (#17)	Aeroportos do Nordeste do Brasil S.A. (ANB):	Bloco de Onze Aeroportos do Brasil S.A. (BOAB):
	Recife Guararapes - Gilberto Freyre (REC)	São Paulo/Congonhas - Deputado Freitas Nobre (CGH)
	Maceió - Zumbi dos Palmares (MCZ)	Campo Grande (CGR)
	Aracaju - Santa Maria (AJU)	Corumbá (CMG)
	João Pessoa - Presidente Castro Pinto (JPA)	Ponta Porã (PMG)
	Juazeiro do Norte - Orlando Bezerra de Menezes (JDO)	Santarém - Maestro Wilson Fonseca (STM)
	Campina Grande - Presidente João Suassuna (CPV)	Marabá - João Correa da Rocha (MAB)
		Carajás - Parauapebas (CKS)
		Altamira (ATM)
		Uberlândia - Tenente Coronel Aviador César Bombonato (UDI)
	Montes Claros - Mário Ribeiro (MOC)	
	Uberaba - Mário de Almeida Franco (UBA)	
Affiliates (#14)	Aena International's participation in 12 airports in Mexico and 2 airports in Jamaica .	



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

The airports managed by the Aena Group, including Spain, the United Kingdom (London Luton), and Brazil, concluded the 2025 financial year with a total of 384.8 million passengers (369.5 million passengers in 2024), representing an increase of 4.16% compared to 2024. Likewise, 3,280 thousand aircraft movements were managed (3,204 thousand aircraft movements in 2024), registering a decrease of 2.37% compared to the previous year, and 1,533,901 tonnes of cargo were transported (1,421,804 tonnes in 2024), which represents a growth of 7.88% in relation to the previous year.

Additionally, the Aena Group focuses on strengthening international connectivity by developing solid strategies that expand its presence in global markets.

	Spain		United Kingdom		Brazil	
	2024	2025	2024	2025	2024	2025
Number of destinations served ^(A)	368	388	123	127	68	66

^(A) Number of destinations served = Destinations where at least 5,000 operations have been carried out

The Aena Group's strategy is implemented as follows: in Spain through the Strategic Plan 2022–2026, the Sustainability Strategy 2021–2030, and the Climate Action Plan 2021–2030; in Brazil with the Sustainability Strategy 2024–2040 and the Climate Action Plan 2024–2040; and at Luton Airport with the [Responsible Business Strategy](#) 2024–2027 and the [Net Zero Roadmap 2040](#).

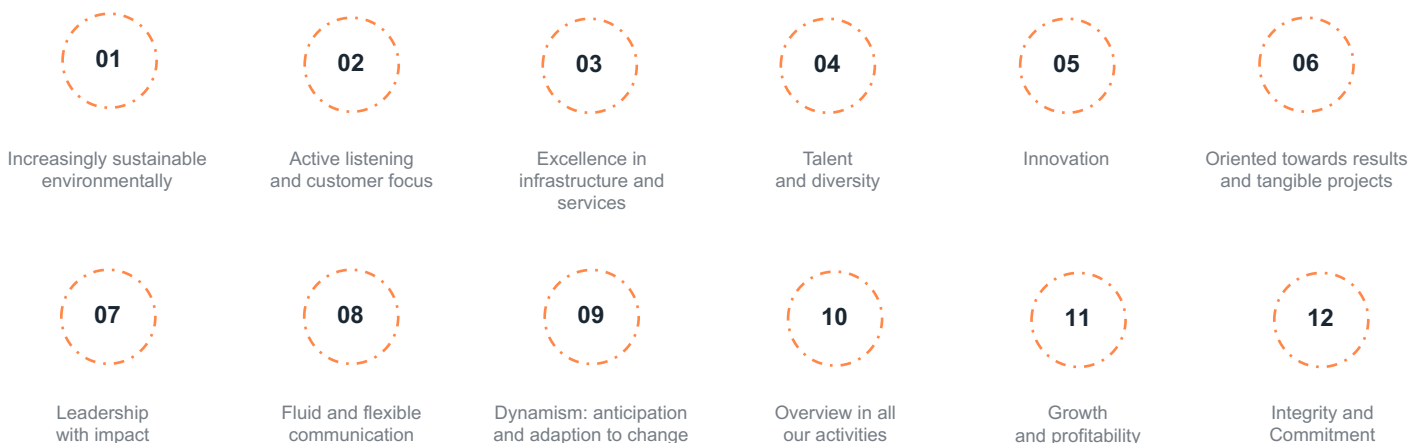
Aena Strategic Plan 2022–2026 at Aena

In 2022, Aena presented its Strategic Plan 2022–2026, with the purpose of positioning its airports as the safest, most efficient, sustainable, and welcoming worldwide. This plan seeks to consolidate airports as key drivers of the economy and tourism, while generating value for shareholders, customers, and society as a whole.

In line with this objective, the plan prioritises the development of the core business, focused on maintaining leadership in safety and operational efficiency, as well as achieving a significant increase in commercial revenue. Additionally, Aena is committed to growth through diversification, promoting international expansion and exploring new business areas, such as Airport Cities and other adjacent opportunities.

Sustainability is positioned as a fundamental pillar that encompasses all growth initiatives, complemented by innovation, technology, digitalisation, customer orientation, and the strengthening of culture and talent, which are identified as essential enabling factors to achieve these objectives.

2022- 2026 Strategic Plan. Values and Purposes





Strategic Objectives

During 2024, the Aena Group carried out a review and update of the Strategic Plan, defining a series of specific objectives for each area of activity, the main ones of which are detailed below.

Aeronautical activity

Aena's aeronautical business strategy focuses on:

- Contributing to increasing the traffic volumes defined in DORA II.
- Maintaining its leadership position in operational efficiency, achieving the required levels of safety and quality.
- Ensuring that infrastructures have sufficient capacity to accommodate future air demand.
- Implementing measures related to alternative energies, with the aim of reducing energy costs and reinforcing the sustainability of operations.

Commercial activity

The Strategic Plan also establishes commercial activity as a fundamental pillar for growth. In this context, the main objectives defined are the following:

- Increase commercial revenue per passenger by at least 32% by 2026 compared to 2019.
- Increase total commercial revenue by 48% by 2026 compared to 2019 levels.
- Expand the offering of digital services and strengthen the loyalty programme, covering all stages of the customer journey, both inside and outside the airport..
- Diversification towards adjacent businesses, such as the Airport Cities project.

International activity

The main objective is to consolidate the Aena Group's international assets.

In Brazil, once control of the 11 BOAB airports has been assumed, the execution of mandatory works continues according to the committed dates set out in the Concession Agreement.

On 11 December 2025, the merger by absorption of the subsidiary *Aeropuertos Mexicanos del Pacífico* (AMP) with its parent company *Grupo Aeroportuario del Pacífico* (GAP) was approved. However, this operation is still subject to the fulfilment of certain precedent conditions and administrative deadlines, with an estimated completion during the first half of 2026. Once the merger is completed, the subsidiary *Aena Desarrollo Internacional* (ADI) will hold a direct stake in GAP.

On 18 December 2025, an agreement was formalised for the acquisition of 51% of a new holding company that owns and manages 100% of Leeds Bradford Airport and 49% of Newcastle Airport, both in the United Kingdom. The closing of the operation, scheduled for the second quarter of 2026, is subject to the fulfilment of a series of requirements, including obtaining relevant regulatory approvals and the formalisation of closing documentation.

The Aena Group aims for international activity to contribute 15% of EBITDA by 2026.

Next steps

Work is currently underway on the preparation of the Strategic Plan 2027–2031.

DORA III will establish the regulatory framework for the 2027–2031 period of aeronautical activity in Spain, integrating Aena's investment plan for its entire network in Spain and orienting it to match capacity with projected demand, reinforce operational safety, raise service quality, and advance in sustainability until net emissions are reached. Its processing is following the established procedure: consultations with airlines, presentation to airport coordination committees, and submission to the competent authorities, until its approval by the Council of Ministers in September 2026.

Sustainability, a transversal growth element

The Aena Group, aware of its economic and social role and the impact it generates in the environments where it operates, has integrated sustainability as a cross-cutting axis in its management, fully consolidating it in the Strategic Plan 2022–2026. As part of this commitment, the Company brought forward its carbon neutrality target for its Spanish airports to 2030, ten years ahead of the initially planned date. This progress is supported by the Climate Action Plan (PAC) and its Sustainability Strategy.

This approach allows the Aena Group to adapt its initiatives to the specific contexts of the regions where it operates, while maintaining common goals. Thus, in the United Kingdom, London Luton Airport reflects its commitment to sustainability in the [Responsible Business Strategy 2024–2027](#), while in Brazil its Climate Action Plan was approved in 2024 and its Sustainability Strategy 2024–2040 was approved during 2025, adapted to local challenges and aligned with global corporate objectives.



ESRS 2: General disclosures

E4: Biodiversity and ecosystems

S3: Affected communities

E1: Climate change

E5: Resource use and circular economy

S4: Consumers and end-users

E2: Pollution

S1: Own workforce

G1: Business conduct

E3: Water and marine resources

S2: Workers in the value chain

Act 11/2018

For the development of the Aena Group's sustainability strategies, a prior analysis of applicable regulations at global, European, and local levels was carried out, as well as of sustainability strategies and trends, with the aim of contextualising the Company's objective-setting process and aligning its business strategy with the Sustainable Development Goals (SDGs) of the United Nations 2030 Agenda, with its commitment to SDG 13 being particularly noteworthy for its performance in the fight against climate change.

In relation to climate change, the recommendations of the Financial Stability Board, through its Task Force on Climate-related Financial Disclosures (TCFD), as well as the guidelines derived from the European Commission's supplement on climate-related information to Directive 2014/95/EU, were taken into account. It is noteworthy that the Aena Group is adhered as a "supporter" of the TCFD, consolidating its role among leading companies committed to the fight against climate change.

To identify the local challenges of airports and other relevant stakeholders in terms of sustainability, meetings were held with Spanish and European airports, as well as with other companies in the air-sector ecosystem such as airlines, aircraft manufacturers, and energy producers. Likewise, the requirements set by investment groups, which play an increasingly active role in influencing organisations to address material risks related to sustainability or ESG, were taken into account.

To ensure the correct execution of its sustainability initiatives, the Aena Group has implemented a governance model that guarantees the fulfilment of its roadmap and its ability to address the main ESG challenges. The growing environmental, social, and economic challenges are addressed as opportunities to strengthen its strategy, identify new areas of growth, and consolidate sustainability as a fundamental pillar of its business model.

	ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
	E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
	S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

2021-30 Sustainability Strategy of Aena Spain

Decarbonization and reduction of pollution	Responsible management of resources (water, energy, promotion of a circular economy, etc.)	Impact on the natural environment (biodiversity)	Commitment to the local community (noise, sustainable mobility, protection of human rights, more vulnerable groups)	Diversity, inclusion, conciliation and professional development of internal talent

2024-2027 Responsible Business Strategy (RBS), United Kingdom (London Luton Airport)

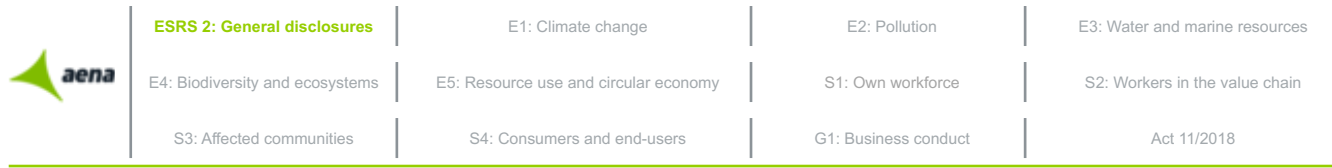
Creating a great place to work and develop professionally	Supporting local residents and the wider community in a meaningful way	Providing infrastructure to achieve net-zero emissions	Collaborating in innovation and technology within the airport sector

2024 - 2040 Estr ategia de Sustentabilidade, Brazil

Environmental topics: Efficient Water Footprint, Circular Economy, Air Quality, Noise Management, Biodiversity Preservation	Social topics: Diversity and Inclusion, Career Development, Work–Life Balance and Motivation, Customer Satisfaction, Developing a Sustainable Culture

Sustainability Strategy

The 2021-2030 Sustainability Strategy at Aena is structured around five strategic programs, designed to address the main identified ESG challenges. These programs are developed through 16 lines of action aligned with the Sustainable Development Goals (SDGs), which materialize in specific projects and actions with clearly defined goals.



The monitoring of this strategy is carried out through quantitative objectives and specific KPIs, whose progress is evaluated and reported periodically. An annual review of the progress of the established objectives is conducted, allowing for the identification of areas for improvement and reinforcing the commitment to achieving the goals. It is worth noting that the fulfilment of these objectives is linked to the variable remuneration of the workforce, incentivizing active involvement in their achievement.

Additionally, the strategy promotes collaboration with third parties, encouraging participation in working groups and the creation of joint projects, with the aim of reducing the environmental and social impact of activities.

Strategic Programmes and key data from Aena's Spain 2021-2030 Sustainability Strategy						
	Zero carbon	Sustainable aviation	Responsible resource use	Community and sustainable value chain	Social commitment	Communication and transparency
Lines of Action	Renewable energies. Energy efficiency. Sustainable fleet. Offsetting of emissions	Clean propulsion fuel for aircraft. Efficiency in aeronautical operations. Sustainable ground handling fleet.	Efficient water footprint. Circular economy.	Sustainable mobility Cooperation and awareness Air quality. Noise management. Preservation of biodiversity	Relationship with the community People management	Assurance of the transparency of the results obtained from the plan. Communication with ESG rating agencies and shareholders.
Some strategic objectives	<ul style="list-style-type: none"> > Carbon neutral airports in 2026. > Reduction of water consumption per passenger. > Reduction of atmospheric contaminants (NOx, SOx, PM). > Zero Waste 2040. > Protection and promotion of local and global biodiversity. 			<ul style="list-style-type: none"> > Limitation of the impact of noise on local communities. > In 2026, triplication of the amount destined for social action initiatives compared to 2019. > By 2030, this amount will account for 1% of the net profit. > Increase the number of women in management positions 		Related investment close to €750 M
Some achievements reached during 2025	<p>100% of energy consumption from renewable sources in the Spanish network.</p> <p>74.4% reduction in own CO₂e emissions in the Spanish network (base year 2019), (70.4% reduction in 2024).</p> <p>Anticipation of the ACI EU's NET ZERO target for Scope 1 and 2 by 10 years, moved from 2040 to 2030.</p> <p>Increase in the number of airports involved and the level of ACA certifications achieved.</p>					

Note: The details of the 2021-30 Sustainability Strategy can be consulted on the Aena website. Likewise, the Sustainability Report details and describes the different lines of action and the corresponding objectives (see chapters E1, E2, E3, E4 y E5).



The Aena Group has developed and implemented various initiatives aimed at improving the sustainability of its products and services:

- Energy Transition:** Linked to the Renewable Energies and Energy Efficiency lines of action. All airports and heliports managed by Aena in Spain and the United Kingdom have used electricity with a 100% renewable origin guarantee since 2020, which supplies lighting, tracks beacons, and other essential uses. In relation to Aena Brasil, various actions related to energy efficiency and renewables have been incorporated in its recent Climate Action Plan.
- Sustainable Mobility and Operations:** Related to the lines of action of Sustainable Own Fleet, Aviation and Sustainable Mobility, and Sustainable Ground Handling Fleet, highlighting the following points:
 - Electrification of vehicles (cars and vans) in the own fleet.
 - Incorporation of sustainable fuels (HVO) in vehicles and heating systems.
 - Installation of electric charging points in car parks, facilitating the transition to less polluting vehicles for employees and passengers.
 - Promotion of the use of Sustainable Aviation Fuel (SAF) by airlines.
- Sustainable development and management of infrastructures:** In Spain, Aena is in the process of implementing the BREEAM (Building Research Establishment Environmental Assessment Method) methodology in the development and management of its expansions and new infrastructures. BREEAM is one of the most recognised international standards for the environmental assessment of buildings and civil engineering projects, and its application ensures that new infrastructures meet the highest requirements in energy efficiency, responsible resource management, emissions reduction, and user well-being.

In addition to implementing environmental standards such as BREEAM, Aena is promoting WELL certification in the construction of its most emblematic future buildings. WELL certification, internationally recognised, evaluates and promotes the physical and mental well-being of people occupying buildings, through criteria such as air quality, natural lighting, thermal comfort, ergonomics, healthy eating, and the promotion of physical activity.

The integration of the WELL methodology into Aena's infrastructures contributes to creating healthier work environments, increases employee satisfaction and productivity, and reinforces the organisation's image as a benchmark in sustainability and well-being. This commitment to people's well-being aligns with international best practices and responds to stakeholder expectations, consolidating Aena as a leader in the responsible and human management of its assets.

- Technological Innovation for Sustainability:** Linked to process optimisation through the use of advanced technologies, the development and promotion of new, more sustainable energy models, and emissions reduction. Collaboration with airlines and other stakeholders allows the Group to support the development of these new technologies and industry standards.

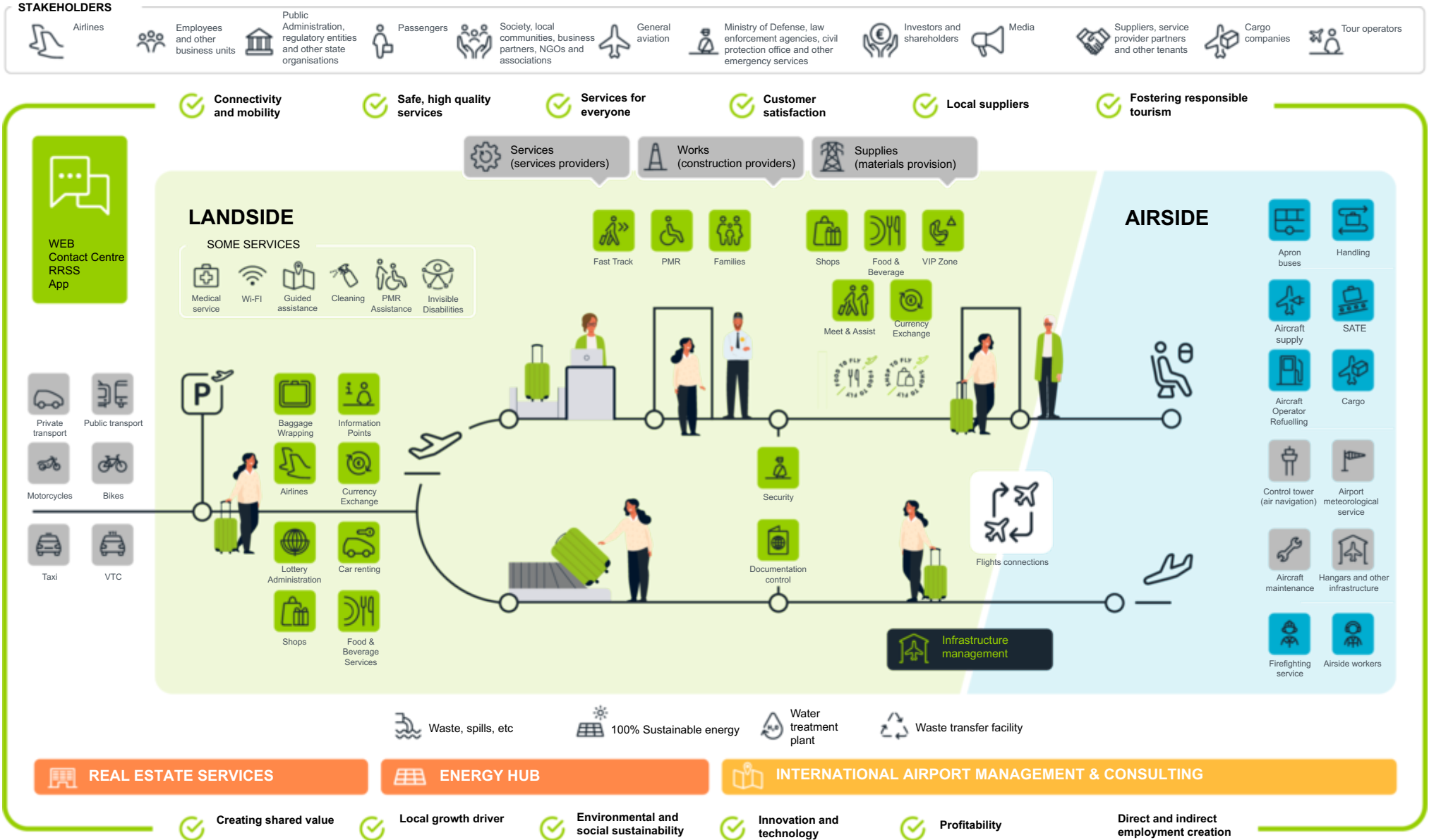
Furthermore, the Aena Group works closely with its main stakeholders to achieve the sustainability objectives reflected in its strategy, highlighting:

- Airlines and suppliers:** The Aena Group promotes sustainable practices throughout its value chain through alliances with airlines, handling agents, and commercial concessionaires, ensuring that environmental standards are applied consistently.
- Local communities:** The Aena Group maintains ongoing dialogue with communities near its airports. Measures include the implementation of projects that mitigate environmental impacts and promote social benefits for adjacent areas.

	ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
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The Aena Group value chain

The value chain of the Aena Group, as a leading airport manager, is composed of actors that enable high-quality airport services.





Aena Group Activities

The Aena Group's main activity is airport management, structuring its operations into the following segments:

- **Airport Segment:** Comprises aeronautical activity and the management of associated commercial spaces, where the Aena Group assumes the role of manager of the airport and its commercial areas, including car parks and VIP lounges.
- **Real Estate Services Segment:** Focuses on providing services related to the lease or transfer of use of land, office buildings, warehouses, hangars, and cargo facilities. These services are aimed at airlines, air-cargo operators, handling agents, and other airport service providers, facilitating the development of complementary and support services for the main activity.
- **SCAIRM Segment:** Includes operations carried out by *Aena Sociedad Concesionaria del Aeropuerto Internacional de la Región de Murcia S.M.E., S.A.*, which manages this key infrastructure.
- **International Segment:** This segment is managed by *Aena Desarrollo Internacional S.M.E., S.A. (Aena Internacional)*, which participates in the operation of 32 airports in different countries. *Aena Internacional* relies on the Aena Group's aeronautical experience and know-how to assume the functions derived from its participation in international businesses. Additionally, in the field of airport consulting, the subsidiary contributes as an expert in airport operations, participating in strategic international projects.

Value Chain Activities

The value chain activities are described below, identifying upstream and downstream suppliers:

Upstream

The Aena Group's value chain is made up of various types of suppliers that provide essential goods and services for the Company's operations. These are mainly classified into:

- **Construction works:** Suppliers related to the construction, improvement, expansion, and maintenance of airport terminals, roads, and other infrastructures.
- **Services:** Includes consultancies, technical maintenance, and other specialised services.
- **Supply:** Comprises both administrative and non-administrative products necessary for daily operations (e.g., energy supply, water, IT equipment, specific instrumentation, etc.).

The nature of relationships with suppliers varies according to the type of product or service offered, being established for the short, medium, or long term. Likewise, the geographical location of these actors depends on the country in which the various Aena Group companies operate.

Regarding input and supply chain management, the Aena Group has developed a structured approach to procure, develop, and ensure the necessary inputs for managing its operations. Procurement is carried out through contracting procedures governed by transparency, competitive bidding, and equal treatment (see details in [G1-2](#)). The identification of needs is linked to the investment, maintenance, and operational plans of the airport network.

Downstream

Downstream activities and services are aimed at end-users, which include both individuals and organisations. Among the main types of entities that interact at this stage are:

- **Operation of Aeronautical Activities:**
 - **Third-party operations on the landside:** Operations related to airline activities on the ground (handling), commercial activities, and security and control activities (passport and border control, FFCCSE security control, public and private entities, baggage delivery (SATE), fast lane, fast track, cleaning service, "Assistance without barriers" service).
 - **Third-party operations on the airside:** Operation of airlines within controlled airspace related to both passenger and cargo transport, landing and take-off, Air Traffic Control, apron control, meteorological services, handling activities (baggage, catering, cleaning), refuelling, FBOs, cargo, medical services, maintenance services for aircraft assistance facilities and gate operation, navigation and communication aid services, and wildlife control.
- **Operation of Non-Aeronautical Activities:** Commercial operations executed by third parties (shops, restaurants, duty-free shops, car rental, advertising, leases, etc.), currency exchange, VAT refund and other financial services, baggage wrapping machines, other vending machines, regulated services (pharmacies, tobacconists, lottery, etc.), supermarkets, passenger support services executed by the Aena Group (epidemiology control, etc.), complementary services (NGO solidarity stands, religious services, etc.), and waste management.



Synergies with the Value Chain

The value chain uses the Aena Group's products and services for physical mobility or to launch its own business. Similar to commercial relationships with suppliers, the nature of these relationships with downstream entities can be short, medium, or long term. Finally, it is worth noting that most downstream entities are located in the same jurisdictions where the Aena Group operates.

Regarding the business model results for stakeholders, the Aena Group's activities are aimed at generating sustainable value for its main stakeholders in the short, medium, and long term.

For customers, particularly passengers, the Aena Group currently provides extensive air connectivity with access to multiple national and international destinations. For them, as for airlines, it provides modern and efficient infrastructures that facilitate air operations, maintaining leadership in safety and operational efficiency, with enhanced commercial spaces and optimised services. All of this is supported by high standards of quality and operational safety. Looking ahead, infrastructure capacity is expected to be expanded through significant investments that will allow for the growth of commercial spaces and the continuous improvement of the passenger experience.

For investors, the Aena Group's business model currently generates sustained profitability, backed by a stable and attractive dividend policy for the sector. In the near future, sustainable growth aligned with the evolution of airport demand is expected, strengthening the Company's resilience against emerging climate and regulatory risks, and consolidating solid profitability margins with efficient debt control.

Local communities and society in general currently benefit from the generation of direct and indirect employment driven by the Aena Group, acting as a catalyst for the economy and tourism. Looking ahead, the commitment is oriented towards progressive decarbonisation with the aim of achieving net-zero emissions, promoting circular economy and sustainable mobility, bringing forward environmental objectives, and increasing airport environmental certifications.

Finally, for suppliers and commercial partners, the Aena Group currently maintains stable and long-term commercial relationships that generate significant business volume, with transparent bidding processes and long-term contracts. In the coming years, the integration of ESG criteria throughout the supply chain is expected to improve, collaboration in technological innovation and sustainability is to be strengthened, and business opportunities are expected to expand through the growth of international activity.

SBM-2: Interests and views of stakeholders

SBM-2 45 (a - d)

Proper management and effective communication with stakeholders are fundamental for the Aena Group to achieve its strategic objectives, generate long-term value, fulfil its social interest, and develop a responsible and sustainable business model. This relationship is based on the principles of transparency, dialogue, trust-building, and shared value creation.

The Airport Regulation Document (DORA) establishes the conditions that must be met at Aena Spain's network airports regarding quality, environment, capacity, and investment planning. This document, approved by the Government of Spain at the proposal of the Ministry of Transport and Sustainable Mobility, details the mandatory investments that Aena Spain must undertake, the capacity levels that must be ensured to meet air traffic demand, and the evolution of airport fees. It also sets minimum service quality standards, including aspects such as safety, punctuality, cleanliness, and passenger comfort.

In accordance with the regulatory framework, and similar to DORA 2017–2021, the preparation of **DORA II 2022–2026** has been the result of a consultation process with airlines and valuable contributions from the National Committee for Markets and Competition, the General Directorate of Economic Policy of the Ministry of Economic Affairs and Digital Transformation, and the State Air Safety Agency (AESAs). Likewise, its drafting has benefited from the contributions of the Airport Coordination Committees of the different territories, in which representatives of regional and local governments, the economic and social sectors of the regions, and other air-sector actors participate.

The Stakeholder Relations Policy aims to recognise the importance of stakeholder management as a key element to achieve social interest and develop a responsible and sustainable business model, and to establish the principles and guidelines for such management, understanding stakeholders as those groups that have the ability to influence the achievement of Aena's objectives or may be impacted by its activity. The approval and supervision of this Policy is the responsibility of the Board of Directors, while the monitoring and control of its application in processes is carried out by the Appointments, Remuneration and Corporate Governance Commission. Some of its guiding principles are:

- Building relationships based on responsibility, ethics, integrity, sustainable development, respect for human rights, and consideration for communities affected by its activities.
- Ensuring compliance with applicable legislation, acting with efficiency, transparency, and ethics, and aligning with its Anti-Bribery Policy.

- Facilitating clear and effective communication channels to ensure equitable access to information and participation, ensuring equal treatment and respect for the rights of its stakeholders.
- Maintaining open and collaborative relationships with authorities, regulatory bodies, and public administrations.
- Promoting dialogue with stakeholders, with special attention to local communities and the territories where it operates, considering their needs, expectations, and perspectives.
- Periodically evaluating relationship mechanisms to ensure they respond efficiently to current needs.
- Promoting the active participation of stakeholders in the business project, fostering the creation of shared value for all involved.
- Building robust, stable, and long-term relationships, based on co-responsibility, respect, and integrity.
- Promoting diversity in all its forms, with special attention to the professional development of its collaborators and members.

Furthermore, the Company ensures the participation of value-chain workers in the Policy through training and awareness-raising to improve their knowledge and understanding of the role they play in the organisation. In addition, it disseminates best practices and improvement opportunities derived from the Policy through communication channels and reporting tools, fostering the exchange of information and integrating their opinions into future updates.

The Aena Group organises its stakeholders into specific categories, which are subdivided into different groups and entities. For their correct identification, segmentation, and prioritisation, the Company uses various tools, among which the Integrated Quality, Environment, and Energy Efficiency Management System (SGI) stands out. This system allows Aena Group units and centres to analyse possible changes in the needs and expectations of stakeholders, as well as to periodically evaluate compliance with their requirements, with the aim of improving the services offered.

In the case of London Luton Airport, stakeholder management is materialised through close collaboration with the local council as the landowner and through the London Luton Airport Consultative Committee (LLACC), which meets quarterly according to local requirements. In addition, the Responsible Business Strategy, updated every three years, prioritises stakeholder opinions and material issues for the community. For specific issues such as noise, the Flight Operations team organises clinics, participation weeks, and direct meetings with stakeholders.

To ensure effective communication, the Aena Group has dialogue and communication mechanisms adapted to each stakeholder group. These mechanisms ensure fluid interaction that allows for the identification and understanding of their needs, expectations, and the most relevant issues.

Likewise, the Aena Group reinforces this system through the design and implementation of training and awareness actions aimed at employees, with a special focus on the areas most directly involved in stakeholder relations.

The Aena Group's stakeholder engagement process is structured through bidirectional tools and mechanisms that foster continuous dialogue, collaboration, and accountability. This approach not only strengthens the Aena Group's commitment to its stakeholders but also allows for the constant evaluation and improvement of the relationship and mutual trust.

Each Unit / airport in Spain, at the local level, analyses the following information:



Annual review

A periodic review of relevant information is carried out to assess and update the corresponding processes.

Stakeholders it engages with

Identification of the stakeholders with whom the Unit interacts directly.

Needs and expectations

Analysis of the needs and expectations of these stakeholders to ensure alignment with the Group's strategic objectives.

Applicable requirements

Verification and compliance with regulatory, legal and other applicable standards.

Monitoring, communication and review mechanisms

Implementation of tools and procedures that enable the monitoring, communication and review of actions undertaken.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

Among the Aena Group's stakeholders, the most relevant in relation to its activity are passengers and airlines. For both, Aena periodically analyses their needs and expectations in Spain through the Stakeholder Matrix, which allows for specific customer segmentation. For more information on communication channels to gather the interests and opinions of passengers and airlines, see [chapter S4](#).

Regarding stakeholder engagement, in the United Kingdom, it is important to highlight the work of London Luton Airport, which organises regular workshops for its suppliers. London Luton Airport has clear objectives and commitments to deliver a robust local supply chain that complements the airport's sustainability goals while contributing to the local economy. The main objective of these workshops is to set expectations and share best practices with potential suppliers from the local economy, thus facilitating continuous improvement and providing businesses with knowledge and information on how to work in the airport environment, while contributing to shared sustainability objectives in terms of environment and social value.

In addition to the aforementioned stakeholders, the Aena Group considers that social entities and non-governmental organisations play a strategic role in its stakeholder relations. Joint collaboration and the implementation of shared initiatives strengthen ties, foster a common understanding of expectations, and generate a greater positive impact on the Company. For more information on communication channels to gather the interests and opinions of social entities and non-governmental organisations, see [chapter S3](#).

Communication from the Aena Group with its stakeholders



Main stakeholders	Communication tools	Expectations or purpose
<p>Passengers (Low cost, seniors, business, family, leisure, etc.)</p>	<p>RQS Monitoring and Management, Periodic Analysis of ASQ Surveys, EMMA Surveys, Monitoring of Process Indicators, DORA Indicators, "RateNow" Devices, Environmental Assistance Office for Passengers</p>	<p>Absence of supervening costs Good quality/price ratio Excellence in service Commercial and food and beverage offer Efficiency, attention and friendliness of personnel</p>
<p>Airlines (Low cost and traditional)</p>	<p>Surveys to companies Direct contact/meetings Indicators associated with company processes Attendance to specialised forums and conferences User committee Work groups</p>	<p>Efficient and coordinated work procedures Quality of service Active collaboration Operational and analytic information of potential markets</p>
<p>Employees and other units</p>	<p>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</p>	<p>Acknowledgement Professional development Transparency and ethics Ease of providing ideas</p>
<p>Public administration, regulatory bodies and other bodies (ENAI, AEMET)</p>	<p>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</p>	<p>Interministerial Commission for Defence and Development Site-specific Meetings/Committees</p>




Common objectives

Main stakeholders	Communication tools	Expectations or purpose
Ministry of Defence, security forces and bodies, civil protection and other emergency services	Specialised Committee (Emergency, National for Safety, Drills, etc.) Meetings AESA and internal Audit Commissions Interministerial Commission for Defence and Development	Proactivity, Feedback
Society, Local Communities/ Nearby Companies/NGOs/ Associations	Specialised Committees (Emergency, National Security, Drills, etc.) AESA and Internal Audit Commission Interministerial Committee between the Ministry of Defence and the Ministry of Transport	Minimisation of the Environmental Impact of Airport Activities Sustainability Corporate Responsibility Cooperation Information Accessibility
Investors and Shareholders	Meetings General Shareholders' Meeting Public Information Communications to the CNMV Investor Relations Contact Channels	Transparency Good Reputation Innovation Corporate Social Responsibility
Communication media	Meetings Complaints, suggestions and compliments tracking and management Follow-up of news in the media	Transparency Regulatory compliance
Suppliers service-providing partners and other leaseholders, cargo companies, tour operators	Direct contacts and meetings with contractors, leaseholders, handling agents, User Committees, Complaints, suggestions and compliments management Indicators Follow-ups and analysis Work groups Analysis of results of the service rendered VIP room surveys, car parks and commercial services, companies Forums and conferences	Clear, Achievable and Stable Contractual Requirements Transparency Equal Treatment Agility in Processing Feasible Operating Rules or Requirements Stability
General Aviation	User committee Direct contact/meetings Work groups	Quality of Service Efficient and Coordinated Operating Procedures Extended Operating Hours for Night Flights Handling Service for Air Taxis Possibility of Non-Precision Instrument Operations



Common objectives

	ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
	E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
	S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

To ensure effective and bidirectional communication, the Aena Group provides its stakeholders with various communication channels, including its corporate website, the different portals that comprise it, and social media. These channels facilitate dialogue with stakeholders and reinforce transparency, a fundamental value for the Company, as it represents a key pillar in building credibility and trust. Furthermore, ensuring citizens' right to access public information is a priority for the Aena Group, reaffirming its commitment to open and accessible management.

The corporate intranet is configured as the main tool and document repository for all Aena Group employees. It provides staff with up-to-date Company information, both corporate and on topics of interest and utility for employees. In addition, it includes more than 30 thematic portals and direct access to sites of interest for the workforce. Across these portals, employees can find all the necessary tools for their work, as well as relevant information from all areas.

Likewise, throughout 2025, several campaigns related to strategic themes were carried out through this medium and other internal communication channels, including communication and leadership for personnel with direct reports, equality and diversity, data management within the Company, and regulatory compliance, among others.

In line with its purpose of continuous improvement, in 2025 the Aena Group continued to modernise the structure and content of the Public Website to offer all its stakeholders reliable, clear, and up-to-date information. The Company's website includes relevant content about its profile, strategy, and actions focused on environmental sustainability, as well as its commitment to society and the environment in which it operates. In addition, it addresses topics related to skills development and professional roles within the Company while providing specific resources for press professionals and offering detailed and structured information to meet the needs of various stakeholder groups from passengers and companions to shareholders, airlines, and suppliers.

The passenger portal provides essential data for planning a trip: flight information, parking reservations, transport, airport services (shops, restaurants, car rental, VIP services, accessibility and maps, luggage and control information, documentation and visa requirements affecting travel, and a specific section for travellers with special needs). In addition, users can purchase the VIP services available at airports: lounge access, Fast Lane and Fast Track service (preferential access to security control), and personalised Meet & Assist assistance, and they can explore and book options in the Aena Food to Fly, Shop to Fly, and Aena Travel marketplaces.

The shareholder and investor portal offers clear, transparent, and updated information on the evolution of the Aena Group's share, including quotation data, dividends, share capital, economic-financial reports, corporate governance, and strategic plans. Airlines, for their part, find information on potential routes, incentives, fees, and operational and commercial aspects in their dedicated portal, which allows them to evaluate opportunities to expand or consolidate their business model. The business opportunities portal details entrepreneurship initiatives and open tenders that the Aena Group offers to companies interested in operating at the airports.

At the corporate level, the website highlights the Company's main data, its structure, and its commitment to sustainability, transparency, and employment.

Citizens have a dedicated portal that allows the submission of claims, complaints, or suggestions regarding airport facilities, services, and the official and commercial entities operating at the airports. In addition, there are two specific portals for supplier contracting and commercial contracting, where the evolution of files and minor contracts can be consulted, with daily updates that guarantee transparency and communication of all relevant aspects of the Company.

Regarding digital accessibility, the Aena Group is committed to ensuring that the content of its website complies with Double A certification in line with the recommendations of the international WAI (Web Accessibility Initiative) group, part of the W3C (World Wide Web Consortium). This initiative seeks to avoid any form of digital discrimination that could generate social exclusion in the virtual environment. The Aena Group ensures that the techniques used on its portal comply with WAI guidelines regarding XHTML and CSS markup, although it acknowledges exceptions in aspects such as PDF documents, subtitling and audio description of videos, and the multimedia player used.

SBM- 3: Material impacts, risks and opportunities and their interaction with strategy and business model

SBM-3 48 (a - g)

The Aena Group recognises the relevance of the material impacts, risks, and opportunities identified throughout its operations and value chain, considering them essential drivers for ensuring a resilient business model aligned with the principles of sustainable development. These impacts, risks, and opportunities are the result of the double materiality assessment carried out by the Aena Group, whose methodology and results are detailed in sections [IRO-1](#) and [IRO-2](#) of this report. Through the Strategic Plan, sustainability strategies, and Climate Action Plans for each of the three regions, concrete objectives, key indicators, and policies have been established to limit and reduce negative impacts, manage the most critical risks, and leverage the opportunities arising from the constantly transforming global environment. This strategic approach integrates a comprehensive analysis that covers both the Group's own operations and the upstream and downstream phases of its value chain, involving suppliers, collaborators, and local communities.



ESRS 2: General disclosures

E4: Biodiversity and ecosystems

S3: Affected communities

E1: Climate change

E5: Resource use and circular economy

S4: Consumers and end-users

E2: Pollution

S1: Own workforce

G1: Business conduct

E3: Water and marine resources

S2: Workers in the value chain

Act 11/2018

In the field of climate change, the scientific community, through organisations such as the IPCC, among others, warns that temperatures will become increasingly extreme and meteorological events will increase in frequency and intensity, which could raise operational costs and affect airport infrastructure. This requires adaptation measures to continue guaranteeing the continuity of airport operations. However, climate change also presents opportunities, among which the implementation of photovoltaic energy projects, the progressive electrification of operations, and the distribution of Sustainable Aviation Fuels (SAF) stand out. These actions not only mitigate risks associated with climate change but also increase energy efficiency, reduce dependence on fossil fuels, and consolidate the Aena Group as a benchmark in sustainability.

Regarding pollution, negative impacts associated with emissions generated by both the Aena Group's operations and its value chain are identified. Likewise, noise pollution derived from these activities affects nearby communities, thus becoming another material issue. Faced with these challenges, the Company has implemented measures to optimise its processes and adopted clean technologies to reduce emissions and mitigate their negative impacts. These initiatives not only foster a more harmonious coexistence with local communities but also reinforce the Aena Group's reputation and its commitment to a sustainable environment.

In relation to water resources, the Aena Group has identified water consumption in airport and value-chain activities as a material impact. Closely linked to the climate emergency, this impact has been integrated into the Group's strategic and sustainability plans, with specific objectives and performance indicators established for water management, in line with Aena's commitment to protecting natural resources and enhancing the resilience of its operations to current and future environmental challenges.

Regarding impacts related to biodiversity, these are mainly generated by aeronautical operations. Infrastructure expansion and construction activities, ground operations, airport lighting, as well as aircraft take-offs and landings, are key sources of impacts affecting biodiversity. Aware of this, the Company has adopted an active approach to mitigate their effects, implementing conservation and mitigation measures with the aim of preserving biodiversity. These actions reinforce the Aena Group's environmental responsibility and promote a more harmonious integration of its activities with the natural environment.

Within the context of circular economy, the responsible management of waste generated by both its own operations and the value chain stands out. The Aena Group demonstrates its commitment through selective collection systems, waste valorisation, the incorporation of recycled materials in infrastructures, and collaboration with suppliers to promote circular economy models across the supply chain. These measures not only minimise environmental impact but also optimise costs and generate added value for the Company and its stakeholders.

In the field of human and labour rights, the Company has promoted initiatives aimed at guaranteeing decent working conditions, promoting equal opportunities, and fostering an inclusive and safe environment, thus responding to the expectations of its employees and collaborators and reinforcing its commitment to human rights.

With regard to affected groups, the influence of the Group's operations on local communities has been considered a significant impact, particularly in terms of job creation and socioeconomic development in areas close to airport infrastructures. The Group's approach prioritises active collaboration, transparency, and solutions that balance airport development with the protection of the rights and expectations of local stakeholders.

In relation to consumers and end-users, the Aena Group has identified significant opportunities in technological innovation and the improvement of service accessibility in areas such as access to information, service quality, and personal safety. The adoption of digital solutions and process optimisation improves the customer experience, offering more efficient services and strengthening the trust and satisfaction of the users who depend on the infrastructures managed by the Aena Group.

Regarding business conduct, the Aena Group has identified the adoption of responsible practices in supplier contracting and the promotion of corporate ethics focused on regulatory compliance as positive material impacts, thus seeking to prevent conduct that could harm the Company's reputation and trust. From a financial perspective, the material risk identified has been the strong dependence on external suppliers for certain services. These material aspects are addressed through specific policies and procedures on ethics, compliance, and good governance, as well as through training and awareness actions aimed at employees and collaborators.

All these identified impacts, risks, and opportunities are integrated into the Aena Group's strategy. To address them, the strategy includes energy transition, through the electrification of operations and the adoption of sustainable fuels; process optimisation through clean technologies; improved environmental management and active biodiversity protection; and the digitalisation of services to ensure operational quality and customer experience. The identification of these IROs has driven concrete adaptations in the business model, including investments in photovoltaic infrastructure, electrification of ground-handling equipment, and agreements for SAF distribution. Likewise, the Investment Plan reflects this strategic reorientation, allocating specific resources to projects on energy efficiency, climate adaptation, and digitalisation.

These strategies are developed with a clear temporal focus to address each challenge. In the short term, actions focus on implementing immediate measures to reduce emissions and continue ensuring compliance with environmental regulations. In the medium term, the Company advances in technological transformation and the progressive electrification of its operations. One of the most ambitious objectives is to achieve Net Zero carbon by 2030 in Spain, consolidating a sustainable, resilient, and people and environment-respectful operating model. The Aena Group's involvement in these aspects materialises both through its own activities, where direct environmental and social impacts are generated, and indirectly through its commercial relationships with suppliers and collaborators throughout the value chain.



ESRS 2: General disclosures

E4: Biodiversity and ecosystems

S3: Affected communities

E1: Climate change

E5: Resource use and circular economy

S4: Consumers and end-users

E2: Pollution

S1: Own workforce

G1: Business conduct

E3: Water and marine resources

S2: Workers in the value chain

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Furthermore, through continuous analysis of its impacts, risks, and opportunities, the Aena Group guarantees its ability to anticipate and adapt to a constantly changing environment. The effective identification and management of impacts, risks, and opportunities not only minimises negative effects but also allows the Company to leverage opportunities arising from innovation, sustainability, and technological transformation. In this way, the Aena Group consolidates a competitive, responsible business model aligned with global expectations for sustainable development and the needs of its stakeholders, actively contributing to a more balanced and prosperous future.

In the current financial year, the Aena Group's material risks and opportunities have been such that their impact on the Company's financial situation and performance is considered minimal. The evaluation of these factors suggests that no significant changes have been perceived in the values of assets and liabilities in the financial statements for the current year.

This stability allows the Aena Group to operate with confidence, focusing on the implementation of its Sustainability Strategy and the continuous improvement of its processes, without the concern of relevant adjustments that could affect its financial performance. Its forecast for the next year is considered similar to the current one.

Regarding the 2025 financial year, the methodology used for the identification and management of impacts, risks, and opportunities continued in line with the standards established by the ESRS. Therefore, the results obtained have been similar to the previous year, with no significant changes recorded.

Through an initial resilience analysis, the Aena Group works to strengthen its capacity for anticipation and adaptation in a changing environment. This exercise allows progress in the identification and management of impacts, risks, and opportunities, in order to minimise possible negative effects and leverage opportunities arising from innovation, sustainability, and technological transformation. In this way, the Aena Group continues to promote a competitive and responsible business model, aligned with global expectations for sustainable development and the needs of its stakeholders. For more information, see [sections E1-SBM-3](#).

The Aena Group has an integrated set of ISO-certified management systems that structure and regulate its operations in key aspects such as quality, environment, safety, and energy efficiency. These standardised systems allow for process standardisation, ensuring compliance with legal requirements and voluntary commitments, and promoting continuous improvement in airport management.



Management Instruments

<p>Environment (ISO 14001)</p>	<p>It addresses the most significant environmental aspects linked to airport activity, including: acoustic emissions, air pollution, greenhouse gas emissions, water consumption, energy consumption, hazardous and non-hazardous waste, discharges, soil contamination, and environmental control of suppliers. This certification covers 100% of the Aena Group's activity. Within the framework of the system, and through periodic sample audits carried out at the centres, continuous improvement of the environmental performance of the activity is ensured.</p>	<p>Certificates: central services and airports in Spain and the United Kingdom. In 2025, the second surveillance audit was successfully passed, following the renewal in 2023. In the network of airports operated by the Aena Brasil subsidiaries, the Integrated Management System is in the process of being implemented, with certification expected between 2025–2026.</p>
<p>Quality (ISO 9001)</p>	<p>It is an international standard based on process management and control requirements, aimed at achieving continuous improvement by focusing on the identification and definition of the Company's processes as a decisive activity for effective performance. Within the framework of the system, and through periodic sample audits carried out at the centres, continuous improvement of process quality is ensured, thus meeting the needs and expectations of customers.</p>	<p>Certificates: central services and airports in Spain. In 2025, the second surveillance audit was successfully passed, following the renewal in 2023. In the network of airports operated by the Aena Brasil subsidiary, the Integrated Management System is in the process of being implemented, with certification expected between 2025–2026.</p>
<p>Environmental Management and Audit Scheme (EMAS) Regulation</p>	<p>It defines an environmental management and audit scheme, based on the ISO 14001 standard, and proposes an effective systematic approach to help organisations manage and continuously improve their environmental performance. EMAS includes its own specific requirements that make it a model of excellence for environmental management.</p>	<p>Menorca Airport and Tenerife South Airport, with the date of the latest validation in 2025.</p>
<p>Energy Efficiency (ISO 50001)</p>	<p>It is an international energy management system standard that provides a tool to systematically optimise energy performance and promote more efficient energy management.</p>	<p>In 2025, the second surveillance audit was successfully passed:</p> <ul style="list-style-type: none"> • Reus Airport. • Valladolid Airport. • SATE Adolfo Suárez Madrid-Barajas Airport. • Zaragoza Airport. • London Luton Airport. • Menorca Airport. • Valencia Airport.



Management Instruments

Airport Carbon Accreditation

Airport Carbon Accreditation is the only global, institutionally endorsed carbon management certification programme for airports. It independently evaluates and recognises the efforts of airports to manage and reduce their carbon emissions through seven certification levels: Level 1, Level 2, Level 3, Level 3+, Level 4, Level 4+, and Level 5. Through its seven certification levels, the programme acknowledges that airports are at different stages on their journey towards comprehensive carbon management.

Spain:

- Adolfo Suárez Madrid-Barajas Airport.
- Alicante–Elche Miguel Hernández Airport (Level 3).
- Josep Tarradellas Barcelona–El Prat Airport (Level 4).
- Bilbao Airport (Level 1).
- El Hierro Airport (Level 1).
- Fuerteventura Airport (Level 1).
- Gran Canaria Airport (Level 1).
- Ibiza Airport (Level 3).
- César Manrique–Lanzarote Airport (Level 2).
- La Gomera Airport (Level 1).
- La Palma Airport (Level 1).
- Málaga–Costa del Sol Airport (Level 3).
- Menorca Airport (Level 3).
- Palma de Mallorca Airport (Level 4).
- Santiago–Rosalia de Castro Airport (Level 1).
- Seville Airport (Level 1).
- Tenerife North–City of La Laguna Airport (Level 1).
- Tenerife South Airport (Level 1).
- Valencia Airport (Level 1).

United Kingdom:

- London Luton Airport (Level 4).

Brazil:

- Orlando Bezerra de Menezes–Juazeiro do Norte Airport (Level 1).
- Presidente Castro Pinto–João Pessoa Airport (Level 1).
- Presidente João Suassuna–Campina Grande Airport (Level 1).
- Recife International Airport (Level 1).
- Santa Maria International Airport–Aracaju (Level 1).
- Zumbi dos Palmares International Airport–Maceió (Level 1).

ISO 20906 Standard

A specific standard for monitoring acoustic impact through the Noise Monitoring and Flight Track Systems at airports. Obtaining this accreditation represents a further step towards ensuring the quality of the data publicly provided by the Aena Group. The Aena Group was the first airport operator in the world to make noise data accredited in accordance with ISO 20906 available at its most relevant Spanish airports. Currently, the Noise Monitoring Systems of several airports are accredited.

- Adolfo Suárez Madrid-Barajas Airport.
- Alicante-Elche Airport.
- Bilbao Airport.
- César Manrique-Lanzarote Airport.
- Gran Canaria Airport.
- Ibiza Airport.
- Barcelona-El Prat Josep Tarradellas Airport.
- Málaga-Costa del Sol Airport.
- Palma de Mallorca Airport.
- Sevilla Airport.
- Tenerife Norte-Ciudad de La Laguna Airport.
- Tenerife Sur Airport.
- Valencia Airport.



4. Impact, risk and opportunity management

IRO-1: Description of the processes to identify and assess material impacts, risks and opportunities

IRO-1 53 (a - h)

Double Materiality Assessment

Description of processes for identifying and assessing material impacts, risks, and opportunities

In 2024, the Aena Group carried out a double materiality exercise with the aim of identifying, assessing, prioritizing, and determining the materiality of potential and actual, positive and negative impacts, as well as the risks and opportunities that, in turn, could have a financial effect on the Company, in the short, medium, and long term, related to people and the environment. This process has been updated during the 2025 financial year.

The Aena Group's double materiality assessment follows a systematic approach, in accordance with the requirements of ESRS 1, ESRS 2, SBM-2, and SBM-3 standards and EFRAG's "Implementation Guidance Materiality Assessment," taking into consideration the Company's activities, the implications of its upstream and downstream value chain, the geographical scope in which it operates (Spain, Brazil, and the United Kingdom - Luton), as well as ESG commitments, objectives, and performance. The analysis includes the companies within the consolidation scope of this Sustainability Report (see [ESRS 2-BP-1](#)).

This exercise has been carried out mainly in four phases:

1. **Contextualization.** In this first phase, the Company's value chain has been conceptualized, analysing the key activities along it, both its own activities or operations and those of the upstream and downstream value chain.

Likewise, critical customers and suppliers, the applicable regulatory environment, key assets, and the location of relevant operations have been identified and analysed. In addition, the main stakeholders of the Aena Group, both affected parties and report users, as well as communication mechanisms, have been analysed, with the aim of identifying their perspectives. This information is presented in greater detail in the ["Stakeholder Interest and opinions"](#).

Furthermore, meetings have been held with the Group's corporate and business areas in Spain, Brazil, and the United Kingdom - Luton, and various sources of information have been analysed, both internal (including strategy, previous sustainability reports, different policies, impacts, complaints and claims received from consumers and end-users, among others), as well as external information (including an analysis of peers, technical documents such as the ["Libro blanco del I+D+i para la sostenibilidad de la aviación en España"](#) from the State Aviation Safety Agency (AESAs); and reference standards such as *The Task Force on Climate-Related Financial Disclosures* (TCFD), *Carbon Disclosure Project* (CDP), and *The Taskforce on Nature-related Financial Disclosures* (TNFD), among others, as well as the regulatory environment.

2. **Identification.** The objective of this phase was to identify, on the one hand, actual and potential impacts of the Aena Group on the environment and society, derived from its own operations and throughout its value chain, and on the other hand, environmental, social, and governance risks and opportunities that could have a material financial effect on the Company, in the short, medium, and long term.

In this stage, the connections between the Aena Group's impacts and its value chain and the dependencies on natural, human, and social resources with the risks and opportunities that may arise from these impacts and dependencies have been examined. This analysis has incorporated an approach that distinguishes between gross impacts, considered in the absence of mitigation or remediation measures, and residual impacts that occur after the application of such measures, with the aim of reflecting the Group's actual exposure before any corrective action.

For the identification of impacts, risks, and opportunities (IROs), the results of the contextualization stage, the list of topics, sub-topics, and sub-sub-topics defined in ESRS 1, AR 16, and interviews with the corporate areas mentioned in the previous phase were taken as a starting point. Additionally, 18 stakeholder groups were consulted to complement the Company's impacts and represent the most relevant links in the Aena Group's value chain, including individual interviews and group sessions.

The impacts, risks, and opportunities (IROs) have been linked to the topics defined in ESRS 1, AR 16 "Sustainability matters to be included in the materiality assessment". The Aena Group's specific IROs have also been integrated into these topics: thus, IROs related to noise have been addressed in the topics associated with "Noise pollution" because, although the main effects caused by noise levels may be generated in communities adjacent to airports, noise pollution is environmental in nature, so its impacts fall within ["ESRS E2 - Pollution"](#).



The link between impacts, risks, and opportunities has been established by analysing which risks or opportunities derive from each identified impact. For example, the impact “Effect on surrounding communities due to acoustic impact” is related to the risk “Increased costs, reputational damage, and loss of revenue due to acoustic impact”. This analysis has been carried out systematically throughout the IRO identification process.

- Assessment.** In this phase, an evaluation of the IROs identified in the previous phase was carried out, following the methodology described below regarding the assessment of impact materiality and financial materiality, taking into account the temporal horizons analysed in the short term (1 year), medium term (1 to 5 years), and long term (more than 5 years):

Impact Materiality:

The corporate areas and business units in Spain, Brazil, and the United Kingdom (Luton) evaluated the impacts identified in the previous phase, by assessing:

- The magnitude, scope, and irremediable nature, for actual negative impacts.
- The magnitude and scope for actual positive impacts.

For potential impacts, both positive and negative, in addition to the above, the probability of occurrence has been evaluated. In cases where a potential negative impact is related to human rights, the severity assessment prevails over the probability of occurrence, provided the former is greater.

Furthermore, various representatives of the Company's stakeholder groups were involved in the impact materiality assessment, who evaluated the overall impact through interviews.

For the selection of scales and the valuation methodology itself, the Aena Group's human rights and environmental due diligence procedure was taken as a starting point. To determine severity, three scales were used: one for magnitude, one for scope, and one for irremediable nature (for negative impacts), each quantitatively rated from 1 to 5 based on quantitative and/or qualitative information (a qualitative description is assigned to each numerical range). These scales have been specifically defined for social, environmental, and governance impacts, establishing clear and quantitative definitions for magnitude, scope, and, where appropriate, irremediable nature in each case. Probability has been measured quantitatively, with a score from 1 to 5, based on qualitative and/or quantitative information. Once the corresponding scores were obtained, they were compared with the established threshold, which was set at 3, allowing for the determination of whether the impacts are considered material or not.

Financial Materiality:

For the analysis of financial materiality, the potential financial effect and the probability of occurrence of the risks and opportunities identified in the previous stage were internally evaluated, based on the conclusions of the Company's risk map and the results of the climate risk analysis. Risks and opportunities were evaluated through interviews by both corporate areas and business units in Spain, Brazil, and the United Kingdom - Luton, considering the particularities of each.

The process for identifying, evaluating, and managing risks and opportunities is based on the Aena Group's general risk management process. In this context, and in line with the CSRD, priority attention is given to sustainability-related risks. This consideration is reflected in the integration of these risks into the risk matrix and strategic decision-making processes, ensuring that ESG risks are addressed preferentially when they may generate significant effects in the short, medium, or long term (in the case of risks and opportunities related to climate change, scenarios and time horizons are detailed in chapter ESRS E1).

In this regard, the scales for assessing the potential financial effect are quantitative, based on quantitative and/or qualitative information, and the probability scale is the same as that used to evaluate impact materiality, both being rated on a scale of 1 to 5. With these valuations, the materiality level of risks and opportunities was obtained by applying the threshold, which was set at 3, as in impact materiality.

The determination of impact and financial materiality thresholds was based on an exhaustive review of the results. During this stage, it was ensured that all topics considered material were included, based on the expert judgment of the participants in the double materiality process, while those considered non-material were discarded.

- Determination.** In this phase, thresholds were defined to determine whether an impact, risk, or opportunity is material, as follows:

- In the case of impacts, the results of the evaluations were taken into consideration, where an impact could be sufficiently significant, according to the evaluation scales, magnitude, scope, and irremediable nature, and probability of occurrence. This implies that if the combination of severity and probability in the rating of an impact is significant, it is considered material.
- For potential financial effects, the thresholds defined by the Aena Group's general risk system were used as a basis. That is, if the combination of the financial effect and the probability in the rating of the risk or opportunity is significant, in accordance with the Company's corporate risks, it is considered material.



Thus, matters for which IROs have been identified and evaluated that exceed the established materiality threshold in any of the three temporal horizons analysed are considered material. During the double materiality assessment, some IROs were identified and evaluated separately for each phase of the value chain. However, to simplify their presentation in the report, these IROs are disclosed in an aggregated manner.

The results of the process were validated by the corporate area directorates and have been reviewed by the Executive Management Committee, the joint Sustainability and Audit Commission, and subsequently validated by the Aena Group's Board of Directors. This process seeks to ensure that decisions related to sustainability and materiality are ratified at the highest levels of the Company.

During the 2025 financial year, the double materiality assessment has been updated to reflect changes in the evaluation and consolidation of impacts, risks, and opportunities (IROs), in line with the regulatory and operational context. Key adjustments include:

- Review of evaluations for certain IROs, considering the evolution of the context and the perception of stakeholders.
- Consolidation of IROs in social areas (e.g., working conditions and equality) to improve methodological coherence.
- Inclusion of new IROs related to emerging risks, such as climate transition, cybersecurity, and personal safety.
- Adjustments in the naming of some sub-topics for greater clarity and alignment with ESRS standards.

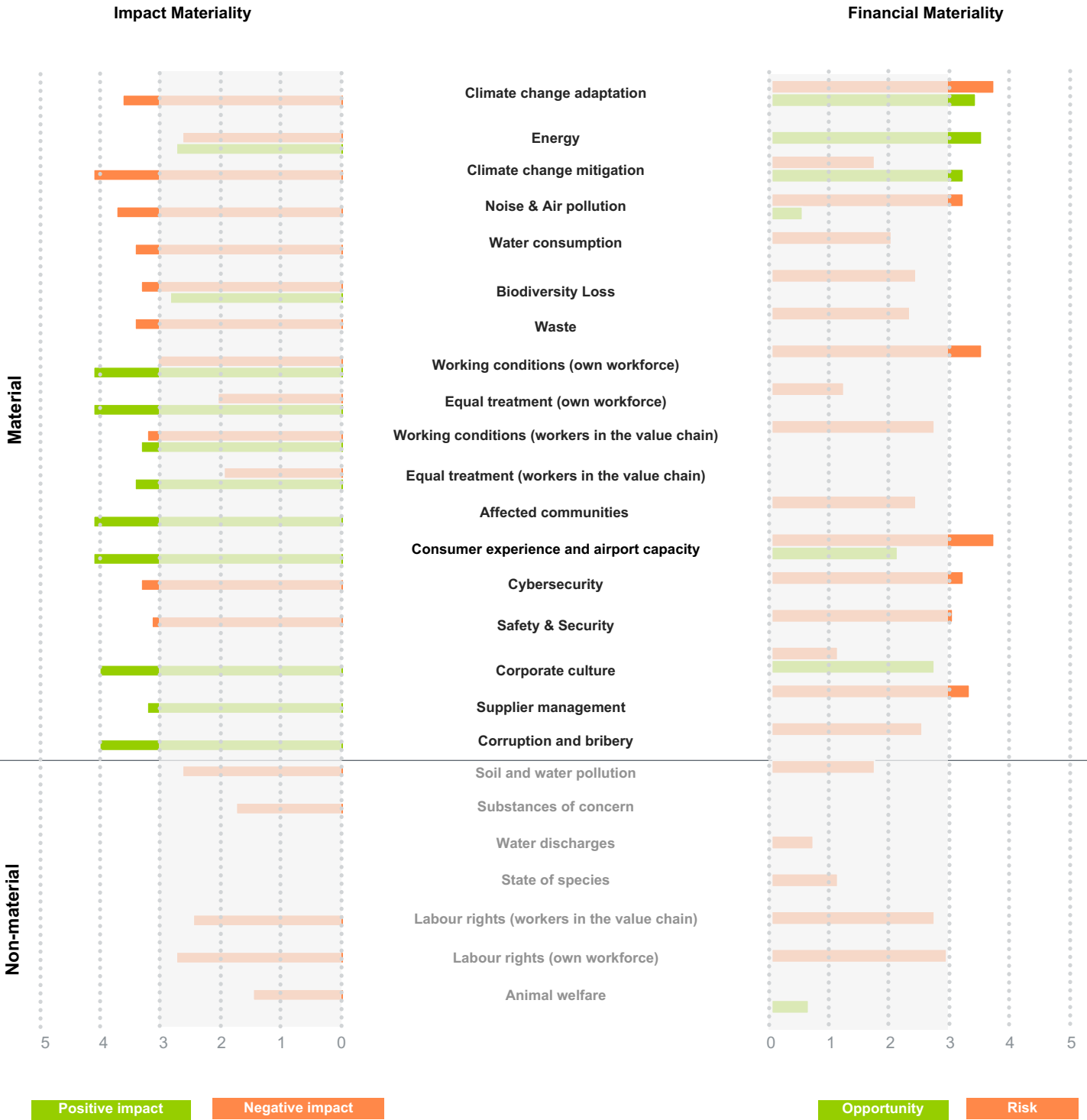
Internal control procedures include periodic review of the results of the double materiality assessment, review of thresholds, as well as validation by corporate areas and business units.

The double materiality assessment process is updated annually, allowing the Aena Group to adapt to changes in the operational and regulatory context, seeking to ensure the relevance and accuracy of its management and disclosure of sustainability aspects. Furthermore, this double materiality assessment is integrated into the Aena Group's Enterprise Risk Management (ERM), which ensures that identified risks and opportunities are incorporated into the corporate risk map and managed according to the Risk Control System, with assigned responsibilities and monitoring in internal committees.

The Aena Group has specific metrics, actions, policies, and objectives to address the identified material aspects. This information is included in greater detail within the different chapters (ESRS) of this Sustainability Report. With these, the aim is to limit and reduce negative impacts, manage risks, and leverage opportunities to foster positive outcomes for both the environment and society.



Double Materiality Matrix





Material Impacts, Risks, and Opportunities

As a result of the process described above, the Aena Group has determined the following material impacts, risks, and opportunities:

Impact Materiality

Topic	Sub-topic	Description	Location in the value chain	Negative / Positive	Actual / Potential	Time Horizon
Climate change	Climate change adaptation	Operational disruption due to extreme weather events with impact on own activities, value chain, and end-users	Entire value chain	Negative	Potential	Short term / Medium term / Long term
	Climate change mitigation	Direct and indirect greenhouse gas emissions (Scope 1, 2, and 3) generated by the Aena Group and its value chain	Entire value chain	Negative	Actual	Short term / Medium term / Long term
Pollution	Pollution of air	Impact on air quality due to the emission of polluting substances (PM, SOx...) generated by the Aena Group and the value chain	Own operations and downstream value chain	Negative	Actual	Short term / Medium term / Long term
		Impact on surrounding communities due to noise	Downstream value chain	Negative	Actual	Short term / Medium term / Long term
Water and marine resources	Water	Reduced water availability due to own activities and those of the value chain	Entire value chain	Negative	Actual	Short term / Medium term / Long term
Biodiversity and ecosystems	Factors of direct incidence on biodiversity loss	Impact on fauna, especially protected and/or threatened species	Entire value chain	Negative	Actual	Short term / Medium term / Long term
Resource use and circular economy	Waste	Generation of different types of waste by own operations and the value chain	Entire value chain	Negative	Actual	Short term / Medium term / Long term
Own Workforce	Working conditions	Promotion of a respectful and dignified work environment and work-life balance for employees	Own operations	Positive	Actual	Short term / Medium term / Long term
		Promotion of fair and equitable remuneration, freedom of association, trade union rights, and collective bargaining	Own operations	Positive	Actual	Short term / Medium term / Long term
		Impact on the safety and health of Aena workers due to working conditions (stress, extreme weather conditions - heat stress, commuting to and from work, constant exposure to traffic routes, etc.)	Own operations	Negative	Potential	Short term / Medium term / Long term
	Equal treatment opportunities for all	Promotion of equal opportunities, inclusion, diversity, merit, and capacity for the professional development of employees	Own operations	Positive	Actual	Short term / Medium term / Long term



ESRS 2: General disclosures

E1: Climate change

E2: Pollution

E3: Water and marine resources

E4: Biodiversity and ecosystems

E5: Resource use and circular economy

S1: Own workforce

S2: Workers in the value chain

S3: Affected communities

S4: Consumers and end-users

G1: Business conduct

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Topic	Sub-topic	Description	Location in the value chain	Negative / Positive	Actual / Potential	Time Horizon
Workers in the Value Chain	Working conditions	Contribution to the generation of decent and respectful employment and generation of fair contracting conditions for workers in the value chain.	Upstream and downstream value chain	Positive	Actual	Short term / Medium term / Long term
		Impact on the safety and health of value chain workers due to working conditions (stress, extreme weather conditions - heat stress, commuting to and from work, constant exposure to traffic routes, etc.)	Upstream and downstream value chain	Negative	Potential	Short term / Medium term / Long term
	Equal treatment and opportunities for all	Equal opportunities and inclusion for value chain workers	Upstream and downstream value chain	Positive	Actual	Short term / Medium term / Long term
Affected Communities	Economic, social, and cultural rights of groups	Contribution to economic growth, job creation, development, and mobility of local communities where the Aena Group operates	Entire value chain	Positive	Actual	Short term / Medium term / Long term
Consumers and End-Users	Impacts related to information	Availability of communication channels for open and constructive dialogue with stakeholders	Own operations	Positive	Actual	Short term / Medium term / Long term
	Social inclusion of consumers or end-users	Improvement of customer experience through agile, efficient, and innovative service using Artificial Intelligence tools	Own operations	Positive	Actual	Short term / Medium term / Long term
		Accessible, inclusive, and quality service for people with functional diversity, PRMs, etc	Downstream value chain	Positive	Actual	Short term / Medium term / Long term
		Improvement of customer experience due to the implementation of efficiency measures and increased airport capacity	Own operations	Positive	Actual	Short term / Medium term / Long term
		Impact on operations due to interruption of systems or technological platforms	Entire value chain	Negative	Actual	Short term / Medium term / Long term
Personal safety of consumers or end-users	Impact on people due to an aeronautical accident or acts of unlawful interference (attacks)	Entire value chain	Negative	Potential	Short term / Medium term / Long term	
Business Conduct	Management of supplier relationships, including payment practices	Ethical practices in supplier contracting	Own operations	Positive	Actual	Short term / Medium term / Long term
	Corporate culture Corruption and bribery	Promotion of business ethics and regulatory compliance	Own operations	Positive	Actual	Short term / Medium term / Long term



Financial materiality (Risk & Opportunities)

Topic	Sub-Topic	Description	Location in the value chain	Risk/ Opportunity	Time Horizon
Climate change	Climate change adaptation	Increased passenger numbers at different times of the year, due to seasonal changes	Entire value chain	Opportunity	Long term
		Operational disruption and infrastructure damage due to weather events associated with climate change (heat waves, extreme rainfall, droughts, etc.)	Own operations	Risk	Short term / Medium term / Long term
		Climate transition (regulatory, technological, market, and reputational changes)	Entire value chain	Risk	Short term / Medium term / Long term
	Climate change mitigation	New services for the distribution of sustainable fuels (hydrogen, SAF, etc.)	Upstream value chain and own operations	Opportunity	Long term
	Energy	Implementation of energy efficiency measures (more efficient airport buildings...)	Own operations	Opportunity	Short term
		Generation of electricity from renewable sources through the implementation of its photovoltaic plan	Own operations	Opportunity	Medium term / Long term
Pollution	Pollution of air	Increased costs, reputational damage, and loss of income due to noise impact	Own operations	Risk	Short term / Medium term / Long term
Own Workforce	Working conditions	Limitations in planning and managing recruitment for the incorporation and training of new personnel	Own operations	Risk	Short term / Medium term / Long term
Consumers and End-Users	Social inclusion of consumers or end-users	Service interruption or decrease in operational capacity or data breaches due to cyberattacks	Own operations	Risk	Medium term / Long term
		Occurrence of an air incident/accident or an act of unlawful interference	Downstream value chain	Risk	Short term / Medium term / Long term
	Personal safety of consumers or end-users	Impact on operations and customer experience due to the execution of planned investments	Own operations	Risk	Medium term / Long term
Business Conduct	Management of supplier relationships, including payment practices	Dependence on services provided by third parties	Upstream and downstream value chain	Risk	Short term / Medium term / Long term



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E1: Climate change

E2: Pollution

E3: Water and marine resources

E4: Biodiversity and ecosystems

E5: Resource use and circular economy

S1: Own workforce

S2: Workers in the value chain

S3: Affected communities

S4: Consumers and end-users

G1: Business conduct

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2. ESRS 2. Environmental Information

Taxonomy

- Taxonomy of sustainable finances

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- E1-6: Gross Scopes 1, 2, 3 and Total GHG emissions
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ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

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ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

Taxonomy of sustainable finances

Introduction

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

In order to develop and specify the information to be published regarding the taxonomy of Article 8, the Commission adopted in July 2021 Delegated Regulation (EU) 2021/2178, which was modified by Delegated Regulation (EU) 2023/2486, published in June 2023. In its Article 5, the modifications made to allow non-financial companies to disclose key performance indicators, as well as any accompanying information in accordance with Annex V, which shows the modifications made in Annexes I and II of Delegated Regulation (EU) 2021/2178 regarding the disclosure of taxonomy-eligible activities, are detailed.

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

The information on the key performance indicators of results is reported in the new tables included in Delegated Regulation (EU) 2026/73 (applicable from January 1, 2026) which modifies Delegated Regulations (EU) 2021/2178, 2021/2139 and 2023/2486 and which, among others, simplifies the content and the presentation of the information that must be disclosed about environmentally sustainable activities.

In accordance with the disclosure requirements of Article 8 of Delegated Regulation (EU) 2021/2178, the Aena Group confirms that it does not carry out, finance, or have exposure to activities related to nuclear energy and fossil gas.

Accounting policy

This section explains how turnover, capital expenditure and operating expenditure have been determined and allocated to the numerator and the basis on which turnover, capital expenditure and operating expenditure have been calculated including, if applicable, any analysis in the allocation of revenues or expenditures to different economic activities.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
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	Turnover	CapEx	OpEx
Processing of financial information for calculation of eligibility and alignment percentages	<p>Obtaining the information based on the extraction of revenue from the accounting system classified by the code of each airport and the economic activity to which said revenue belonged. The corresponding average exchange rate with the various currencies has been applied, to convert the figures to euros.</p>	<p>Information is obtained from the registration of tangible and intangible assets in the investment system. The corresponding average exchange rate has been applied to the different currencies to convert the figures to euros. The extraction includes the investment code, associated airport, description of the investment, and the amount of asset registrations during the fiscal year.</p> <p>Additionally, Aena has a CapEx plan for the 2022-26 horizon related to Aena's regulated business. This Plan is governed by the Airport Regulation Document (DORA II) approved by the Council of Ministers on September 28, 2021, in compliance with Law 18/2014, and regulates basic airport services: those provided to aircraft and passengers.</p> <p>Furthermore, planned investments are reviewed annually, and actions may be adjusted based on the new needs of each airport, as approved by Aena's Executive Management Committee (EMC).</p> <p>The data provided is based on actual execution and not on planning, so there may be some variation with respect to what is established in the DORA.</p> <p>Regarding investments derived from non-regulated business, these are approved by the EMC.</p>	<p>The information is obtained from the operating expenses (considered in the taxonomy) of the accounting system, corresponding to the items of the airports. The corresponding average exchange rate has been applied with the different currencies, to convert the figures to euros. The items of expenses included are as follows:</p> <ul style="list-style-type: none"> a. Building renovation measures b. Short-term leases c. Maintenance and repairs. d. Non-capitalized R&D investments <p>Since extraction allows for the OpEx to be identified by airport, but does not allow for the same division by taxonomic activity, the answer to question 30 of the EU Taxonomy FAQs issued by the European Commission on 19 December 2022 has been considered, which indicates that "reporting entities should use a non-financial metric that provides for an accurate allocation of the CapEx to a Taxonomy-aligned activity. [...] The reporting undertaking should also provide contextual information [...] concerning: the allocation of CapEx to multiple projects, and the methodology to allocate the CapEx to Taxonomy-aligned activities". The Aena Group has applied this very criterion to allocate the OpEx by means of an indirect allocation of OpEx costs based on the distribution of revenues by activity and airport, which allows for the analysis of eligibility and alignment by activity to be carried out.</p>
Calculation of eligibility	<p>Calculation of the denominator: net amount of the consolidated turnover of the Aena Group.</p> <p>Calculation of the numerator: net amount of the turnover associated with the minimum management units (airports) analysed for which eligible activities have been identified (see section a) Eligibility Analysis).</p>	<p>Calculation of the denominator: sum of the consolidated capital investment additions of the group linked to tangible and intangible assets.</p> <p>Calculation of the numerator: sum of the capital investment additions associated with the minimum management units (airports) analysed for which eligible activities have been identified (see section a) Eligibility Analysis) linked to tangible and intangible assets.</p>	<p>Calculation of the denominator: sum of the consolidated costs of the Aena Group related to the maintenance of the business operation, which includes the items related to:</p> <ul style="list-style-type: none"> a. Building renovation measures b. Short-term leases c. Maintenance and repairs. d. Non-capitalised R&D investments <p>To facilitate the extraction of the type of expenses, an association has been made to the ledger accounts 620. Research and development expenses for the year, 622. Repairs and conservation, and 621. Leases and royalties.</p> <p>Calculation of the numerator: product of the multiplication of the denominator (taxonomic OpEx) by the ratio of eligible revenues per activity and airport to the total revenues of that airport.</p>



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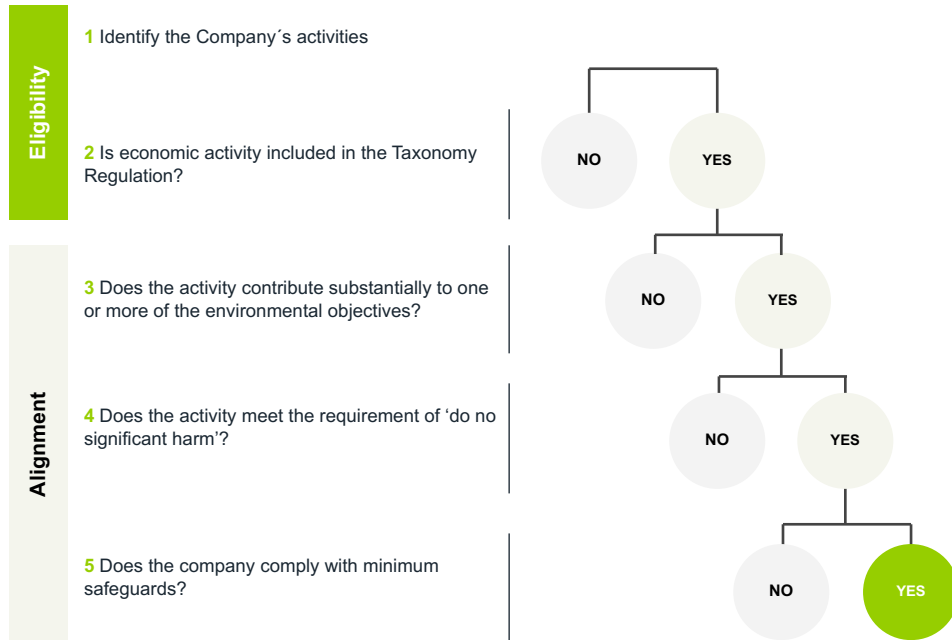
G1: Business conduct

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	Turnover	CapEx	OpEx
Calculation of alignment	<p>Calculation of the denominator: the same value as detailed in previous section is used.</p> <p>Calculation of the numerator: the following steps are applied to its calculation:</p> <ol style="list-style-type: none"> 1. Assessment of full or partial compliance with the SC (Substantial Contribution) and DNSH (Do No Significant Harm) criteria in accordance with the interpretations contained in the following section of this document for each minimum management unit (airport). 2. Assessment of compliance with the minimum safeguards at the Aena Group level. 3. Sum of 100% or the proportional part (based on the degree of compliance with the SC criteria) of the amounts calculated as eligible for each minimum management unit (applied to each KPI) when: <ol style="list-style-type: none"> a. it has concluded that the minimum management unit tested meets SC and DNSH criteria. b. it has concluded that the group meets the criteria established in the minimum safeguards. 		

Assessment of compliance with Regulation (UE) 2020/852

The process carried out by Aena Group to identify its Taxonomy-eligible and aligned economic activities, is as follows:



a) Eligibility Analysis

In order to determine whether the economic activities carried out by the Aena Group are eligible according to the EU taxonomy, an analysis has been carried out on the descriptions of the activities present in the following documents:

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

This study allows the Aena Group to assess the adjustment of its activity to these descriptions and it applies to 46 airports and 2 national heliports and 18 international airports (17 in Brazil and 1 in the United Kingdom).

The nature of Aena Group's economic activities can be distinguished into three categories:

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

The Aena Group's main activity is airport management, which includes all services related to airport traffic and air transport.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

In the process of identifying eligible activities for the 2025 financial year, the clarifications published by the European Commission during 2022 in the FAQ documents are maintained:

- Eligibility represents the potential for an activity covered by the Climate Delegated Regulation or the Environmental Delegated Regulation to be Taxonomy-aligned in the future.
- To identify eligible activities in the company, it is not necessary to consider qualifiers or meet the substantial contribution criteria.

In accordance with this interpretation and with the activities listed in Delegated Regulation 2021/2139, its amendments and Delegated Regulation 2023/2486, the economic activities carried out by the Aena Group are the following:

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

- 4.9: "Transmission and distribution of electricity": the Aena Group produces and purchases electricity from renewable sources from supplier companies. This electricity is distributed within the airport facilities through its own distribution networks with substations and power plants. The Aena Group supplies energy both to its own infrastructures and to companies operating at the airports.
- 6.5: "Transport by motorbikes, passenger cars and light commercial vehicles": the Aena Group purchases light vehicles for the development of its activities.
- 6.15: "Infrastructure enabling low-carbon road transport and public transport": the Aena Group operates passenger car parks equipped with electric charging points that allow the zero-emission operation of road transport. Since there is no complete transition to zero-emission road transport, the current potential to adapt all parking spaces is established based on regulatory thresholds regarding parking spaces that must have electric charging points.
- 6.17: "Low carbon airport infrastructure": the Aena Group operates infrastructure necessary for the operation of aircraft with zero tailpipe CO₂ emissions or for the airport's own operations, including supply of 400Hz and preconditioned air (PCA), availability of boarding bridges and aircraft parking spaces that could be equipped with 400Hz and PCA and those own operations with the potential to be zero emissions (handling and catering).
- 7.3: "Installation, maintenance and repair of energy efficiency equipment": the Aena Group carries out the purchase of products/services linked to this activity, such as the replacement of energy efficient light sources or the installation of high-efficiency heating or ventilation systems.
- 7.4: "Installation, maintenance and repair of charging stations for electric vehicles in buildings (and in parking spaces attached to buildings)": the Aena Group carries out the purchase and installation of charging stations for electric vehicles in its parking lots and airport facilities.
- 7.5: "Installation, maintenance and repair of instruments and devices for measuring, regulation and controlling energy performance of buildings": the Aena Group carries out the purchase and implementation of equipment and systems aimed at optimizing the energy efficiency of terminal buildings, including the installation of energy management systems. These actions allow for centralized monitoring and regulation of energy consumption, facilitating the reduction of emissions and efficient energy use.
- 7.6: "Installation, maintenance and repair of renewable energy technologies": the Aena Group carries out the purchase and installation of on-site renewable energy technologies, such as solar photovoltaic systems.
- 7.7: "Acquisition and ownership of buildings": the Aena Group purchases real estate and/or exercises ownership rights over these (activities developed within the terminal and real estate activity outside the terminal building, except for land leasing), which it considers eligible under heading 7.7 of Annex I. According to FAQ 158 published in December 2022, revenues derived from building ownership, for example, rents, can be considered regardless of the activities that take place in a building, specifically mentioning the revenue generated by airport managers in the development of their activity (specifically mentioned were: duty-free shops and ground handlers operations). This activity includes the rental of spaces and the provision of facilities to users in terminal buildings, cargo logistics centres, hangars, offices, and other types of buildings owned by the Aena Group.

Activities identified in Annex I of Delegated Regulation (EU) 2023/2485 that substantially contribute to climate change mitigation:

- 6.20: "Air transport ground handling operations": the Aena Group carries out the purchase of snow ploughs and other snow clearance and surface de-icing equipment at some of its airports.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

Activities identified in Annex I of Delegated Regulation 2023/2486 that substantially contribute to the sustainable use and protection of water and marine resources:

- 2.2 "Urban wastewater treatment": the Aena Group operates and maintains wastewater treatment plants at some of its airports.

Activities identified in Annex II of the Delegated Regulation 2023/2486 that substantially contribute to the transition to a circular economy:

- 2.2 "Production of alternative water resources for purposes other than human consumption": the Aena Group maintains and operates rain and stormwater collection facilities used to replace water from abstraction or from the drinking water supply systems.
- 3.3: "Demolition and wrecking of buildings and other structures": the Aena Group carries out demolitions and dismantling in its airport infrastructures.
- 3.4 "Maintenance of roads and motorways": the Aena Group performs maintenance work on its access roads, aircraft taxiways and aprons in its operations.

b) Alignment analysis

In order to determine the understanding of the substantial contribution (SC) and 'do no significant harm' (DNSH) criteria and minimum safeguards, Aena has carried out:

- A qualitative analysis of the technical screening criteria (SC and DNSH) and minimum safeguards.
- An interpretation to evaluate the technical screening criteria for each of the eligible activities.
- A follow-up and evaluation of the interpretive approaches to SC and DNSH criteria, as well as minimum safeguards, by the sector, and the performance of a comparative analysis on the published approaches of other companies with activities related to those performed by the Aena Group.
- A follow-up and evaluation of the clarifying information published by the European Commission through the FAQ documents.

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

c) Evaluation of the technical screening criteria by activity

i. Substantial contribution to climate change mitigation

- **4.9: Transmission and distribution of electricity**

Annex I of Delegated Regulation 2021/2139 includes activity 4.9 "Transmission and distribution of electricity", which encompasses activities that align with "Construction and operation of distribution systems that transport electricity on high-voltage, medium-voltage and low-voltage distribution systems".

The Aena Group has its own infrastructures to distribute electricity within airport facilities and considers that the construction and operation of these infrastructures are actions with the potential to contribute to climate change mitigation (therefore, eligible for this objective), when they comply with the criteria established by Annex I of Delegated Regulation 2021/2139.

The assessment of the technical criteria for substantial contribution has been carried out by investment and by airport, considering the text included in Annex I of Delegated Regulation 2021/2139, without the need for interpretations or assumptions in this regard.

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

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

Activity 6.5 refers to activities related to the purchase of light vehicles.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

For all the reasons stated above, the Aena Group considers that the purchase of electric vehicles is an action with the potential to contribute to climate change mitigation (therefore, eligible for this objective), when it complies with the criteria established by Annex I of Delegated Regulation 2021/2139.

The assessment of the technical criteria for substantial contribution has been carried out by investment and by airport, considering the text included in Annex I of Delegated Regulation 2021/2139, without the need for interpretations or assumptions in this regard.

6.15: Infrastructure enabling low-carbon road transport and public transport

Annex I of the Delegated Regulation 2021/2139 includes activity 6.15 “Infrastructure enabling low-carbon road transport and public transport”, which encompasses activities that are adjusted with “Construction, modernisation, maintenance and operation of infrastructure that is required for zero tailpipe CO₂ operation of zero-emissions road transport, as well as infrastructure dedicated to transshipment, and infrastructure required for operating urban transport”.

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

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

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

Delegated Regulation 2021/2139	Evaluation of compliance with SC
1. The activity complies with one or more of the following criteria:	
a. the infrastructure is dedicated to the operation of vehicles with zero tailpipe CO ₂ emissions: electric charging points, electricity grid connection upgrades, hydrogen fuelling stations or electric road systems (ERS).	The criterion applied by the Aena Group for compliance with the SC criteria is that the infrastructure (parking lot) has vehicle charging points installed in the parking spaces. It is interpreted that such compliance may occur partially, considering a degree of alignment that must be applied to the turnover, CapEx and OpEx associated with each parking lot, and which will be calculated as: Number of parking spaces with electric charging points / Total number of parking spaces.
b. the infrastructure and installations are dedicated to transshipping freight between the modes: terminal infrastructure and superstructures for loading, unloading and transshipment of goods.	Not considered in the evaluation.
c. the infrastructure and installations are dedicated to urban and suburban public passenger transport, including associated signalling systems for metro, tram and rail systems.	The criterion applied by the Aena Group for compliance with the SC criteria is that the infrastructure is dedicated to passenger transport (only applicable to CapEx items related to the service of shuttles between terminals).
2. The infrastructure is not dedicated to the transport or storage of fossil fuels.	The infrastructure (parking) is not dedicated to the transport or storage of fossil fuels.

6.17: Low carbon airport infrastructure

Annex I of the Delegated Regulation 2021/2139 and its amendment includes activity 6.17 “Low carbon airport infrastructure”, which encompasses activities that are aligned with the “Construction, modernisation, maintenance and operation of infrastructure that is required for zero tailpipe CO₂ operation of aircraft or the airport’s own operations, and for provision of fixed electrical ground power and preconditioned air to stationary aircraft as well as infrastructure dedicated to transshipment with rail and water transport”.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

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

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

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

Delegated Regulation 2021/2139	Evaluation of compliance with SC
1. The activity complies with one or more of the following criteria:	
a. the infrastructure is dedicated to the operation of aircraft with zero tailpipe CO ₂ emissions: electricity charging and hydrogen refuelling.	Not considered in the evaluation.
b. the infrastructure is dedicated to the provision of fixed electrical ground power and preconditioned air to stationary aircrafts.	The criterion applied by the Aena Group for compliance with the SC criteria is that the infrastructure (parking stands) have 400Hz and PCA supply points installed. It is interpreted that such compliance may occur partially, considering a degree of alignment that must be applied to the turnover, CapEx and OpEx associated with each airport, and which will be calculated as: Number of contact parking stands (with boarding gates) and remote parking stands, equipped with 400 Hz and PCA / Total parking stands.
c. the infrastructure is dedicated to the zero direct emissions performance of the airport’s own operations: electric charging points, electricity grid connection upgrades, hydrogen refuelling stations.	The criterion applied by the Aena Group for compliance with the SC criteria is that the infrastructure dedicated for airport operations (handling agents) has electrical charging points for electrical equipment and vehicles.
d. the infrastructure and installations are dedicated to transshipping freight with rail and water transport: terminal infrastructure and superstructures for loading, unloading and transshipment of goods.	Not considered in the evaluation.
2. The infrastructure is not dedicated to the transport or storage of fossil fuels.	The criterion applied by the Aena Group for compliance with the SC criteria is that the infrastructure is not dedicated exclusively to the transportation or storage of fossil fuels. For its evaluation, it is verified that revenue from fuel and lubricants represents less than 5% of the total used at the airport. In addition, revenue from fuel and lubricants are considered non-eligible and therefore are not part of the numerator in both the eligibility and alignment KPIs.

• **6.20: Air transport ground handling operations**

Annex I of Delegated Regulation 2023/2485 includes activity 6.20 "Air transport ground handling operations", which encompasses activities that align with the description of "snow ploughs and other snow clearance and surface de-icing equipment".

To comply with the substantial contribution criteria, ground handling vehicles must have zero direct CO₂ emissions (exhaust gases), and the propulsion of all ground handling devices and equipment must come from a zero-emission engine.

The Aena Group has snow ploughs and other snow clearance and surface de-icing equipment at some of its airports and considers that the purchase of this equipment constitutes actions with the potential to contribute to climate change mitigation (therefore, eligible for this objective), when they comply with the criteria established by Annex I of Delegated Regulation 2023/2485.

The assessment of the technical criteria for substantial contribution has been carried out by investment and by airport, considering the text included in Annex I of Delegated Regulation 2023/2485, without the need for interpretations or assumptions in this regard.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

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

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

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

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

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

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

Annex I of the Delegated Regulation 2021/2139 includes activity 7.4 “Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings)”.

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

In view of the foregoing, the Aena Group considers the installation, maintenance and reparation of charging stations for electric vehicles in buildings and in parking spaces attached to the buildings as actions with the potential to contribute to climate change mitigation (therefore, eligible for this objective), when they meet the criteria established by Annex I of the Delegated Regulation 2021/2139.

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

- 7.5: Installation, maintenance and repair of instruments and devices for measuring, regulation and controlling energy performance of buildings**

Annex I of Delegated Regulation 2021/2139 includes activity 7.5 "Installation, maintenance and repair of instruments and devices for measuring, regulation and controlling energy performance of buildings".

Activity 7.5 refers to actions related to the installation, maintenance and repair of smart thermostats, building control systems, motion and day light sensors, as well as smart meters for gas, heat, cool and electricity. The Aena Group considers all investments allocated to this activity in its buildings.

For all the reasons stated above, the Aena Group considers that the measures carried out to install, maintain and repair instruments and devices for measuring, regulation and controlling energy performance of buildings are actions with the potential to contribute to climate change mitigation (therefore, eligible for this objective), when they comply with the criteria established by Annex I of Delegated Regulation 2021/2139.

The assessment of the technical criteria for substantial contribution has been carried out by investment and by airport, considering the text included in Annex I of Delegated Regulation 2021/2139, without the need for interpretations or assumptions in this regard.

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

Annex I of the Delegated Regulation 2021/2139 includes activity 7.6 “Installation, maintenance and repair of renewable energy technologies”.

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

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



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

7.7: Acquisition and ownership of buildings

Annex I of the Delegated Regulation 2021/2139 includes activity 7.7 “Acquisition and ownership of buildings” that encompass the acquisition of real estate and management of the ownership rights of those assets.

According to FAQ 158 published in December 2022, revenue derived from the ownership of the building –for example rents– can be considered regardless of the activities that are carried out in a building, specifically mentioning the revenue generated by airport managers in the development of their activity (specifically mentioned in their examples were: duty-free shops and ground handlers operations).

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

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

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

Delegated Regulation 2021/2139	Evaluation of compliance with SC
1. For buildings built before 31 December 2020, the building has at least an Energy Performance Certificate (EPC) class A. As an alternative, the building is within the 15% of the national or regional building stock expressed as operational Primary Energy Demand (PED) and demonstrated by adequate evidence, which at least compares the performance of the relevant asset to the performance of the national or regional stock built before 31 December 2020 and at least distinguishes between residential and non-residential buildings.	The compliance criterion with the SC is that the building has an energy efficiency certificate equal to or greater than that of the top 15% most energy-efficient buildings in the national real estate stock. If an airport has multiple buildings with different energy ratings, the alignment is calculated as the percentage of aligned square meters over the total square meters. The latest report <u>“Estados de la Certificación Energética de los Edificios”</u> (“States of Energy Certification of Buildings”) from the Institute for Energy Diversification and Saving (IDAE) in 2022 has been used. Based on this report, it is concluded that the energy rating corresponding to the top 15% most energy-efficient buildings in the Spanish real estate stock is letter “D”. Therefore, buildings with an energy certification ranging from “A” to “D” are considered to meet the substantial contribution criterion.
2. For buildings built after 31 December 2020, the building meets the criteria specified in Section 7.1 of this Annex that are relevant at the time of the acquisition.	Not considered in the evaluation.
3. Where the building is a large non-residential building (with an effective rated output for heating systems, systems for combined space heating and ventilation, air-conditioning systems or systems for combined air-conditioning and ventilation of over 290 kW) it is efficiently operated through energy performance monitoring and assessment.	The compliance criterion applied by Aena Group for SC criteria consists on the availability of an energy certificate for its buildings and an ISO 14001 standard certification.

ii. Substantial contribution to sustainable use and protection of water and marine resources

2.2: Urban waste water treatment

Annex I of Delegated Regulation 2023/2486 includes 2.2 “Urban waste water treatment” activity which includes the “Construction, extension, upgrade, operation and renewal of urban waste water infrastructure including treatment plants, sewer networks, storm water management structures, connections to the waste water infrastructure, decentralised wastewater treatment facilities, including individual and other appropriate systems, and discharge structures for treated effluent”.

The Aena Group has infrastructures for the collection and treatment of waste water generated in its facilities and believes that these infrastructures have the potential to contribute to the sustainable use and protection of water and marine resources (therefore, eligible for this objective), when they meet the criteria established by Annex I of Delegated Regulation 2023/2486.

The evaluation of the substantial contribution criteria has been carried out by investment and by airport, considering the text included in Annex I of Delegated Regulation 2023/2486, it being unnecessary to make interpretations or assumptions in this regard.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

iii. Substantial contribution to the transition to a circular economy

• 2.2: Production of alternative water resources for purposes other than human consumption

Annex II of Delegated Regulation 2023/2486 includes activity 2.2 "Production of alternative water resources for purposes other than human consumption" which includes the following: "Construction, extension, operation and renewal of facilities for producing reclaimed waters, facilities for harvesting rain and storm water and facilities for collection and treatment of grey water. These alternative water resources are used to replace water from abstraction or from the drinking water supply systems and can be used for aquifer recharge, irrigation, industrial reuse, recreation and any other municipal use".

The Aena Group has infrastructures for the production of reclaimed waters in its facilities and believes that these infrastructures have the potential to contribute to the transition to a circular economy (therefore, eligible for this objective), when they meet the criteria established by Annex II of Delegated Regulation 2023/2486.

The evaluation of the substantial contribution criteria has been carried out by investment and by airport, considering the text included in Annex II of Delegated Regulation 2023/2486, it being unnecessary to make interpretations or assumptions in this regard.

• 3.3: Demolition and wrecking of buildings and other structures

Annex II of Delegated Regulation 2023/2486 includes activity 3.3 "Demolition and wrecking of buildings and other structures", which encompasses "the demolition and wrecking of buildings, roads and runways, railways, bridges, tunnels, waste water treatment works, water treatment works, pipelines, wells and boreholes, power- generating plants, chemical plants, dams and reservoirs, mines and quarries, offshore structures, near-shore works, ports, waterway works or land formation and reclamation".

The Aena Group carries out the demolition and wrecking of buildings and other structures and considers that these activities have the potential to contribute to the transition towards a circular economy (therefore, eligible for this objective), when they comply with the criteria established by Annex II of Delegated Regulation 2023/2486.

The assessment of the technical criteria for substantial contribution has been carried out by investment and by airport, considering the text included in Annex II of Delegated Regulation 2023/2486, without the need for interpretations or assumptions in this regard.

• 3.4: Maintenance of roads and motorways

Annex II of Delegated Regulation 2023/2486 includes activity 3.4 "Maintenance of roads and motorways" which includes: "Maintenance of streets, roads and motorways, other vehicular and pedestrian ways, surface work on streets, roads, highways, bridges, tunnels, aerodrome runways, taxiways and aprons, defined as all actions undertaken to maintain and restore the serviceability and level of service of roads".

The Aena Group maintains the taxiways, aprons and other vehicle roads in its facilities and believes that these infrastructures have the potential to contribute to the transition to a circular economy (therefore, eligible for said objective), when they meet the criteria established by Annex II of Delegated Regulation 2023/2486.

The evaluation of the substantial contribution criteria has been carried out by investment and by airport, considering the text included in Annex II of Delegated Regulation 2023/2486, it being unnecessary to make interpretations or assumptions in this regard.

iv. Principles of do no significant harm to another environmental objective (DNSH)

The second set of technical criteria requires each potentially aligned activity (i.e., eligible company activities that meet the criteria for substantial contribution) to be evaluated and it be shown that they do not significantly harm any of the other environmental objectives.

• Climate change mitigation

The following eligible activities of the Aena Group present criteria of do not cause significant harm to the climate change mitigation objective:

- WTR 2.2 and CE 2.2 Activities:

Compliance with DNSH at an investment level is assessed by checking whether direct greenhouse gas (GHG) emissions from the waste water system or reuse treatment are calculated and whether the results are disclosed to investors and clients on demand. In the case of anaerobic digestion of sewage sludge, it is checked if a monitoring plan is in place for methane leakage at the facility.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

– CE 3.3 Activity:

Compliance with the DNSH principle is evaluated at the investment level by verifying that, during demolitions, foams or boards containing fluorinated gases or ozone depleting substances are handled to ensure their safe reuse or destruction. When technically not feasible, the case is documented, and the information is retained for five years, made available upon request.

– CE 3.4 Activity:

DNSH compliance is assessed at investment level by checking that there is a traffic congestion mitigation plan to be implemented during maintenance works.

• **Climate change adaptation**

The principle of 'do no significant harm' to the objective of climate change adaptation is common to all the eligible activities of the Aena Group:

- Climate Change Mitigation (CCM): 4.9, 6.5, 6.15, 6.17, 6.20, 7.3, 7.4, 7.5, 7.6 and 7.7 Activities
- Sustainable use and protection of water and marine resources (WTR): 2.2 Activity
- Transition to a circular economy (CE): 2.2, 3.3 and 3.4 Activities

According to Appendix A of Delegated Regulation 2021/2139 and Delegated Regulation 2023/2486, companies must identify physical climate risks that are material to the activity, among those listed in the table of Section II of the aforementioned appendix, performing a robust climate risk assessment and vulnerability analysis.

For this reason, the Aena Group has completed a climate risk analysis to identify the most material physical climate risks of the managed infrastructures (airports). The analysis considers different climate projections using the scenarios RCP 4.5 and RCP 8.5 established by the IPPC.

This analysis has allowed the Aena Group to identify a series of adaptation measures that will be applied in the future, to manage the relevant risks and evaluate them based on their effectiveness (see more information in chapter [E1](#)).

• **Sustainable use and protection of water and marine resources**

The principle of 'do no significant harm' to the objective of sustainable use and protection of water and marine resources is common to the following eligible activities of Aena Group:

- Climate Change Mitigation (CCM): 6.15, 6.17 and 6.20 Activities
- Transition to a circular economy (CE): 2.2, 3.3 and 3.4 Activities

Aena Group is considered DNSH compliant as it has:

- An environmental management system implemented and certified in accordance with ISO 14001, since it is assumed that with said certification the activity carried out is managing adequately (and in accordance with the guidelines established at the national and European level) the possible environmental risks derived from the economic activity, including those related to water resources, given that, among others, aspects such as discharge or consumption management are evaluated.
- An environmental impact assessment in accordance with Directive 2014/52/EU, amending Directive 2011/92/EU, on the assessment of the effects of certain public and private projects on the environment. Likewise, if potential risks related to the use and protection of water resources have been detected, an environmental surveillance plan is in place including actions to mitigate such impacts.
- Climate risk analysis of the Aena Group assessing risks related to the sustainable use and protection of water and marine resources, such as the risk of droughts, extreme precipitation or the risk of river or coastal flooding (see section [Climate risk analysis of Aena Group](#)).
- [Aena's strategic water plan 2021-2030](#) which includes the action plans applicable to Spanish Airports (see [E3-3](#)).
- Regarding activity CCM 6.20, the Aena Group uses biodegradable de-icing fluids in its de-icing operations.

• **Transition to a circular economy**

The principle of 'do no significant harm' to the objective of transition to a circular economy applies to the following eligible activities of the Aena Group that substantially contribute to the objective of climate change mitigation (CCM): 4.9, 6.5, 6.15, 6.17 and 6.20.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

Compliance with the DNSH criteria is assessed at both investment and installation levels, as the Aena Group has a waste management system integrated into its environmental management system, which complies with the requirements of ISO 14001 and is externally verified. This ensures the minimisation of waste generation and the control of waste management during the utilisation phase (maintenance), as well as the reuse and recycling of waste at the end of its life cycle (including non-hazardous construction and demolition waste, batteries, electronic products, and hazardous waste, among others), in accordance with the waste hierarchy. Regarding CCM 6.15 and CCM 6.17 activities, compliance with the minimum requirement of 70% reuse and/or recycling of non-hazardous construction and demolition waste is verified. For CCM 6.5, the CE marking (European Conformity), which is mandatory for vehicles marketed within the European Union, ensures compliance with safety, health, and environmental protection requirements. With regard to activity CCM 4.9, it is verified that a waste management plan exists at the action (investment) level.

- **Pollution prevention and control**

The following eligible activities for the Aena Group include criteria to ensure no significant harm (DNSH) to the objective of pollution prevention and control:

- CCM 4.9 Activity:

Compliance with the DNSH principle established at the investment and installation level is evaluated by verifying that the assessed investments do not occur in overground high voltage lines and do not use polychlorinated biphenyls (PCBs).

- CCM 6.5 Activity:

DNSH compliance is considered met, as the technical specifications for the procurement of electric vehicles state that they must comply with all homologation, environmental, energy-saving, and safety requirements specific to both Spain and the European Union. Additionally, the vehicles must be provided with the “CE” marking and the “CE” declaration of conformity.

- CCM 6.15, CCM 6.17, CE 3.3 y CE 3.4 Activities:

The Aena Group is considered to comply with DNSH as it has:

- An environmental management system implemented and certified in accordance with ISO 14001, ensuring that the activities carried out are appropriately managed (and aligned with national and European Directives) concerning potential environmental risks, including those related to pollution prevention and control.
- Environmental impact assessments in compliance with Directive 2014/52/EU, which amends Directive 2011/92/EU, on the assessment of the effects of certain public and private projects on the environment. These assessments incorporate measures to reduce noise, dust, and pollutant emissions during construction or maintenance works. Additionally, if potential pollution-related risks are identified, an environmental monitoring plan is in place, outlining actions to mitigate such impacts.
- Regarding CE 3.4 activity, the Aena Group employs low-noise pavement types for road surfaces.
- CCM 6.20 y CCM 7.3 Activities:

The Aena Group is considered to comply with DNSH, as its activities do not involve the manufacture, placing on the market or use of substances listed in Appendix C of Delegated Regulation 2021/2139 and Delegated Regulation 2023/2486. Furthermore, the removal of asbestos-containing materials is carried out by appropriately trained personnel, with health monitoring before, during and after the works, in accordance with national law.

- WTR 2.2 Activity:

The Aena Group complies with DNSH, as it has an environmental management system implemented and certified under ISO 14001, ensuring compliance with maximum permissible pollutant discharge levels. Measures are applied to prevent and mitigate storm water overflows from the waste water collection system and sewage sludge is used in accordance with Council Directive 86/278/EEC and applicable national law.

- CE 2.2 Activity:

DNSH compliance is assessed by verifying that the investment adheres to Regulation (EU) 2020/741 and applicable national legislation. Additionally, aquifer recharge and surface run-off water infiltration must comply with the Directive 2006/118/EC and relevant national laws.

- **Protection and restoration of biodiversity and ecosystems**

The principle of ‘do no significant harm’ to the objective of protection and restoration of biodiversity and ecosystems is common to the following Aena Group eligible activities:

- Climate Change Mitigation (CCM): 4.9, 6.15 and 6.17
- Sustainable use and protection of water and marine resources (WTR): 2.2
- Transition to a circular economy (CE): 2.2, 3.3 and 3.4



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

The Aena Group is considered to be DNSH compliant as it has environmental impact assessments in accordance with Directive 2014/52/EU, amending Directive 2011/92/EU, on the assessment of the effects of certain public and private projects on the environment, via which steps are taken to protect biodiversity and ecosystems during construction or maintenance work. Likewise, if potential risks related to the protection and recovery of biodiversity and ecosystems have been detected, there is an environmental surveillance plan that includes actions to mitigate such impacts.

v. Minimum safeguards

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

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

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

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

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

- **Human rights**

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

The Aena Group adopts and incorporates a commitment to Human Rights through its Human Rights Policy, aligned with the principles set out in the United Nations Global Compact, the Guiding Principles on Business and Human Rights, the OECD Guidelines and the Social Policy of the International Labour Organization, among others.

In compliance with the provisions of said Policy, it establishes a human rights due diligence procedure, focused on facilitating the identification, prevention, mitigation, monitoring and remediation of possible adverse effects on human rights related to its activity, and in which the roles, responsibilities and actions of the areas involved in the process are defined (for more information see section [GOV-4 ESRS 2](#)).

Within this framework, the Complaints Channel (or the counterpart in the subsidiaries – Canal da Ética and Whistleblower Channel) becomes the main tool for individuals and groups potentially affected to raise concerns about adverse impacts, make inquiries or report possible risks or non-compliance in the various matters (see more information in chapter [G-1](#)).

Additionally, there are no firm convictions for aspects related to employment law, human rights, data protection, consumer protection, humanitarian or criminal law. The company’s response to entities such as the NCP (National Contact Points for Responsible Business Conduct Database de la OECD) o BHRRC (Business & Human Rights Resource Centre (where applicable) is considered evidence for compliance.

- **Corruption**

This is considered to be complied with, since Aena establishes its formal and express commitment to the rejection of any fraudulent or corrupt practice in any form through its corporate policies, like the Anti-bribery Policy, Code of Conduct, the Conflicts of Interest Compliance Policy and the Business Courtesies Policy, and it has processes to prevent corruption such as internal controls, measures for the prevention and detection of bribes, as well as training and awareness activities for its employees (see more information in chapter [G-1](#)).

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



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

Taxation

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

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

The Aena Group submits the Transparency Report to the Spanish Tax Agency (AEAT), with the latest report submitted corresponding to the 2023 fiscal year, as indicated in the list of reporting entities (updated by the AEAT on January 27, 2025).

This set of tax measures guarantees the Aena Group's tax transparency, complying with the requirements envisaged by the minimum safeguards of the European Taxonomy.

In addition, there are no firm convictions for issues related to tax evasion.

Fair competition

This pillar of minimum safeguards is considered fulfilled since the Aena Group is committed to avoiding any type of conduct related to unfair competition in internal regulations, has measures and integrates issues related to the protection of unfair competition in the compliance system. In addition to the above, Aena, the conditions imposed in DORA II act as guarantor to avoid any conduct related to unfair competition, with regard to price fixing. And, with regard to contracts with suppliers and other third parties, Aena Spain is subject to the provisions of Law 9/2017, of 8 November, on Public Sector Contracts. Finally, the Aena Group provides training programs to the governing bodies and conducts employee awareness actions through information pills in this area.

Likewise, in 2024, the Antitrust Compliance Policy has been approved, whose aim is to develop Aena Group's express commitment to free competition and best market practices and sets out the basic principles of regulatory compliance in this area in line with the ethical business values, principles and guidelines for Aena Group's conduct, and in line with the main regulatory references and best practices in the area of regulatory compliance.

Thus, the Aena Group complies with each of the aspects issued by the OECD in its rules on fair competition, that is, it carries out compliance with the regulations regarding competition, refusal to join anti-competitive agreements, cooperation with the authorities if necessary and training employees on fair competition matters.

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



ESRS 2: General disclosures

E1: Climate change

E2: Pollution

E3: Water and marine resources

E4: Biodiversity and ecosystems

E5: Resource use and circular economy

S1: Own workforce

S2: Workers in the value chain

S3: Affected communities

S4: Consumers and end-users

G1: Business conduct

Act 11/2018

Key Performance Indicators

Financial year															
2025															
KPI	Total	Proportion of Taxonomy-eligible activities	Taxonomy-aligned activities	Proportion of Taxonomy-aligned activities	Breakdown by environmental objectives of Taxonomy-aligned activities						Proportion of enabling activities	Proportion of transitional activities	Not assessed activities considered non-material	Taxonomy-aligned activities in previous financial year (2024)	Proportion of Taxonomy-aligned activities in previous financial year (2024)
					Climate Change Mitigation	Climate Change Adaptation	Water	Circular Economy	Pollution	Biodiversity					
	Millions of euros	%	Millions of euros	%	%	%	%	%	%	%	%	%	Millions of euros	%	
Turnover	6,278.34	60.98%	3,283.45	52.30%	52.30%	0.00%	0.00%	0.00%	0.00%	0.00%	4.00%	0.00%	0.00%	2,791.37	48.43%
CapEx	1,183.79	44.60%	378.39	31.96%	31.85%	0.00%	0.11%	0.01%	0.00%	0.00%	10.79%	0.00%	0.00%	252.78	30.69%
OpEx	392.86	57.90%	200.69	51.08%	51.08%	0.00%	0.00%	0.00%	0.00%	0.00%	4.02%	0.00%	0.00%	168.85	47.04%



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

Reported KPI Turnover

Financial year 2025

Economic Activities	Code	Taxonomy-eligible KPI (Proportion of Taxonomy eligible Turnover)	Taxonomy-aligned KPI (monetary value of Turnover)	Taxonomy-aligned KPI (Proportion of Taxonomy-aligned Turnover)	Environmental objective of Taxonomy-aligned activities					Enabling activity	Transitional activity	Proportion of Taxonomy-aligned in Taxonomy-eligible	
					Climate Change Mitigation	Climate Change Adaptation	Water	Circular Economy	Pollution				Biodiversity
		%	Millions of euros	%	%	%	%	%	%	%	(E where applicable)	(T where applicable)	%
Infrastructure enabling low-carbon road transport and public transport	CCM 6.15	0.04%	1.49	0.02%	0.02%						E		56.78%
Low carbon airport infrastructure	CCM 6.17	5.95%	249.47	3.97%	3.97%						E		66.79%
Acquisition and ownership of buildings	CCM 7.7	54.99%	3,032.49	48.30%	48.30%								87.83%
Sum of alignment per objective					52.30%	0.00%	0.00%	0.00%	0.00%	0.00%			
Total KPI (Turnover)		60.98%	3,283.45	52.30%	52.30%	0.00%	0.00%	0.00%	0.00%	0.00%	4.00%	0.00%	85.76%

In 2025, the eligible turnover, according to taxonomic criteria, is 60.98%, and the aligned turnover is 52.30% of the total turnover. The alignment percentage with respect to eligibility is 85.76%. The eligible and aligned revenues are mainly associated with CCM 7.7 activity of Acquisition and ownership of buildings. The percentage of turnover that aligns with the taxonomy has increased by 3.87% compared to the previous year.



ESRS 2: General disclosures

E1: Climate change

E2: Pollution

E3: Water and marine resources

E4: Biodiversity and ecosystems

E5: Resource use and circular economy

S1: Own workforce

S2: Workers in the value chain

S3: Affected communities

S4: Consumers and end-users

G1: Business conduct

Act 11/2018

Reported KPI CapEx

Financial year 2025

Economic Activities	Code	Taxonomy-eligible KPI (Proportion of Taxonomy eligible CapEx)	Taxonomy-aligned KPI (monetary value of CapEx)	Taxonomy-aligned KPI (Proportion of Taxonomy aligned CapEx)	Environmental objective of Taxonomy-aligned activities						Enabling activity	Transitional activity	Proportion of Taxonomy-aligned in Taxonomy-eligible
					Climate Change Mitigation	Climate Change Adaptation	Water	Circular Economy	Pollution	Biodiversity			
					%	Millions of euros	%	%	%	%			
Transmission and distribution of electricity	CCM 4.9	1.44%	17.07	1.44%	1.44%						E		100.00%
Transport by motorbikes, passenger cars and light commercial vehicles	CCM 6.5	0.17%	1.55	0.13%	0.13%								78.96%
Infrastructure enabling low-carbon road transport and public transport	CCM 6.15	0.02%	0.08	0.01%	0.01%						E		38.80%
Low carbon airport infrastructure	CCM 6.17	1.77%	13.84	1.17%	1.17%						E		66.09%
Air transport ground handling operations	CCM 6.20	0.15%	0.00	0.00%	0.00%								0.00%
Installation, maintenance and repair of energy efficiency equipment	CCM 7.3	1.91%	22.57	1.91%	1.91%						E		100.00%
Installation, maintenance and repair of charging stations for electric vehicles in buildings (and in parking spaces attached to buildings)	CCM 7.4	0.51%	6.01	0.51%	0.51%						E		100.00%



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

<i>Installation, maintenance and repair of instruments and devices for measuring, regulation and controlling energy performance of buildings</i>	CCM 7.5	0.06%	0.74	0.06%	0.06%					E	100.00%		
<i>Installation, maintenance and repair of renewable energy technologies</i>	CCM 7.6	5.70%	67.43	5.70%	5.70%					E	100.00%		
<i>Acquisition and ownership of buildings</i>	CCM 7.7	28.33%	247.69	20.92%	20.92%						73.86%		
<i>Urban waste water treatment</i>	WTR 2.2	0.13%	1.32	0.11%		0.11%					83.01%		
<i>Production of alternative water resources for purposes other than human consumption</i>	CE 2.2	0.01%	0.09	0.01%		0.01%					84.35%		
<i>Demolition and wrecking of buildings and other structures</i>	CE 3.3	0.11%	0.00	0.00%		0.00%					0.00%		
<i>Maintenance of roads and motorways</i>	CE 3.4	4.30%	0.00	0.00%		0.00%					0.00%		
Sum of alignment per objective					31.85%	0.00%	0.11%	0.01%	0.00%	0.00%			
Total KPI (CapEx)		44.60%	378.39	31.96%	31.85%	0.00%	0.11%	0.01%	0.00%	0.00%	10.79%	0.00%	71.67%

In 2025, the eligible CapEx, according to taxonomic criteria, is 44.60%, and the aligned CapEx is 31.96% of the total. The alignment percentage with respect to eligibility is 71.67%. The taxonomic activities that contribute most to CapEx eligibility are CCM 7.7 Acquisition and ownership of buildings, CCM 7.6 Installation, maintenance and repair of renewable energy technologies, and CE 3.4 Maintenance of roads and highways, due to investments made in remodelling and expansion of terminal buildings such as those in Palma de Mallorca in Spain or those at *Uberlândia - Tenente Coronel Aviador César Bombonato* or *São Paulo/Congonhas - Deputado Freitas Nobre* Airports in Brazil; regeneration and repaving of runways and taxiways, and the installation of a solar photovoltaic park at Adolfo Suárez Madrid-Barajas Airport. The results remain in the same order of magnitude as the previous year, although the percentage of CapEx that aligns with the taxonomy has increased by 1.27%.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

Reported KPI OpEx

Financial year 2025

Economic Activities	Code	Taxonomy-eligible KPI (Proportion of Taxonomy eligible OpEx)	Taxonomy-aligned KPI (monetary value of OpEx)	Taxonomy-aligned KPI (Proportion of Taxonomy aligned OpEx)	Environmental objective of Taxonomy-aligned activities					Enabling activity	Transitional activity	Proportion of Taxonomy-aligned in Taxonomy-eligible	
					Climate Change Mitigation	Climate Change Adaptation	Water	Circular Economy	Pollution				Biodiversity
		%	Millions of euros	%	%	%	%	%	%	%	(E where applicable)	(T where applicable)	%
<i>Infrastructure enabling low-carbon road transport and public transport</i>	CCM 6.15	0.04%	0.09	0.02%	0.02%						E		51.69%
<i>Low carbon airport infrastructure</i>	CCM 6.17	5.78%	15.69	3.99%	3.99%						E		69.14%
<i>Acquisition and ownership of buildings</i>	CCM 7.7	52.09%	184.91	47.07%	47.07%								90.36%
Sum of alignment per objective					51.08%	0.00%	0.00%	0.00%	0.00%	0.00%			
Total KPI (OpEx)		57.90%	200.69	51.08%	51.08%	0.00%	0.00%	0.00%	0.00%	0.00%	4.02%	0.00%	88.22%

In 2025, the eligible OpEx, according to taxonomic criteria, is 57.90%, and the aligned OpEx is 51.08% of the total taxonomic OpEx. The alignment percentage with respect to eligibility is 88.22%. The percentage of OpEx that aligns with the taxonomy has increased by 4.04% compared to the previous year.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

MDR-P: Environmental policies

The Aena Group:

The following policies are published on the Aena Public Website, within the **Corporate Policies** section. They are approved by the Board of Directors as the highest level responsible, and are applicable to Aena (the parent company) and to any of the companies integrated into its group (subsidiaries), under the terms established in Article 42 of the Spanish Commercial Code (the “Aena Group”). Subsidiaries domiciled outside Spain may make the necessary adaptations to this policies to comply with applicable local law.

Sustainability Policy

Updated in December 2024, its objective is to define and establish the commitments, principles and strategies to be followed by the Aena Group in carrying out its activity, optimising its contribution to sustainable development, creating long-term value, maximising positive impacts, and minimising negative impacts on society and the environment throughout its value chain, behaving ethically and transparently.

Taking as its primary reference the principles set forth in the United Nations Global Compact, the United Nations Sustainable Development Goals (SDGs), the regulations applicable to the Company’s scope of activity and the expectations of stakeholders, this Policy establishes the principle of integrating sustainability into all business areas and organisational levels of the Company. This involves extending its culture to employees, customers, suppliers, the value chain, partners, and other stakeholders, as well as ensuring sustainable management and alignment with social and environmental sustainability objectives by supplier and contractor companies within the scope of work carried out for the Aena Group.

This Policy integrates the variable of climate change into internal decision-making processes, as well as in the analysis and management of risks and opportunities in the short, medium and long term, incorporating appropriate adaptation mechanisms and minimising the environmental impacts of the Group’s activity, under a preventive approach (especially in relation to climate change, air quality, noise management, water management and discharges, impact on biodiversity and ecosystems, and the management of hazardous and non-hazardous waste), ensuring that processes meet the highest quality standards and promoting the transition to a circular economy that includes all processes.

In addition, the Sustainability Policy includes, among its principles, the consideration of stakeholders interests and opinions in the development and updates of the double materiality assessment process. This aims to identify, assess, prioritise and determine the significance of potential and actual, positive and negative impacts, as well as risks and opportunities that may have a financial effect on the Company, in the short, medium and long term, related to people and the environment.

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

Updated in May 2025, its objective is to promote the safe, efficient, and sustainable development of air transport and maintain excellent results for stakeholders. It includes principles that serve as a guide and framework for the Company’s activities throughout its entire value chain in environmental matters, integrated with energy efficiency, quality, and occupational health and safety. Among these principles is ensuring environmental protection and preventing pollution, integrating sustainable development criteria that contribute to reducing the impact of the activity, promoting the sustainable use of resources and addressing climate change in line with the objectives set out in the current Sustainability Strategy. Furthermore, it promotes minimising the environmental impacts of the Company’s activity, using a preventive approach (especially regarding climate change, air quality, noise management, water management and wastewater discharge, impact on biodiversity and ecosystems, and the management of hazardous and non-hazardous waste), ensuring that processes meet the highest quality standards and promoting the transition to a circular economy that includes all processes. This Policy also establishes the principle of reconciling airport activity with the protection and conservation of existing natural habitats and their biodiversity, minimising deforestation and offsetting its impact through appropriate instruments.

Furthermore, one of the principles of this Policy is to ensure that both staff and the companies operating for the Aena Group receive proper communication regarding it. The Policy is accessible on the Company’s website, allowing everyone to be aware of their rights and obligations and facilitating consultation by stakeholders. In this regard, the Aena Group promotes the adoption of these principles and values among the other Group entities with which it collaborates.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

United Kingdom - specific policies:

Environment Policy

London Luton Airport has an **Environment Policy** aligned with the Group's Integrated Management Policy, which details key aspects such as climate change adaptation and mitigation, circular economy and responsible resource use, and pollution management. This policy is communicated to all employees and stakeholders in the airport's value chain and is available on the Company's website. It also takes into account the interests and opinions of stakeholders. Responsibility for this Policy and its content lies with both the Sustainability Committee of the Board of Directors and the Chief Executive Officer of London Luton Airport Operations Limited.

Brazil - specific policies:

The *Política de Sustentabilidade* for ANB and another for BOAB, as well as the *Política de Gestão Integrada da Qualidade, Meio Ambiente, Eficiência Energética e Segurança e Saúde do Trabalho* for ANB and another for BOAB, are publicly available on **Aena's Brasil corporative website**. These policies allow for the internal development of the necessary processes to ensure compliance with the policies established in this area by the parent company, Aena. Therefore, the principles and objectives described therein regarding climate change, pollution, biodiversity protection, and the use of natural resources also apply to all Aena Brasil facilities.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

E1 Climate change

Climate change is one of the greatest global challenges of our time, demanding a coordinated and ambitious response from all sectors of society. To address this challenge, it is essential to design and implement comprehensive mitigation and adaptation strategies that significantly reduce greenhouse gas emissions and strengthen the resilience of infrastructure and communities to climate impacts. These strategies must be aligned with international commitments, such as the Paris Agreement, and supported by innovation, energy efficiency, and the transition to renewable energy sources. Climate change is a global challenge that requires the implementation of mitigation and adaptation strategies, which must be addressed to reduce environmental impact. In the context of the airport industry, there are multiple activities that contribute to direct and indirect greenhouse gas (GHG) emissions:

- **Scope 1 emissions:** These are emissions from sources or processes directly controlled by the Company. These include both stationary combustion (emissions from generator sets, portable generators, boilers, fire-fighting operations, and auxiliary pumps for fire water tanks) and combustion from mobile sources (light- and heavy-duty vehicles).
- **Scope 2 emissions:** These are indirect emissions resulting from the purchase of electrical and thermal energy.
- **Scope 3 emissions:** These are indirect emissions from activities not owned or directly controlled by the Company. They primarily correspond to the consumption of fossil fuels during the landing and takeoff (LTO) cycle of aircraft, as well as the use of Auxiliary Power Units (APUs) that supply power to aircraft while on the ground. Additionally, vehicles and machinery used to provide ground handling services, along with passenger and employee access to the airport, and employee business travel, contribute to these emissions, among other sources.

Material IROs - Impact Materiality (Impacts)

Topic	Sub-topic	Sub-sub-topic	Impact	Location in the value chain	Positive / Negative	Actual / Potential	Time Horizon
E1 Climate change	Climate change adaptation	—	Operational disruption due to extreme weather events with impact on own activities, value chain, and end-users	Entire value chain	Negative	Potential	Short term / Medium term / Long term
E1 Climate change	Climate change mitigation	—	Direct and indirect greenhouse gas emissions (Scope 1, 2, and 3) generated by the Aena Group and its value chain	Entire value chain	Negative	Actual	Short term / Medium term / Long term



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

Material IROs - Financial Materiality (Risks and Opportunities):

Topic	Sub-topic	Driver	Risk / Opportunity Description	Location in the value chain	Risk / Opportunity	Time Horizon
E1 Climate change	Climate change adaptation	Due to climate change, extreme temperatures and weather events are becoming more frequent, which can make some destinations difficult to access or lead passengers to seek other destinations.	Increased passenger numbers at different times of the year, due to seasonal changes	Entire value chain	Opportunity	Long term
E1 Climate change	Climate change adaptation	Due to climate change, extreme weather events are becoming more frequent.	Operational disruption and infrastructure damage due to weather events associated with climate change (heat waves, extreme rainfall, droughts, etc.)	Own operations	Risk	Short term / Medium term / Long term
E1 Climate change	Climate change adaptation	The transition towards a low-carbon economy can generate financial impacts stemming from new regulatory requirements, technological advances, climate policies, and changes in market dynamics.	Climate transition (regulatory, technological, market, and reputational changes)	Entire value chain	Risk	Short term / Medium term / Long term



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
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Topic	Sub-topic	Driver	Risk / Opportunity Description	Location in the value chain	Risk / Opportunity	Time Horizon
E1 Climate change	Climate change mitigation	<p>The sustainable aviation program is focused on positioning Aena as a driving force for other stakeholders in the aviation sector to accelerate their decarbonisation.</p> <p>One of the lines of action is based on proactive participation in the development of new sustainable fuels and their integration into the aviation industry. To achieve this, a series of strategic objectives have been defined regarding the distribution of Sustainable Aviation Fuels (SAF) at Aena airports.</p>	New services for the distribution of sustainable fuels (hydrogen, SAF, etc.)	Upstream value chain and own operations	Opportunity	Long term
E1 Climate change	Energy	<p>The EU/2024/1275 Energy Efficiency Directive presents an opportunity for Aena to identify and implement efficiency measures that will result in both cost and energy savings, reducing its exposure to current and future carbon pricing mechanisms. Compliance with the parameters established in this legislation will lead to the avoidance of potential penalties and a reduction in energy consumption in Aena's internal processes.</p>	Implementation of energy efficiency measures (more efficient airport buildings...)	Own operations	Opportunity	Short term
E1 Climate change	Energy	Meeting all or part of the airports' electricity demand through self-generation from renewable sources.	Generation of electricity from renewable sources through the implementation of its photovoltaic plan	Own operations	Opportunity	Medium term / Long term



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
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E1- ESRS 2 GOV-3: Integration of sustainability-related performance in incentive schemes

E1-GOV 3-13

In Spain, the degree of compliance with Aena's Climate Action Plan 2021-2030 is linked to the variable remuneration of all employees, including the Chairman and CEO, Executive Vice Chairman, and members of the Executive Management Committee. This link is implemented through the Performance Management System, which is evaluated annually and includes specific indicators related to climate and sustainability objectives.

Specifically, for members of Senior Management, the variable remuneration depends on the achievement of the Company's objectives, which include a sustainability objective that accounts for 25% of the 50% or 40% of the Company's objectives (depending on the Directorate).

For their part, sustainability objectives (Climate Action Plan for Aena, Spain) account for 25% of the Company's total objectives for the Chairman and CEO (25% of 100% in 2024), and 25% of 50% for the Executive Vice Chairman (25% of 50% in 2024).

In the United Kingdom, key sustainability objectives, including climate targets, are an integral part of management objectives and influence variable remuneration, which is linked to Aena's performance at London Luton Airport. These objectives apply to the CEO, all members of the Executive Leadership Team, and key members of the Senior Management team, including the Head of Sustainability, the Head of Flight Operations, and the Net Zero Senior Manager.

At Aena Brasil, the CEO, the General Director, and the Director of Institutional Relations, Communication and ESG have established the "Implementation and monitoring of the Climate Action Plan: 2025 Milestones" as a sustainability objective, with a weighting of 5% or 10%. Additionally, the individuals within the Directorate of Institutional Relations, Communication and ESG have sustainability objectives formally linked to the Performance Management System (SGD), reinforcing leadership's responsibility for material sustainability matters. Following the approval of 2025 Aena Brasil's Sustainability Strategy, the possibility of gradually extending the establishment of sustainability objectives within the SGD to other Directors, such as Airport Directors, is being evaluated.

For more information, see [ESRS 2 - GOV 3](#).

Strategy


E1-1: Transition plan for climate change mitigation

E1-1 14, E1-1 15, E1-1 16, E1-1 17, AR 4, AR 5

In Spain, the Transition Plan or Climate Action Plan 2021-2030, approved by the Board of Directors and submitted to an advisory vote by the Shareholders' Meeting in 2021, covers Aena S.M.E., S.A. and SCAIRM. This plan is aligned with ACI EUROPE's Net Zero initiative (Airports Council International Europe), which currently commits 314 airports managed by 90 operators in 36 European countries to achieve and maintain net-zero carbon emissions in operations under their control by 2050 at the latest, marking a significant milestone in the sector's fight against climate change.

Aena's Net Zero commitment in Spain is aligned with the objectives of the Paris Agreement, limiting global warming to 1.5 °C and contributing to keeping the temperature increase below 2 °C compared to pre-industrial levels, while pursuing efforts to further limit the temperature increase to 1.5 °C. Additionally, in Spain, Aena has established intermediate decarbonisation targets for 2030 (scopes 1 and 2), in line with the criteria of ACI EUROPE's Net Zero initiative.

Likewise, Aena's Climate Action Plan 2021-2030 in Spain is integrated and harmonised with the Aena Group's Strategic Plan 2022-2026. The latter was updated in 2024, reinforcing sustainability as one of its strategic pillars and establishing even more ambitious decarbonisation targets. Among those is the advancement of the Net Zero commitment for its own emissions to 2030, ten years ahead of the initial target. Sustainability is thus consolidated as a cross-cutting factor in the Company's roadmap, including several key enablers for achieving responsible growth, with particular emphasis on environmental considerations, in line with what was already reflected in the DORA II. The Company also aims to increase the number of airports and the level of Airport Carbon Accreditation certifications, reaching a total of 19 airports, which encompasses more than 94% of the emissions of the Spanish network.

	ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
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	S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

This Climate Action Plan 2021-2030 is integrated into the Sustainability Strategy 2021-2030 for the Spanish airport network, with an associated investment in that period of €750 million included in the Airport Regulation Document 2022-2026 (DORA) approved by the Council of Ministers on September 28, 2021, in compliance with the provisions of Law 18/2014. The planned investments are reviewed annually, and actions may be adjusted based on new needs, subject to approval by the Aena Group's Executive Management Committee. In general terms, the financial resources allocated to the Climate Action Plan in Spain for the period 2021-2030 amount to €550 million, and to €750 million for the Sustainability Strategy 2021-2030. For more information on the economic resources linked to the Climate Action Plan, please refer to the section on [Taxonomy of Sustainable Finances](#).

In the United Kingdom, London Luton Airport has a Responsible Business Strategy 2024-2027, which includes its transition plan to achieve the Net Zero target for its own emissions by 2040. This plan, developed in collaboration with stakeholders across the airport and approved by the London Luton Airport Sustainability Committee, establishes a strategy with 30 commitments. Among these, is the goal of achieving a 100% low-carbon fleet for its own vehicles by 2030, through the use of low-carbon fuels and the transition to electric vehicles. Likewise, a commitment to sustainable aviation has been made, setting a target of achieving net-zero emissions in its own operations by 2040. London Luton Airport's Net Zero objective and interim targets are aligned with the Paris Agreement, as reflected in its Responsible Business Strategy 2024-2027 and its Net Zero Roadmap 2040, which establish commitments to progressive decarbonisation and validate its contribution to limiting global warming to 1.5 °C, in line with international regulatory and sectoral frameworks.

In Brazil, the Board of Directors of Aena Brasil approved the Climate Action Plan 2024-2040, or transition plan, in 2024. This plan covers the companies ANB and BOAB. It entails an investment of approximately €12 million and aims to align its commitments with those of its parent company, Aena in Spain, in order to progressively reduce its emissions until achieving ACI EUROPE's Net Zero target by 2040. Furthermore, the necessary actions to achieve this goal are expected to be incorporated in its future Strategic Plans. This plan is part of Aena Brasil's Sustainability Strategy 2024-2040, which is structured around five strategic programs, two of which are specifically focused on decarbonisation. Each program encompasses different lines of action and specific initiatives, establishing targets and indicators for monitoring and evaluation. The key objective is to achieve carbon neutrality in scopes 1 and 2 by 2035, laying the groundwork for achieving Net Zero by 2040. Additionally, Aena Brasil is committed to facilitating and promoting the decarbonisation of other stakeholders in the aviation sector, thus contributing to more sustainable air transport. To this end, collaboration with suppliers, tenants, aircraft operators, and the community is essential to improving sustainability throughout the value chain. Aena Brasil's Net Zero commitments and interim targets are aligned with the objectives of the Paris Agreement, as defined in its Climate Action Plan and Sustainability Strategy.

All of the Aena Group's Climate Action Plans establish annual indicators that allow for monitoring the progress of the various planned initiatives and specific projects, ensuring that each action contributes to the overall sustainability objectives. The main decarbonisation levers and programs, including changes in the service portfolio and the adoption of new technologies, are detailed in section [E1-3](#). Strategic climate change objectives are detailed in section [E1-4](#). For further information on current financial resources linked to the Climate Action Plans, please refer to the section on [Taxonomy of Sustainable Finances](#).

The Aena Group does not carry out any economic activities related to the extraction, production, or trade of coal, oil, or gas. The company carries out activities covered by Regulation (EU) 2020/852 and its implementing regulations (please see section on [Taxonomy of Sustainable Finances](#)). Additionally, according to Implementing Regulation (EU) 2022/2453, Aena is not excluded from the EU Paris-aligned benchmarks.

The Aena Group has identified several sources of potential locked-in GHG emissions within its operations:

- **Emergency generators:** A portion of the Aena Group's potentially locked-in GHG emissions is attributable to the use of emergency generators, which are activated in the event of power outages at airport facilities. These generators are essential to ensure operational continuity and safety. These emissions are considered locked-in because the generators are necessary for emergency power supply and cannot be completely eliminated with current technology, although work is underway to implement technologies that store clean and continuous energy, thus reducing the use of fossil fuels.
- **Fossil fuel vehicles in its own fleet (heavy-duty vehicles):** Some vehicles in the Aena Group's own fleet continue to run on fossil fuels because the complete electrification of the fleet requires a phased approach, as there are still no equivalent substitutes for certain types of vehicles. These heavy-duty vehicles, such as tankers or fire trucks, require high power, immediate availability, and absolute reliability. Currently, there is no operational equivalent electric alternative for critical interventions representing a locked-in source of GHG emissions over time. While the contribution of these vehicles to the Group's overall emissions profile is marginal compared to other own sources, the gradual introduction of HVO in some types of these heavy-duty vehicles, not suited for electrification, is planned to achieve their decarbonisation. These emissions are included in each airport's decarbonisation targets, ensuring that the Group's climate objectives remain achievable and are not compromised by these residual sources.

All locked-in emissions identified in scopes 1 and 2 are incorporated into the Group's Climate Action Plans. Therefore, they do not jeopardise the achievement of medium- and long-term climate objectives, as the Group annually reviews technological advancements and market opportunities to reduce these emissions over time. If reductions are not possible, the Group remains committed to minimising locked-in GHG emissions through ongoing investments in infrastructure, fleet renewal, and the promotion of alternative fuels and electrification solutions. Progress on these investments will be reported annually, and any significant changes in the status of locked-in emissions will be disclosed in future sustainability reports.



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E1-ESRS 2 SBM-3: Material impacts, risks and opportunities and their interaction with strategy and business model

E1-SBM 3- 18, E1-SBM 3 19 (a-c)

In Spain, through the Aena Group Strategic Plan 2022-2026, the Sustainability Strategy 2021-2030, and the Climate Action Plan 2021-2030; in the United Kingdom through London Luton Airport's Responsible Business Strategy; and in Brazil through its Climate Action Plan 2024-2040 and the Aena Brasil Sustainability Strategy 2024-2040, the Company has established specific objectives, key indicators, and policies to limit and reduce negative impacts, manage risks, and leverage opportunities arising from a constantly changing global environment. This strategic approach includes a comprehensive analysis of physical and transition risks, both in the Group's own operations and throughout its value chain, involving suppliers, partners, and local communities. Climate risks and opportunities are identified and assessed through a double materiality assessment and are reviewed periodically by Senior Management and the Board of Directors. The material climate risks identified in this analysis are shown in the IROs table, classified as physical or transition risks (see section E1, [Table of material IROs](#)). For further information related to the double materiality assessment, please refer to [ESRS 2. IRO 1](#).

In the current fiscal year, these risks and opportunities have not had a significant impact on the financial statements, nor have they caused significant changes in the values of assets and liabilities. This stability allows the Aena Group to operate with confidence in its infrastructure, systems, procedures, and people, focusing on the continuous improvement of its processes, without financial uncertainties linked to climate change risks. Based on the results of climate risk and resilience analyses, as described in more detail below, the Aena Group has demonstrated a strong capacity to adapt to changes and manage the associated risks.

The results of the Aena Group's climate risk analysis (physical risks, transition risks, and opportunities) have been developed at a more detailed level and with different time horizons, as it implies a specific assessment methodology (criteria, scales, and thresholds for relevance, prioritisation, or materiality) that results in more specific risks and opportunities. For further information, please refer to [ESRS 2. IRO 1](#).

Climate risk and resilience analysis

E1-SBM 3-19 (a, b, c); E1-AR6, AR7 (a, b, c) ; AR8 (a, b)

The Aena Group's initial resilience analysis is based on national and international regulatory and strategic frameworks, as well as best practice references and long-term financial projections. Its purpose is to strengthen the Company's preparedness for the the risks and opportunities associated with climate change. The methodology employed allows for a more comprehensive assessment of the operational and regulatory context in which the Aena Group operates, as well as an analysis of the strength of its governance structures and its capacity for strategic adaptation. The work is organised around three main pillars: the resilient environment, climate governance, and economic resilience.

Regarding the scope of the resilience analysis, Aena has given priority consideration to its own operations that represent the greatest exposure to climate risks, both physical and transition, including critical infrastructure of the airport network in Spain, the United Kingdom, and Brazil. Additionally, the assessment of those value chain activities whose exposure to physical or transition risks could generate significant impacts on Aena's business or operations has been incorporated, including regulatory bodies, ground handling companies, fuel suppliers, and airlines.

For more details on the Group's operations and its value chain, please refer to the section on [Aena Group and its Value Chain](#).

The same time horizons have been applied for physical and transition risks, aligned with climate and business scenarios. These time horizons allow for the identification and prioritisation of material risks for its operations, thus establishing GHG emission reduction targets in line with the requirements of section [E1-4](#). The projections derived from the models used by the Intergovernmental Panel on Climate Change (hereinafter "IPCC") include various uncertainties arising from short-, medium-, and long-term climate variations, while the "Net Zero 2050" scenario, published by the International Energy Agency, allows for capturing the main trends of the transition towards a low-carbon economy in the transition risk analysis, ensuring planning aligned with the Company's sustainability objectives and operational needs.

For more information on physical risks, transition risks, and climate scenarios, please refer to section [E1-IRO 1](#).

The main uncertainties considered in Aena's resilience analysis stem primarily from the variability in climate scenarios, the limitations of physical and operational models, and the future evolution of socioeconomic and regulatory factors. To address these uncertainties, IPCC scenarios (SSP2-4.5 and SPP5-8.5) and socioeconomic trajectories (SSP) were used for the evolution of physical risks, as well as the International Energy Agency's Net Zero scenario for the analysis of transition risks. Taken together, these scenarios allow for the assessment of climate change-related impacts in the time horizons of 2030, 2040, and 2050, incorporating both physical and transition risks.



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In more detail, Aena has conducted an initial resilience analysis using a comprehensive approach that encompasses the environment in which the Company operates, the governance of information related to sustainability and climate change commitments, and economic resilience. The results confirm a solid level of preparedness for climate challenges.

Within the scope of the Resilient Environment, the work carried out, supported by national and European climate change plans, current regulatory frameworks, and international reports such as those from the IPCC and ICAO, as well as official platforms like Climate-Adapt and AdapteCCa, has allowed for progress in assessing how climate factors can influence the regulatory, economic, and operational framework. The progress achieved to date indicates that the context in which Aena operates is adequately prepared and provides a solid foundation for further strengthening strategic decision-making focused on adaptation and resilience.

Regarding Governance, the analysis developed in accordance with TCFD criteria highlights an integration of climate change into the Board's oversight, the role of senior management, and the risk management system. This progress demonstrates greater alignment with international best practices and a continued strengthening of the organisation's commitment to the responsible management of climate risks, both in strategic planning and decision-making processes.

Finally, the Economic Resilience analysis assesses the Group's capacity to maintain operational and financial continuity in the face of adverse climate scenarios, as well as its potential for adaptation or asset transformation based on future needs. Aena maintains a solid financial position and access to diverse sources and instruments of financing, providing the necessary flexibility to advance in the implementation of adaptation measures and respond effectively to the potential challenges of climate change.

Aena is making progress in the analysing its resilience to the physical and transition risks associated with climate change, relying on integrated, proactive management aligned with international best practices. Preliminary results indicate a strong capacity for adaptation and mature governance, which contribute to anticipating and mitigating impacts across different time horizons. In this way, the Company continues to strengthen its position to maintain operational and financial continuity in the face of adverse climate scenarios, reinforcing its commitment to long-term sustainability and generating value for all its stakeholders.

Impact, risk and opportunity management

E1 ESRS 2 IRO-1: Description of the processes to identify and assess material climate-related impacts, risks and opportunities

E1-IRO-1 20 (a)

The Aena Group has established a detailed double materiality assessment process to identify and evaluate impacts, risks, and opportunities arising from climate change, whose methodology is described in the double materiality section (**ESRS 2 IRO-1**). In addition, information is provided regarding the interviews and consultations carried out with the affected stakeholder groups.

In this process, the Company has identified and categorised the impacts, risks, and opportunities derived from climate change through several stages: Understanding, Identification, Evaluation, and Determination.

In the Identification stage, the Aena Group has evaluated climate change-related impacts by analysing and quantifying Scope 1, 2, and 3 Greenhouse Gas (GHG) emissions. The Group analyses these emissions using internal evaluation tools and following recognized methodologies such as the GHG Protocol standard, a result of a partnership between the World Resources Institute (WRI), the World Business Council for Sustainable Development (WBCSD), and ISO 14064 standards.

Based on the data available in the internal systems, the information is consolidated to calculate the carbon footprint following the established **methodology** and using the corresponding country-specific emission factors. These factors are obtained from reputable databases according to the different emission sources identified in each scope, in order to ensure the quality and accuracy of the calculations. Emissions are calculated semi-annually and annually, which allows the Company to prioritise its mitigation and adaptation actions, ensuring that its efforts to reduce emissions are aligned with corporate sustainability objectives.



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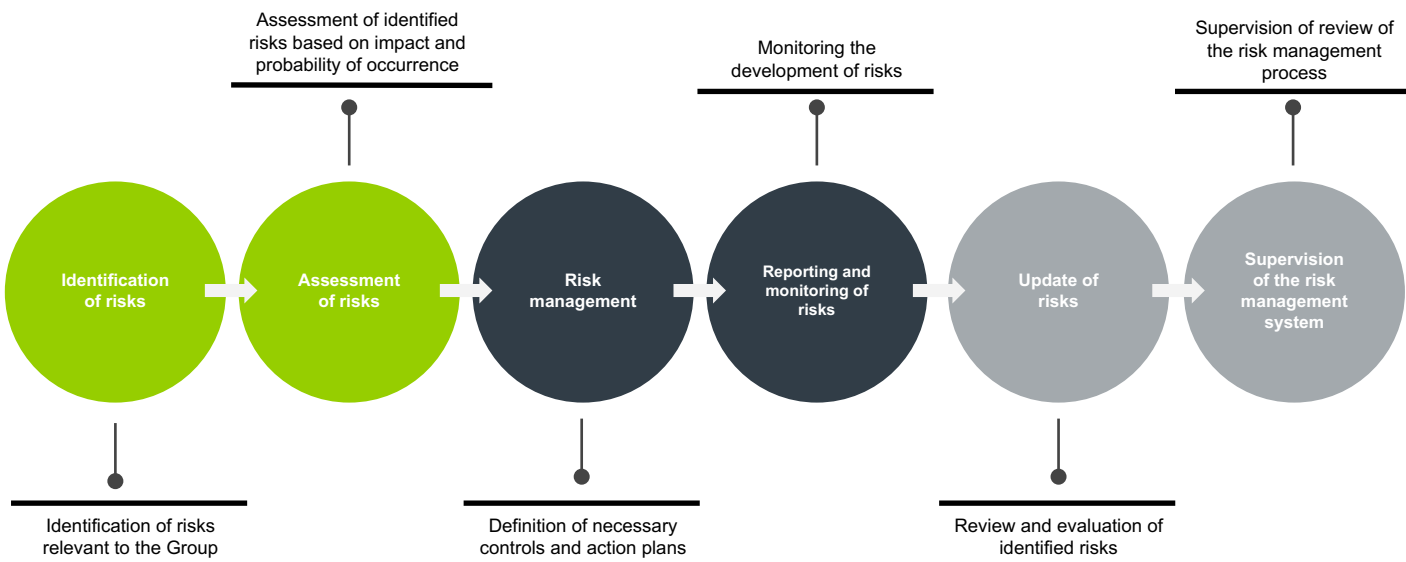
Furthermore, the Aena Group reviews its infrastructure expansion plans through the Strategic Environmental Assessment of Master Plans and Special Plans, identifying GHG sources and calculating projected emissions, as well as other potential climate impacts —such as changes in land use— that may have repercussions along the value chain. Through this Environmental Assessment, both current operations and infrastructures, as well as future projects and traffic forecasts, are considered, applying a preventive approach to minimise any negative impacts. This allows the Aena Group to anticipate potential emission sources and to develop mitigation strategies in line with its climate commitments.

In this context, the results of the quantification of GHG emissions (climate-related impacts) are detailed in section **E1-6**.

The outcome of the Aena Group's climate risk analysis (physical risks, transition risks, and opportunities) is at a more detailed level, as it counts on a specific evaluation methodology (criteria and scales and relevance or prioritisation or materiality threshold that results in very detailed risks and opportunities). The climate risk analysis carried out by the Aena Group includes those derived from applicable regulation and legislation, and covers both its own operations and the relevant links of the value chain.

Management of climate change-related risks

The Aena Group, in order to ensure continuous monitoring and facilitate the reporting process, includes climate risk analysis in the Company's risk map, which takes into account management, supervision, and control mechanisms, and includes indicators and measures linked to its Climate Action Plans. This process involves operating with a transversal vision that involves all corporate departments, as well as the different governance bodies in the process of identification, analysis, evaluation, assessment, and control of risks.



During 2025, the Aena Group has updated its climate risk analyses for each of its geographical areas, taking into account high emission scenarios and their impact on all its assets and business activities, considering their geospatial coordinates and the value chain, including upstream and downstream phases.

The climate risk analysis evaluates physical and transition risks and climate opportunities following the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD), covering different time horizons that include both current operations and future projects. Key infrastructures analysed include runways, terminal buildings, and aprons, which have a longer lifespan.

To determine which physical risks are material for the Company, a preliminary analysis was carried out for the 28 risks identified in Appendix A of the technical screening criteria annexes of the EU Taxonomy Delegated Acts, selecting those that could affect the Aena Group due to its specific conditions. For this purpose, in general terms, sector references, the list of risks that, as guidance, could be included in the regulations and/or requirements applicable for these purposes, those identified by peers, internal references, etc., were analysed. All of this served to make an initial selection of the risks that, *a priori*, could significantly impact the Aena Group.

Regarding the scenarios used, these climate risk analyses consider both high emission scenarios and those aligned with the Paris Agreement, offering a solid basis for strategic decision-making and investment planning. By considering a variety of climate scenarios, the Aena Group can proactively adapt to different potential futures, ensuring that its strategies and operations are resilient to climate variations and allowing its projects to align with established climate commitments.

Below are the climate risk analyses for Spain, the United Kingdom (London Luton Airport), and Brazil.



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Climate risk analysis for Aena in Spain:

Physical risks and climate scenarios (IPCC):

E1-IRO 1- 20 (b), E1-IRO 1-21, AR 13 (c)

Physical risks directly related to climate change have been identified. These risks can be driven by acute events or long-term chronic changes in weather patterns, and may affect the infrastructure and operation of Aena's network of 46 airports and 2 heliports in Spain, as well as its value chain.

This analysis covers short-term (2025), medium-term (2033), and long-term (2053) time horizons, taking into account the vulnerability of assets and activities based on their geographical location and lifespan. It also ensures that the process is aligned with the Company's strategic and investment plans.

The following climate scenarios identified by the IPCC have also been considered:

- **SSP5 8.5 SCENARIO (Business as Usual scenario):** This corresponds to a pathway in which emissions continue to rise at the current rate, assuming global warming that will likely not exceed 4°C.
- **SSP2 4.5 SCENARIO (Strong Mitigation scenario):** This corresponds to a pathway in which emissions would have been halved by 2080 and it is very likely that global warming will not exceed 2°C.
- **SSP1-2.6 SCENARIO:** SSP scenarios consider both the level of emissions and the Shared Socioeconomic Pathway. The "1" refers to the socioeconomic trend, in this case, sustainable development, and the "2.6" to the approximate level of radiative forcing by the year 2100. This scenario is similar to RCP 2.6 in terms of climate projections, although it covers a broader range of future greenhouse gases and air pollutants. This types of scenario is considered in the IPCC Sixth Assessment Report.

For the identified climate events, the magnitude of the impact and the probability of the risk materialising at each of the airports in the Aena network in Spain are taken into account.

The quantitative analysis for the SSP2-4.5 and SSP5-8.5 climate scenarios is based on risk calculation, understood as the system's susceptibility to being negatively affected due to its inability to absorb the effects of climate change.

Risk, therefore, depends on both magnitude and probability, and is specific to each risk assessed. A matrix is constructed to define the risk level for each variable evaluated within the defined time horizons and under the SSP2-4.5 and SSP5-8.5 climate scenarios for each airport.

Moreover, the qualitative analysis was conducted according to shared socioeconomic pathway scenario SSP1-2.6. This analysis focused exclusively on measuring projected variations of climate values (e.g., maximum temperature) with respect to the historical reference period defined by the IPCC (1986-2005) to strengthen the quantitative analysis.

Based on the analyses and models developed from available data, and always taking into account the uncertainty associated with climate projections, airports that could be impacted by the effects of climate change have been identified. These airports would be affected if the planned adaptation measures were not adopted, particularly regarding extreme rainfall and heat waves.

In this regard, Aena in Spain has updated its adaptation plan for the period 2025-2033-2053 for airports whose physical risks have been categorised as critical, developing new strategies to adapt to them. Individual adaptation plans were generated for the 46 airports and 2 heliports to create the climate change adaptation plan for Aena's network in Spain.

These adaptation plans outline the necessary measures to reduce the identified climate risks. The measures have been planned individually for each airport and climate risk. To mitigate the risks for extreme temperatures and heat waves, measures have been planned such as reinforcing the terminals' air conditioning system and the using resistant materials on runways, while for the risks of flooding and extreme rainfall, measures have been planned that include new drainage systems. For the risk of drought, measures have been designed such as the installation of water tanks and the use of reclaimed water.

Transition risks and climate scenarios (IEA):

E1-IRO 1- 20 (c), E1-IRO 1-21

In the transition to a low-carbon economy, Aena in Spain faces several changes associated with the implementation of new legal and regulatory requirements, technological advancements, emerging policies, and market dynamics. According to the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD), these changes are classified as transition risks, which can impact Aena in Spain financially, operationally, and reputationally. To better understand the transition risks associated with climate change, these risks are assessed using the following climate scenario from the International Energy Agency (IEA):

NZE SCENARIO (NET ZERO EMISSIONS BY 2050): This scenario shows how the global energy sector can achieve net-zero CO₂ emissions by 2050, meeting the United Nations Sustainable Development Goals (SDGs) and limiting global warming to 1.5°C by 2100. It is therefore the most demanding scenario for organisations, as achieving it will require the implementation of various costly measures, which in turn will necessitate adjustments to short-term strategies.



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Furthermore, three time horizons have been established: short-term (2025), medium-term (2035), and long-term (2055) to analyse transition risks. This timescale allows Aena in Spain to anticipate imminent needs related to the various opportunities (changes in the business model, investments in technologies, new market strategies, reputation strengthening, etc.) that may arise from the climate risk analysis.

Transition risks are assessed under the concept of materiality, defined as the importance or relevance of a risk in relation to Aena's objectives and operations in Spain. Material risks are those that have the potential to significantly affect financial results, business continuity, or reputation. To determine the materiality of the identified risks, the inherent probability, vulnerability, inherent impact of the risk, and its residual impact are taken into account.

Each risk, in each of the previously defined time horizons, is assigned a value based on two variables: exposure and probability of occurrence. This is used to construct a matrix that defines the level of materiality for each transition risk in the defined time horizons, and the criticality is calculated, allowing for the selection of risks that need to be incorporated into the internal risk management process.

This process also considers technological advancements and market changes that can positively impact operations, transforming them into an opportunity. For example, the transition to a low-carbon economy could present opportunities to modernise infrastructure and optimise energy efficiency, ultimately strengthening a competitive position.

Opportunities:

In Spain, Aena has identified and assessed opportunities associated with detected climate risks in order to develop mitigation and/or adaptation strategies in response. This analysis considered the five main categories proposed by the TCFD as a starting point.

Climate risk analysis at London Luton Airport:

In the UK, London Luton Airport has its own **Climate Change Adaptation Report** (CCAR), which analyses risks under SSP 4.5 and 8.5 scenarios. The report aligns with the TCFD methodology and Aena's risk analysis in Spain, identifying the Initial, Inherent, and Residual risk levels.

The climate change and adaptation analysis for London Luton Airport has been prepared based on the Department for Environment, Food and Rural Affairs (DEFRA) Adaptation Report, which presents the UK Government's Fourth Climate Change Risk Assessment (CCRA4).

The climate risk and adaptation analysis for London Luton Airport aligns with DEFRA requirements, as well as with the relevant sections of the UK Climate Change Act. It also emphasises the importance of fostering an inclusive, interdepartmental, and effectively coordinated approach that involves the various teams within London Luton Airport.

The analysis considers three time horizons:

- **Baseline year:** UK climate projections for the period 1981-2000 are used to represent baseline conditions.
- **Short term:** The period 2021-2040 (2030s) is used to understand short-term risks in the physical risk assessment.
- **Long term:** The period 2061-2080 (2070s) is used to assess long-term risks in the physical risk assessment, encompassing the expected lifespan of the airport's assets.

The methodology employed identifies the risk factors that could impact the operations of London Luton Airport, which are as follows:

- **Risk:** There are risks at London Luton Airport related to extreme weather events that could negatively impact airport operations.
- **Vulnerability:** Vulnerability refers to the tendency of airport operations, economic and social aspects, and goods and services to be affected by the impacts of climate change, based on the sensitivity and adaptive capacity of the systems in operation.
- **Exposure:** Exposure refers to the presence of people, ecosystems, goods, cultural assets, and services in locations that are vulnerable or could be affected by climate change, such as heat waves, floods, storms, etc.
- **Response:** The response can reduce or increase risk and opportunities by affecting each of the other factors.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
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Physical risks and climate scenarios:

E1-IRO 1-20 b, E1-IRO 1-21

In identifying physical risks, thresholds were considered, including probability and severity, at which the performance of London Luton Airport assets is affected by extreme weather events. This was achieved through an analysis based on a combination of information from the airport's previous climate adaptation report, the results of the UK Climate Risk Assessment, UKCP18 scenario projections, and a review of sector-specific risk assessments.

Climate-related transition risks:

E1-IRO 1- 20 c, E1-IRO 1-21

For the assessment of transition risks, the regulatory framework considered focuses on the transition to a low-carbon economy and its impact on costs. In the UK, this framework is based on the Climate Change Act 2008, which aims to ensure that carbon emissions do not contribute to global warming exceeding 2 degrees Celsius, with the goal of remaining below 1.5 degrees Celsius. This is reflected in the UK Climate Projections for climate scenario purposes, as well as in all applicable low-carbon economy requirements for businesses. A comprehensive TCFD assessment will be necessary in the future to fully mature the understanding of the transition risks faced by LLA, including quantitative and scenario analysis. To facilitate future work, the risks have been grouped according to the TCFD framework's recommendations for policy and legal risks, technological risks, market risks, and reputational risks.

Opportunities:

The analysis considered identifying climate change-related opportunities for London Luton Airport in order to gain a competitive advantage. These opportunities include investment in sustainable technologies and infrastructure to reduce the environmental footprint, improve operational efficiency, and mitigate the the short-, medium-, and long-term effects of climate change. These opportunities are related to both the identified physical and transition risks.

Climate risk analysis at Aena Brasil:

In 2024, Aena Brasil conducted an initial climate risk assessment, which was updated in 2025 and covers all of Aena's airport operations in Brazil, including both its subsidiaries (BOAB and ANB). This analysis established two climate scenarios (pessimistic and optimistic) and time horizons to better understand the evolution of physical risks, transition risks, and opportunities. These are as follows:

- **Baseline Year:** Brazil's climate projections for 2023 are used to establish baseline conditions.
- **Short Term:** The period 2024-2030 is used to understand short- and medium-term risks and opportunities.
- **Medium/Long Term:** The period 2031-2050 is used to assess medium- and long-term risks and opportunities, covering the expected lifespan of assets in Brazil.

Physical risks and climate scenarios:

E1-IRO 1- 20 (b), E1-IRO 1-21, AR 13(c)

The physical risks analysed result from events (acute) or long-term changes (chronic) in climate patterns. They can cause direct damage to assets, and indirect impacts due to disruptions of the supply chain.

The physical risk assessment analysis was conducted using the *Adapta Brasil* MCTI platform, a tool developed by the Brazilian Ministry of Science, Technology, and Innovation, which integrates and disseminates information on climate change risks in Brazil.

Specifically, two future scenarios were used on the platform:

- **SSP5-8.5 SCENARIO (Business as Usual scenario):** Represents a pathway without significant mitigation efforts, with a continuous increase in emissions. Under this scenario, Brazil faces a substantial increase in average annual temperature, an intensification of extreme events (such as prolonged droughts and severe floods), and greater pressure on ecosystems, critical infrastructure, and production systems.
- **SSP2-4.5 SCENARIO (Strong Mitigation scenario):** This scenario assumes that emissions would have been halved by 2080. In the Brazilian context, moderate temperature increases and gradual alterations in precipitation patterns are projected, with differentiated impacts depending on the region and economic sector analysed.

It is worth noting that throughout 2025, Aena Brasil finalised individualised adaptation plans for each of its 17 airports, aimed at reducing vulnerability to extreme weather events and ensuring the continuity and safety of their operations.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
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Aena Brasil's Climate Adaptation Plan includes adaptation measures to minimise the physical risks identified in the risk analysis for each airport, using a quantitative risk analysis methodology. This methodology analyses the severity of the airport's climate risk (initial risk) as well as the risk reduction generated by the designed adaptation measures (residual risk).

By 2025, Aena Brasil has implemented the adaptation measures planned for that year and designed an additional number of measures that are currently being implemented. The results of the adaptation plans show that, with the implementation of the proposed measures, the 17 airports in the network are protected against the climate risks identified for both the optimistic and pessimistic scenarios in the medium and long term.

Although there is currently no national regulation requiring this analysis, legislation is evolving, and in 2023, an Interministerial Committee on Climate Change (CIM) was created, whose overall objective is to develop the Climate Adaptation and Mitigation Plan at the national level. This plan aims to guide, promote, and catalyse coordinated adaptation and mitigation actions for human and natural systems through short-, medium-, and long-term strategies within the framework of sustainable development.

Climate-related transition risks:

E1-IRO 1- 20 c, E1-IRO 1-21

The transition to a low-carbon economy may involve political, legal, technological, market, and reputational changes to address climate change-related mitigation and adaptation requirements.

The assessment is carried out with a standardised framework that considers limits for impact, the probability of events, and the severity of impacts. This framework is expanded to include an assessment of transition risks, following current best practices and guidance from the TCFD (Task Force on Climate-related Financial Disclosures). However, the transition risks assessment is in a preliminary phase, and the risks are assessed only on a qualitative basis. This analysis considered the same short-, medium-, and long-term time horizons used in the physical risks assessment.

Aena Brasil has identified four main risk categories in accordance with the TCFD recommendations: political and legal risks, technological risks, market risks and reputational risks, each with potential impacts on airport operations in the context of the transition to a low-carbon economy.

Opportunities:

The analysis also included the identification and assessment of strategic opportunities arising from climate change and the transition to a low-carbon economy. These opportunities were assessed following the methodology and time horizons used in the identification of physical and transition risks.

Main results of the Aena Group's climate risk analyses:

It should be noted that the results of the Aena Group's climate risk analyses (physical risks, transition risks, and opportunities) across the different regions feature a high level of detail, as they count on a specific assessment methodology as explained above.

Regarding physical risks with potential impact on airport infrastructure or the management of transport services, the following stand out:

1. Extreme temperatures.
2. Heat waves.
3. Extreme precipitation.
4. Droughts.
5. Risk of river or coastal floods.

Regarding transition risks, and following the methodology described above, the Aena Group conducts a comprehensive assessment to understand the implications of each risk and determine its relevance/materiality in the financial, operational, and reputational areas across the different time horizons defined previously. These risks are linked to the categories of policy and legal, technological, market, and reputational risks.

Thus, and according to the probability and potential impact assessments, the most significant transition risks at the group level are, by type:

- Regulatory: arising from regulations in the different regions where the Group operates, with particular emphasis on European regulations, such as Fit for 55, Green Deal 2040, and the Clean Industrial Deal, and specifically in Spain, due to the ban on flights with high-speed rail alternatives.
- Technological: due to the transition to new technologies and sustainable fuels at airports and the potential shortfall in the electrical grid's capacity to meet future needs.



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- Market: due to changes in tourism trends.
- Reputational: as a consequence of possible breaches of commitments to achieve net zero emissions by Aena and its value chain.

Furthermore, based on the results obtained in previous climate risk studies, opportunities were identified related to the categories of resource efficiency and energy source (such as the introduction of new technologies and operational measures), products and services (development of efficient operations management technologies, services that meet customer expectations for more sustainable travel: multimodal hubs and sustainable tourism, and low-emission services), markets, and resilience (greater access to sustainable financing and promotion of the use of sustainable aviation fuels through collaborations with key partners in the aviation sector).

The climate risks and opportunities of the Aena Group, identified after the double materiality assessment ([ESRS 2. IRO 1](#)), are shown in the introductory table of section [E1](#). Further information can also be found in Note 3.4, Description of the main risks arising from climate change, of the Consolidated Annual Accounts 2025 - Block A.

E1-2: Policies related to climate change mitigation and adaptation

E1-2 22, E1-2 24, E1-2 25

The Aena Group maintains a firm commitment to addressing the challenges of climate change in all the regions where it operates, implementing specific policies aimed at managing the potential impacts related to both mitigation and adaptation to climate change. Both the Sustainability Policy and the Policy on Integrated Quality, Environment, Energy Efficiency and Occupational Health and Safety Management establish the commitment to integrating climate change mitigation and adaptation into all its operations and value chain, aligning its actions with the objectives of the Group's Sustainability Strategy and Climate Action Plans. These policies apply to all Group entities, including those in Spain, the United Kingdom, and Brazil, and cover both its own operations and the activities of its value chain, involving suppliers and other stakeholders. The main objectives of these policies are to reduce its carbon footprint and promote energy efficiency and the use of renewable energy.

The policies are implemented through specific action plans, such as each company's Climate Action Plans, which include energy efficiency initiatives and the transition to renewable energy. These actions are reviewed and updated regularly to ensure their alignment with scientific and regulatory developments, and their effectiveness is monitored by the Group's governing bodies and sustainability committees.

Compliance with the policies is monitored through key performance indicators (KPIs), ensuring continuous improvement and transparency in the management of climate risks and opportunities. For more information on Minimum Disclosure Requirements (MDR-P), please refer to the [Environmental policies](#) section.

E1-3: Actions and resources related to climate change policies

E1-3 26, E1-3 28, E1-3 29 (a), E1-3 29 (b), E1-3 29 (c)i, E1-3 29 (c)ii, AR 21, AR 22

The Aena Group follows the roadmap established by the Climate Action Plans (PAC) of Aena in Spain, London Luton Airport, and Aena Brasil. These plans reflect the Aena Group's commitment and establish the necessary actions to achieve the carbon footprint reduction targets for its Scope 1 and 2 emissions, and set collaborative objectives to boost the reduction of its Scope 3 emissions that are not under its control⁵.

In this regard, the Aena Group has annual strategic targets aimed at reducing its own emissions through the purchase, generation, and self-consumption of renewable energy, and improving energy efficiency in its facilities, among other initiatives.

Regarding Scope 3 emissions, measures focus on promoting the use of Sustainable Aviation Fuel (SAF), reducing emissions attributable to ground handling by increasing the use of electric vehicles, installing electric charging points for passengers, employees, and companies working at airports, and promoting sustainable mobility to and from airports, as well as actively involving the supply chain and local communities in driving sustainability.

Constant progress toward meeting the established objectives has led to significant achievements in environmental certifications by 2025, specifically within the framework of ACI EUROPE's Airport Carbon Accreditation program.

⁵ The Aena Group is working on the development of systems and processes that will provide detailed information on achieved and projected emission reductions, broken down by action. Currently, initiatives are being implemented to improve the traceability and monitoring of emission reduction actions.



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In Spain, three airports—Palma de Mallorca, Adolfo Suárez Madrid-Barajas, and Josep Tarradellas Barcelona-El Prat—have achieved Level 4 certification, reflecting a high level of commitment to managing and reducing carbon emissions. In addition, four airports have renewed their Level 3 certification, thus consolidating their efforts in carbon management. These airports are Málaga-Costa del Sol, Alicante-Elche Miguel Hernández, Ibiza, and Menorca. César Manrique-Lanzarote Airport has renewed its Level 2 certification, while Santiago-Rosalía de Castro Airport has renewed at Level 1. Furthermore, ten airports, including those of the Canary Islands Group, Valencia, Seville, and Bilbao, have obtained Level 1 certification for the first time, representing a significant initial step in managing their emissions.

In the United Kingdom, London Luton Airport has maintained its Level 4 certification, demonstrating the consolidation of its sustainable practices and its commitment to carbon neutrality. In Brazil, seven airports managed by Aena Brasil are accredited at Level 1, with the goal of extending Airport Carbon Accreditation at this level to other facilities, marking the beginning of their journey towards more efficient and responsible carbon emission management.

The main decarbonisation levers or programs used to drive the achievement of the objectives set out in each of the PAC are detailed below. These programs include mitigation measures that are also related to corrective measures aimed at minimising Scope 1, 2, and 3 emissions, with no individuals identified as being harmed by this material impact (MDR-A 68 d). Regarding the Aena Group's capacity to execute these measures, as indicated in section [ESRS 2 SBM-2](#), the Airport Regulation Document (DORA) sets mandatory investment targets for climate change. This commitment is also reflected in section [E1 SBM-3](#). For more information on allocated resources, please refer to the section on [Taxonomy of Sustainable Finances](#).

For more information on progress made and ongoing actions, please refer to section [E1-6](#).

Scope 1 and 2: Carbon Neutrality

The main objective of this program is to position Aena in Spain as a carbon-neutral airport operator by 2026, thus laying the foundation for achieving ACI EUROPE's Net Zero target by 2030 and 2040 in the case of London Luton Airport and Aena Brasil's airports. To manage its material impacts, risks, and opportunities, the Aena Group has implemented several key actions aimed at mitigating the impact of Scope 1 and 2 emissions, as well as improving the energy efficiency of its airport buildings, all in line with its Environmental Policies (please refer to section [MDR-P: Environmental Policies](#)).

In this regard, since 2024, all electricity consumed in the Spanish airport network and at London Luton Airport (United Kingdom) has come from 100% certified renewable sources, while Aena Brasil is committed to reaching this percentage in all its airports by 2027, having reached a total of 89% in 2025 (76% en 2024).

Furthermore, with the aim of increasing the percentage of self-sufficiency, the Aena Group continues to advance its Photovoltaic Plan, which will significantly increase its own energy generation capacity. It is projected that, by 2029, the deployment of Aena's Photovoltaic Plan in Spain will reach a renewable energy production equivalent to 51% of the consumption registered in 2019. During 2025, the construction of a photovoltaic plant at Adolfo Suárez Madrid-Barajas Airport, with a nominal capacity of 120 MW, has been completed. In addition, the construction has begun on a photovoltaic plant at Josep Tarradellas Barcelona-El Prat Airport, with a nominal capacity of 10 MW, and another at Reus Airport with a capacity of 12.5 MW. It is estimated that, once operational, these three facilities will be able to generate approximately 287 GWh. Considering all plants currently in the permitting process, both grid-connected and off-grid, Aena's Photovoltaic Plan's total production could reach 540 GWh by 2029. Furthermore, in 2025, the construction of new photovoltaic plants at Málaga-Costa del Sol, Zaragoza, Valencia, and La Gomera airports has been awarded, and the bidding process has begun for an additional 45 MW nominal capacity plant at Adolfo Suárez Madrid-Barajas Airport.

In Spain, as part of this initiative, Aena has awarded a Power Purchase Agreement (PPA) in 2025 for the purchase of 40 GWh, with commissioning scheduled for 2026. Additionally, procedures have begun for the purchase of an extra 135 GWh through this same mechanism.

Regarding the thermal energy strategy⁶, in 2025, guarantees of origin for biomethane were purchased for the boilers at Josep Tarradellas Barcelona-El Prat Airport, and procedures have begun to contract the supply of geothermal energy at Adolfo Suárez Madrid-Barajas Airport. Likewise, throughout 2025, feasibility studies have been conducted for replacing boilers with geothermal systems at the airports of Bilbao, Girona-Costa Brava, Asturias, Pamplona, Santiago-Rosalía de Castro, Vigo, and Valladolid.

Furthermore, in Spain, measures focused on improving energy efficiency have been implemented, such as replacing conventional lighting with LED technology. In 2025, in Spain, 85% of the lighting in airport terminals (51% in 2024) has been LED, with the goal of reaching 100% by 2026.

Finally, it is worth noting that, in Spain, Aena is in the process of implementing the BREEAM (Building Research Establishment Environmental Assessment Method) methodology for the future development and management of its expansions and new infrastructure. BREEAM is one of the most recognised international standards for the environmental assessment of buildings and civil engineering projects. Its future application will ensure that new infrastructures meets the highest energy efficiency requirements.

All these actions have resulted in a greater than expected reduction in CO₂e emissions in 2025, thus reducing the required offset percentage (8%). In this regard, 8,198 tCO₂e (6%) were offset in 2026 from Scope 1 and 2 emissions in 2019.

⁶ Currently, the largest source of Scope 2 emissions comes from the purchase of heating and cooling energy from the concessionary combined heat and power plant located at Adolfo Suárez Madrid-Barajas Airport. To reduce the emissions associated with this plant and in line with decarbonisation and energy efficiency improvement objectives, the concession includes the installation and commissioning of electric chillers and boilers at the airport. Additional measures to further reduce these emissions are currently being analysed and will be reported in future sustainability reports.



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In the United Kingdom, London Luton Airport has committed to ensuring that by 2026, 25% of the electricity used directly in its facilities will come from renewable energy sources located at the airport itself or in nearby areas. To this end, the Power Purchase Agreement (PPA) for a 30-year photovoltaic solar plant at London Luton Airport, with a production capacity of 10 to 12 MWp has been reactivated in 2025. Likewise, the lighting in all internal buildings and parking areas has been upgraded to LED technology, achieving 100% coverage, with this process expected to be completed by 2025. Additionally, as part of the runway resurfacing plan, the installation of new and efficient LED runway lighting systems will begin in late 2025 and is expected to be completed by March 2026.

In Brazil, Aena Brasil's airports aim to achieve 100% LED lighting in all their facilities by 2027 and extend this technology to aprons and runway lights before 2030. Furthermore, the commissioning of a photovoltaic plant for self-consumption is planned for Carajás-Parauapebas Airport.

The Aena Group also has a strategy focused on replacing air conditioning and emergency equipment with more energy-efficient alternatives and transitioning to a sustainable vehicle fleet. To this end, actions are being taken such as the electrification of the Company's own vehicle fleet, as well as the incorporation of sustainable fuels in existing vehicles, generators, and boilers. By 2025, the percentage of electric cars and vans in the Company's own fleet in Spain has reached 58% (52% in 2024), while in the United Kingdom, 86% of vehicles at London Luton Airport have been low-carbon (88% in 2024). By 2025, sustainable vehicles have constituted 24% of the Company's own fleet at Aena Brasil airports (0% in 2024).

The following are the air conditioning and lighting actions that are underway or have been completed in Spain by 2025.

Table 1. Energy efficiency measures in air conditioning per centre in Spain

Centre	Action	Description	Status (Completed/In progress)	Time horizon
A Coruña	Air conditioning	Installation of heat pump and buffer tank for Terminal	In progress	Short-term
Adolfo Suárez Madrid-Barajas	Air conditioning	Installation of CO ₂ probes in AHUs	Completed	Short-term
Adolfo Suárez Madrid-Barajas	Air conditioning	Renovation of the air conditioning and lighting installations at the Network Management Centre (CEGRA)	In progress	Short-term
Adolfo Suárez Madrid-Barajas	Electromechanical	Obsolescence plan: Various renovation and improvement actions in T123 lifts. Phase 3.	In progress	Short-term
Albacete	Air conditioning	New air conditioning equipment in the Terminal Building	Completed	Short-term
Algeciras (Heliport)	Air conditioning	Renovation of air conditioning equipment	In progress	Short-term
Alicante-Elche Miguel Hernández	Air conditioning	Renovation of climate equipment (split)	Completed	Short-term
Asturias	Air conditioning	Supply and installation of autonomous air conditioning units for aircraft on the apron	In progress	Short-term
Josep Tarradellas Barcelona-El Prat	Air conditioning	Renovation of the heating system in the Technical Block	In progress	Short-term
Josep Tarradellas Barcelona-El Prat	Air conditioning	Renovation of air conditioning in the Cargoparc Building	Completed	Short-term
Josep Tarradellas Barcelona-El Prat	Air conditioning	Renovation of precision equipment in the TWR E Equipment Room	Completed	Short-term
Madrid-Cuatro Vientos	Air conditioning	Air conditioning in TWR Equipment Room	Completed	Short-term
El Hierro	Air conditioning	Supply and installation of chiller unit	Completed	Short-term
Fuerteventura	Air conditioning	Adaptation and improvement of air conditioning	In progress	Short-term
Huesca-Pirineos	Air conditioning	Alternative heating system for the Fire Station	Completed	Short-term
Huesca-Pirineos	Air conditioning	Installation of air conditioning for the former Airways Aviation Flight School offices	In progress	Short-term



ESRS 2: General disclosures

E1: Climate change

E2: Pollution

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S4: Consumers and end-users

G1: Business conduct

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Table 1. Energy efficiency measures in air conditioning per centre in Spain

Centre	Action	Description	Status (Completed/In progress)	Time horizon
Jerez	Air conditioning	Renovation of cooling and heating production equipment in the Terminal Building	Completed	Short-term
La Gomera	Air conditioning	Replacement of air conditioning equipment	In progress	Short-term
Logroño	Air conditioning	Renovation of air conditioning in the Control Tower	In progress	Short-term
Menorca	Air conditioning	Replacement of AHUs	Completed	Short-term
Menorca	Building Envelope	Replacement of terminal chillers	Completed	Short-term
Melilla	Building Envelope	Remodeling of Fire Station Building	Completed	Short-term
Melilla	Building Envelope	Replacement of air conditioning in Aena II Building	Completed	Short-term
Reus	Building Envelope	Remodeling of Fire Station Building	In progress	Short-term
Santiago-Rosalía de Castro	Air conditioning	DHW heating system using aerothermal technology	In progress	Short-term
Seville	Air conditioning/ Building Envelope	Supply and installation of boarding bridges and aircraft handling equipment	In progress	Short-term
Valencia	Air conditioning	Terminal Building T1 refurbishment	In progress	Short-term
Zaragoza	Air conditioning	Adaptation to RITE of ENAIRE Building	In progress	Short-term
Zaragoza	Air conditioning	Pavement regeneration on runway 14R-32L and taxiways	In progress	Short-term

Table 2. Energy efficiency measures in lighting per centre in Spain

Centre	Action	Description	Status (Completed/In progress)	Time horizon
Alicante-Elche Miguel Hernández	Lighting	Lighting control in various areas of the Terminal	In progress	Short-term
Alicante-Elche Miguel Hernández	Lighting	New lighting fixtures at check-in desks	Completed	Short-term
Josep Tarradellas Barcelona-El Prat	Lighting	Replacement of reflective airfield signs and beacons in the airport's movement area	Completed	Short-term
Bilbao	Lighting	Installation of LED lights on the RWY 10-28 runway edge system and runway protection on RWY 12-30	Completed	Short-term
Bilbao	Lighting	Efficient LED lighting for Terminal Building	Completed	Short-term
Palma de Mallorca	Lighting	Replacement of air conditioning in Aena II Building	Completed	Short-term
Palma de Mallorca	Lighting	Rehabilitation of North taxiway and other taxiways	In progress	Short-term
Reus	Lighting	Adaptation of new technologies and regulations for beacon systems	Completed	Short-term
Santiago-Rosalía de Castro	Lighting	Adaptation of apron lighting	In progress	Short-term
Valencia	Lighting	Replacement of LED lighting in various airport areas	Completed	Short-term



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Finally, it is worth mentioning the innovative project underway in Spain, the Hovyu project, developed within the framework of the Aena Ventures program, with the objective of capturing and neutralising CO₂ from the natural gas boilers at Josep Tarradellas Barcelona-El Prat Airport. In June 2025, the contract was formalised with the startup selected to deploy the solution, with the aim of having a CO₂ capture plant installed in the existing boilers of Terminal 1 by early 2027.

In the United Kingdom, at London Luton Airport, several initiatives aimed at improving energy efficiency have been carried out in 2025:

- Completion of LED upgrades in all London Luton Airport Operations Limited controlled internal buildings and car parks reducing both energy demand and light pollution. Airfield lighting upgrades and runway lighting upgrades to be undertaken as part of resurfacing programme.
- Building fabric study undertaken to assess condition of LLA operated buildings, the outcome of the study will provide a comprehensive list of all passive energy saving measures and associated savings from reduced heating, cooling and lighting demand. The recommendations will form the bases of an Energy Efficiency phase two programme from 2027.

Aena Brasil has defined an ambitious decarbonisation strategy for its airports, aiming to achieve carbon neutrality by 2035 and Net Zero status by 2040. This roadmap is structured around specific goals and actions to optimise efficiency and reduce greenhouse gas emissions across all its operations. The main areas of action to reduce Scope 1 and 2 emissions include:

- Adaptation of generator sets to operate on biodiesel and replacing brush cutters and lawnmowers with electric models.
- Gradual renewal of the vehicle fleet, incorporating hybrid or electric models, and implementation of a telemetry system for efficient management.
- Development of a fuel policy that prioritises the use of biodiesel and ethanol in vehicles.
- Implementation of a leak detection and repair program for air conditioning equipment, which includes staff training, the use of advanced detectors, and increased frequency of maintenance inspections.
- Replacement of current refrigerants with alternatives with lower Global Warming Potential (GWP) in refrigeration systems.
- Installation of dual-flush valves in restrooms to reduce water consumption and of flare burners in wastewater treatment plants (WWTP) to reduce CO_{2e} emissions.
- Purchase of International Renewable Energy Certificates (IRECs) to guarantee the traceability of the renewable origin of the energy consumed.
- Installation of a photovoltaic plant at Carajás Airport for self-sufficiency with renewable energy.
- Installation of LED lighting in all airports.
- Implementation of smart control systems in lifts and escalators.
- Prioritisation of the use of high-efficiency electric engines and replacement of equipment with more efficient alternatives.
- Incorporation of Building Energy Management Systems (BEMS) and automation in lighting and air conditioning control.

In the case of Aena Brasil airports, Scope 1 and 2 emissions reduction measures are currently being implemented and will be completed over the next few years. In this regard, it should be noted that all new airport expansion projects in Brazil already include energy efficiency measures and the use of renewable energy in their design.

Scope 3: Sustainable Aviation

In Spain, Aena has implemented various actions aimed at reducing Scope 3 greenhouse gas emissions, in line with its commitment to promoting a more sustainable aviation. Among these initiatives, those focused on fostering clean propulsion in aircraft stand out, promoting the use of Sustainable Aviation Fuels (SAF). To this end, Aena actively participates in industry forums and alliances, and collaborates closely with producers, airlines, and other key stakeholders, with the goal of increasing the use of these fuels and promoting their production.

In this regard, Aena's participation in the Alliance for Zero Emission Aviation (AZEA) and the Renewable and Low-Carbon Fuels Value Chain Industrial Alliance (RLCF), promoted by the European Commission, is noteworthy. The first of these initiatives aims to identify technological, operational, and regulatory challenges for the introduction of hydrogen in air transport and define roadmaps for zero-emission aircraft (electric and H₂). The second initiative seeks to boost the production and distribution of Sustainable Aviation Fuels (SAF) and Sustainable Maritime Fuels (SMF) to support the implementation of the FuelEU Maritime and RefuelEU Aviation Regulations, working closely together to facilitate the transition to a greener and more sustainable future.



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S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

In 2025, the ReFuelEU Aviation initiative marks a milestone in the decarbonisation of air transport by establishing the requirement that at least 2% of the fuel supplied at European Union airports be Sustainable Aviation Fuel (SAF). This mandate, which will be progressively increased to 70% by 2050, is a key measure for reducing emissions associated with air travel, which represent the majority of Scope 3 emissions. The incorporation of this initial 2% not only contributes to reducing direct aircraft emissions but also reinforces the value chain's commitment to climate objectives, laying the groundwork for a transition to carbon neutrality by 2050.

In Spain, the distribution of SAF at Aena airports relies on the national pipeline and hydrant system infrastructure, thus integrating it into the same logistics network as conventional kerosene and leveraging existing infrastructure (pipelines, hydrants, and storage tanks). This is possible because SAF is certified as "drop-in", meaning it can be blended with Jet A-1 without modifying aircraft or facilities, and can be mixed with kerosene in the same network, complying with international standards and European regulations.

In addition to the above, the supply of renewable electricity to aircraft also plays a fundamental role in reducing emissions. Currently, all gate parking positions at Spanish airports are equipped with 400 Hz power supply. Throughout 2024, the installation of new connectors and the upgrading of older equipment continued, with the aim of extending these systems to remote apron positions in the future. The electricity supplied by Aena to aircraft in Spain is guaranteed to be 100% renewable, which reinforces the contribution to reducing Scope 3 greenhouse gas emissions.

Regarding operational efficiency in the aviation sector, Airport Collaborative Decision Making (A-CDM) systems have been implemented at five airports in the Spanish network. These systems optimise operations management through real-time information exchange, resulting in reduced taxiing times, lower fuel consumption, and decreased emissions during the LTO cycle and the use of Auxiliary Power Units (APUs). Additionally, ten airports have advanced control towers that facilitate operational coordination and contribute to emissions reduction.

Furthermore, significant progress has been made in the transition to a more sustainable ground handling fleet. The recent award of the latest tender for ground handling services at Spanish airports incorporates sustainability criteria that exceed the targets set in the Climate Action Plan 2021-2030.

In the United Kingdom, London Luton Airport is actively collaborating with airlines to promote the production and use of Sustainable Aviation Fuels (SAF) in their operations. In parallel, initiatives are underway to move towards a sustainable fleet in ground handling operations through the "Future of Transport" program. This program involves collaboration with strategic partners to introduce electric vehicles and developing charging infrastructure throughout the airport. Additionally, London Luton Airport has been focusing on increasing the proportion of based Next Generation aircraft (NEOs, Max), achieving 62% in the summer peak activity of 2025, compared to 46% in 2024. This has demonstrated the airport's leadership in fleet modernisation, which has had a significant positive impact in reducing noise and carbon emissions from improved efficiency and reduced fuel burn.

In Brazil, throughout 2025, Aena Brasil has focused its efforts on strengthening the analysis of emissions reductions within Scope 3 of its Climate Action Plan, advancing in the identification and management of indirect sources of emissions related to its airport operations. As a result, it has established two main lines of action. The first is geared towards clean propulsion in aircraft, and the second focuses on developing of a more sustainable ground handling fleet.

These initiatives, in addition to addressing the negative impacts linked to Scope 3 emissions, open strategic opportunities for the development of new services, such as the distribution of sustainable fuels and the integration of clean technologies into airport operations. Through these actions, the Aena Group reinforces its commitment to sustainability, innovation, and reducing its environmental impact throughout the entire value chain of the aviation sector.

Scope 3: Community and Value Chain Program

Within the framework of its Sustainability Strategies and with the purpose of managing its material IROs, the Aena Group has launched several initiatives focused on sustainable mobility and climate cooperation, in order to mitigate the negative impacts of greenhouse gas emissions and promote more sustainable transport alternatives.

In Spain, Aena has strengthened its commitment to sustainable mobility by expanding its network of electric vehicle charging points on both the airside and landside, facilitating their use for employees, passengers, and airport users. By the end of 2025, the Spanish airport network has 4,699 charging points distributed between the landside and airside (4,347 in 2024). In addition, incentives have been implemented to encourage the use of sustainable vehicles in Aena parking facilities, through a 10% discount on parking fees for vehicles with a ZERO emissions sticker from the Spanish Directorate General for Traffic (DGT), within the *Aena Club Cliente* program. This measure was used by 8% of passengers in 2025, representing an increase of almost 2 percentage points compared to the previous year. Parking capacity for bicycles and electric scooters has also been increased at airport facilities.

In line with the objectives of the Climate Action Plan 2021-2030, Aena has committed to offsetting 100% of the emissions generated by its employees' business travel in Spain, through verified sustainable projects since 2024. Based on this commitment, 1,495 tons of CO₂e from business travel by car, train, boat, and plane in 2025 will be offset through 2026. In 2025, the 1,351 tons of CO₂e corresponding to 2024 emissions in this category have been offset through a reforestation project in the Eastern Mountains of Uruguay, focused on the use of high-quality timber. This project contributes to emissions absorption, responsible forest management, ecosystem regeneration, and sustainable local development. The initiative has been certified by Verra, in accordance with FSC and Verified Carbon Standard (VCS).



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
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In the United Kingdom, London Luton Airport has continued to promote sustainable mobility through the Luton DART (Direct Air-Rail Transit) and the Luton Airport Express, offering an electrified rail service and an automated electric transport system that connects the airport terminal with Luton Airport Parkway train station, thus improving the sustainability of journeys to and from the airport. Notably, the UK airport has been recognised by the CAA (Civil Aviation Authority) with a "VERY GOOD" rating in its 2024/25 Airport Accessibility Report .

As part of its commitment to cooperation and climate awareness, the Aena Group actively participates in various sustainability and aviation industry forums, promoting collaboration and the exchange of best practices in climate change.

In the UK, London Luton Airport works closely with its suppliers to achieve emissions reductions both in its own operations and throughout the entire supply chain. This commitment has been strengthened through the promotion of more efficient aircraft and the implementation of the Sustainable Supply Chain Charter initiative, which seeks to involve all partners and suppliers in reducing environmental impact.

For its part, Aena Brasil has worked throughout 2025 to conduct a Scope 3 emissions analysis, especially regarding sustainable mobility and climate cooperation, with the expectation of completing this process in the first quarter of the year.

It is worth noting that the majority of the CapEx and OpEx investments included in the Aena Group's Climate Action Plans (PAC) are geared towards the implementation of renewable energy, the purchase of biofuels, improving energy efficiency, installing charging points, and purchasing electric vehicles for its own fleet. These initiatives are already considered within the activities included in the delegated act on climate change mitigation under the EU Taxonomy of Sustainable Finance, as noted in this report.

Metrics and targets

E1-4: Targets related to climate change mitigation and adaptation

E1-4 30, E1-4 32, E1-4 33, E1-4 34, AR 24, AR 25, AR 26, AR 29, AR 30

In line with its Sustainability Policy and Integrated Management Policy, the Aena Group has established consolidated GHG emission reduction objectives and targets, aligned with those of the Paris Agreement, as well as with the requirements of the Science-Based Targets Initiative (SBTi) for setting science-based targets for reducing its own emissions and those of its value chain. The validation of these long-term emission reduction targets by SBTi includes the entire Aena Group⁷, with the overall objective being to achieve net-zero GHG emissions across the entire value chain by 2050 (Scopes 1, 2, and 3).

Regarding Aena's Climate Action Plan 2021-2030 in Spain, it defines the basis for achieving the updated goal of being Net Zero Carbon by 2030, in line with ACI EUROPE's commitment to Scopes 1 and 2. It is worth noting that this objective was brought forward by 10 years from the initial target set for 2040. Net Zero represents the commitment to achieve a zero balance between greenhouse gas emissions generated by its own operations and those removed or offset, prioritising their direct and real reduction by at least 90% compared to its baseline year. Furthermore, this objective is linked to the goal of achieving carbon neutrality by 2026, a purpose being implemented through the Carbon Neutrality Program, which is detailed in section **E1-3**.

This Climate Action Plan 2021-2030 is integrated into the Company's Sustainability Strategy and is endorsed by shareholders each year. Thus, in 2025, the Updated 2024 Report of the Climate Action Plan has been approved, in an advisory capacity, at the corresponding Shareholders' Meeting, with 92.5% of votes in favour.

Likewise, to ensure the proper materialisation and implementation of Aena's Climate Action Plan in Spain, the Sustainability and Climate Action Commission includes among its functions the understanding, promotion, guidance, and oversight of environmental objectives, action plans, practices, and policies. The Company has also established an internal working group specifically dedicated to coordinating the cross-functional deployment of its Sustainability Strategy and supporting its implementation by promoting the active and direct involvement of all areas and employees.

Furthermore, the Aena Group has a Chief Green Officer (CGO), whose main function is to integrate sustainability into all business areas and inform both the Board of Directors and employees about any new developments or progress related to sustainability, using the established communication channels.

Regarding the climate plans of London Luton Airport in the UK and the airports managed by Aena in Brasil, it is worth highlighting that their main strategic target is the decarbonisation of their own emissions (Scope 1 and 2), with the goal of achieving Net Zero status by 2040.

⁷ The scope of the targets includes AENA S.M.E., S.A., SCAIRM and its subsidiaries in the United Kingdom (LLA) and in Brazil (ANB).



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
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COMPANY	OBJECTIVE	YEAR
Aena SME SA, SCAIRM (Spain)	Carbon neutrality for own emissions (Scope 1 and 2)	2026
	ACI EUROPE's Net Zero corporate target for own emissions (Scope 1 and 2)	2030
LLAOL (United Kingdom)	ACI EUROPE's Net Zero corporate target for own emissions (Scope 1 and 2)	2040
ANB, BOAB (Brazil)	Carbon neutrality for own emissions (Scope 1 and 2)	2035
	ACI EUROPE's Net Zero corporate target for own emissions (Scope 1 and 2)	2040
Aena Group	Achieving net-zero GHG emissions across the entire value chain (Scope 1, 2 and 3) - SBTi	2050
	Commitment to reduce Scope 1 and 2 GHG emissions by 90% - SBTi	2050
	Commitment to reduce Scope 3 GHG emissions by 90% - SBTi	2050

Spain⁸

- **Carbon neutrality in 2026:** In Spain, Aena has committed to reducing its Scope 1 and 2 emissions by 82% by 2026 compared to the 2019 baseline, offsetting the remaining 18% through verified sustainable projects, thus achieving carbon neutrality in that same year.
- **ACI EUROPE's Net Zero by 2030:** The Company aims to achieve net-zero emissions for its Scopes 1 and 2 by 2030. To reach this target, the climate scenarios provided by the IEA were taken into account (please refer to Aena's transition risks section in Spain) (E1-4 AR 30c).
- **Airport Carbon Accreditation (ACA):** Aena's objective is for 19 of its airports in Spain to achieve Level 4+ certification under ACI EUROPE's ACA program by 2026. These airports represent more than 94.5% of passenger traffic and 94.2% of Scope 1 and 2 emissions from the Spanish airport network.
- **Renewable electricity strategy:** Deployment of Aena's Photovoltaic Plan in Spain with the aim of reaching 51% renewable energy production by 2029 compared to 2019 consumption (952 GWh/year).
- **Financial Power Purchase Agreement (PPA):** With the objective of covering between 15% and 20% of total electricity consumption from 2026 onwards (0% in 2019).
- **Commitment to maintaining the purchase of 100% renewable energy with a certificate of origin:** Inclusion into electricity contracts of the necessary requirements to guarantee that 100% of the energy consumed by Aena in Spain is of renewable sources (60% in 2019).
- **Future grid independence solutions:** Additionally, and with the aim of increasing installed capacity through storage and improving the resilience and independence of the electrical grid at airports managed by Aena in Spain, studies have begun to determine the feasibility of renewable energy storage in lithium batteries and green hydrogen, taking advantage of available space at airports, with the objective of increasing installed capacity through storage, improving resilience and independence from the electrical grid.
- **Thermal energy strategy:** The use of renewable energies for thermal energy generation at airports in the Aena network in Spain is presented as an opportunity to improve the environmental situation of the airports, making them more sustainable, efficient, and resilient, with the objective that by 2030, 100% of the thermal energy consumed by airports will be of renewable origin through the purchase of sustainable fuels and the production of renewable thermal energy through geothermal, aerothermal, and electric boilers and chillers (in 2019, the only consumption of renewable thermal energy was that of the geothermal plant at Reus Airport, which generated 41,224 kWh that year).
- **Energy efficiency:** Reduce energy consumption per passenger by 9% by 2030 compared to 2019, through the installation of LED lighting systems in terminals and on aprons, and the replacement of existing air conditioning equipment with more efficient ones (in 2019, energy consumption per passenger was 4.44 kWh/pax).
- **Electrification of the own fleet:** Electrify 26% of the own fleet by 2026, with the remaining 74% using sustainable fuels. By 2025, the percentage of electric vehicles and vans was 58% (52% in 2024) (0% in 2019).

⁸ The baseline year for all of Spain's targets is 2019. This baseline year was chosen because, during the preparation of the PAC in 2021, 2019 was the last historically normalised year in terms of number of aircraft movements (during which 136,630.5 tCO₂e were emitted for Scope 1 and 2).



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
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- **Promoting collaboration and climate awareness:** Establish agreements with universities and technology centres to accelerate the sustainable transformation of the sector and launch a climate awareness campaign each year. Sustainability criteria have also been defined for the selection of suppliers and tenants.

United Kingdom (London Luton Airport)⁹:

In line with its Responsible Business Strategy, London Luton Airport aims to be Net Zero by 2040 for its Scope 1 and 2 emissions. Projections indicate that by that year, residual emissions are estimated at around 300 tCO₂e, demonstrating the airport's strong commitment to climate change mitigation and long-term sustainability. This roadmap highlights the importance of investing in clean energy and improving operational efficiency, considering them key elements for progressing towards carbon neutrality.

Other objectives include:

- Supplying 25% of the airport's electricity from renewable energy sources located on-site or near the airport by 2026. In 2019, this supply was 0%.
- Working towards the goal of achieving 100% low-carbon emissions in own vehicles by 2030 through the use of low-carbon fuels and the transition to electric vehicles (0% in 2019).
- 100% LED lighting in buildings operated by London Luton Airport by 2027 and working towards 100% LED lighting on taxiways by 2030.
- Working with third parties to promote sustainable aviation, primarily with airlines to encourage the intake of Sustainable Aviation Fuel (SAF) at the airport.

Brazil¹⁰:

In 2024, Aena Brasil developed its Climate Action Plan 2024-2040, focused on Scopes 1 and 2, with the goal of achieving Carbon Neutrality by 2035 and Net Zero status by 2040. Subsequently, in 2025, Aena Brasil added Scope 3 to this plan, establishing the following key objectives:

- Reduce Scope 1 greenhouse gas (GHG) emissions by 60% by 2030, using 2023 emissions as a baseline.
- Ensure that, starting in 2025, 100% of the electricity consumed at airports (Scope 2) comes from renewable sources.
- Reduce Scope 3 emissions by 30.84% by 2040, using 2023 as the baseline year.

Aena Brasil's Climate Action Plan 2024-2040 was approved in 2024 (Scope 1 and 2) and in 2025 (Scope 3) by the Aena Brasil Board of Directors, including ANB and BOAB, and establishes medium- and long-term objectives, actions, projects, evaluation mechanisms, key performance indicators (KPIs), and a governance framework. This plan is based on several lines of action, such as the use of renewable energy, the reduction of fugitive emissions, the improvement of energy and operational efficiency, the transition to a sustainable own vehicles fleet, effluent treatment, and emissions offsetting.

Key goals and actions include:

- Replacing 30% of diesel consumed with biodiesel in its own fleet starting in 2027.
- Promoting the hybridization or electrification of 67% of its own vehicle fleet by 2030.
- Achieving a 7% reduction in fuel consumption in its own operations starting in 2027.
- Using only ethanol in flex-fuel vehicles starting in 2027.
- Reducing fugitive emissions from refrigerant liquid leaks by 30% starting in 2026.
- Replacing 50% of current refrigerant liquids with alternatives that have a lower Global Warming Potential (GWP) before 2030.
- Ensuring that, starting in 2025, 100% of the energy consumed at airports (except Carajás) has IREC traceability.
- Reducing effluent generation in airport sanitary wastewater discharges by 40% by 2026.
- Decreasing CO₂e emissions associated with wastewater effluent treatment by 37% by 2026.
- Reducing emissions associated with electricity consumption at ANB airports by 31% by 2030, compared to the baseline scenario.

⁹ The baseline year for London Luton Airport's targets is 2019. This baseline year was chosen because, during the preparation of the climate strategy, 2019 was the last historically normalised year in terms of number of aircraft movements (during which 7,947 tCO₂e were emitted for Scope 1 and 2).

¹⁰ The baseline year for Aena Brasil's Climate Action Plan is 2023, calculated using a comprehensive methodology that includes all ANB and BOAB airports, even though the latter only operated within Aena Brasil for one month in 2023. To this end, estimates of BOAB's emissions were made for the entire 2023 fiscal year.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
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Additionally, Aena Brasil achieved Level 1 of the Airport Carbon Accreditation (ACA) certification at its ANB and BOAB airports during 2024 and 2025, with the goal of progressively advancing to higher certification levels each year.

The monitoring and control of these objectives, KPIs, and actions is the responsibility of Aena Brasil's Sustainability and ESG Committee, ensuring effective and transparent management of its Climate Action Plan 2024-2040.

The following details the quantitative data corresponding to the emissions reduction targets established for each of the regions that make up the Group:

E1-4 34 (b, c, d), E1-4 AR24

Emissions reduction target (tCO ₂ e)	Spain				
	2019 (Base year)	Total emissions 2025	% reduction objective 2025-2019	% achieved reduction 2025-2019	2030 Emissions Reduction Target (Net Zero ACI) ^(A)
Scope 1	22,769.60	14,247.78	41%	37%	100%
Scope 2	113,860.90	20,781.55	78%	82%	100%
Scope 3	3,866,448.10	3,568,751.63	--	--	--

^(A) 100% corresponds to a 90% reduction and a 10% offset.

In 2025, Aena met its interim corporate target for reducing Scope 1 and 2 emissions in Spain by 72% compared to the baseline year (2019), exceeding it and reaching 74.4%. This result demonstrates its progress on the path defined in its Climate Action Plan towards the Net Zero target by 2030.

Emissions reduction target (tCO ₂ e)	United Kingdom				
	2019 (Base year)	Total emissions 2025	% reduction objective 2025-2019	% achieved reduction 2025-2019	2030 Emissions Reduction Target (Net Zero ACI)
Scope 1	2,966.00	1,447.98	37%	51%	90%
Scope 2	4,981.30	0.00	100%	100%	100%
Scope 3	278,268.00	316,855.00	--	--	--

In 2025, London Luton Airport met its corporate target for reducing Scope 1 and 2 emissions in the UK, set at 76% for that year compared to the baseline year (2019), achieving 80%. This demonstrates progress towards its planned decarbonisation strategy.

Emissions reduction target (tCO ₂ e)	Brazil				
	2019 (Base year)	Total emissions 2025	% reduction objective 2025-2019	% achieved reduction 2025-2019	2030 Emissions Reduction Target (Net Zero ACI)
Scope 1	3,092.00	2,753.74	--	11%	92%
Scope 2	987.00	518.98	--	47%	100%
Scope 3	571,902.01	779,192.70	--	--	--

Note: The Aena Group's climate action plans establish corporate Net Zero targets linked to ACI EUROPE's target, which only includes Scopes 1 and 2 (own emissions). For Scope 3, the Aena Group's commitment, validated by SBTi, is applicable (excluding BOAB as it was not in operation in the year the target validation was submitted). In this regard, it should be noted that since the validation was carried out in 2024, the reporting of emissions trend corresponding to this commitment will be done in accordance with SBTi criteria in subsequent reports.

A separate 2025 target for reducing Scope 1 and 2 CO₂e emissions is not available; instead, the sum of both targets is provided.

In 2025, Aena Brasil had set a corporate target of reducing Scope 1 and 2 emissions by 21% compared to its baseline year (2023). However, due to a delay in the implementation of certain actions, it fell 1 percentage point short of this target, although the roadmap to achieve their Net Zero target by 2040 remains on track.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
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The Aena Group has defined a robust and transparent framework for disclosing the baseline year and reference value related to its greenhouse gas (GHG) emissions reduction targets. In this context, the baseline year for Spain and the United Kingdom has been set at 2019, while for Brazil it has been set at 2023. This ensures consistent and uniform comparison over time, thus facilitating an assessment of progress in emissions reduction.

Maintaining the baseline year: The baseline year chosen for Spain and the United Kingdom is 2019, and for Brazil is 2023, remaining unchanged unless there are relevant changes to the targets or the scope of reporting. If adjustments are made, a detailed explanation will be provided on how the new reference value impacts both the achievement of new targets and the presentation of cumulative progress.

Comparability of targets: If new targets are established, it will be ensured that the baseline year used is recent and no more than three years prior to the start of the target period. This criterion ensures the comparability of objectives and their alignment with current sustainability standards.

Evolution of emissions: Aena's carbon footprint in Spain is transparently monitored through annual reports and the Updated PAC Report, allowing stakeholders to be aware of any deviations and progress towards sustainability commitments.

In the United Kingdom, the evolution of London Luton Airport's carbon footprint is published externally in LLA's Annual Sustainability Report and LLA's Carbon Reduction Strategy and GHG Management Report, thus providing stakeholders with clear information on the airport's progress towards its sustainability objectives.



ESRS 2: General disclosures

E1: Climate change

E2: Pollution

E3: Water and marine resources

E4: Biodiversity and ecosystems

E5: Resource use and circular economy

S1: Own workforce

S2: Workers in the value chain

S3: Affected communities

S4: Consumers and end-users

G1: Business conduct

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E1-5: Energy consumption and mix¹¹

E1-5 37, E1-5 38, E1-5 39, E1-5 40, E1-5 AR 33, E1-5 AR 34, E1-5 AR 37

	Total energy consumption (GJ) ^(A)							
	2024				2025			
	Spain	United Kingdom	Brazil	Consolidated total	Spain	United Kingdom	Brazil	Consolidated total
Renewable energy consumption	3,493,181	118,375	244,575	3,856,131	3,667,426	75,325	307,790	4,050,541
Non-renewable energy consumption	853,014	34,325	108,510	995,849	666,392	24,775	29,741	720,908
Total	4,346,195	152,700	353,085	4,851,980	4,333,818	100,099	337,531	4,771,448

	Total energy consumption (MWh)							
	2024				2025			
	Spain	United Kingdom	Brazil	Consolidated total	Spain	United Kingdom	Brazil	Consolidated total
Renewable energy consumption	970,336	32,882	67,938	1,071,156	1,018,738	20,924	85,498	1,125,160
Non-renewable energy consumption	236,950	9,535	30,142	276,627	185,110	6,882	8,261	200,253
Total	1,207,286	42,417	98,080	1,347,783	1,203,848	27,806	93,759	1,325,413

^(A)1 GJ = 0.2778 MWh

¹¹ The Company's activity is included in the definition of sectors with high climate impact that are used to determine energy intensity.



ESRS 2: General disclosures

E1: Climate change

E2: Pollution

E3: Water and marine resources

E4: Biodiversity and ecosystems

E5: Resource use and circular economy

S1: Own workforce

S2: Workers in the value chain

S3: Affected communities

S4: Consumers and end-users

G1: Business conduct

Act 11/2018

E1-5 AR 32 (h), AR 34

	Energy consumption and mix (MWh)	
	2024	2025
Fuel consumption from coal and coal products	--	--
Fuel consumption from crude oil and petroleum products	41,739.34	44,160.32
Fuel consumption from natural gas	34,071.72	31,505.11
Fuel consumption from other fossil sources	--	--
Consumption of purchased or acquired electricity, heat, steam, and cooling from fossil sources	200,813.97	124,439.30
Total fossil energy consumption (calculated as the sum of lines 1 to 5)	276,625.03	200,104.73
Share of fossil sources in total energy consumption (%)	20.50%	15.00%
Consumption from nuclear sources	--	147.31
Share of consumption from nuclear sources in total energy consumption (%)	--	0.00
Fuel consumption from renewable sources, including biomass (also comprising industrial and municipal waste of biologic origin), biofuels, biogas, renewal hydrogen, etc.)	5,140.48	15,843.83
Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources	1,057,837.90	1,102,489.59
Consumption of self-generated non-fuel renewable energy	8,078.70	6,817.77
Total renewable energy consumption (calculated as the sum of lines 8 to 10)	1,071,057.08	1,125,151.19
Share of renewable sources in total energy consumption (%)	79.50%	84.90%
Total energy consumption (calculated as the sum of lines 6, 7 and 11)	1,347,682.11	1,325,255.91



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
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E1-5 37 (c). i

	Consumption of renewable fuels (GJ)							
	2024				2025			
	Spain	United Kingdom	Brazil	Consolidated total	Spain	United Kingdom	Brazil	Consolidated total
Biofuels	12,560	5,946	0	18,506	43,412	13,216	409	57,037
Total	12,560	5,946	0	18,506	43,412	13,216	409	57,037

	Consumption of renewable fuels (MWh)							
	2024				2025			
	Spain	United Kingdom	Brazil	Consolidated total	Spain	United Kingdom	Brazil	Consolidated total
Biofuels	3,489	1,652	0	5,141	12,059	3,671	114	15,844
Total	3,489	1,652	0	5,141	12,059	3,671	114	15,844



ESRS 2: General disclosures

E1: Climate change

E2: Pollution

E3: Water and marine resources

E4: Biodiversity and ecosystems

E5: Resource use and circular economy

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E1-5 37 (c). ii

Consumption of electricity and thermal energy from renewable sources (GJ)								
	2024				2025			
	Spain	United Kingdom	Brazil	Consolidated total	Spain	United Kingdom	Brazil	Consolidated total
Electricity	3,480,450	112,429	244,575	3,837,454	3,623,907	62,109	307,381	3,993,397
Heating/Cooling	171	0	0	171	107	0	0	107
Subtotal	3,480,621	112,429	244,575	3,837,625	3,624,014	62,109	307,381	3,993,504

Consumption of electricity and thermal energy from renewable sources (MWh)								
	2024				2025			
	Spain	United Kingdom	Brazil	Consolidated total	Spain	United Kingdom	Brazil	Consolidated total
Electricity	966,799	31,231	67,938	1,065,968	1,006,649	17,253	85,384	1,109,286
Heating/Cooling	48	0	0	48	30	0	0	30
Subtotal	966,847	31,231	67,938	1,066,016	1,006,679	17,253	85,384	1,109,316



ESRS 2: General disclosures

E1: Climate change

E2: Pollution

E3: Water and marine resources

E4: Biodiversity and ecosystems

E5: Resource use and circular economy

S1: Own workforce

S2: Workers in the value chain

S3: Affected communities

S4: Consumers and end-users

G1: Business conduct

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E1-5 37 (c). iii

Renewable energy facilities in Spain		GJ	MWh	GJ	MWh
		2024	2024	2025	2025
Energy generated from renewable sources	Wind power	6,143.00	1,706.38	3,409.42	947.06
	Solar power/photovoltaics	23,098.00	6,416.08	21,197.83	5,888.29
	Solar thermal energy	0.00	0.00	0.00	0.00
	Geothermal	171.00	47.52	106.68	29.63
	Subtotal	29,412.00	8,169.98	24,713.93	6,864.98
Energy consumed from renewable sources	Wind power	5,910.00	1,641.79	3,351.02	930.84
	Solar power/photovoltaics	23,002.00	6,389.38	21,086.26	5,857.30
	Solar thermal energy	0.00	0.00	0.00	0.00
	Geothermal	171.00	47.52	106.68	29.63
	Subtotal	29,083.00	8,078.69	24,543.96	6,817.77
Energy sold from renewable sources	Wind power	233.00	64.59	58.40	16.22
	Solar power/photovoltaics	96.00	26.70	111.57	30.99
	Solar thermal energy	0.00	0.00	0.00	0.00
	Geothermal	0.00	0.00	0.00	0.00
	Subtotal	329.00	91.29	169.97	47.21



ESRS 2: General disclosures

E1: Climate change

E2: Pollution

E3: Water and marine resources

E4: Biodiversity and ecosystems

E5: Resource use and circular economy

S1: Own workforce

S2: Workers in the value chain

S3: Affected communities

S4: Consumers and end-users

G1: Business conduct

Act 11/2018

E1-5 38, AR 33

Consumption of non-renewable fuels (GJ)

	2024				2025			
	Spain	United Kingdom	Brazil	Consolidated total	Spain	United Kingdom	Brazil	Consolidated total
Diesel Fuel	107,940	8,059	30,619	146,618	128,429	1,985	24,594	155,008
Petrol	984	0	656	1,640	820	0	480	1,300
Natural Gas	96,553	26,105	0	122,658	91,032	22,386	0	113,418
Propane	957	0	0	957	1,346	0	0	1,346
LPG	0	161	0	161	0	83	0	83
Kerosene	887	0	0	887	920	321	0	1,241
Subtotal	207,321	34,325	31,275	272,921	222,547	24,775	25,074	272,396



ESRS 2: General disclosures

E1: Climate change

E2: Pollution

E3: Water and marine resources

E4: Biodiversity and ecosystems

E5: Resource use and circular economy

S1: Own workforce

S2: Workers in the value chain

S3: Affected communities

S4: Consumers and end-users

G1: Business conduct

Act 11/2018

Consumption of non-renewable fuels (MWh)

	2024				2025			
	Spain	United Kingdom	Brazil	Consolidated total	Spain	United Kingdom	Brazil	Consolidated total
Diesel Fuel	29,983	2,239	8,505	40,727	35,675	551	6,832	43,058
Petrol	273	0	182	455	228	0	133	361
Natural Gas	26,820	7,251	0	34,071	25,287	6,218	0	31,505
Propane	266	0	0	266	374	0	0	374
LPG	0	45	0	45	0	23	0	23
Kerosene	246	0	0	246	255	89	0	344
Subtotal	57,588	9,535	8,687	75,810	61,819	6,881	6,965	75,665

E1-5 38 (e)

Consumption of electricity and thermal energy from non-renewable sources (GJ)

	2024				2025			
	Spain	United Kingdom	Brazil	Consolidated total	Spain	United Kingdom	Brazil	Consolidated total
Electricity	0	0	77,234	77,234	0	0	4,667	4,667
Heating	198,728	0	0	198,728	142,886	0	0	142,886
Cooling	446,968	0	0	446,968	300,959	0	0	300,959
Subtotal	645,696	0	77,234	722,930	443,845	0	4,667	448,512



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

Consumption of electricity and thermal energy from non-renewable sources (MWh)								
	2024				2025			
	Spain	United Kingdom	Brazil	Consolidated total	Spain	United Kingdom	Brazil	Consolidated total
Electricity	0	0	21,454	21,454	0	0	1,296	1,296
Heating	55,202	0	0	55,202	39,691	0	0	39,691
Cooling	124,158	0	0	124,158	83,600	0	0	83,600
Subtotal	179,360	0	21,454	200,814	123,290	0	1,296	124,586

E1-5 40, E1-5 42, E1-5 43, AR 37

In Spain, the Aena Group's activity is registered under CNAE code 5223, corresponding to "Storage and support activities for transport", which places its operations within the scope of auxiliary services to air transport, including the management of airports and heliports. This classification belongs to group H522, which is within chapter H: Transport and storage.

According to Annex I of Delegated Regulation (EU) 2022/1288, the sectors included in sections A–H and section L of Annex I of Regulation (EC) No 1893/2006 are considered "sectors with high climate impact". Therefore, the activities carried out by the Aena Group are included in this list, which means that the Company is subject to specific requirements and considerations for sectors with significant climate impact.

Energy intensity per net revenue		
2024	2025	% Variation
0.00023	0.00021	(10)%

Total energy consumption from activities in high climate impact sectors per net revenue from activities in high climate impact sectors (MWh/€)

To calculate the energy intensity ratio, the amount of global net revenue is used (Note 5. Financial information of the Consolidated Annual Accounts 2025 - Block A).



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

E1-6: Gross Scopes 1, 2, 3 and Total GHG emissions¹²

E1-6 44, E1-6 48, E1-6 49, E1-6 50 (a), E1-6 51, E1-6 52, E1-6 53, E1-6 54, E1-6 55, AR 39, AR 41, AR 43 (c), AR 44 (b), AR 45 (b), AR 45 (d), AR 45 (e), AR 46 (d), AR 46 (f), AR 46 (g), AR 46 (h) i, AR 46 (i), AR 46 (j), AR 47 (b), AR 48, AR 53 (c)

	Carbon footprint (tCO ₂ e)							
	2024				2025			
	Spain	United Kingdom	Brazil	Consolidated total	Spain	United Kingdom	Brazil	Consolidated total
Direct emissions (scope 1)	12,668.16	1,911.06	3,111.27	17,690.49	14,247.78	1,447.98	2,753.74	18,449.50
Indirect emissions (scope 2) Market-based	27,717.61	0.00	1,153.73	28,871.34	20,781.55	0.00	518.98	21,300.53
Indirect emissions (scope 2) Location-based	104,411.13	6,466.24	4,871.84	115,749.21	129,658.15	3,053.67	3,915.00	136,626.82
Scope 3 emissions	3,468,233.43	277,698.61	514,430.90	4,260,362.94	3,568,751.63	316,855.00	779,192.70	4,664,799.33

Sources for fuel densities in Spain:

- Royal Decree 61/2006, of January 31, which establishes the specifications for gasoline, diesel, fuel oil, and liquefied petroleum gases and regulates the use of certain biofuels.
- Royal Decree 1088/2010, of September 3, amending Royal Decree 61/2006, of January 31, regarding the technical specifications for gasoline, diesel, the use of biofuels, and the sulphur content of fuels for maritime use.
- MITERD, National Greenhouse Gases Inventory (1990-2022), 2024 ed. Annex 7. Table A7.1.
- GHG Protocol.

Sources for lower heating values (LHV) in Spain:

- Royal Decree 1088/2010, of September 3, amending Royal Decree 61/2006, of January 31, regarding the technical specifications for gasoline, diesel, the use of biofuels, and the sulphur content of fuels for maritime use.
- MITERD, National Greenhouse Gases Inventory (1990-2022), 2024 ed. Annex 7. Table A7.1.
- GHG Protocol.

Note: The information reported for calculating Scope 3 emissions for London Luton Airport for the 2024 fiscal year has been corrected, as the previous report included WTT items that are not required according to the corporate footprint calculation criteria.


¹²The calculation of the Company's Scope 1 and 2 carbon footprint is based on the methodology defined by the GHG Protocol, following the operational control approach. Consequently, the emission sources to be included in each scope are:

- Scope 1: Direct emissions from the organisation originating from sources under its ownership or control:
 - Stationary combustion: generators and backup systems, boilers, combined heat and power plants owned or controlled by the Company, fire service practices (SEI), etc.
 - Mobile combustion: light and heavy-duty vehicles belonging to the Company's own fleet.
- Scope 2: Indirect GHG emissions from off-site electricity generation and heating or cooling purchased and consumed by the Company's facilities and centres.

To calculate Scope 1 emissions, activity data for each source is collected, selecting the most accurate primary data source (whenever possible, the supply invoice is used). The primary data is multiplied by an emission factor taken from recognised and up-to-date sources, such as MITERD and the GHG Protocol, to obtain the corresponding emissions.

To calculate Scope 2 emissions, the following procedure is used:

- Electricity consumption data available on supply invoices are collected and multiplied by the corresponding emission factor. In the case of market-based emissions calculations, the emission factor of the electricity retailer is used, applying the corresponding percentage of Guarantees of Origin purchases. In the case of location-based emissions calculations, the emission factor published in the corresponding country for the national electricity grid is used. These calculations yield the Scope 2 emissions due to the purchase and consumption of electricity.
- Data on the total emissions from the external heating and cooling provider are collected, and the proportion corresponding to the Company's heat and cooling purchases by is calculated. These calculations yield the Scope 2 emissions due to heat and cooling purchases.

	ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
	E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
	S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

E1-6 48 (b): In 2025, only 4,461 tCO₂e have been subject to the EU ETS (4,908 tCO₂e in 2024), relating to the Josep Tarradellas Barcelona-El Prat and Palma de Mallorca airports, so 24.2% of the Aena Group's Scope 1 emissions come from activities under the EU Emissions Trading System (27.7% in 2024), information that is referenced in Note 26.1 Information on greenhouse gas emission allowances of the Consolidated Annual Accounts 2025 - Block A.

	Scope 1 biogenic emissions (tCO ₂ e)	
	2024	2025
Spain	637.60	2,194.74
United Kingdom	430.60	977.24
Brazil	272.00	26.07



ESRS 2: General disclosures

E1: Climate change

E2: Pollution

E3: Water and marine resources

E4: Biodiversity and ecosystems

E5: Resource use and circular economy

S1: Own workforce

S2: Workers in the value chain

S3: Affected communities

S4: Consumers and end-users

G1: Business conduct

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E1-6 AR 41; AR 43 (c), 45 (b)

Direct GHG emissions (Scope 1)

	2024				2025			
	CO ₂	CH ₄	N ₂ O	CO ₂ e	CO ₂	CH ₄	N ₂ O	CO ₂ e
Spain								
Diesel	7,526.87	0.71	0.13	7,583.16	9,352.20	0.96	0.15	9,419.34
Petrol	68.91	0.01	0.00	69.34	56.51	0.02	0.00	57.70
Natural gas	5,513.37	0.48	0.00	5,526.89	4,602.23	0.40	0.00	4,613.28
Propane	62.74	0.00	0.00	62.74	88.30	0.00	0.00	88.30
Kerosene	63.29	0.01	0.00	63.68	63.19	0.01	0.00	63.58
HVO	3.97	0.00	0.00	4.01	0.00	0.00	0.00	0.00
Biomethane	632.09	0.06	0.00	633.64	0.00	0.20	0.00	5.58
BioLPG	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
TOTAL	12,599.12	1.21	0.14	12,668.16	14,162.43	1.59	0.15	14,247.78
United Kingdom								
Diesel Fuel	560.71	0.07	7.44	568.22	141.29	0.02	0.02	143.14
Natural gas	1,323.61	2.03	0.65	1,326.29	1,257.90	1.93	0.62	1,260.45
Propane	0.00	0.00	0.00	0.00	5.29	0.00	0.00	5.29
LPG	10.35	0.01	0.01	10.36	25.30	0.04	0.06	25.40
HVO	0.00	0.00	0.00	6.19	0.00	0.00	0.00	13.70
TOTAL	1,894.67	2.11	8.10	1,911.06	1,429.78	2.00	0.70	1,447.98
Brazil								
Diesel	1,975.87	0.13	0.12	2,009.98	1,418.79	0.10	0.06	1,438.56
Petrol	32.86	0.02	0.01	34.64	23.80	0.01	0.00	24.51
Propane	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Kerosene	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Others (Effluents and Refrigerant Leaks)	1,066.65	0.00	0.00	1,066.65	1,210.03	0.92	0.20	1,289.87
TOTAL	3,075.38	0.15	0.13	3,111.27	2,652.62	1.04	0.27	2,753.74



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

E1-6 AR 41; AR 43 (c), 45 (b)

Indirect GHG emissions (Scope 2) Market-based

2024

2025

CO₂

CH₄

N₂O

CO₂e

CO₂

CH₄

N₂O

CO₂e

Spain

Electrical energy	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Heating and cooling energy	27,717.61	0.00	0.00	27,717.61	20,781.55	0.00	0.00	20,781.55
TOTAL	27,717.61	0.00	0.00	27,717.61	20,781.55	0.00	0.00	20,781.55

United Kingdom

Electrical energy	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Heating and cooling energy	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
TOTAL	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Brazil

Electrical energy	1,153.73	0.00	0.00	1,153.73	430.65	0.00	0.00	518.98
Heating and cooling energy	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
TOTAL	1,153.73	0.00	0.00	1,153.73	430.65	0.00	0.00	518.98



ESRS 2: General disclosures

E1: Climate change

E2: Pollution

E3: Water and marine resources

E4: Biodiversity and ecosystems

E5: Resource use and circular economy

S1: Own workforce

S2: Workers in the value chain

S3: Affected communities

S4: Consumers and end-users

G1: Business conduct

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E1-6 AR 45 (d)

Indirect GHG emissions (Scope 2) Location-based

2024

2025

CO₂

CH₄

N₂O

CO₂e

CO₂

CH₄

N₂O

CO₂e

Spain

Electrical energy	76,693.53	0	0	76,693.53	108,876.60	0	0	108,876.60
Heating and cooling energy	27,717.60	0	0	27,717.60	20,781.55	0	0	20,781.55
TOTAL	104,411.13	0.00	0.00	104,411.13	129,658.16	0.00	0.00	129,658.15

United Kingdom

Electrical energy	6,466.24	0	0	6,466.24	3,053.67	0	0	3,053.67
Heating and cooling energy	0	0	0	0.00	0	0	0	0.00
TOTAL	6,466.24	0.00	0.00	6,466.24	3,053.67	0.00	0.00	3,053.67

Brazil

Electrical energy	4,871.84	0	0	4,871.84	3,915.00	0	0	3,915.00
Heating and cooling energy	0	0	0	0.00	0	0	0	0.00
TOTAL	4,871.84	0.00	0.00	4,871.84	3,915.00	0.00	0.00	3,915.00



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

Scope 3 Emissions by category (tCO₂e)

	2024				2025			
	Spain	United Kingdom	Brazil	Consolidated total	Spain	United Kingdom	Brazil	Consolidated total
Category 1: Purchased goods and services.	300,893.67	314.85	30,148.00	331,356.52	321,805.24	7,930.00	30,905.90	360,641.14
Category 2: Capital goods	116,734.24	7,499.18	25,529.00	149,762.42	142,607.93	20,295.00	305,082.20	467,985.13
Category 3: Fuel and energy related activities	12,327.45	2,584.63	1,377.20	16,289.28	11,332.27	1,992.00	1,030.20	14,354.47
Category 5: Waste generated in operations	7,388.62	37.71	2,138.30	9,564.63	6,460.34	208.00	2,464.70	9,133.04
Category 6: Business travel	1,350.65	131.54	905.40	2,387.59	1,495.00	227.00	670.00	2,392.00
Category 7: Employee commuting	7,008.19	981.00	533.10	8,522.29	8,178.87	1,401.00	560.60	10,140.47
Category 8: Upstream leased assets	76.28	na	76.60	152.88	41.08	na	28.60	69.68
Category 9: Downstream transportation and distribution	410,361.20	na	42,136.60	452,497.80	399,465.47	na	47,840.00	447,305.47
Category 11: Use of sold products	2,568,319.51	266,149.70	411,586.70	3,246,055.91	2,657,522.79	284,802.00	390,610.50	3,332,935.29
Category 15: Investments	43,773.62	na	na	43,773.62	19,842.64	na	na	19,842.64
Total	3,468,233.43	277,698.61	514,430.90	4,260,362.94	3,568,751.63	316,855.00	779,192.70	4,664,799.33

Since Scope 3 emissions include indirect GHG emissions from activities related to the Company, but generated by sources neither owned nor controlled by it, the most appropriate calculation method is chosen for each category based on available data. Thus, primary data is used whenever possible (Categories 3 and 5), or methods based on economic values are used, using the Environmentally Extended Input-Output (EEIO) methodology (Categories 1, 2, 8, and 15), or emissions are calculated/modeled with ad hoc tools (Categories 6, 7, 9, and 11). All emission factors applied are taken from publicly available and reputable databases such as DEFRA, the GHG Protocol, etc.

The following categories are excluded from Scope 3:

- Category 4, Upstream transportation and distribution: the Company does not contract logistics services. Any expense related to the transport of products purchased by the organisation cannot be separated and would be included in Category 1.
- Category 10, Processing of sold products: the Company does not produce products, so this category is not applicable.
- Category 12, End-of-life treatment of sold products: the Company does not produce products, so there is no related waste and this category is not applicable.
- Category 13, Downstream leased assets: assets leased by Aena to other entities are assumed to be Aena's own and are reported in Scope 1 and 2.
- Category 14, Franchises: the company does not have franchises, so this category is not applicable.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

The following table sets out the consolidated objectives and targets of the Aena Group. For country-specific details, please refer to the relevant section [E1-4](#).

E1-6 AR 47 (b); AR 48

	Retrospective				Milestones and target years			
	Base year ¹³	2024 emissions	2025 emissions	% Variation	2026	2030	2040	Annual % target / Base year
Direct emissions (scope 1)								
Direct emissions (scope 1) (tCO ₂ e)	28,827.60	17,690.49	18,449.50	4.3%	20,148.40	15,189	2,790	4.3%
Percentage of Scope 1 GHG emissions from regulated emission trading schemes (%)	--%	27.7%	24.2%	-12.8%	—%	—%	—%	—%
Indirect emissions (scope 2)								
Indirect emissions (scope 2) - Market based (tCO ₂ eq)	119,829.20	28,871.34	21,300.53	-26.2%	79,886.13	0	0	4.8%
Indirect emissions (scope 2) - Location based (tCO ₂ e)	0.00	115,749.21	136,626.82	18.0%	0	0	0	—%
Scope 3 emissions								
Total Gross indirect (Scope 3) GHG emissions (tCO ₂ e)	—	4,260,362.94	4,664,799.33	9.5%	—	—	—	—%
Category 1: Purchased goods and services	—	331,356.52	360,641.14	8.8%	—	—	—	—%
Category 2: Capital goods	—	149,762.42	467,985.13	212.5%	—	—	—	—%
Category 3: Fuel and energy-related activities	—	16,289.28	14,354.47	-11.9%	—	—	—	—%
Category 5: Waste generated in operations	—	9,564.63	9,133.04	-4.5%	—	—	—	—%
Category 6: Business travel	—	2,387.59	2,392.00	0.2%	—	—	—	—%
Category 7: Employee commuting	—	8,522.29	10,140.47	19.0%	—	—	—	—%
Category 8: Upstream leased assets	—	152.88	69.68	-54.4%	—	—	—	—%
Category 9: Downstream transportation and distribution	—	452,497.80	447,305.47	-1.1%	—	—	—	—%
Category 11: Use of sold products	—	3,246,055.91	3,332,935.29	2.7%	—	—	—	—%
Category 15: Investments	—	43,773.62	19,842.64	-54.7%	—	—	—	—%
Total GHG emissions								
Total GHG emissions (location-based) (tCO ₂ e)	28,827.60	4,393,802.64	4,819,875.65	10%	—	—	—	—%

¹³ The base year for Spain and the United Kingdom is 2019. The base year for Brazil is 2023. The Aena Group's PACs targets only refer to Scopes 1 and 2, so a base year does not apply in the case of Scope 3.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

	Retrospective				Milestones and target years			
	Base year ¹³	2024 emissions	2025 emissions	% Variation	2026	2030	2040	Annual % target / Base year
Total GHG emissions (market-based) (tCO₂e)	148,656.80	4,306,924.77	4,704,549.36	9%	—	—	—	—%

Each target year in the table corresponds to the following:

- 2030: Spain's Net Zero target for Scopes 1 and 2.
- 2040: The UK and Brazil's Net Zero target for Scopes 1 and 2.

The Aena Group's corporate climate action plans include specific Net Zero targets for its own emissions. For Scope 3, the Aena Group's commitment, validated by SBTi, applies (excluding BOAB as it was not in operation in the year the targets were submitted for validation). In this regard, it should be noted that since the SBTi validation of the targets was carried out in 2024, the reporting of emissions performance related to this commitment will be done in accordance with SBTi criteria in subsequent reports.

Note: The information reported for calculating Scope 3 emissions for London Luton Airport for the 2024 fiscal year has been corrected, as the previous report included WTT items that are not required according to the corporate footprint calculation criteria.

E1-6 AR 46 (g)

	2024	2025
Percentage of Scope 3 emissions calculated using primary data obtained from suppliers or other value chain partners ^(A)	100%	100%

^(A) These percentages have been obtained based on Category 11 (LTO, APUs, and ground handling operations) of Scope 3, this being the most significant category.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

GHG intensity based on net revenue:

E1-6 53, E1-6 54, E1-6 AR 53, AR 54, AR 55 (a)

	GHG intensity - tCO ₂ e (location-based) per net revenue (tCO ₂ e/€)		
	2024	2025	% Variation
Total GHG emissions (location-based) per net revenue (tCO ₂ e/thousands of €)	0.00076	0.00077	1%

	GHG intensity - tCO ₂ e (market-based) per net revenue (tCO ₂ e/€)		
	2024	2025	% Variation
Total GHG emissions (market-based) per net revenue (tCO ₂ e/thousands of €)	0.00075	0.00075	—%

To calculate the GHG intensity ratio, the amount of global net revenue is used (Note 5. Financial information of the Consolidated Annual Accounts 2025 - Block A).

E1-7: GHG removals and GHG mitigation projects financed through carbon credits

E1-7 59, E1-7 60, E1-7 61, AR 36 (b)

The Aena Group has set a net-zero emissions target for 2030 in Spain (scopes 1 and 2), and for 2040 in the United Kingdom and Brazil, in line with the criteria of the ACI EUROPE's Net Zero initiative (please refer to section [E1-4](#)). The Net Zero commitment is based on the direct reduction of gross GHG emissions, with a target reduction of at least 90% compared to the baseline year. Residual emissions that cannot be eliminated after the implementation of all reduction measures (please refer to section [E1-3](#)), are expected to be offset through carbon offsetting, following internationally recognised methodologies.

During 2025, voluntary carbon credits were purchased to offset a total of 1,351 tCO₂e generated by employee business travel by car, train, boat, and plane (scope 3) in Spain during 2024. This offsetting was carried out through a reforestation project in the Eastern Mountains of Uruguay, focused on the use of high-quality timber. The project contributes to emission absorption, responsible forest management, ecosystem regeneration, and sustainable local development. The initiative has been certified by Verra, in accordance with FSC and Verified Carbon Standard (VCS).

Similarly, Aena will purchase carbon credits in the first half of 2026 the corresponding to emissions from its employees' business travel in Spain during 2025 (1,495 tCO₂e). Additionally, Aena has planned to offset 8% of its total Scope 1 and 2 emissions. However, having reduced emissions more than anticipated this year, it is only necessary to offset 6% of the projected emissions (8,198 tCO₂e) with respect to 2019 Scope 1 and 2 emissions, thus achieving the target of 80% set in the Climate Action Plan (comprising 72% direct reduction and 8% offsetting), reaching 80.4% (74.4% reduction and 6% offsetting).

The Aena Group's climate neutrality declarations are accompanied by GHG emission reduction targets (please refer to section [E1-4](#)), prioritising direct reduction and using carbon credits only to offset residual emissions until the targets set for each year are met. The use of carbon credits in 2030 in Spain and in 2040 in the United Kingdom and Brazil does not replace or limit the achievement of gross emissions reduction targets, but is reserved exclusively to offsetting those emissions that cannot be technically removed.

When purchasing voluntary carbon credits to offset emission, the Aena Group adheres to the criteria defined in ACI EUROPE's Airport Carbon Accreditation program. Thus, the emission reductions from Aena's carbon offset projects must be additional, measurable, permanent (with a minimum guarantee of 30 years), and not driven by legal obligations. The offset projects must be transparent, traceable, and have adequate monitoring and control systems. Furthermore, the offset credits will be verified by independent bodies, thereby ensuring regulatory and methodological compliance.

It is also important to highlight that, in order to provide a positive environmental impact and social integrity, it is a mandatory quality criterion that offset projects offer collateral benefits and contribute to one or more of the United Nations Sustainable Development Goals (SDGs).

Finally, the credits will be registered in the following recognised programs or standards, included and accepted by ACI EUROPE's Airport Carbon Accreditation program, such as:

- Verified Carbon Standard.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

- Gold Standard.
- Climate Action Reserve.
- American Carbon Registry.

In Spain, Aena has a Framework Agreement that will end in 2027, under which the awarded companies submit their bids and projects annually for the emissions to be offset that meet the aforementioned criteria.

Regarding locked-in Scope 1 and 2 GHG emissions, the Aena Group is working on a strategy for their neutralisation in order to achieve Net Zero status within the established timeframes for each company.

E1-8: Internal carbon pricing

E1-8 62

The Aena Group does not have an internal carbon pricing system.

E1-9: Anticipated financial effects from material physical and transition risks and potential climate-related opportunities

E1-9-64, E1-9 66, E1-9 67, E1-9 68, E1-9 69, AR 69, AR 70, AR 72, AR 73, AR 75, AR 78, AR 79, AR 80, AR 81

The Aena Group avails itself of the Delegated Regulation "the Quick-Fix" adopted by the European Commission, adhering to the moratorium set out in Appendix C of CSRD ESRS 1 for all mandatory datapoints of disclosure requirement E1-9.

Non-applicable Datapoints

- DPs not included because, due to the Company's activity, they are considered not to be applicable: E1-5 37 (b), E1-5 38 (a), AR 32 (i), E1-6 46-47, E1-6 50 (b), AR 46 (h) ii-iii, AR 51, E1-7 58, AR 56-59, AR 62, E1-8 63.
- DPs not included because they are contextual information or conditional requirements, i.e., the answer is provided in another linked DP: E1-2 23, E1-3 27, E1-4 31, E1-5 35, E1-5 41, E1-6 45.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
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E2 Pollution

The Aena Group, committed to sustainability and respect for the environment, recognises the importance of addressing the environmental impacts derived of its operations. As a world leader in airport management, it assumes its responsibility to mitigate the negative effects associated with its activity, aware that airport operations primarily generate two types of pollution: atmospheric and acoustic. Both impacts are directly related to aircraft take-off, landing, and taxiing operations, among other sources, thus requiring a comprehensive approach to their management. To address these challenges, the Aena Group has designed complementary strategies that simultaneously address air quality and noise control, promoting sustainable practices aligned with the most demanding international standards.

Material IROs - Impact materiality (Impacts)

Topic	Sub-topic	Sub-sub-topic	Impact	Location in the value chain	Positive / Negative	Actual / Potential	Time horizon
E2 Pollution	Pollution of air	—	Impact on air quality due to the emission of polluting substances (PM, SOx...) generated by the Aena Group and the value chain	Own operations and downstream value chain	Negative	Actual	Short term / Medium term / Long term
E2 Pollution	Pollution of air	—	Impact on surrounding communities due to noise	Downstream value chain	Negative	Actual	Short term / Medium term / Long term

Material IROs - Financial materiality (Risks and Opportunities):

Topic	Sub-topic	Sub-sub-topic	Driver	Description of the risk / opportunity	Location in the value chain	Risk / Opportunity	Time horizon
E2 Pollution	Pollution of air	—	Airports are the hub of numerous activities involving machinery, vehicle movement, both in access roads and within the airport itself, and aircraft operations. These noise sources, primarily aircraft, cause nuances to the public, but they also adhere to strict regulatory controls and receive significant media attention. For these reasons, additional costs or reputational damage could be incurred, potentially leading to lost revenue.	Increased costs, reputational damage, and loss of income due to noise impact	Own operations	Risk	Short term / Medium term / Long term



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
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E2 ESRS 2 IRO-1: Description of the processes to identify and assess material pollution-related impacts, risks and opportunities

IRO-1 11(a - b), AR9 (a - b)

The process for determining and assessing material impacts, risks and opportunities related to pollution within the Aena Group is based on the methodology described in the section on **double materiality assessment** (see [ESRS 2. IRO-1](#)). This methodology details the analysis of both the Group's own assets and operations and those that form part of its value chain.

In Spain, in order to comply with the commitments established in the Policy on Integrated Quality, Environmental, Energy Efficiency and Occupational Health and Safety Management, as well as to identify, monitor, and manage environmental impacts and risks, Aena has promoted the implementation, maintenance and certification of an **Integrated Quality and Environmental Management System (SGI)**, in accordance with international standards ISO 9001, ISO 14001 and ISO 50001.

The fundamental purpose of Aena's SGI is to ensure that airport activity is carried out according to criteria of quality and excellence, while simultaneously guaranteeing the protection of the natural environment. To facilitate the operation of the SGI, Aena uses several software applications:

- **ARA:** Allows users to consult the documentation that comprises the SGI (manuals, procedures, process sheets, etc.), register and manage notifications, and register of documentary evidence of the SGI (reports, analyses, licenses, etc.).
- **ASGI:** Application for the identification, assessment and evaluation of environmental aspects at Aena's facilities, the calculation of environmental indicators, and the environmental control of companies.
- **DATAR SGI:** Automated system for collecting and managing data/indicators for monitoring and evaluating SGI processes.
- **EVIDENTIA:** Collaboration portal for registering documentary evidence of the Integrated Management System (reports, analyses, licenses, etc.).
- **SALEM:** Enables the identification, updating and evaluation of the legal requirements applicable for each unit/centre within the scope of the SGI.

Likewise, based on the Aena Group's risk map, the **Risk Management System (SGR)** identifies both environmental and sustainability risks. This system includes procedures for managing identified risks and provides support to the Integrated Quality, Environmental and Energy Efficiency Management System.

In the United Kingdom, London Luton Airport has included in its environmental and energy manual the obligation to comply with ISO 14001 and ISO 50001 standards, as well as the identification of risks and opportunities linked to energy management. This information is used to keep management informed about the management systems. The identification, description, and treatment of these risks and opportunities are carried out through the risk governance structure, which facilitates the detection of environmental aspects of activities and services that must be controlled or over which some influence can be exerted, considering the life cycle perspective, new or planned developments, and new or modified activities .

Similarly, the Aena Group incorporates the environmental variable into its decision-making processes by conducting Environmental Impact Assessments of its Master Plans and Projects, especially in those centres whose location and characteristics may generate a significant environmental impact. This approach allows it to anticipate and reduce potential risks or impacts both in the planning and construction phases of its infrastructures and during its operation.

In Spain, Aena provides users with the following platforms through which they can submit requests for information, complaints, and suggestions regarding environmental and noise issues. These platforms facilitate obtaining an external perspective on the impact of airport activities, helping to accurately assess the impact on affected communities.

- The **Environmental Care Office**, accessible through [Aena Public Website](#), provides prompt and transparent responses to environmental complaints.
- The **Environmental Office at Adolfo Suárez-Madrid Barajas Airport (OFIMA)** and the **Environmental Office at Josep Tarradellas Barcelona-El Prat Airport (SAIM)**, receive environmental complaints from communities near these airport facilities.
- [Interactive Noise Maps \(WebTrak\)](#).
- The [Procedures and Claims Portal](#).

In the United Kingdom, London Luton Airport offers users an interactive noise map called [TraVis](#).



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
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In Brazil, users of Aena subsidiaries and other affected parties can submit inquiries, suggestions, complaints, and claims on this matter through the [Ouvitoria Channel](#)¹⁴ (online), among other tools (emails, customer service, etc.).

E2-1: Policies related to pollution

E2-1 12, E2-1 14, E2-1 15 (a), E2-1 15 (c), AR 11

The Aena Group has adopted specific policies for pollution prevention and control, applicable to all companies within the Group, with the aim of effectively managing the material impacts and risks related to air and noise pollution.

The **Sustainability Policy** and the Policy on **Integrated Quality, Environmental, Energy Efficiency and Occupational Health and Safety Management** establish commitments to minimise negative impacts and maximise positive ones throughout the value chain. These include specific measures for the prevention and control of air pollution, including nitrogen oxides (NO_x), sulphur oxides (SO_x), carbon monoxide (CO), non-methane volatile organic compounds (NMVOC) and particulate matter (PM₁₀ and PM_{2.5}), as well as for noise management. These policies are aligned with the objectives of the 2021-2030 Sustainability Strategy and their implementation is supported by continuous monitoring procedures, fleet electrification, operational optimisation, emergency plans, early warning systems, and communication with competent authorities. In the event of incidents, immediate containment measures, operational adjustments, and public information systems are activated to limit the impact on people and the environment.

The scope of these policies covers both the company's own operations and third-party activities at all network locations. The Board of Directors is responsible for monitoring and ensuring compliance with these policies, with the support of the Sustainability and Climate Action Commission, which assesses progress through monitoring indicators and regular audits, adapting procedures according to the regulatory framework of each country.

In the United Kingdom, London Luton Airport has an **Energy Policy** and an **Environment Policy**, aligned with ISO 50001, ISO 14001 standards, the requirements of the Global Real Estate Sustainability Benchmark (GRESB), and Airport Carbon Accreditation Level 4 requirements, as well as internal environmental strategies. These policies reinforce the commitment to continuous improvement in energy and environmental management, under the responsibility of the Board of Directors Sustainability Committee and the CEO of LLAOL. It is also worth noting that London Luton Airport has been recognised for the fourth consecutive year, as an Industry Leader by the GRESB. Regarding pollution, the Environment Policy includes the principle of monitoring air quality at the airport and its surroundings to meet national targets, identifying and reducing own emissions, and investigating any exceedances. Furthermore, it seeks to minimise the impact of noise on nearby communities by collaborating with airlines and implementing the Noise Action Plan, as well as evaluating potential operational improvements.

In Brazil, the **Sustainability Policy** and the **Quality and Environmental Management Policy** of the companies that make up the Aena Brasil's subsidiary (ANB and BOAB) define commitments to minimise the environmental impacts associated with their activities, using a preventive approach, especially regarding air quality and noise management.

For more information on Minimum Disclosure Requirements (MDR-P), please refer to the **Environmental policies** section.

E2-2: Actions and resources related to pollution

E2-2 16, E2-2 18 (MDR-A), AR 13


The most relevant actions are related to both air pollution and environmental noise. These aspects are described in detail below.

Air pollution

Section **E1-3** details both the actions aimed at preventing air pollution and the resources allocated for their implementation. The specific strategies related to air quality are then presented below.

The Aena Group implements a set of initiatives and measures aimed at preventing and reducing air pollution. These actions include improving energy efficiency, using renewable energies, promoting sustainable mobility, and reducing third-party emissions, thus contributing to improved air quality in the airport environment.

¹⁴ In Brazil, the Management System also addresses the relationships with airport users, aiming to provide citizens with information about the Ombudsman Office and its relationship with consumers, suppliers, employees, the community, and users. Aena Brasil is obligated to maintain a physical and electronic service system for users and an ombudsman to investigate complaints, claims, requests for information, suggestions, and compliments related to the execution of the Concession Agreement. Furthermore, the Airport Exploration Plan (PEA) establishes the obligation to implement a system for registering and processing complaints related to service provision.

	ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
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In Spain, since 2001, Aena has carried out systematic air quality monitoring and control at the main airports (Adolfo Suárez Madrid-Barajas, Josep Tarradellas Barcelona-El Prat, Palma de Mallorca, Alicante-Elche Miguel Hernández, and Málaga-Costa del Sol), through continuous and automatic monitoring of key pollutant concentration levels: sulphur dioxide (SO₂), nitrogen oxides (NO_x), carbon monoxide (CO), ozone (O₃), benzene (C₆H₆), and particulate matter (PM₁₀ and PM_{2.5}). This data is collected at Aena's own stations and, in some cases, integrated into municipal and regional air quality monitoring networks. In addition, since 2009, Gran Canaria Airport has carried out an annual measurement campaign to assess environmental conditions. Furthermore, in 2025, Josep Tarradellas Barcelona-El Prat Airport launched a pilot project to improve air quality, by installing two air purification devices located in the taxi waiting area of Terminal 1. These stations, in addition to absorbing and cleaning the air in this area, will measure the following pollutants to verify the improvement: NO_x, SO_x, PM_{2.5}, PM₁₀, volatile organic compounds, and ultrafine particles.

In the United Kingdom, local authorities are required by the British government to identify potential exceedances in pollutant levels and to implement preventive measures when necessary. Although this legal responsibility lies with local authorities, London Luton Airport has adopted an Air Quality Strategy as a best practice and has committed to reducing its impact on air quality in the area. Following recognised standards, the airport has been conducting continuous monitoring and evaluation of air quality both within its facilities and in the surrounding area since 2003. The data collected allows verification of compliance with national air quality objectives and analysis of the temporal evolution of pollutant concentrations in the region.

To measure air pollution, London Luton Airport uses diffusion tubes at 15 different locations to obtain accurate readings of nitrogen dioxide (NO₂), while particulate matter (PM₁₀) is monitored at a specific site using a Beta Attenuation Monitor. Nitrogen dioxide is collected monthly, and the annual air quality results are included in the annual Sustainability Report. In 2025, the airport implemented improvement measures to achieve the proposed targets, including the creation of a roadmap that identifies the main contributors to air pollution and establishes mitigation measures to reduce its impact and improve air quality across the airport premises. Air quality monitoring has also been reviewed to develop a consolidated programme by 2026 to minimise duplication with local authorities, eliminate obsolete technologies, and ensure that monitoring is carried out in areas close to the most vulnerable receptors.

In Brazil, airports managed by Aena Brasil are conducting simulations to analyse atmospheric emissions generated by aircraft activities and ground handling equipment. The first phase of measurements was completed at the end of 2024, and a second phase is currently underway, scheduled for the end of 2025. This second phase will provide comparative data to facilitate monitoring air quality trends. The main purpose of these analyses is to identify and plan various measures for the coming years, focused on reducing pollution from aviation emissions, promoting the use of sustainable fuels, installing electric charging stations for passenger and ground handling vehicles, and renewing part of the fleet with electric or hybrid vehicles that run on ethanol/biofuel. Among the actions already taken by Aena Brasil, the replacement of S500 diesel with S10 stands out, which has resulted in a significant reduction in sulphur levels, as well as an increase in the use of ethanol in airport operations. At Congonhas Airport, the addition of ten electric buses for passenger transport represents a significant step towards more sustainable mobility.

Noise pollution

The Aena Group recognises noise pollution as a material impact of its airport operations and actively manages the associated risks, with particular attention to affected local communities.

In Spain, Aena has identified areas and stakeholder groups potentially exposed to high noise levels through the periodic development of Strategic Noise Maps (SNM) and the delimitation of noise easements, in accordance with Directive 2002/49/EC and applicable national legislation. During 2025, Noise Action Plans were developed prepared for major Spanish airports, those with more than 50,000 annual aircraft movements, which include specific measures aligned with the European Union's objectives to reduce the impact of transport noise by 2030.

Through these Noise Action Plans, Aena promotes noise management from a comprehensive perspective based on the "Balanced Approach" concept established by the International Civil Aviation Organization (ICAO), adopted by the ICAO Assembly at its 33rd session (2001) and reaffirmed in subsequent sessions (Resolution A41-20). This approach includes:

- **Reduction of noise at source:** Adopting advanced technologies and practices to minimise aircraft noise. This includes promoting increasingly stringent standards for aircraft manufacturers' certification and implementing incentives to renew fleets with quieter aircraft and propulsion systems.
- **Operational procedures:** Optimisation of operational procedures to reduce noise impact, such as optimised descents or the definition of procedures that avoid overflights of urban areas, or greater precision procedures that reduce route deviation and increase distance from populated areas.
- **Land-use management:** Control of land uses in the vicinity of airports to ensure compatibility with noise levels in each zone. To this end, coordination mechanisms have been established in Spain that require the aeronautical authority to inform planning instruments if they are affected by noise easements, in order to prevent sensitive uses in the airport environment, such as new residential areas or educational or healthcare facilities. Related to this, significant investments in noise insulation plans for existing residential areas should be highlighted. This includes providing sound insulation to buildings that, while affected by sound pressure levels exceeding those established by regulations, exceed the legally established acoustic quality objectives indoors.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
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- **Operating restrictions:** Operating restrictions may only be applied when previously adopted measures prove insufficient to reduce the number of people affected.

One of the main measures implemented by Aena is the execution of Noise Insulation Plans (PAA) in the vicinity of airports within its network. These plans, based on environmental permits and/or noise easements associated with these facilities, aim to ensure that the buildings targeted by these measures (residential buildings and buildings with sensitive uses such as educational, healthcare, and cultural facilities) have the required protection against noise pollution.

During 2025, Aena soundproofed 331 properties in Spain for a total of €3,240,596.73 (297 soundproofed properties and €4,524,777.46 in 2024). Furthermore, in 2025, a total 11 of meetings related to Noise Insulation Plans were held in Spain (15 in 2024).

In the United Kingdom, London Luton Airport carried out the soundproofing of 148 properties in 2025 at a cost of €512,682.45 (138 properties soundproofed and €405,441.02 in 2024). The airport's Consultative Committee also met to discuss the community impacts and the results of implemented measures.

In Brazil, the Brazilian Civil Aviation Regulations (RBAC) stipulate that airports with an average annual aircraft movements exceeding seven thousand in the last three years must establish an Aeronautical Noise Management Commission (CGRA). The CGRA's primary function is to analyse, update, and implement the Specific Aeronautical Noise Zoning Plan (PEZR) for each airport. Of the airports managed by Aena Brasil, 11 had established CGRAs by 2025.

The Aeronautical Noise Management Commissions (CGRA) are responsible for proposing noise monitoring actions, identifying the most affected areas, overseeing and supporting initiatives aimed at reducing noise impact, and performing other tasks outlined in the RBAC. These forums act as a collaborative space and are made up of airport staff, representatives of nearby communities, environmental agencies, the air navigation service provider and municipal authorities included in the PEZR, as well as other interest groups involved in the management of aeronautical noise, land use and airport operations.

These commissions meet semi-annually, in compliance with RBAC 161, with representatives from the airport operator and public agencies in attendance. During 2025, 22 meetings of the Aeronautical Noise Management Commissions (CGRAs) were held at Aena Brasil airports. Generally, the topics addressed included: updating and implementing the Specific Noise Zoning Plans (PEZR), the results of on-site measurement campaigns and simulations at critical receptors, and coordination with municipalities to integrate noise contours into urban planning instruments. Key agreements included strengthening the regulatory integration of noise contours, maintaining annual noise measurement campaigns, expanding citizen participation, and ensuring transparency in access to noise information. Among the noteworthy actions carried out in 2025 was the reduction in the number of complaints at Recife Airport, due to the relocation of engine testing during nighttime hours. Similarly, at Congonhas Airport, an agreement has been established with all airlines and ANAC (National Civil Aviation Administration) for the implementation of NADP (Noise Abatement Departure Procedures), which consist of noise-reduced takeoffs, minimising the noise impact on surrounding residential areas.

At airports managed by Aena Brasil, there are no noise insulation plans, as local regulations and operations do not require them. Therefore, data is not available, nor is information reported, on soundproofed properties in Brazil. The Aena Group will update and report this information if such plans are implemented in the future.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
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Airport	Number of soundproofed properties and amount allocated (Spain and United Kingdom (LLA))							
	2024		2025		Spain 2000-2024 United Kingdom (LLA) 2016-2024		Spain 2000-2025 United Kingdom (LLA) 2016-2025	
	Number of soundproofed properties	Amount allocated (€)	Number of soundproofed properties	Amount allocated (€)	Number of soundproofed properties	Amount allocated (€)	Number of soundproofed properties	Amount allocated (€)
A Coruña	25	215,299	4	167,374	873	7,510,066	877	7,677,440
Alicante-Elche Miguel Hernández	16	256,148	0	45,012	3,247	42,946,077	3,247	42,991,089
Josep Tarradellas Barcelona-El Prat	0	0	0	0	50	2,966,717	50	2,966,717
Bilbao	134	1,422,425	19	234,355	2,234	26,488,007	2,253	26,722,363
Cesar Manrique - Lanzarote	0	257,353	11	196,786	0	478,696	11	675,483
Fuerteventura	0	0	0	0	0	0	0	0
Girona-Costa Brava	0	0	0	0	0	50,902	0	50,902
Gran Canaria	0	22,453	0	10,235	628	10,213,977	628	10,224,212
Ibiza	0	0	0	216	612	6,447,287	612	6,447,504
La Palma	0	0	0	0	22	402,329	22	402,329
Adolfo Suárez Madrid-Barajas	2	120,817	2	93,850	12,924	170,626,315	12,926	170,720,164
Málaga-Costa del Sol	0	260	0	3,137	814	16,323,736	814	16,326,872
Melilla	0	0	0	63	0	0	0	63
Menorca	0	0	0	325	11	227,779	11	228,104
Palma de Mallorca	102	1,544,372	21	252,028	1,543	22,410,296	1,564	22,662,323
Pamplona	0	0	0	0	43	1,224,084	43	1,224,084
Sabadell	0	0	0	0	0	13,633	0	13,633
Santiago-Rosalía de Castro	0	79	1	8,655	15	298,296	16	306,952
Seville	0	29,562	20	152,756	431	1,838,530	451	1,991,286
Tenerife Norte-Ciudad de La Laguna	0	110,919	6	272,129	1,117	26,254,076	1,123	26,526,205
Tenerife-Sur	0	89,880	238	1,003,712	0	206,104	238	1,209,816
Valencia	18	448,050	7	699,401	4,265	23,492,446	4,272	24,191,848
Vigo	0	3,421	2	71,305	247	3,716,875	249	3,788,180
Vitoria	0	3,742	0	29,257	11	260,623	11	289,880
Londres-Luton	138	405,441	148	512,682	622	1,677,553	770	2,190,236
Total Spain and United Kingdom (LLA)	435	4,930,218	479	3,753,279	29,709	366,074,404	30,188	369,827,683

In Note 26. Environmental Commitments – Amount per number of soundproofed properties of the Consolidated Annual Accounts 2025 – Block A.

Stakeholder engagement is a fundamental pillar of noise management. The Aena Group maintains open communication channels with local communities, authorities, and other stakeholders, organising public consultations, regular meetings, and complaint mechanisms to gather and address citizens' concerns. The results of these interactions are integrated into the planning and review of the measures adopted.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
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In Spain, as part of noise quality monitoring and control measures, Aena operates Noise Monitoring Terminals (TMR) at the following airports: Adolfo Suárez Madrid-Barajas, Josep Tarradellas Barcelona-El Prat, Palma de Mallorca, Málaga-Costa del Sol, Alicante-Elche Miguel Hernández, Gran Canaria, Seville, Valencia, Bilbao, Ibiza, César Manrique-Lanzarote, Tenerife Norte-Ciudad de la Laguna, Tenerife Sur, and Fuerteventura. To ensure transparency and effective communication with communities, noise information, linked to radar trajectories and flight plans is made publicly available through monthly and annual reports published on the website, as well as through platforms such as *WebTrak*, which offers real-time georeferenced information, and *Insightfull*, implemented at Aena's three main airports (Adolfo Suárez Madrid-Barajas, Josep Tarradellas Barcelona-El Prat, and Palma de Mallorca). Additionally, tools like *WebTrak* in Spain, *TraVis* in the United Kingdom, and *Ouvidoria* in Brazil allow any resident to directly and transparently monitor and report noise impacts.

Likewise, in Spain, according to Law 48/1960 on Air Navigation, the delimitation of easements involves the establishment of Joint Commissions, comprised of representatives from the Ministry of Transport and Sustainable Mobility, the Ministry for Ecological Transition and the Demographic Challenge, the relevant autonomous community, and the affected municipalities. These commissions are responsible for approving and ensuring compliance with the easement delimitation. Furthermore, community participation is strengthened through the existence of Environmental Monitoring Commissions, responsible for overseeing soundproofing requests and the progress of noise insulation projects, as well as through Noise Working Groups at certain airports.

In the United Kingdom, London Luton Airport develops its Noise Action Plan in accordance with local regulations, with the participation of an independent analyst and the Noise Insulation Subcommittee. Progress and results are communicated regularly to both the authorities and the community. The London Luton Airport Consultative Committee (LLACC), which includes representatives from the local authority, community groups, and other relevant stakeholders, maintains an ongoing dialogue and reviews noise reports quarterly and at the end of each year. Furthermore, the Luton Rising initiative promotes economic development and sustainable growth in the Luton area, seeking to maximise social and economic benefits through investments, job creation, and support for community projects, working in conjunction with the LLACC and other stakeholders.

The Aena Group reviews and updates its noise actions regularly, ensuring alignment with applicable regulatory objectives and continuous improvement in noise pollution management, for the benefit of communities and the environment.

Noise complaints

	Number of claimants		
	Spain	United Kingdom	Brazil
Noise complaints 2024	756	244	100
Noise complaints 2025	601	204	197

The Aena Group provides accessible complaints and claims channels through its corporate websites, guaranteeing high levels of confidentiality and independence. Likewise, it rigorously monitors all claims, complaints, and requests received through these channels to ensure effective management and respect for the rights of all stakeholders.

E2-3: Targets related to pollution

E2-3 20, E2-3 22 (MDR-T), E2-3 23 (a), E2-3 25

Regarding air quality, the targets are geared towards compliance with applicable legislation and the reduction of pollutant emissions. As for noise impact, actions and targets are channelled through noise action plans and noise insulation plans, with the aim of minimising noise exposure in communities near airports. These objectives are directly linked to the Aena Group's Sustainability Policy and the Policy on Integrated Quality, Environment, Energy Efficiency and Occupational Health and Safety Management, the content of which is detailed in disclosure requirement [E2-1](#).



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

Air pollution

The Aena Group has established an integrated approach to air pollution management, applicable to all its operations. This framework covers both its own operations and, progressively, the value chain, and includes mechanisms for identifying, assessing, and managing material impacts related to air pollution.

In Spain, air pollution targets are defined in Aena's 2021-2030 Sustainability Strategy and are aligned with the Climate Action Plan 2021-2030, which address aspects related to air quality by defining strategic projects aimed at reducing emissions of various air pollutants (NO_x, SO_x, and PM₁₀). The definition of these voluntary goals and targets is based on internationally recognised methodologies, considering scenarios aligned with the Paris Agreement, the European Green Deal, and the European Directive on National Emission Ceilings (Directive EU 2016/2284). In the short term, Aena is carrying out pilot projects to validate the future implementation of innovative solutions and, in the medium and long term¹⁵, the quantitative targets for 2030 include the reduction of emissions per passenger compared to 2019:

	Reduction of pollutant emissions			
	Spain			
	Baseline 2019	2024	2025	Target 2030
NO_x emissions (g/pax)	0.60	70%	66%	22%
SO_x emissions (g/pax)	0.03	32%	11%	36%
PM₁₀ emissions (g/pax)	0.05	70%	70%	15%

The targets are reviewed periodically to ensure their relevance and ambition, based on technological and regulatory developments. Progress towards these targets is monitored using key performance indicators (KPIs) that are reported regularly to the Sustainability and Climate Action Commission. Results and deviations are analysed, and actions and allocated resources are adjusted as needed. Furthermore, there is an internal team dedicated exclusively to coordinating the cross-cutting implementation of the Strategy, supporting its rollout, and fostering the active and direct participation of all areas and staff within the organisation.

In the United Kingdom, London Luton Airport's qualitative objectives include improving air quality by establishing monitoring systems that enrich data and facilitate real-time understanding of the impact of different emission sources, measuring air quality with broad spatial coverage, and formulating more effective policies based on data analysis. In the medium and long term, the airport has designed a specific air quality roadmap, with the aim of identifying the main factors contributing to air pollution and proposing recommended mitigation measures. Likewise, the air quality program has been reviewed and strengthened for 2026 and beyond, considering the potential impact on local air quality, the duplication of monitoring with local authorities, the elimination of obsolete technological equipment, and ensuring that monitoring adequately represents sensitive receptors in all areas of the airport.

In Brazil, the airports managed by Aena Brasil have incorporated a specific line of action for air quality within their Sustainability Strategy, approved in 2025, as part of the Responsible Use of Resources program. The main purpose is to keep polluting emissions below the legal limit. In the short term, the aim is to improve the current measurement system at ANB and expand measurements at BOAB, while in the long term, the target is to reduce emissions, supported by the Climate Action Plan 2024-2040, which includes the renewal of the own fleet with electric or hybrid vehicles and the use of sustainable fuels. The NO_x, SO_x, PM_{2.5}, and PM₁₀ emission targets have been defined taking 2024 as the baseline year and annual fuel consumption as a reference, applying weighted emission factors for their calculation. These targets are based on the commitments of the Paris Agreement and have been developed with the participation of airports as key stakeholders. The targets set for 2025, 2030, and 2040 are as follows:

¹⁵ No ecological thresholds or allocations for specific entities were applied when setting the targets.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

Air quality results				
Brazil				
	2025 target	2025	2030 target	2040 target
NO_x (µg/m³)	< 50 µg/m ³	14.29 µg/m ³	< 45 µg/m ³	< 40 µg/m ³
SO_x (µg/m³)	< 30 µg/m ³	14.57 µg/m ³	< 20 µg/m ³	< 20 µg/m ³
PM_{2.5} (µg/m³)	< 17 µg/m ³	7.75 µg/m ³	< 15 µg/m ³	< 10 µg/m ³
PM₁₀ (µg/m³)	< 35 µg/m ³	20.5 µg/m ³	< 30 µg/m ³	< 20 µg/m ³

In the international subsidiaries of the Aena Group, policies and objectives adapted to the local context are applied, but following the same principles of alignment with applicable regulations, systematic monitoring and periodic review of targets and actions.

Noise

The Aena Group has established specific and measurable targets for reducing noise impact, aligned with applicable regulations and ICAO international standards. These are primarily mandatory targets derived from compliance with legislation.

Thus, in compliance with the European Environmental Noise Directive and its transposition into national legislation in Spain, Aena has defined targets within the Action Plans for each “major airport” with more than 50,000 annual aircraft movements: Adolfo Suárez Madrid-Barajas, Alicante-Elche Miguel Hernández, Josep Tarradellas Barcelona-El Prat, Bilbao, Gran Canaria, Ibiza, César Manrique-Lanzarote, Málaga Costa del Sol, Palma de Mallorca, Seville, Tenerife Norte-Ciudad de La Laguna, Tenerife Sur, and Valencia. These plans must be reviewed and updated every five years, ensuring that the implemented measures are effective and aligned with European Union regulations.

The [Noise Action Plans 2024-2028](#) for major airports in Spain have the following main objectives:

- To reduce environmental noise generated by airport activities.
- To reduce the number of people affected by this type of pollution.
- To protect quiet areas and contribute to achieving European objectives aimed at minimising the impact of environmental noise.

These European objectives include the European Union’s Action Plan “Towards Zero Pollution for Air, Water and Soil” (COM/2021/400 final) and the “Sustainable and Smart Mobility Strategy” promoted by the European Commission (COM/2020/789 final). Furthermore, Spanish national regulations on noise establish acoustic quality objectives that must be achieved in the different acoustic zones into which the territory is divided.

On the other hand, Noise Insulation Plans arise from the Resolutions issued by the Ministry for Ecological Transition and the Demographic Challenge, resulting from the environmental impact assessment procedures applied to airport expansion projects within the Aena network in Spain. These plans also stem from the application of Law 5/2010 of March 17, which amends Law 48/1960 of July 21, on Air Navigation, and establishes the noise easements for airports, as well as the associated action plans. Noise Insulation Plans are designed to ensure that acoustic quality objectives are not exceeded indoors at homes and buildings with sensitive-uses, which is also in line with environmental protection policies.

The targets and objectives defined in the Action Plans are based on baseline values obtained through previous assessments and the results of the Strategic Noise Maps (SNM), updated in phase IV. This data, based on conclusive scientific evidence and internationally validated methodologies, allows for measuring progress in reducing environmental impacts. Aena uses noise assessment and modelling tools supported by state-of-the-art scientific research, ensuring that the data used is accurate and realistically reflects the actual and potential impacts of its operations.

In the United Kingdom, London Luton Airport has defined short-term and medium- to-long-term noise targets. The targets established in the airport’s Noise Action Plan 2024-2028 are aligned with its commitment to reducing the impact of noise on surrounding communities. The targets of the Noise Action Plan are set by the airport and are all voluntary. These targets are directly linked to the overall policy objectives of limiting and reducing the number of people significantly affected by aircraft noise, as described in the Aviation Policy Framework and the Noise Policy Statement for England. The plan uses 2021 as the baseline year, when the noise contour reached 57 dB LAeq,16h, and sets out the following lines of action for the period 2024-2028:

- To reduce the number of people significantly affected by noise compared to the 2021 base year.
- To keep airport growth within the noise limits set by the Noise Preferential Routes and the Noise Contour Limit.
- To minimise the impact of night operations.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

- To implement technological and operational improvements to reduce noise during takeoffs and landings.
- To strengthen transparency through annual reports and LLACC meetings.

The immediate targets focus on reducing acoustic impact. Among the priorities is the reduction of maximum takeoff Noise Violation Limits (NVLs), taking measured decibels (dB) as reference. The goal is to reduce the daytime limit to 79 dB by 2026, while the nighttime limit will be reduced to 78 dB by 2025. In addition, the aim is to ensure high compliance in Continuous Descent Operations (CDO), with the target of achieving and maintaining 95% compliance. This practice is key to minimising the impact of noise on nearby communities, promoting a more harmonious coexistence.

In the medium and long term, the targets set for London Luton Airport are aimed at implementing advanced technologies and innovative procedures that contribute to reducing the impact of noise on surrounding communities. One of the priorities is the transition to a quieter fleet, aiming for 100% of operational aircraft to comply with the ICAO Annex 16, Vol. I, Chapter 4 standards by 2027, and at least 75% to be classified as Chapter 14 compliant by 2028. This transition represents an important step towards modernising the aircraft fleet and reducing the noise associated with its operations.

In Brazil, the main target of Aena Brasil's 2024-2040 Sustainability Strategy regarding noise management is to implement an action plan in accordance with the Specific Noise Zoning Plans (PEZR), approved by the *Agência Nacional de Aviação Civil* (ANAC), and to monitor aircraft noise, ensuring that relevant information is publicly accessible. This goal is monitored through the Aeronautical Noise Management Commissions (CGRA), which, according to Brazilian regulations, have the following responsibilities:

- Holding semi-annual meetings to evaluate the progress of actions.
- Preparing and publishing annual reports on aeronautical noise.
- Maintaining up-to-date noise information on the institutional website, including minutes, reports, PEZR, and citizen complaint channel (*Ouvidoria*).
- Addressing all complaints received and proposing mitigation measures when necessary.
- Regularly monitor noise levels in the vicinity of airports, both through on-site measurements and simulations, and calculate indicators such as the exposed population.

These targets allow Aena Brasil to measure, manage, and report the impact of noise, as well as to make progress towards reducing population exposure, in compliance with international sustainability standards.




ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

E2-4: Pollution of air

E2-4 26, E2-4 28 (a), E2-4 29, E2-4 30 (a - c), E2-4 31, AR 21, AR 22, AR 26 (a - e), AR 27 (a - b)

	Nitrogen oxides (NO _x), sulphur oxides (SO _x) and other significant air emissions																	
	NO _x (t)			SO _x (t)			CO(t)			NMVOC(t)			PM ₁₀ (t)			PM _{2.5} (t)		
	SP	UK	BR	SP	UK	BR	SP	UK	BR	SP	UK	BR	SP	UK	BR	SP	UK	BR
	2024																	
Diesel	45.55	2.50	9.45	6.23	0.00	0.00	12.47	0.64	2.43	2.75	0.21	0.51	2.44	0.21	0.80	2.26	0.21	0.80
Gasoline	0.17	0.00	0.12	0.02	0.00	0.00	2.22	0.00	1.18	0.15	0.00	0.14	0.00	0.00	0.00	0.00	0.00	0.00
Natural gas	8.07	1.93	0.00	0.07	0.02	0.00	2.80	0.76	0.00	2.51	0.60	0.00	0.08	0.02	0.00	0.08	0.02	0.00
Propane	0.07	0.00	0.00	0.00	0.00	0.00	0.03	0.00	0.00	0.02	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Kerosene	0.06	0.00	0.00	0.01	0.00	0.00	8.55	0.00	0.00	0.26	0.00	0.00	1.93	0.00	0.00	1.93	0.00	0.00
LPG	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
HVO	0.02	2.01	0.00	0.00	0.00	0.00	0.01	0.52	0.00	0.00	0.11	0.00	0.00	0.17	0.00	0.00	0.17	0.00
Biomethane	0.93	0.00	0.00	0.01	0.00	0.00	0.36	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.01	0.00	0.00
Biopropane	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total 2024	54.87	6.45	9.57	6.34	0.02	0.00	26.43	1.92	3.61	5.69	0.92	0.65	4.46	0.40	0.80	4.28	0.40	0.80
	2025																	
Diesel	55.90	0.64	3.80	7.92	0.00	0.00	14.55	0.32	0.98	3.34	0.06	0.21	2.90	0.05	0.32	2.68	0.05	0.32
Gasoline	0.15	0.00	1.91	0.02	0.00	0.00	1.71	0.00	18.57	0.11	0.00	2.20	0.00	0.00	0.01	0.00	0.00	0.01
Natural gas	9.95	0.90	0.00	0.09	0.01	0.00	3.90	0.67	0.00	3.09	0.04	0.00	0.10	0.02	0.00	0.10	0.02	0.00
Propane	0.10	0.00	0.00	0.00	0.00	0.00	0.04	0.00	0.00	0.03	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Kerosene	0.07	0.03	0.00	0.01	0.04	0.00	9.19	0.01	0.00	0.28	0.00	0.00	2.08	0.00	0.00	2.08	0.00	0.00
LPG	0.00	0.05	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00
HVO	0.00	4.62	0.00	0.00	0.00	0.00	0.00	2.33	0.00	0.00	0.42	0.00	0.00	0.38	0.00	0.00	0.38	0.00
Biomethane	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Biopropane	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.14	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01
Total 2025	66.16	6.23	5.72	8.04	0.05	0.00	29.39	3.35	19.68	6.85	0.54	2.41	5.09	0.45	0.33	4.87	0.45	0.34

Note: The table includes information related to pollutants listed in Annex II of [Regulation \(EC\) No 166/2006](#) of the European Parliament and of the Council (European Pollutant Release and Transfer Register, "EPRTR Regulation"), with the exception of GHG emissions, which are reported according to ESRS E1 Climate Change.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

The data presented in the table above are calculated, as it is not possible to obtain direct measurements that would allow the required level of detail. Direct measurement does not allow for the differentiation of emissions by fuel type or the determination of what proportion of each pollutant is due to own operations and what proportion corresponds to the value chain.

For these calculations, the methodology used was the "[EMEP / EEA air pollutant emission inventory guidebook](#)" and the "[Aviation Emissions and Air Quality Handbook](#)" from the U.S. Department of Transportation - Federal Aviation Administration (US FAA). Regarding the degree of uncertainty, the activity data were obtained from primary sources, which reduces uncertainty thanks to the traceability of the information, including invoices, computerised records, and meters. In addition, the emission factors used come from recognised national and international sources, developed by official bodies. Therefore, the degree of uncertainty in the data is considered to be under control.

The variations between 2024 and 2025 are presented in the following table, which shows the evolution of emissions of nitrogen oxides (NO_x), sulphur oxides (SO_x), and other significant emissions into the air, allowing an assessment of the Aena Group and its progress towards reducing atmospheric impact:

Variations in emissions 24-25: Nitrogen oxides (NO _x), sulphur oxides (SO _x) and other significant air emissions																		
	NO _x (t)			SO _x (t)			CO(t)			NMVOC(t)			PM ₁₀ (t)			PM _{2.5} (t)		
	SP	UK	BR	SP	UK	BR	SP	UK	BR	SP	UK	BR	SP	UK	BR	SP	UK	BR
Total	21%	(3)%	(40)%	27%	154%	(13)%	11%	74%	445%	20%	(42)%	270%	14%	11%	(59)%	14%	11%	(58)%

Since direct source meters are not available, the data obtained are derived from applying the emission factors corresponding to the energy consumption reported in Chapter [E1](#), from the airports' own facilities and equipment such as boilers, generator sets, vehicles, and fire-fighting operations. The sources for the emission factors used to calculate the various pollutants from the fuels used have been, in the case of Spanish airports, US EPA/US FAA and EMEP/EEA, while in Brazil the same methodology is applied using the specific emission factors established by the Brazilian authorities.

In the case of the United Kingdom, all calculations and conversion factors are used in accordance with UK government standards under the Department for Environment, Food and Rural Affairs (DEFRA) and the Environment Agency, as detailed within the governance of its air quality action plan.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

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

The following tables show data on the number of people exposed to different noise levels in the vicinity of major airports in the Aena network in Spain, segmented by phases and time slots:

- Lday 65 dB(A): Represents the number of people exposed to a noise level of 65 decibels during the day (7h-19h).
- Levening 65 dB(A): Indicates the number of people exposed to 65 dB(A) during the evening (19h-23h).
- Lnight 55 dB(A): Shows the number of people exposed to 55 dB(A) during the night, a lower threshold due to greater sensitivity to noise at nighttime (23h-7h).

SNM PHASE I													
Noise levels	Gran Canaria	CM Lanzarote ^(A)	Tenerife Sur	Tenerife Norte-Cdad. La Laguna	Alicante - Elche MH	Bilbao	JT Barcelona-El Prat	Ibiza ^(A)	AS Madrid-Barajas	Málaga-Costa del Sol	Palma de Mallorca	Valencia	Seville ^(A)
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	-

^(A) SNM not prepared since at the time of its preparation the airport did not reach 50,000 annual aircraft movements. The preparation and management of SNMs are regulated both by Directive 2002/49/EC and its corresponding transposition into national legislation.

SNM PHASE II													
Noise levels	Gran Canaria	CM Lanzarote ^(A)	Tenerife Sur	Tenerife Norte-Cdad. La Laguna	Alicante - Elche MH	Bilbao	JT Barcelona-El Prat	Ibiza	AS Madrid-Barajas	Málaga-Costa del Sol	Palma de Mallorca	Valencia	Seville
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

^(A) SNM not prepared since at the time of its preparation the airport did not reach 50,000 annual aircraft movements. The preparation and management of SNMs are regulated both by Directive 2002/49/EC and its corresponding transposition into national legislation.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

SNM PHASE III

Noise levels	Gran Canaria	CM Lanzarote	Tenerife Sur	Tenerife Norte-Cdad. La Laguna	Alicante - Elche MH	Bilbao ^(A)	JT Barcelona-El Prat	Ibiza	AS Madrid-Barajas ^(B)	Málaga-Costa del Sol	Palma de Mallorca	Valencia	Seville ^(A)
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	1754	1,520	515	91	-

^(A) SNM not prepared since at the time of its preparation the airport did not reach 50,000 annual aircraft movements. The preparation and management of SNMs are regulated both by Directive 2002/49/EC and its corresponding transposition into national legislation.

^(B) The increase in nocturnal values at Adolfo Suárez Madrid-Barajas Airport is due to maintenance work on runway 32R-14L. These actions forced the use of the non-preferred runway (32L-14R) during 2016. The Lday, Levening, and Lnight levels correspond in each case to the applicable regulations.

SNM PHASE IV

Noise levels	Gran Canaria	CM Lanzarote	Tenerife Sur	Tenerife Norte-Cdad. La Laguna	Alicante - Elche MH	Bilbao	JT Barcelona-El Prat	Ibiza	AS Madrid-Barajas	Málaga-Costa del Sol	Palma de Mallorca	Valencia	Seville
Lday 65 dB ^(A)	0	144	0	166	64	16	11	16	4	212	124	2	0
Levening 65 dB ^(A)	0	7	0	17	65	2	21	16	0	206	73	2	0
Lnight 55 dB ^(A)	0	0	-	-	70	0	19	14	50	409	131	49	0



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

Evolution of the number of people exposed to noise in the United Kingdom¹⁶

The following table shows the number of people exposed to different noise levels in the vicinity of London Luton Airport, during the summer period, segmented by years and time slots:

Noise Levels (“summer contours”)	2023	2024
Lday 66 dB(A)	4	4
Lnight 57 dB(A)	2,050	2,050

Note:

London Luton Airport uses a different reporting approach for noise pollution, in accordance with UK Planning requirements. This involves using periods from June 16th to September 15th, reported as LAeq Day and Night periods, to compute noise contours. The noise information and data (summer), reported in this table are externally validated and available in April of the following year.

E2-6: Anticipated financial effects from pollution-related risks and opportunities

E2-6 39 (a - c), E2-6 40 (a - c), E2-6 41

The Aena Group has identified noise pollution from airport operations as a material risk, with anticipated financial effects in the short, medium, and long term. These effects may include possible costs associated with implementing mitigation measures, investments in noise reduction technologies, expenses related to regulatory compliance, and possible penalties or litigation. However, proactive management of this risk can also generate opportunities, such as improving corporate reputation and strengthening relationships with local communities, which could translate into competitive advantages and potential cost savings.

The Aena Group avails itself of the moratorium provided in Appendix C of ESRS 1 of Commission Delegated Regulation (EU) 2023/2772 of July 31, 2023, supplementing Directive 2013/34/EU of the European Parliament and of the Council with regard to sustainability reporting standards, in relation to this disclosure requirement.

Non-applicable Datapoints

- DPs not included because, after the Double Materiality Assessment, it has been concluded that they are non-material to the Company: E2-1 15 (b), E2-3 23 (b), E2-3 23 (c), E2-3 23 (d), E2-4 28 (b).
- DPs not included because, due to the Company’s activity, they are considered not to be applicable: E2-5 32, E2-5 33, E2-5 34 y E2-5 35.

¹⁶ Regarding Brazil, similar studies have been initiated in 2025 and the corresponding information will be reported in 2026.

E3 Water and marine resources

Water consumption at airports is a critical matter that results from both the Aena Group's own and third-party activity. Key water uses imply primarily; human consumption by passengers and workers, catering and services, irrigation and maintenance of green areas, cleaning, fire-fighting services, damage to hydraulic facilities causing leakages whose detection and repair are critical to minimise water waste, as well as the execution of construction works, operation of HVAC systems and vehicle washing.

Reduced water availability may be a direct consequence of these activities. This not only affects own operations but also relationships with suppliers and other stakeholders in the upstream and downstream value chain. Given the high volume of passengers, employees and users who transit daily through the airports, the Aena Group considers it essential to optimise water consumption — one of the main natural resources used in its facilities. In addition to water consumption, information on water discharges has been reported to provide traceability with respect to previous years.

Material IROs - Impact materiality (Impacts)

Topic	Sub-topic	Sub-sub-topic	Impact	Location in the value chain	Positive / Negative	Actual / Potential	Time horizons
E3 Water and marine resources	Water	Water consumption	Reduced water availability due to own activities and those of the value chain	Entire value chain	Negative	Actual	Short term / Medium term / Long term

Material IROs - Financial materiality (Risks and Opportunities): There are neither material risks nor opportunities based on financial materiality.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

E3 ESRS 2 IRO-1: Description of the processes to identify and assess material water and marine resources-related impacts, risks and opportunities

IRO-1 8 (a), IRO 1-8 (b)

The process for determining and assessing material impacts, risks and opportunities related to water and marine resources was carried out by means of the methodology described in the section on **double materiality assessment** (see [ESRS 2 IRO-1](#)) in which the analysis of its assets and activities of both its own operations and its value chain is outlined in detail.

E3-1: Policies related to water and marine resources

E3-1 9, E3-1 10, E3-1 11, E3-1 12 (a) i, E3-1 12 (a) ii, E3-1 12 (b), E3-1 12 (c), E3-1 13

In order to manage the reduced availability of water resources due to own activities and those of the value chain, the Aena Group has two Policies. Among the objectives of the **Policy on Integrated Quality, Environmental, Energy Efficiency and Occupational Health and Safety Management** and the **Sustainability Policy** is to ensure the protection of the environment and the prevention of pollution, integrating sustainable development criteria that contribute to reducing the impact of its activity in terms of water and discharge management, promoting the sustainable use of resources and the fight against climate change in line with the objectives set in the current Sustainability Strategy. Both policies apply to all activities and services provided by the Aena Group, both in airport facilities and in other buildings and infrastructures managed by the Group, ensuring broad geographical coverage and all its centres, located both inside and outside areas classified with a relevant water stress level, providing a comprehensive approach.

The Aena Group also emphasises the treatment of different types of water to achieve more sustainable sourcing and analyses the consumption of its facilities in water stress regions in order to rationalise water consumption in its own operations and those of its value chain.

In this regard, it is worth noting that the regions considered with water stress have been obtained from the World Resources Institute (WRI) Aqueduct, in its most updated version, being those areas that are within the stress threshold above 40% (high and extreme level), which corresponds to the location of 27 airports of the Aena Group network: 25 locations in Spain, 1 in the United Kingdom and 1 in Brazil.

The monitoring and compliance with these policies are the responsibility of the **Board of Directors**, with the support of the **Sustainability and Climate Action Commission**, which continuously evaluates the progress of the targets.

For information on Minimum Disclosure Requirements (MDR-P), see section [Environmental policies](#).

E3-2: Actions and resources related to water and marine resources

E3-2 15, E3-2 16, E3-2 17

The Aena Group has developed a comprehensive and advanced approach to water management at its airports throughout its value chain, encouraging the adoption of responsible practices among employees, suppliers, concession companies and third parties. Aena manages water as an essential resource within its 2021-2030 Sustainability Strategy, with the aim of reducing consumption and increasing the use of alternative sources. The strategy focuses on efficiency, reuse and control, applying measures such as leak detection, installation of water-saving devices, optimised irrigation and the use of reclaimed water.

In addition, specific clauses have been implemented in bidding processes and internal procedures have been reviewed in order to ensure efficient water resource management, and awareness-raising campaigns are carried out aimed at employees and users, promoting responsible consumption. The adoption of **alternative sources of water supply**, such as reused, rainwater and desalinated water, is a key measure to reduce potable water consumption and mitigate the risk of shortages in the regions where it operates.¹⁷

¹⁷ No individuals have been identified as harmed by the material impact related to water (MDR-A 68 d).



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

Spain

In 2019, a thorough diagnosis of the starting point in water management was carried out at airports and heliports in Spain, covering all phases of the water cycle, including:

- **Water supply:** withdrawal sources, distribution and storage systems.
- **Wastewater:** source, networks, treatment, discharge and sludge control systems.
- **Stormwater:** drainage networks, treatment systems and control of activities with a risk of potential water contamination.

Additionally, an assessment was carried out on communication, participation and awareness around water use and external risk management, which made it possible to identify strengths, areas for improvement and establish concrete measures in the following aspects:

- **Water supply:** improved water quality, optimisation of infrastructure and distribution equipment.
- **Management:** consumption control, savings measures, supply to third parties and awareness-raising programmes.
- **Wastewater:** treatment plant reinforcement, network monitoring and pollutant control.
- **Stormwater:** implementation of effective drainage and filtration systems.
- **External risks:** prevention of water supply outages in drought or flood situations.

As a result of this diagnosis, Aena's 2021-2030 Water Strategic Plan was structured, which has defined an action plan for each centre based on six lines of action:

1. Water footprint assessment: measuring the impact on sustainability and adapting water cycle management.
2. Increased water reuse: use of alternative sources.
3. Adapting procedures to climate change: defining or modifying standard operating procedures and developing water management guidelines to deal with shortages.
4. Awareness and communication: communication campaigns aimed at stakeholders, in order to inform them about the water situation at each airport and the measures taken to improve water management.
5. Efficiency in potable water consumption: projects to reduce consumption through leak detection, improvements in distribution facilities and real-time monitoring of potable water consumption.
6. Neutral water balance: projects focused on identifying pollutants and improving the quality of wastewater and stormwater.

Action plans have been prepared by consolidating the actions identified for each airport in the Aena network in Spain. These plans include a detailed description of the measures, their implementation timeframe, cost and level of prioritisation.

Best practices in water management were identified and standardised at several airports, highlighting the implementation of automated leak detection systems, proactive network maintenance and continuous consumption monitoring.

The **water footprint** has also been assessed for 100% of the sites in Spain, using 2019 as the baseline year and following the recognised methodology of the **Water Footprint Network (WFN)**. This analysis allows for the evaluation of impact of water use on operations and strengthens sustainable management. In addition, water management systems are certified under **ISO 14001, ISO 9001 and EMAS** standards, ensuring compliance with high international standards.

To ensure effective management, Aena applies advanced technologies including real-time monitoring systems, enabling continuous assessment of its objectives and facilitating the adoption of corrective measures as needed. Furthermore, it closely tracks key indicators such as water consumption per passenger and the use of alternative, adapting its policies based on the results obtained.

Additionally, Aena's centres in Spain conduct constant monitoring through regular analyses, verifying compliance with the parameters established in the corresponding authorisations. This control encompasses both wastewater and stormwater, with the aim of preserving the **Public Water Domain (DPH)** and the **Public Maritime-Terrestrial Domain (DPMT)**. Channelled discharges are directed to treatment facilities, either internal or external, before final discharge. Potentially contaminated stormwater is treated in hydrocarbon separation plants, while uncontaminated stormwater is discharged directly into the DPH or DPMT. In the event of partial non-compliance, corrective actions are implemented and continuous monitoring is carried out. No non-compliance occurred during fiscal years 2025 and 2024.

Among the water supply network actions completed or underway at various airports in 2025 are those listed below. These are defined in the action plans for each airport in the Aena network in Spain, which include details of implementation deadlines and future planned measures:

- **FGL Granada-Jaén Airport:** Installation of instantaneous water consumption meters with remote transmission. Software application for managing consumption data. This action is expected to be completed in 2026.



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- Valladolid Airport: Installation of devices for detecting and controlling water leaks. This action has been completed in 2025.
- Menorca Airport: Installation of 54 wireless flow meters with IoT technology. This action has been completed in 2025.
- Melilla Airport: Repair and replacement of branch pipes, beginning in 2025 and expected to be completed in 2026.
- Valencia Airport: Contracting of a company specialising in leak detection and treatment. Work has begun in 2025 and is expected to be completed in 2026.
- Santiago-Rosalía de Castro Airport: Watertightness testing of the sewer network using pressure system in sections. Repair and replacement of deteriorated sections. These tests are carried out regularly, and this work will continue in 2026 and subsequent years.

In addition, airports located in areas of greater water stress, such as Fuerteventura, Ibiza and César Manrique-Lanzarote, use desalination plants to utilise seawater.

Another key measure in 2025 is the reuse of treated wastewater for irrigating green areas, thus avoiding the additional consumption of drinking water for this purpose. Related to water reuse, a facility at the Alicante-Elche MH Airport repurposes grey water, condensate from cooling equipment, and evaporative condenser blowdown. After treatment, this water is used to flush toilets. In 2025, an additional plant has been commissioned to independently treat evaporative condenser blowdown. This process is simplified compared to the first plant, as this effluent does not require the same level of treatment as the other two sources. Throughout 2025, this plant has avoided the consumption of 19,530 m³ (8,529 m³ in 2024), the equivalent of 7.8 Olympic swimming pools (3.5 in 2024).

At Adolfo Suárez Madrid-Barajas and Josep Tarradellas Barcelona-El Prat airports, two white papers have been produced that integrate sustainability criteria into the urban and architectural design of future real estate developments. These criteria include the sustainable consumption of resources and water reuse through various means, such as rainwater harvesting from building roofs, the installation of separate drainage systems, and the promotion of sustainable urban drainage.

As previously mentioned, in Spain, Aena maintains a firm commitment to reducing water consumption across its entire network of airports and heliports, including those located in water-stressed areas. This commitment is realised through the objectives established in its Strategic Plan, which includes specific measures to optimise the efficient use of water resources and promote sustainability in all operations.

Furthermore, awareness campaigns have been developed for employees, passengers and suppliers to promote responsible water consumption practices at the facilities. To support these actions, signage and posters have been installed to educate and raise awareness about the importance of water conservation, encouraging stakeholder participation in achieving water sustainability goals. Among the awareness initiatives carried out during 2025 at Spanish airports are ongoing water efficiency campaigns for employees and passengers.

In Spain, all these initiatives reflect Aena's comprehensive approach to managing water-related risks in its operations, especially in regions with a high level of water risk.

United Kingdom

In the UK, London Luton Airport has installed low-flow taps and dual-flush toilets in several of its buildings. In 2025, the airport conducted a comprehensive water cycle assessment to analyse potable water consumption and identify areas where non-potable water could be used, with the aim of reducing its reliance on the mains water supply. This initiative is relevant for the airport, which considers water management and consumption reduction priorities within its expansion plans.

The airport also has a system in place to monitor and report fuel spills to preserve water quality, and during the winter, when airlines use de-icing on their aircraft, this activity is monitored. In addition, the airport has committed to identifying and measuring internal operations that use potable water and that could be supplied with alternative water sources.

These actions have shown that efficient water resource management can be key to reducing consumption. Finally, it is worth mentioning that the airport's water supplier has also conducted a comprehensive review of the water cycle, reaffirming its commitment to conservation and involving its supply chain.

Brazil

At Aena Brasil airports, strict controls have been implemented through the monthly collection and analysis of water samples, ensuring compliance with applicable legal standards and contributing to sustainable management of this resource.

In line with its commitment to Responsible Resource Use, included in its Sustainability Strategy, and under the strategic pillar of *Pegada Hídrica Eficiente*, Aena Brasil is working to reduce potable water consumption, implement sustainable measures, and promote the use of alternative sources.

Airports managed by the subsidiary ANB have implemented high-efficiency wastewater treatment plants that will be connected to reuse networks for restrooms, fire suppression systems, and garden irrigation, allowing for more efficient water use in these facilities.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
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A prime example is Juazeiro do Norte Airport, which has improved its water efficiency by reusing treated wastewater from its own Wastewater Treatment Plant (WTP), thus facilitating the circular use of water and achieving average annual savings of 40%, with peaks of up to 70% at certain times. In addition, rainwater harvesting and reuse systems have been installed for non-potable uses, such as irrigation of green areas and surface cleaning. This project is especially relevant in the Cariri region, characterised by a semi-arid climate and recurrent water stress, and was recognised in 2024 by *ACI-LAC Green Airport Recognition*: "Water Efficiency at Juazeiro del Norte Airport" and awarded best environmental sustainability project in the internal INNOVA programme.

During 2024 and 2025, progress has been made in installing rainwater harvesting stations and reuse systems at Aena Brasil airports. At ANB, the initiative is already completed, while at BOAB it is planned for a later phase. These facilities will allow for the collection, storage and treatment of rainwater for non-potable uses, thus contributing to a reduction in potable water consumption.

Significant Financial Resources Related to Water Use

As a result of these efforts, the Aena Group manages water responsibly, efficiently and sustainably across all its facilities, minimising risks and optimising the opportunities offered by this essential resource, both in Spain and at its international subsidiaries. Information regarding significant financial resources related to water use consisted of capital expenditures (CapEx) of €1.74 million in 2025 (€6.58 million in 2024).

E3-3: Targets related to water and marine resources

E3-3 20, E3-3 21, E3-3 22 (MDR-T), E3-3 23 (a), E3-3 23 (c), E3-3 25

In Spain, **Aena's Strategic Water Management Plan 2021-2030** constitutes the main framework for water resource management at the 46 airports and 2 heliports in the national network, as well as in all other buildings and infrastructures managed by the company. This plan establishes specific and measurable targets, applicable to all activities and services, geared towards two defined strategic objectives:

- **Objective 1:** Reduce water consumption by 10% per passenger by 2030 compared to 2019 (with an interim target of 5% by 2026), addressing the decrease in the availability and quality of freshwater resulting from climate change.
- **Objective 2:** Increase the use of alternative water sources per passenger by 150% by 2030 compared to 2019 (a 50% increase by 2026), integrating the management of water supply sources and climate risks.

These voluntary targets apply to both airport facilities and other infrastructures managed by Aena in Spain, including centres located both within and outside water-stressed regions. It is worth noting that, according to *WRI Aqueduct*, 25 airports in the Spanish network are located in regions with high or extreme water stress (above the 40% threshold), which reinforces the relevance of these objectives.

The plan's development process included consultations with international airport operators and an assessment of the situation of Aena's centres in Spain, involving relevant stakeholders. The targets are aligned with UN Sustainable Development Goal (SDG) 6 and the Aena Group's sustainability pillars. No ecological thresholds or specific allocations were applied, given the global and voluntary nature of the targets.

Monitoring is carried out using annual indicators that allow for the evaluation of progress and facilitate comparability over time. Results and progress are published through the company's corresponding reporting mechanisms. The Sustainability and Climate Action Commission annually monitors the targets, tracking their progress, trends, or significant changes necessary to achieve the established goals.

In the United Kingdom, London Luton Airport's *Responsible Business Strategy* considers water management a key component. Therefore, the airport has opted for a proactive approach to reducing water consumption. This effort not only represents its commitment to environmental stewardship but also aims to optimise operational efficiency and reduce future costs. The qualitative objective is to identify and measure internal activities that currently rely on potable water in order to assess the feasibility of using non-potable water instead. This objective, like all those established in the *Responsible Business Strategy*, was developed through an extensive participatory process involving more than hundred stakeholders. The process included internal interviews with employees from various departments, collaborative workshops with airlines, passengers, and community members, as well as interviews with corporate social responsibility experts and local residents.

In Brazil, Aena Brasil's Sustainability Strategy includes targets to reduce potable water consumption, implement sustainable initiatives, and promote the use of alternative sources. Its central purpose is to achieve a 7.5% reduction in potable water consumption by 2040 compared to 2023, in addition to establishing continuous actions to achieve a decrease of 15 litres per passenger by 2025, 10.90 litres per passenger by 2030, and 10 litres per passenger by 2040. The process of defining these objectives was carried out in a similar way to that of Spain, consulting airports as key stakeholders.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
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Global Progress Towards Achieving the Adopted Targets

In 2025, total water consumption at Spanish airports has reached 0.0199 m³/passenger (0.0201 m³/passenger in 2024), and 222% (222% in 2024) in the use of alternative water sources since 2019, due to the increase in the volume of water from alternative availability sources (not available in 2019), such as second-use water (project developed after 2019 at Alicante-Elche Miguel Hernández Airport), irrigation canal water, and rainwater; in addition to the increase in the volume of desalinated water (+148%) and reclaimed water, which has risen from 90.6 thousand m³ in 2019 to 693.0 thousand m³ in 2025, representing an increase of +665%. In absolute terms, this represents an increase of 1,021.9 thousand m³ compared to 2019, which was not been obtained from mains or well water.

In the United Kingdom, total water consumption per passenger in 2025 has been 0.0079 m³/passenger (0.0082 m³/passenger in 2024).

Regarding Aena Brazil, in 2025 total water consumption at Brazilian airports has been 0.0152 m³/passenger (0.0140 m³/passenger in 2024).

Monitoring

In Spain, Aena monitors water consumption through regular audits and integrated management systems, such as the Integrated Quality and Environmental Management System. This ensures comprehensive control of related practices and allows for proactive adjustments to environmental policies and actions if deviations are detected.

To ensure the proper implementation and achievement of these targets, as well as those previously mentioned, the Sustainability and Climate Action Commission holds quarterly meetings. This committee is responsible for understanding, promoting, guiding, and monitoring environmental objectives, action plans, practices, and policies. Likewise, the monitoring of indicators related to the Aena Group's water management is carried out by this Committee on both a semi-annual and annual basis. It is worth noting that the current targets have remained stable throughout 2025, with no changes made to their definition or measurement criteria compared to the previous period.

E3-4: Water consumption

E3-4 26, E3-4 27, E3-4 28 (a), E3-4 28 (b), E3-4 28 (c), E3-4 28 (e), E3-4 29, AR 28, AR 29, AR 32

The Aena Group employs various internationally recognised methodologies, standards and approaches to compile and verify data related to water consumption and storage, thus ensuring the reliability and accuracy of the reported information. To optimise the use of water resources and minimise losses, advanced monitoring technologies, such as smart meters and real-time leak detection systems, have been implemented, especially in critical areas or those with high water stress.

The Aena Group also focuses on managing the quality and quantity of water in the basins it depends on, particularly in areas of high water risk. This management includes the integration of alternative supply sources (such as reclaimed and desalinated water), which are regularly monitored to ensure they meet the necessary quality requirements for use in irrigation and other non-potable purposes. Furthermore, standardised methodologies and the implementation of monitoring systems help maintain the accuracy of the collected data.

This section presents quantitative data reflecting the Group's performance in water resource management, broken down by source and region, with particular attention to water-stressed areas. Information on wastewater discharges is also included, differentiating between water type and final destination, which allows for measuring environmental impact and ensuring compliance with regulatory standards and best practices in sustainability.

The presentation of this information reflects the Aena Group's commitment to operating responsibly, minimising environmental risks and maximising the efficient use of water resources, in line with its strategic objectives and the principles of sustainable development.

	Regions with water stress							
	2024				2025			
	Spain	United Kingdom	Brazil	Consolidated total	Spain	United Kingdom	Brazil	Consolidated total
Water consumption (thousands of m ³)	3,135.56	137.85	15.42	3,288.83	3,284.43	138.65	20.54	3,443.62
% Water consumption in water-stressed regions as a percentage of total	47%			48%				



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
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	Water consumption - Thousands of m ³							
	2024				2025			
	Spain	United Kingdom	Brazil	Consolidated total	Spain	United Kingdom	Brazil	Consolidated total
Desalinated water/ Seawater (thousands of m³)	560.86	0.00	0.00	560.86	546.33	0.00	0.00	546.33
<i>Volume corresponding to areas of water stress</i>	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Well water/ Groundwater (thousands of m³)	1,958.36	0.00	167.05	2,125.41	2,105.85	0.00	208.71	2,314.55
<i>Volume corresponding to areas of water stress</i>	504.12	0.00	15.42	519.54	570.01	0.00	20.54	590.55
Drinking water from the mains (thousands of m³)	3,498.66	137.85	451.63	4,088.14	3,538.71	138.65	483.80	4,161.16
<i>Volume corresponding to areas of water stress</i>	2,589.64	137.85	0.00	2,727.49	2,670.41	138.65	0.00	2,809.06
Consumption of reclaimed water purchased from third parties and from a reclaimed network/ Municipal water supply or from other water companies (thousands of m³)	200.42	0.00	3.87	204.29	194.04	0.00	0.00	194.04
<i>Volume corresponding to areas of water stress</i>	41.80	0.00	0.00	41.80	44.01	0.00	0.00	44.01
Total water consumption (thousands of m³) ^(A)	6,218.30	137.85	622.55	6,978.70	6,384.92	138.65	692.51	7,216.08
<i>Volume corresponding to areas of water stress</i>	3,135.56	137.85	15.42	3,288.83	3,284.43	138.65	20.54	3,443.62
Total recycled and reused water consumption (thousands of m³)	574.40	0.00	0.00	574.40	593.45	0.00	0.00	593.45

^(A) Water reused from internal processes is not included to avoid double counting. In 2025, 95% of measurements were direct (92% in 2024), 5% were extrapolated measurements (8% in 2024), and no sampling measurements were taken.

	Water intensity		
	2024	2025	% Variation
Consolidated total (m³/€)	0.0012	0.0011	-5%

To determine water intensity, the amount of global net income is used, which can be found in consolidated financial statements.



ESRS 2: General disclosures

E1: Climate change

E2: Pollution

E3: Water and marine resources

E4: Biodiversity and ecosystems

E5: Resource use and circular economy

S1: Own workforce

S2: Workers in the value chain

S3: Affected communities

S4: Consumers and end-users

G1: Business conduct

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Wastewater discharges by water type – Thousands of m³

	Final destination	2024	2025
Spain	Fresh water	3,947.60	4,266.77
	In areas of water stress	2,002.92	2,091.31
	Other waters	259.30	250.91
	In areas of water stress	213.79	209.39
United Kingdom	Fresh water	129.31	124.79
	In areas of water stress	129.31	124.79
	Other waters	0.00	0.00
	In areas of water stress	0.00	0.00
Brazil	Fresh water	0.00	0.00
	In areas of water stress	0.00	0.00
	Other waters	320.00	572.55
	In areas of water stress	12.34	16.43



ESRS 2: General disclosures

E1: Climate change

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S1: Own workforce

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Wastewater discharges by destination – Thousands of m³

	Final destination	2024	2025
Spain	Surface water	223.07	271.96
	In areas of water stress	94.55	113.16
	Groundwater	36.85	22.25
	In areas of water stress	0.09	0.08
	Seawater	0.00	0.00
	In areas of water stress	0.00	0.00
United Kingdom	Third-party water	3,930.39	4,223.47
	In areas of water stress	2,105.47	2,187.45
	Surface water	0.00	0.00
	In areas of water stress	0.00	0.00
	Groundwater	0.00	0.00
	In areas of water stress	0.00	0.00
Brazil	Seawater	0.00	0.00
	In areas of water stress	0.00	0.00
	Third-party water	129.31	124.79
	In areas of water stress	129.31	124.79
	Surface water	240.31	304.27
	In areas of water stress	12.34	16.43
Consolidated Total	Groundwater	33.95	32.79
	In areas of water stress	0.00	0.00
	Seawater	0.00	0.00
	In areas of water stress	0.00	0.00
	Third-party water	45.74	235.49
	In areas of water stress	0.00	0.00
Consolidated Total	Surface water	463.38	576.23
	In areas of water stress	106.89	129.60
	Groundwater	70.80	55.04
	In areas of water stress	0.09	0.08
	Seawater	0.00	0.00
	In areas of water stress	0.00	0.00
Consolidated Total	Third-party water	4,105.44	4,583.75
	In areas of water stress	2,234.78	2,312.24



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
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E3-5: Anticipated financial effects from material water and marine resources-related risks and opportunities

E3-5 33 (a), E3-5 33 (b), E3-5 33 (c)

The Aena Group has not identified any material risks or opportunities related to water and marine resources, and therefore there are currently no financial effects related to this topic. However, it will consider the anticipated financial effects should any related risks or opportunities be identified in the future.

Non-applicable Datapoints

- DPs not included because, after the Double Materiality Assessment, it has been concluded that they are non-material to the Company: E3-1 12(a) iii, E3-3 23 (b), E3-4 28 (d).
- DPs not included because, due to the Company's activity, they are considered not to be applicable: E3-1 14.

E4 Biodiversity and ecosystems

The accelerated and constant loss of biodiversity worldwide represents a threat to ecosystems. This phenomenon is closely linked to the climate crisis, as biodiversity degradation and climate change mutually reinforce each other, intensifying negative effects on the environment. Consequently, the Aena Group, in its commitment to sustainability and the preservation of biodiversity, recognises the importance of protecting and conserving the ecosystems in which it operates. In this context, it acknowledges its responsibility to mitigate any negative impacts its activities may generate on flora, fauna, and natural habitats, promoting sustainable practices aligned with the highest international conservation standards. The actions, policies, and programmes implemented by the Aena Group to preserve biodiversity and protect ecosystems are detailed below. Likewise, the results of the measures adopted, the short- and long-term objectives, and the regulatory framework guiding its initiatives in this area are presented.

Material IROs – Impact materiality (Impacts):

Topic	Sub-topic	Sub-sub-topic	Impact	Location in the value chain	Positive / Negative	Actual / Potential	Time Horizon
E4 Biodiversity and ecosystems	Factors of direct incidence on biodiversity loss	Noise and light pollution	Impact on fauna, especially protected and/or threatened species	Entire value chain	Negative	Actual	Short term / Medium term / Long term

Material IROs – Financial materiality (Risks and Opportunities): There are neither material risks nor opportunities based on financial materiality.



ESRS 2: General disclosures

E1: Climate change

E2: Pollution

E3: Water and marine resources

E4: Biodiversity and ecosystems

E5: Resource use and circular economy

S1: Own workforce

S2: Workers in the value chain

S3: Affected communities

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ESRS 2 E4-1: Transition plan and consideration of biodiversity and ecosystems in strategy and business model

E4-1 11, E4-1 13 (a), E4-1 13 (b), E4-1 13 (c), E4-1 13 (d), E4-1 13 (e), E4-1 13 (f)

The Aena Group mainly carries out two types of actions to assess the resilience of its current strategy and business model to physical, systemic, and transition risks related to biodiversity and ecosystems¹⁸:

1. Related to the planning of infrastructure modification actions

In these cases, mechanisms for monitoring and controlling impacts on biodiversity and ecosystems are available (Environmental Studies of Master Plans or projects, Environmental Monitoring Plans, prior consultations on the environmental impact of projects). The results are incorporated into the Aena Group's strategic level and therefore influence the business model for decision-making based on a resilience analysis in biodiversity-related aspects covering:

- Own operations: Identifying impacts on biodiversity and ecosystems during the planning, operation, and construction phases.
- Value chain: Environmental studies are made publicly available with the aim of integrating the participation of local communities and specialised entities regarding all biodiversity impacts that must be considered. Likewise, the Aena Group includes environmental, social, and governance criteria in procurement specifications and promotes collaboration with suppliers to ensure sustainable practices in all phases of the supply chain.
- Time horizons linked to the planning, construction, and operation of infrastructures, and in the short, medium, and long term through continuous monitoring of habitats included in and around its airports.

2. Related to airport operations

With the aim of making biodiversity compatible in airports and their surroundings, in Spain, Aena conducts Fauna and Habitat Studies at the airports where it operates to identify species' behaviour, and subsequently, the Airport Wildlife Risk Study and the Wildlife Management Program are developed.

The Fauna and Habitat Study is carried out in accordance with the Spanish Aviation Safety Agency (AESAs) Guide for **"Preparation of Fauna and Habitat Studies in Airport Environments"** which defines applicable hypotheses and time horizons. These studies must be updated with a maximum periodicity of 7 years and require desk work to identify these habitats and fieldwork to study the behaviour of the fauna present in them. In addition, personnel from airports with wildlife management functions, city councils, the Department of Environment, technical experts, and agents involved in territorial management, among others, participate to provide knowledge on the presence, abundance, and biology of fauna. As a result, the Fauna and Habitat Study allows for:

- Identifying the most relevant species for aeronautical operations.
- Determining the most relevant habitats and characterising them, such as airports in sensitive areas.
- Determining the movement patterns of species at the airport and its surroundings.

Based on the results of the Fauna and Habitat Study, along with data on wildlife monitoring, attraction foci, wildlife incidents, etc., the Airport Wildlife Risk Study is prepared in accordance with AESAs' **"Guide for the preparation of Wildlife impact risk studies at Airports"** and the Risk Management System of the Airport's Operational Safety Management System. The result of this study is a classification of the wild fauna present in the airport environment based on its risk level, a determination of tolerability based on probability and severity, and, from the results obtained for that tolerability, a proposal of measures to reduce the danger of wildlife at the aerodrome in cases where it is necessary.

The same personnel involved in the Fauna and Habitat Study participate in the preparation of the Wildlife Risk Study, in addition to air operators and air navigation service providers. Its update frequency is annual to determine if the identified risks remain at sufficiently low levels and to verify the effectiveness of the implemented measures and the wildlife control procedure, adapting it or including more mitigating measures if they are found to be ineffective or insufficient.

The risks identified in the Airport Wildlife Risk Study are mitigated and managed through an Airport Wildlife Management Program, which is prepared in accordance with the provisions of AESAs in the technical document **"Preparation of the wildlife risk management program"**. The Program not only includes the establishment of internal actions, typical of the Airport Manager, but also the involvement of external entities (local authorities, associations, individuals, etc.) that are linked to the presence of wildlife in the airport environment and/or its management. The purpose of this is to achieve an adequate and effective program that allows the Airport Manager to:

¹⁸Although the considerations of the Taskforce on Nature-related Financial Disclosures (TNFD) have been taken into account, a group-wide risk analysis related to biodiversity and ecosystems has not been conducted under this initiative.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

- Integrate information from the Fauna and Habitat Studies, the Airport Wildlife Risk Studies, the performance of periodic censuses, and the notification and management of incidents caused by birds or other animals, in order to understand the real problem posed by the presence of wildlife at the airport.
- Establish and apply risk reduction/mitigation measures to achieve a low and controlled collision risk.
- Periodically monitor and evaluate the effectiveness of the established measures. Efforts should focus on applying the most effective measures and seeking alternative solutions in cases where the results are not satisfactory.

All the above processes are certified and verified by the Spanish Aviation Safety and Security Agency (AESA), in which local and national authorities in Spain with competencies in biodiversity also participate.

In the United Kingdom, London Luton Airport manages biodiversity in accordance with its Wildlife Strike Hazard Reduction Plan. This plan describes the main management responsibilities for wildlife and bird control at the aerodrome in accordance with British regulation 139/2014 Guidance Material GM1 - 4 ADR.OPS.B.020 described by the UK Civil Aviation Authority along with the guidelines set out in CAP 772 Wildlife Hazard Management at Aerodromes.

In Brazil, there is a Wildlife Risk Management Plan at all airports managed by Aena Brasil and a Wildlife Hazard Identification Study at the main airports. Both documents are regulated and approved by the National Civil Aviation Agency (ANAC). The purpose of these documents is to ensure that operational areas remain free of collisions and to protect the wildlife in the airport environment, through the implementation of effective actions and control mechanisms.

With the measures implemented at the airports, the Aena Group ensures that its operation is resilient and compatible with the biodiversity of the areas where it operates.

E4 ESRS 2 SBM-3: Material impacts, risks and opportunities and their interaction with strategy and business model

E4-SBM-3 16 (a) i, E4-SBM-3 16 (a) ii, E4-SBM-3 16 (a) iii, E4-5 35

The main activities of the Aena Group that may generate negative impacts on biodiversity stem from the construction or expansion of its infrastructure, as well as aircraft operations¹⁹. In any case, the Group ensures compatibility between the protection of natural heritage and the maintenance of safety and quality standards, inherent to airport activity, implementing various wildlife risk control and analysis measures that are detailed below.


This impact on biodiversity is assessed through the corresponding environmental assessment procedures, both for planning instruments (master plans, special plans, etc.) and for projects carried out at each airport (48 locations in Spain, 1 in the United Kingdom, and 17 in Brazil), during the planning, the construction and operation phases of airport infrastructure projects. An Environmental Study is an instrument enabling the preservation of natural resources and the protection of the environment by introducing the environmental variable into decision-making regarding planning instruments and projects that may have an impact on the surroundings. In this regard, the Aena Group conducts environmental assessments of its planning instruments and projects, providing greater reliability and confidence in the decisions made by allowing the selection, among the different viable alternatives, of the one that, safeguarding general interests, takes into account all effects derived from the projected activity and establishes the necessary preventive and corrective measures, from a global and integrated perspective, adequately guaranteeing channels for public information and participation.

These Environmental Studies analyse significant direct and indirect positive and negative impacts in relation to, among other issues, the following:

- Affected protected species;
- The extent of areas that may suffer impacts;
- The duration of impacts;
- Possible impacts on soil degradation and sealing;
- The reversibility or irreversibility of impacts.

The processes for evaluating environmental impacts, both for plans and projects, are based on the Mitigation Hierarchy framework, paying special attention to the protection of biodiversity and protected areas, the integration of environmental aspects into decision-making, precaution and precautionary action, and the guarantee of channels for public information and participation. All of this is aimed at ensuring a net zero loss or a net gain in biodiversity.

¹⁹ These impacts on biodiversity do not result in significant negative social consequences.

	ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
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	S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

The analysis of the detected impacts, both actual and potential, is submitted for consultation with the affected public administrations and interested parties. To ensure transparency, in Spain, Aena publishes on its website the **Environmental Resolutions** obtained by each airport, which provide information on the nature of significant, direct, and indirect impacts related to pollution, potential biodiversity loss, or habitat transformation. In this regard, protected areas located at Spanish airports, and any restoration, conservation, or compensation measures carried out in them, can be consulted in the aforementioned Environmental Resolutions. Likewise, Aena Brasil has its **Ruído Aeronáutico e Sustentabilidade** website where any stakeholder can consult and request the environmental impact studies of its airports. These impact assessments also consider the social dimension, analysing the possible impact on indigenous communities, although the assessments carried out to date have not identified material impacts in this area.

Once the Environmental Resolutions are issued by the Ministry for Ecological Transition and Demographic Challenge, which conclude the environmental impact assessment processes, projects are updated to include the environmental measures established in the Resolutions. A monitoring process is then carried out through Environmental Monitoring Plans (PVA) that supervise the implementation of corrective measures to mitigate impacts derived from operational and infrastructure expansion activities, both during the construction and operation phases of construction projects and in the development of planning instruments. This allows the verification of compliance with the required preventive, corrective, and/or compensatory measures, as well as evaluating the degree of compliance with the established environmental objectives and indicators, so that unforeseen adverse effects can be identified and even the need for new measures detected.

Both the environmental diagnosis of the initial situation, and the analysis of alternatives, foreseen impacts, and the establishment of preventive, corrective, and compensatory measures derived from the different environmental assessment processes, can be consulted on Aena's Public Website, in the Environmental Impact Assessment (EIA) and the Strategic Environmental Assessment (SEA). These resolutions have been obtained over the period during which airport expansions have taken place. No Environmental Resolutions or Declarations for projects were issued during 2025.

Mitigation measures against potential impacts on biodiversity and ecosystems derived from infrastructure expansions, both during their construction and operational phases, are indicated in the corresponding Environmental Resolutions and Environmental Declarations, which are monitored through the Environmental Monitoring Plan that is periodically submitted to the substantive body.

The presence of vegetation, fauna, and natural spaces is harmonised with airport operations through the adoption of various measures that prevent any impact that may be caused to these natural environments, always in strict compliance with current regulations on biodiversity protection. Consequently, the possible alteration of the habitat of certain species of flora and fauna derived from new developments is foreseen and corrected through the implementation of specific measures focused on ensuring the correct selection of infrastructure location, the design of facilities, and the application of preventive and corrective, and, where appropriate, compensatory measures. All of this is aimed at avoiding and minimising any possible impact that could be caused.

In Spain, this objective is reflected in the Sustainability Strategy 2021-2030, which, in the field of biodiversity conservation, includes two key lines of action:

- Biodiversity protection, communication, and awareness initiatives.
- Volunteer actions.

At London Luton Airport, through its Responsible Business Strategy, it has succeeded in supporting neighbours and the local community, working to promote the positive impacts derived from airport management activities. These positive impacts include working on biodiversity in the community; seeking to improve local biodiversity by developing at least three biodiversity initiatives by 2027. Likewise, these interactions with affected groups constitute a fundamental way to gather their perceptions of the negative impacts derived from airport activity, thus allowing the systematic integration of these opinions into the evaluation process.

The competent authorities issue resolutions, observations, and local regulatory updates according to the country of operation :

- In Spain, the Ministry for Ecological Transition and Demographic Challenge (MITERD) is responsible for issuing environmental resolutions, as well as monitoring impacts and mitigation measures .
- In Brazil and the United Kingdom, responsibility lies with: regional and local entities dedicated to the protection of biodiversity and ecosystems .

Regarding the sites under the operational control of the Aena Group that generate negative impacts in sensitive areas from a biodiversity perspective, it should be noted that Spain is one of the most biologically diverse countries in the European Union. The airports in the Spanish network are distributed throughout the national territory, which leads to a wide variety of ecosystems and habitat types, always depending on the specific characteristics of the location of each airport. For this reason, 18 airports and 1 heliport in Spain are located near or within protected natural areas included in the Natura 2000 Network .

On the other hand, among the airports managed by Aena Brasil, only Carajás Airport is located in an environmentally protected area within the *Campos Ferruginosos* National Park. London Luton Airport in the United Kingdom is not located in a protected area .

Section **ESRS 2 SBM-1** shows the complete list of sites operated by the Aena Group and their geographical location.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

Locations where protected natural spaces are included based on the Natura 2000 Network, both inside airport and adjoining enclosures (sites on the property)

AIRPORT	INSIDE Airport Service Area	Adjoining Airport Service Area (less than 100m)	LESS than 1km	TYPE OF SPACE N2000 NETWORK
A Coruña	NO	NO	840 m	SPA
Almería	NO	NO	130 m	SAC
	NO	NO	160 m	SPA
	NO	NO	160 m	SCI
Asturias	NO	YES (50 m)	-	SAC/SPA
Burgos	NO	NO	650 m	SAC
Cesar Manrique - Lanzarote	NO	YES (25 m)	-	SAC
	NO	YES (25 m)	-	SCI
Ceuta (helipuerto)	NO	NO	700 m	SCI
	NO	NO	700 m	SPA
Córdoba	NO	YES	-	SAC
	NO	NO	300 m	SAC
Fuerteventura	NO	YES	-	SCI
La Gomera	YES	-	-	SPA
	NO	YES (85 m)	-	SPA
	NO	YES (85 m)	-	SAC
Gran Canaria	YES	-	-	SAC
	NO	NO	125 m	SAC
Ibiza	YES	-	-	SAC/SPA
	NO	NO	550 m	SAC
JT Barcelona-El Prat	YES	-	-	SAC/SPA
La Palma	NO	NO	800 m	SAC
AS Madrid-Barajas	YES	-	-	SAC
	NO	NO	760 m	SPA
	NO	NO	760 m	SAC
Málaga-Costa del Sol	NO	NO	240 m	SPA
Salamanca	NO	NO	500 m	SAC
San Sebastián	YES	-	-	SPA
	NO	YES (70 m)	-	SAC
Tenerife-Sur	NO	NO	390 m	SAC
	NO	NO	980 m	SAC/SPA
Vitoria	NO	NO	950 m	SAC

SPA: Special Protection Area (for birds).
 SCI: Site of Community Importance.
 SAC: Special Area of Conservation.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
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In 2025, the 48 centres that have been part of the Aena network in Spain covered a total area of 14,963.7 hectares (14,976.9 in 2024). Of these, all have carried out biodiversity impact assessments, thus covering 14,963.7 hectares of the total (48 centres and 14,976.9 hectares in 2024). Regarding the area included within protected spaces under the Natura 2000 Network – such as Special Areas of Conservation (SCA), Special Protection Areas for Birds (SPA), and Sites of Community Importance (SCI) – in 2024 and 2025, Spanish airports had a total of 483 hectares representing 3.2% of the total area.

In the case of airports managed by Aena Brasil, in 2024 and 2025, with a total area of 4,600 hectares, the protected area amounted to 294 hectares corresponding to Carajás-Parauapebas Airport, which is entirely located within the Campos Ferruginosos National Park area.

For its part, London Luton Airport, in the United Kingdom, has a total airport area of 245 hectares in 2024 and 2025, of which 57 hectares correspond to the apron (runway and aircraft parking stands); however, there are no protected areas in the vicinity of this airport.

Within the Aena Group, 7 of the centres located in protected natural areas had specific management plans to remedy or minimise impacts on biodiversity in 2024 and 2025, covering a total of 5,992.3 hectares in both years.

E4 ESRS 2 IRO-1: Description of processes to identify and assess material biodiversity and ecosystem-related impacts, risks and opportunities

E4-IRO-1 17 (a), E4-IRO-1 17 (b), E4-IRO-1 17 (c), E4-IRO-1 17 (d), E4-IRO-1 19 (a), E4-IRO-1 19 (b)

The process to determine material impacts, risks, and opportunities related to biodiversity and ecosystems was carried out using the methodology described in the **double materiality** chapter ([ESRS 2. IRO-1](#)), which details the analysis of its assets and activities, both its own operations and its value chain.

As part of this analysis, the double materiality assessment covers a wide spectrum of the Aena Group's interactions with biodiversity and ecosystems throughout its entire value chain. This includes considering direct impacts on fauna and flora (especially protected or threatened species), the alteration and degradation of adjacent habitats and ecosystems due to operational factors (such as emissions, noise, or light pollution), as well as landscape fragmentation and pressures derived from infrastructure development activities and other risks related to the supply chain and safety.

This double materiality assessment is reviewed and updated annually, ensuring that the IRO identification process is exhaustive and covers the diversity of the Aena Group's interactions with biodiversity and ecosystems, allowing for strategic and transparent management.

The Aena Group has not identified any material dependencies on biodiversity or ecosystem services in its business model, nor have any systemic risks been identified. This is why actions include the control and management of vegetation and wildlife in airport environments to avoid critical dependencies on ecosystem services.

Regarding the presence of facilities located in areas considered sensitive due to their biodiversity or in their vicinity, and the possible negative impact of operations in these areas, as well as the implementation of actions to mitigate these effects on biodiversity, the information is detailed in the previous section.

E4-2: Policies related to biodiversity and ecosystems

E4-1 11, E4-2 20, E4-2 22, E4-2 23 (a), E4-2 23 (b), E4-2 23 (f), E4-2 24 (a), E4-2 24 (d)

The Aena Group's commitment to reconcile airport activity with the protection and conservation of existing natural habitats and their biodiversity is reflected in its Policy on Integrated Quality, Environment, Energy Efficiency and Occupational Health and Safety, and its Sustainability Policy, applicable to the companies integrated into the Aena Group, also promoting the adoption of this principle in other companies with which it collaborates. Within this framework, the Aena Group recognizes the importance of considering its stakeholders in the management and conservation of biodiversity.

The Integrated Management Policy also highlights the importance of reconciling airport activity with the protection and conservation of existing natural habitats in the surroundings and their biodiversity, minimizing deforestation and compensating for its impact through appropriate instruments.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
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Furthermore, the Code of Conduct for Third Parties includes a commitment to environmental protection, control, and management by the value chain based on the Aena Group's standards. These standards include topics such as reducing greenhouse gas emissions, adapting to climate change, minimizing the consumption of natural and energy resources, protecting air quality, minimizing the water footprint, reducing noise pollution and waste management, promoting circular economy in its activities, and protecting biodiversity (including no deforestation and land conservation).

For more information on minimum disclosure requirements (MDR-P), please refer to the [Environmental policies](#) section.

E4-3: Actions and resources related to biodiversity and ecosystems

E4-3 25, E4-3 27, E4-3 28 (b)

Regarding the monitoring and control of wildlife presence in the airport premises, which is carried out in all Spanish airports, it is worth highlighting, as an example, the use of trained falconry birds that perform high-altitude marking flights to deter birds from entering the airports. This measure is currently applied at 33 airports and 1 heliport managed by Aena in Spain. Additionally, mechanical means are used, such as non-lethal trapping and the use of sounds and pyrotechnics.

In the case of Aena Brasil airports, all have Wildlife Risk Management Studies and biodiversity protection at the airports²⁰. Additionally, as in the Spanish airport network, monitoring and control of wildlife presence in the airport premises is carried out, and various measures are developed for their exclusion from operational areas, adapted to the situation of each airport. Likewise, biodiversity protection activities are carried out within the airport premises and in the airport security area with actions for biodiversity protection, based on wildlife inspections focusing on the operational area (runway system). The inspections aim to identify aggregations, potential attraction points, and access points for wildlife, carrying out the most appropriate deterrent actions for the situation.

Regarding vegetation control, as in the case of wildlife, in Spain and Brazil, the Aena Group monitors the incidence of habitats in the airport surroundings, fostering collaboration with the entities responsible for their management and executing specific measures that promote environmental care and respect with a guarantee of operational safety.

Communication and awareness towards stakeholders is a central axis of the Aena Group's biodiversity strategy, with concrete examples of collaboration that are added to those already existing during 2025:

Spain


- Exhibition on the natural parks of Girona: Girona-Costa Brava Airport has inaugurated a new permanent exhibition to showcase the eight natural parks in its surroundings, with photographs provided by the *Patronat de Turisme Costa Brava Girona* of the *Diputació de Girona*.
- Exhibition at César Manrique–Lanzarote Airport: It hosts the exhibition 'Life and Landscapes of the Spanish Geoparks'. The exhibition, recently inaugurated, highlights the geodiversity and culture that make Spain a unique place, with a call for the conservation, education, and valorisation of collective heritage.
- Cetacean exhibition at Fuerteventura Airport: Fuerteventura Airport hosted the Travelling Exhibition of Macaronesian Cetaceans, organised by the Tourism, Blue Economy, and Biosphere Reserve area of the Island Council.
- Within the framework of the "Aena with society" program, various projects aimed at the category "Promotion of ecological transition, conservation of natural capital and biodiversity" continued to be implemented during 2025. Among them, two winning initiatives stand out: the one presented by the Círvite Association, titled "Therapeutic garden and environmental comfort in Spain's first sustainable shelter" and the one promoted by the Assut Foundation, called "Land stewardship in the Tancat de L'Estell (L'Albufera Natural Park)".

Likewise, within the "Aena with research" program, the AENA-BIRD project has been launched, winner in the "Sustainable community and value chain" category. This four-year project aims to develop a system based on a completely autonomous ornithopter—a flapping-wing aircraft—that does not require the use of a radio-control pilot, and that will have specific functionalities for its application in the airport environment.

Among the planned functionalities are:

- Deterring birds to avoid possible impacts with aircraft.
- Noise measurement.
- Air pollution measurement.

²⁰ In the United Kingdom, London Luton Airport does not have Fauna and Habitat Studies.

	ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
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- Flora sampling to assess pollution.
- Perimeter surveillance.

Another action resulting from the specific growth of vulture populations in Spain in recent years, and the possible risk of interaction with aviation during their long-distance movements and aggregation in certain areas, has been the Agreement between AESA, MITERD, and Aena, which establishes the framework for collaboration to promote and manage a vulture tagging study. This study aims to understand their behaviour and contribute to the identification of effective measures to reconcile aviation and the growth of the vulture population.

In Spain, Aena is developing a study of griffon and black vulture movements around Adolfo Suárez Madrid-Barajas Airport and griffon vultures around Bilbao Airport. The study is based on tagging vultures of different ages with GPS equipment to monitor their activity. The tagging of specimens began in Madrid in November 2024 and continued in autumn 2025 in Madrid and the province of Biscay. By the end of 2025, a total of 62 griffon vultures (35 and 27 respectively in each area) and 20 black vultures were tagged with active GPS. More than half of the tagged vultures remain within the province and surroundings where they were captured. This study is confirming known vulture feeding points and analysing other potential ones. The study will conclude in mid-2027, and its results are expected to contribute to the design of corresponding lines of action by all agents involved in species and natural environment management and activities around both airports, improving coexistence between aviation and avifauna.

Among the most innovative actions related to the protection of local fauna in Spain, the *Radar Aviar* project stands out. This is a system based on radar technology for detecting bird movements in the airport environment, compatible with airport equipment and systems. The use of this technology at airports reinforces operational safety and improves information on wildlife ethology, helping to identify and characterise bird movement patterns, as well as identifying their attraction points. This allows integrating the information provided by the equipment into decision-making and the application of appropriate mitigating measures. Currently, the equipment is operational at Bilbao Airport and will be implemented at other airports in the Spanish network.

During 2025, Palma de Mallorca Airport has advanced in the innovative implementation of an active trap system for the capture and subsequent translocation of kestrels, a protected species whose presence on runways poses a risk to air safety. By analysing the behaviour of these birds, it was discovered that kestrels frequently perched on the airport signage and marking on the runways, so a multidirectional detection system was designed, which activates automatically upon detecting the bird's weight. When the kestrel perches, the system triggers, capturing the animal without causing it harm. Once captured, in collaboration with the Ministry of Environment, each specimen is ringed – allowing for scientific monitoring – and subsequently transferred to a safe environment, away from the airport area. During this process, data on age, sex, measurements, and physical condition are recorded, providing valuable information for behavioural and conservation studies. This project combines operational safety with environmental sustainability by developing specific methods that respect wildlife and adapt to the behaviour of the species.

United Kingdom


At London Luton Airport, collaborations with third parties to contribute to the protection and restoration of habitats through tree-planting initiatives stand out. Habitat restoration projects, such as "Queens Green Canopy" and "Tree for Free", have also been carried out, reflecting an approach based on nature-based solutions. These programs have involved local communities in tree planting activities, fostering the connection between environmental actions and local knowledge.

This airport also works to improve biodiversity in the local community, providing funding for local projects that seek to improve biodiversity through the new Greener Future Fund as part of the broader Community Trust Fund scheme. As part of its ongoing commitment to youth development within its area of influence, it has launched a new Environmental Education program to continue investing in the beneficiaries of the Greener Future Fund, in which 4 local primary schools with more than 140 students have participated.

Brazil

At Aena Brasil airports, collaborations are carried out with third parties to contribute to wildlife protection and habitat restoration, as well as the monitoring and control of wildlife presence in the airport premises, and Wildlife Risk Management Studies and biodiversity protection. Among these, the following stand out:

- Collaboration during 2025 with local stakeholders to replant 1300 trees around airports as an environmental offsetting measure, after having removed about 300 trees as part of the works carried out.
- The development of the 2024-2040 Sustainability Strategy, developed in 2025, which includes specific aspects of biodiversity.
- The holding of two commissions per year addressing aspects related to biodiversity together with those stakeholders at each airport.
- Participation in the National Commission for Wildlife Risk Management, composed of representatives from various civil and military aviation entities. Its purpose is to serve as a forum for debate and subsequent integrated action by the aeronautical community.

	ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
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During the 2025 financial year, the Aena Group has not resorted to biodiversity offsetting mechanisms in the development of its action plans or in the management of its impacts on biodiversity. Aena maintains its commitment to prioritise the prevention, minimisation, and direct restoration of impacts on biodiversity in its operations and projects, in accordance with the mitigation hierarchy established in applicable regulations and international sustainability standards.

Significant Financial Resources in Biodiversity and Ecosystems

As a result of the actions implemented for the conservation of biodiversity and the protection of ecosystems, the Aena Group has managed the natural spaces in which it operates responsibly and sustainably, both in Spain and in its international subsidiaries. In 2025, the resources allocated to operating expenses (OpEx) linked to biodiversity management amounted to €6.23 million (€5.58 million in 2024), reflecting Aena's continuous commitment to the protection and improvement of ecosystems in all its areas of influence.

E4-4: Targets related to biodiversity and ecosystems

E4-4 29, E4-4 31, E4-4 32 (a), E4-4 32 (c), E4-4 32 (d), E4-4 32 (e), E4-4 32 (f)

At all Aena Group centres, environmental management is carried out within the framework of the Operational Safety System, which enables the protection of natural heritage with the maintenance of safety and quality standards, inherent to airport activity.

In this context, in Spain, and in compliance with applicable regulations, the Wildlife and Habitats Study is periodically prepared for each airport in the national network, validating the results with the collaboration of local and autonomous entities, and the Spanish Aviation Safety and Security Agency (AESA). In this regard, it should be noted that in 2024, the Wildlife and Habitats Study of the Región de Murcia International Airport was drawn up, completing the current renewal cycle of these studies at all Aena's Spanish airports.

The main objective of the Aena Group, both in the short, medium and long term, is to protect and promote local and global biodiversity, as indicated in the key lines of action (biodiversity protection, communication and awareness initiatives, and volunteering actions). These goals and actions are framed within the mitigation hierarchy, focusing primarily on the avoidance and minimisation of impacts, and complemented by habitat restoration initiatives. No ecological thresholds or impact assignments were applied when setting these targets.

In Spain, to achieve the aforementioned objective, indicators are included within each airport's Wildlife Program and are reviewed semi-annually. Additionally, an annual Bird Committee meeting is held at each airport, which includes: personnel from the airports responsible for wildlife management, the air navigation service provider, the corresponding municipalities, the Department of Environment, technical experts, pilots, and agents involved in territorial management.

In the United Kingdom, London Luton Airport aims to carry out three biodiversity-related actions by 2027, even though the negative impact on fauna, especially protected and/or threatened species, is not considered material due to its location.

Aena Brasil, through its new 2024-2040 Sustainability Strategy, has defined the reduction of bird collisions as its main biodiversity target, establishing a continuous decrease compared to the previous year as its objective. This progressive improvement approach does not set a specific reduction percentage but uses the values recorded in each financial year as a reference to evaluate the performance of the next, allowing for year-on-year comparative monitoring.

In line with these objectives, its commitment to wildlife is evaluated through key indicators, among which are: a total of 4 collaboration agreements with third parties for wildlife protection and habitat restoration at ANB airports, and 1 agreement at BOAB. The monitoring and control of the presence of wild animals on airport premises is carried out at 11 airports (ANB and BOAB) by a contracted team, and at 6 additional airports by an in-house team. Likewise, risk management associated with wildlife management and biodiversity protection is documented through specific studies covering 4 ANB airports and 3 BOAB airports, with their respective wildlife hazard identifications and Wildlife Risk Management Programs, and the rest of the airports applying their Basic Wildlife Risk Management Plans.

E4-5: Impact metrics related to biodiversity and ecosystems change

E4-5 33, E4-5 AR 28

In 2025, the Aena Group has carried out actions for the conservation of biodiversity and ecosystems at its sites located within or near sensitive areas (see section [E4 SBM-3](#)) through a series of specific initiatives and collaborations (see details in section [E4-3](#)). The Group's efforts align with ESG framework metrics, focusing on the material impact identified on biodiversity and ecosystems.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
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S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

To ensure the safety of both wildlife and aeronautical operations, one of the metrics used at Adolfo Suárez Madrid-Barajas Airport is the number of birds captured and relocated outside the airport. Each bird is marked with a metal ring and a PVC ring for remote reading, and resident birds are additionally marked with wing bands and GPS trackers. The number of birds captured varies depending on seasonal changes, climatic conditions, and real-time service needs. This meticulous monitoring helps keep the number of specimens within the airports under control, preventing young birds, potentially more vulnerable than adult specimens, from entering the area. In 2025, the total number of specimens trapped and ringed at the airport was 340, compared to 517 in 2024.

Another indicator is the number of nests and bird chicks identified within the airport premises. Birds nesting at the airport are closely monitored to ensure breeding success. Eggs and chicks from each nest are tracked to determine the optimal time for their removal. Chicks are relocated when they reach an appropriate size to ensure their survival in a new environment. This approach also ensures that parent birds do not perceive the nesting attempt as a failure, thus preventing repeated breeding attempts within the same year. The number of managed nests and relocated chicks varies annually. In 2025, at Adolfo Suárez Madrid-Barajas Airport, 15 nests were managed (16 nests in 2024) and 23 chicks were relocated (40 in 2024).

An additional metric used by Aena in Spain to evaluate wildlife management is the number of technical dissemination sessions aimed at stakeholders and airport staff. Thus, both in 2024 and 2025, Adolfo Suárez Madrid-Barajas Airport held 3 sessions of this nature with the involvement of different stakeholder groups.

E4-6: Anticipated financial effects from biodiversity and ecosystem-related risks and opportunities

E4-6 42, E4-6 45 (a), E4-6 45 (b), E4-6 45 (c)

The Aena Group has not identified any material risks or opportunities related to biodiversity and ecosystems, and therefore there are currently no financial effects related to this topic. However, it will consider the anticipated financial effects should any related risks or opportunities be identified in the future.

Non-applicable Datapoints

- DPs not included because, after the Double Materiality Assessment, it has been concluded that they are non-material to the Company: E4-2 23 (c).
- DPs not included because, due to the Company's activity, they are considered not to be applicable: E4-IRO-1 17 (e) i, E4-IRO-1 17(e) ii, E4-2 23 (d), E4-2 23 (e), E4-2 24 (b), E4-2 24 (c), E4-5 38.



ESRS 2: General disclosures

E1: Climate change

E2: Pollution

E3: Water and marine resources

E4: Biodiversity and ecosystems

E5: Resource use and circular economy

S1: Own workforce

S2: Workers in the value chain

S3: Affected communities

S4: Consumers and end-users

G1: Business conduct

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E5 Resource use and circular economy

The Aena Group, in its commitment to sustainability and responsible resource management, recognises the importance of fostering the transition to a circular economy model in its operations. Therefore, it assumes its responsibility to minimise the environmental impact associated with the use of materials and waste generation, promoting practices that prioritise reduction, reuse, and recycling. This chapter details the actions, policies, and programs implemented by the Aena Group to promote circular economy. It also presents the results of the measures adopted, the short-, medium-, and long-term targets, and the regulatory framework that guides initiatives in this area.

Material IROs - Impact materiality (Impacts)

Topic	Sub-topic	Sub-sub-topic	Impact	Location in the value chain	Positive / Negative	Actual / Potential	Time horizons
E5 Resource use and circular economy	Waste	—	Generation of different types of waste by own operations and the value chain	Entire value chain	Negative	Actual	Short term / Medium term / Long term

Material IROs – Financial materiality (Risks and Opportunities): There are neither material risks nor opportunities based on financial materiality.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

E5 ESRS 2 IRO-1: Description of the processes to identify and assess material resource use and circular economy-related impacts, risks and opportunities

IRO-1 11 (a), IRO-1 11 (b)

The process for determining the material impacts, risks and opportunities related to circular economy and the use of resources was carried out by means the methodology described in the section on **double materiality assessment (ESRS 2. IRO-1)**, in which the analysis of its assets and activities of both its own operations and its value chain is outlined in detail.

E5-1: Policies related to resource use and circular economy

E5-1 12, E5-1 14, E5-1 16, AR 9 (a), AR 9 (b)

The Aena Group is committed to promoting circular economy in the airport environment to minimise the volume of both hazardous and non-hazardous waste generated, encourage its proper segregation, and contribute to maximising its recovery throughout the entire value chain. This commitment is reflected in the **Sustainability Policy** and the **Policy on Integrated Quality, Environment, Energy Efficiency and Occupational Health and Safety Management**, applicable to all companies within the Aena Group.

In Spain, the 2021-2030 Sustainability Strategy defines the main actions in the following areas:

- Reducing waste generation.
- Promoting segregation and recycling, as well as energy recovery and composting, in accordance with the waste hierarchy.

For its part, London Luton Airport in the United Kingdom actively works to reduce waste whenever possible. Therefore, its **Environment Policy** identifies the importance of incorporating the principles of circular economy and waste reduction in all areas and levels of the company and through on-site partners. The principles and objectives described in this policy are as follows:

- Minimise waste generation and use of single-use plastics, and maximise reuse and recycling rates.
- Ensure that no waste from standard operations is sent to landfills.
- Work with partners to support best practices in waste disposal.
- Monitor waste volumes in accordance with objectives.

These policies apply to both Aena Group operations and the rest of the value chain.

For more information on Minimum Disclosure Requirements (MDR-P), please refer to the **Environmental Policies** section.


E5-2: Actions and resources related to resource use and circular economy

E5-2 17, E5-2 19, E5-2 20 (e), E5-2 20 (f)

In accordance with the amendment introduced by Directive (EU) 2025/794 (Quick Fix), which allows certain reporting requirements to be deferred during the initial transitional period, the Aena Group has decided to avail itself of this exemption for requirement E5-2 regarding actions and resources related to resource use and circular economy. However, voluntary information on initiatives developed in this area is presented below.

The preservation of natural resources is based on various aspects, highlighting the proper management of waste generated by the airports in the network. In this regard, the Aena Group promotes initiatives at its airports and collaborates with stakeholders to move towards a circular economy.

This approach translates into specific initiatives linked to the waste hierarchy:

	ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
	E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
	S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

- **Prevention:** Optimisation of procurement, inclusion of eco-design principles in new projects, as well as specific clauses in procurement processes.
- **Reuse:** The objective is to extend the useful life of products or components, preventing them from becoming waste, achieving repeated use, and avoiding their entry into the waste management chain. Within the organisation, an example would be the recovery and redistribution of equipment in good condition among airports, or the reuse of construction waste in other projects.
- **Recycling:** Thanks to the expansion of recycling centres and selective separation systems in terminals and as part of airport operational procedures.
- **Other recovery operations:** This category includes all operations that allow for the recovery of value from waste other than recycling, for both hazardous and non-hazardous waste. Some examples include component recovery, composting, recovery of useful substances, or energy recovery.
- **Disposal:** This is the last option, reserved for non-recoverable fractions, managed in accordance with environmental regulations.

In Spain, Aena's 2021-2030 Sustainability Strategy includes a specific line of action to improve the management of recurring non-hazardous waste and achieve its **Zero Waste commitment by 2040**²¹. The areas of action are:

- Waste measurement and monitoring;
- Reduction of waste generated;
- Use of sustainable materials;
- Promotion of segregation and recycling;
- Energy recovery and composting;
- Collaboration and awareness-raising.

Likewise, in Spain, Aena incorporates strict criteria for the management of third-party waste (including suppliers) in its supplier bidding processes, and has technical evaluation criteria, such as the percentage of reuse of materials/products and/or recycling of non-hazardous construction and demolition waste on-site itself or at other sites.

In addition, Aena is also working on a new pay-as-you-throw system that will promote the recovery and recycling of waste generated by third parties at its facilities in Spain. To this end, the key pillar of its circular economy action line focuses on improving the measurement and traceability of generated waste, with waste monitoring being particularly important. This monitoring is carried out taking into account the specific characteristics of each airport.

In the United Kingdom, one of the priorities within the Responsible Business Strategy is to increase the percentage of waste recovered and minimise its disposal in landfills, fostering a circular economy within the airport sector. To achieve this, the following lines of action are being developed:

- Operate a segregated waste stream throughout the airport, with a specialised waste manager to ensure that waste is handled in accordance with the applicable regulations.
- Through the waste manager, carry out further sorting and segregation of waste and expand collection to include new types of recyclable materials.
- Establish a recycling rate target to reduce waste and encourage recovery.
- Engage tenants at the airport to implement segregation improvements, providing easily accessible separation bins and on-site support from the waste manager. London Luton Airport is in continuous collaboration with tenants to achieve the established non-hazardous waste recycling target.

The results obtained from this latest line of action are due to the development of a quarterly program (Waste Champions) to incentivise better waste management practices among concessionary companies operating at the airport. Furthermore, London Luton Airport has implemented a new waste management fee structure, in compliance with the Simpler Recycling legislation, which aims to encourage concessionaires and operators to adopt more robust and responsible waste management practices. In addition, the airport has strengthened its waste segregation program, installing separate containers for passengers and concessionaires, improving the traceability of the waste stream generated, and optimising recycling processes.

Aena Brasil, through its 2024-2040 Sustainability Strategy, manages waste using procedures that comply with applicable regulations and laws, as well as the National Solid Waste Policy (PNRS), established by [Law No. 12.305/2010](#) and regulated by [Decree No. 10.936/2022](#). The PNRS sets environmental management guidelines and objectives to be achieved throughout Brazil, including the importance of selective waste collection at airports.

²¹ Applies to recurring non-hazardous waste excluding construction and demolition waste.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
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In line with the PNRS waste hierarchy principle, which that prioritises waste prevention, Aena Brasil airports implement preventive strategies in phases prior to waste production. These include the progressive elimination of single-use plastics, the installation of drinking fountains to promote reusable bottles, and contractual agreements with concessionaires to minimise packaging and optimise inventory. Additionally, awareness campaigns on responsible consumption are being developed for passengers and staff, achieving comprehensive management that reduces both operating costs and environmental impact.

Considering waste management in the different countries where the Aena Group operates, the following types of actions have been developed:

Monitoring

Designated airport personnel rigorously monitor all waste generated, from its origin and storage to its delivery to authorised waste management companies for external treatment. Likewise, to ensure proper waste management, related activities are monitored periodically. In addition, compliance with obligations by contractors and tenants is verified within the framework of the Environmental Surveillance Plan.

To monitor the total amount of waste generated in the Aena Group by type, as well as the recovery and disposal rates, data reported from direct measurements or estimates by the various units and airports is used and stored in a database:

- In Spain, the Integrated Quality and Environmental Management System (SGI) has a database that allows the registration of the amount of waste produced, distinguishing between more than 30 different types of waste and specifying their recovery level.
- In the United Kingdom, waste management company Cawleys uses a method that involves weighing each bag of collected waste and sorting it into the appropriate stream. Cawleys sends this information to London Luton Airport, providing a breakdown of waste streams and informing the basis for the overall recycling rate. The process is subject to regular reviews through waste audits that verify compliance with procedures.
- At Aena Brasil, the information provided by contracted waste management companies is integrated into an internal tool used to collect and calculate the corresponding indicators.

Selective Collection

In Spain, transfer plants have been established at several airports for non-hazardous waste, centralising and optimising temporary storage conditions, especially for unsorted household waste. The Aena Group also has specific points for the temporary storage of hazardous waste, designed with pollution prevention measures to ensure safe management. This waste is stored selectively in containers until its collection by authorised waste management companies.

During 2025, the projects developed at London Luton Airport focused primarily on improving the efficiency of segregating and recycling non-aircraft waste. These initiatives included continuing the incentive program that promotes proper waste sorting among concessionaire employees, collaborating with food and beverage outlet managers in the terminals, installing improved containers in waste storage areas, and optimising the general waste fee to encourage best practices. Catering waste from international flights, on the other hand, has been managed separately by airline ground handling agents, in accordance with UK government regulations.

Waste Reuse and Recycling

Once waste is generated, as a general rule, waste management companies contracted by the Aena Group must ensure that, whenever possible, waste is ultimately used for recovery, reuse, and recycling. In cases where disposal is necessary, the waste manager must duly justify each situation, ensuring maximum environmental responsibility in all processes.

In addition, the Aena Group collaborates closely with authorised waste management entities, which are responsible for the collection and subsequent treatment of waste. This encompasses a fundamental framework as well as the development of management systems according to the type of waste.

In Spain, collaboration agreements with Ecoembes, Ecovidrio, and European Recycling Platform (ERP) have been maintained through 2025 to ensure proper management of waste. Specifically, at Josep Tarradellas Barcelona-El Prat Airport, the Trinijove Foundation is responsible for collecting and separating the recyclable waste generated at that facility.

In the United Kingdom, at London Luton Airport, Cawleys manages the waste, carrying out meticulous separation before disposal. Furthermore, it ensures that waste is recycled or used for energy recovery, avoiding landfill disposal whenever possible. It also includes in its construction contracts the obligation to reuse materials as much as feasible.

In Brazil, the priorities for waste management have been established as: preventing waste generation, minimising its volume, promoting reuse, boosting recycling, processing solid waste, and finally, its disposal. BOAB has a Zero Waste project, which aims to reduce waste by 50% by 2030 and achieve zero landfill by 2040.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
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Reducing Plastic Use

In Spain, Aena has incorporated a clause into its catering service contracts formalising its commitment to reducing the amount of plastic waste generated, prohibiting the use of single-use plastics, and promoting the use of products made from biodegradable or recyclable materials. In addition, it is continuing its initiative to increase the number of drinking fountains in public areas, reinforcing its commitment to reducing plastic consumption. By providing drinking water, airports encourage the use of reusable bottles, improving the passenger experience and promoting more responsible resource management.

Similarly, in the United Kingdom, new contracts signed with catering service providers at London Luton Airport include restrictions on single-use plastics. This measure responds both to the rigorous regulations imposed by the British government on certain single-use plastics and to the implementation of additional recycling agreements aimed at ensuring proper management of their environmental impact.

Awareness

Building on actions implemented in previous years, the Aena Group has placed signs in terminals and technical areas to promote awareness of the proper separation of waste in designated containers. Similarly, airports provide signage and send informational bulletins to employees, both internal and external, as well as to users, to inform them about the correct way to segregate waste.

Innovation

The Aena Group is firmly committed to innovation and collaboration on international projects to develop new procedures and technologies that improve waste management in airport environments. In this regard, in Spain, its participation in the **LIFE-TRIPL AIR project** stands out. This European project is co-financed by the European Commission's LIFE program (managed by the CINEA Agency). This project, which began in June 2024 and will run for four years, aims to implement innovative solutions for the efficient management of waste in airports. Among its initiatives is development of a "Smart-Bin" prototype, an intelligent container capable of automatically selecting and differentiating waste, which was implemented on a trial basis at Adolfo Suárez Madrid-Barajas and Tenerife-Sur airports in 2025.

The LIFE-TRIPL AIR project has the collaboration of six international partners, including the airports of Budapest, Venice, and Dubrovnik. The Aena Group participates with the Adolfo Suárez Madrid-Barajas and Tenerife Sur airports. The project objectives focus on three key areas:

- Completing the design of an effective waste collection and classification system.
- Defining software that allows for the traceability and prediction of waste generation in the airport environment.
- Developing new models for recycling and recovering waste, thus promoting a more sustainable and efficient waste management model.

Significant Financial Resources Related to Circular Economy

As a result of the measures implemented in the area of circular economy and responsible waste management, the Aena Group has made significant progress in reducing the environmental impact associated with its operations, both in Spain and its international subsidiaries. In 2025, the resources allocated to operating expenses (OpEx) reached €11.17 million (€9.68 million in 2024), which demonstrates Aena's commitment to the transition towards a more sustainable and efficient model in the use of resources.

E5-3: Targets related to resource use and circular economy

E5-3 21, E5-3 23, E5-3 24, E5-3 24 (e), E5-3 24 (f), AR 15, E5-3 25, E5-3 26, E5-3 27

In Spain, the voluntary Zero Waste 2040 target focuses on recurring non-hazardous waste, excluding construction and hazardous waste. The interim target is to increase the recovery rate of non-hazardous waste to 72% by 2030 compared to the 2019 baseline. The methodology used to calculate these percentages is based on the direct measurement of waste generated and recovered, in accordance with the internal procedures of the Integrated Quality and Environmental Management System, and applicable national regulations.

At London Luton Airport, the target is to achieve a 75% recycling rate and 100% zero waste to landfill, in collaboration with the airport's concessionaires. To this end, specific KPIs have been included in the contract with the waste manager, and performance is monitored quarterly. Currently, the airport has achieved 100% waste recovery (100% in the 2024), 0% sent to landfill (0% in the 2024), and 81 % waste recycling (82% in the 2024). The current challenge is to progressively increase the recovery rate in the recycling and energy recovery categories, promoting circular economy in the airport context.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
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In Brazil, as part of the Responsible Use of Resources program, the main objective is to achieve zero waste at airports, increase recycling and cooperation, and drastically reduce waste sent to landfills, with the goal of zero waste for non-hazardous waste by 2040. The monitoring methodology is based on the monthly collection of data from waste managers and its consolidation into an internal indicator tool. Progress is reviewed semi-annually by the Aena Brasil Sustainability Committee.

Although no ecological thresholds or allocations to specific entities have been applied to define the targets, the objectives are aligned with the United Nations Sustainable Development Goals (SDGs) related to circular economy. The targets are monitored regularly, and the need for adjustments is assessed based on the results and regulatory changes.

To coordinate the necessary actions and ensure compliance with the targets, the Aena Group has created an internal working group with representatives from the operational areas involved in waste management. This group meets regularly to develop optimisation projects and ensure compliance with legal and sustainability requirements, involving third parties in the continuous improvement of waste management.

Monitoring and control of progress towards targets falls to the Sustainability and Climate Action Commission in Spain, and to the Sustainability Committees at London Luton Airport and Aena Brasil. Results and progress are reported annually, among other sources, in the Sustainability Report, which includes key indicators and deviations from established targets.

Progress Towards Established Targets

The following shows the degree of progress with respect to the goals set for waste management in Spain.

Spain (Zero Waste)	Baseline 2019	2024	2025	Target 2040
Quantity of Non-Hazardous Waste, NHW (t)	78,979	39,279	41,555	0
% of recovery	74%	72%	79%	100%

Note: The target is recurring non-hazardous waste, excluding construction waste and hazardous waste.

In the UK, London Luton Airport has set a target of a 75% recycling rate by 2026, encompassing all waste generated at the terminal (from its own operations, tenants, and passengers, excluding waste managed by third parties). This target was established in the Responsible Business Strategy, using 2024 as the baseline year. In 2024, the airport's recycling rate was 82% and the energy recovery rate was 18%, while in 2025, the recycling rate was 81% and the energy recovery rate was 19%.

In Brazil, with a baseline year of 2024, the target is to progressively reduce non-hazardous waste sent to landfills, with a 50% reduction by 2030 and achieving Zero Waste by 2040. The Zero Waste concept means that waste is not sent to landfills, but rather to recovery facilities, prioritising composting of organic waste and energy recovery from the remainder. Currently, management focuses on recycling, and it is planned to break down and report of recovery processes in greater detail for the coming years.

See section [E5-5](#) for information on waste management and other resource use issues.

E5-5: Resource outflows

E5-5 37 (a), E5-5 37 (b) , E5-5 37 (c), E5-5 37 (d), E5-5 38 (a), E5-5 38 (b), E5-5 39, E5-5 40

The Aena Group is committed to sustainability and the responsible management of waste at its airports. Proper waste management is key to reducing environmental impact and moving towards a circular economy. Therefore, it monitors indicators that show the total amount of waste and its destination: reuse, recycling, or disposal.

These indicators allow for the evaluation of environmental performance, the identification of improvements, and the setting of targets for prevention, reuse, and recycling. In addition, they guarantee transparency and alignment with the Sustainable Development Goals, promoting efficiency and reducing environmental impact.

Through this monitoring, the Aena Group reinforces its commitment to sustainability and ensures comprehensive waste management in accordance with regulations and the expectations of communities and stakeholders.

The waste managed by the Aena Group primarily results from two activity streams:

- Direct activity of the Aena Group, which includes waste from the segregated waste bins located in the terminals, buildings and parking areas managed by the Group; waste generated in passenger security checkpoints; waste generated in offices, waste from terminal cleaning and the maintenance of airport and heliport facilities; waste from existing areas and buildings not leased to other companies; waste generated in the employee cafeteria; and waste from the screening of wastewater treatment plants owned by the Aena Group.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
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- Activity of the various companies and tenants operating within the airport premises, which includes catering waste, commercial premises, third-party offices, and duty-free shops, among others. The Aena Group does not manage hazardous waste from third-party companies.

All waste managed by the Aena Group follows specific control guidelines, which, according to waste type, include the following:

- **Non-Hazardous Waste (NHW):** This waste is mostly similar to household and commercial waste and is delivered to the local entity or authorised management company. The Manager of the Integrated Management System (RDSGI) and/or the unit or centre's record manager keeps copies of the records of waste deliveries to waste management companies and/or the invoices or waste collection fees from the local authority. This waste is collected in general municipal waste containers, separated for different types (paper/cardboard, glass, packaging, or organic matter and other waste), or in specific containers for other selectively collected waste (scrap metal, wood, pruning remains, toner cartridges, etc.), and is removed at the appropriate frequency for each type.

Non-Hazardous Waste (NHW) also includes construction and demolition waste (CDW) generated at worksites carried out by the units or centres. This waste is stored in containers and delivered to an authorised waste management company or transported to an authorised landfill. The RDSGI/Worksite Manager of the unit or centre keeps a copy of the corresponding delivery records. CDW generated in other worksites is managed by the contracted company, as required by applicable legislation in each case, and is controlled according to the corresponding procedure.

- **Hazardous Waste (HW):** This waste mainly includes used mineral oils, batteries, fluorescent tubes, absorbents contaminated by hydrocarbon spills, and contaminated empty containers, among others. These must comply with certain storage, packaging, and labelling requirements.

Healthcare waste is also included within Hazardous Waste (HW). This waste is managed, either in-house or through established agreements, according to specific healthcare waste regulations or regional legislation, if applicable. During the waste management process, contracted waste management companies are required to electronically submit detailed waste measurement reports, including the date, time, and quantity of waste collected and treated, along with the corresponding application documents such as treatment contracts and the identification document, which specifies the final destination.

Across the network of centres in Spain, an updated chronological file is maintained, grouping the waste generated according to several criteria²²:

- The nature of the waste (indicating whether it is hazardous or not).
- The selective waste collection points.
- The waste's destination²³, indicating whether it undergoes recovery processes, such as recycling or reuse, or if it is disposed of.

This inventory is supplemented by a chronological record of waste removals, both hazardous and non-hazardous, which details the following information:

- Nature (e.g., used filters, healthcare waste, etc.).
- EWC code (European Waste Catalogue).
- Origin (e.g., vehicle or generator maintenance, medical service, etc.).
- Destination (manager to whom it is delivered).
- Quantity removed.
- Type of treatment.
- When applicable, the means of transport (including the vehicle registration number) and the collection frequency.

Likewise, maintenance personnel and those responsible for records keep documentation related to waste removal by third parties. Similarly, Aena's units and centres in Spain ensure compliance with the relevant legal obligations regarding waste, such as preparing and submitting the Hazardous Waste Minimisation Plan every four years, submitting the Annual Hazardous Waste Report, and the Annual Packaging Declaration to the Autonomous Community when required.

As for London Luton Airport in the United Kingdom, as well as the airports operated by Aena Brasil subsidiaries, they implement waste management systems similar to those in Spain, adapting to the legal requirements of each country.

²² Furthermore, Aena waste produced by suppliers will be removed under their responsibility, and they must provide Aena units and centres with evidence of its proper management, in accordance with the corresponding procedure, unless there is a prior agreement with the centre specifying another form of management.

²³ Except for cases of waste collection by the municipal manager in Spain.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
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In the case of London Luton Airport, Cawleys is responsible for managing waste generated by the airport itself, tenants, and passengers. This management is carried out in accordance with British waste laws and the airport's specific objectives. Compliance is verified through the ISO 14001 certified environmental management system, via regular audits that review both local regulations and internal policies. Cawleys provides monthly waste reports that facilitate the monitoring and control of recycling rates, and this data is shared with management to evaluate progress.

In Brazil, the companies responsible for waste management at subsidiary airports are subject to a strict regulatory framework encompassing all legislation, safety regulations, and requirements included in the tender specifications. This compliance is reinforced by specific clauses in the contracts that detail the suppliers' obligations. Furthermore, these companies must periodically submit reports and supporting documentation, such as waste treatment and final disposal certificates, enabling comprehensive monitoring of environmental performance and ensuring sustainable waste management. Among the required documents are the licenses of the third-party landfills used, the Waste Transport Manifest (MTR) which allows tracking the journey of the waste from its origin to its destination, and the Final Destination Certificate (CDF), which the waste management companies issue as proof of proper treatment and disposal.



ESRS 2: General disclosures

E1: Climate change

E2: Pollution

E3: Water and marine resources

E4: Biodiversity and ecosystems

E5: Resource use and circular economy

S1: Own workforce

S2: Workers in the value chain

S3: Affected communities

S4: Consumers and end-users

G1: Business conduct

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Hazardous and non-hazardous waste generated

	2024				2025			
	Spain	United Kingdom	Brazil	Consolidated total	Spain	United Kingdom	Brazil	Consolidated total
Total recovered waste (t)	531	28	11	571	438	107	0	545
Recovered waste (%)	61.8%	100.0%	8.1%	55.4%	59.2%	100.0%	0.0%	56.5%
<i>Reused (t)</i>	5	0	0	5	0	0	0	0
<i>Reused (%)</i>	0.6%	0.0%	0.0%	0.5%	0.0%	0.0%	0.0%	0.0%
<i>Recycled (t)</i>	94	0	0	94	32	107	0	139
<i>Recycled (%)</i>	10.9%	0.0%	0.0%	9.1%	4.3%	100.0%	0.0%	14.4%
<i>Other recovered(t)</i>	433	28	11	472	406	0	0	406
<i>Other recovered (%)</i>	50.3%	100.0%	8.1%	45.8%	54.8%	0.0%	0.0%	42.1%
Total disposed waste (t)	329	0	130	459	303	0	118	420
Disposed waste (%)	38.2%	0.0%	91.9%	44.6%	40.8%	0.0%	100.0%	43.5%
<i>Incinerated (t)</i>	0	0	31	31	0	0	118	118
<i>Incinerated (%)</i>	0.0%	0.0%	22.2%	3.0%	0.0%	0.0%	100.0%	12.2%
<i>Landfill (t)</i>	103	0	0	103	136	0	0	136
<i>Landfill (%)</i>	11.9%	0.0%	0.0%	10.0%	18.3%	0.0%	0.0%	14.1%
<i>Other disposed (t)</i>	226	0	99	325	167	0	0	167
<i>Other disposed (%)</i>	26.3%	0.0%	69.8%	31.5%	22.5%	0.0%	0.0%	17.3%
Hazardous Wasted, HW (t)	860	28	142	1,029	741	107	118	965
Total recovered waste (t)	28,250	2,181	3	30,434	32,894	2,126	30	35,050
Recovered waste (%)	71.9%	100.0%	0.1%	66.7%	79.2%	100.0%	0.6%	72.2%
<i>Reused (t)</i>	23	0	0	23	176	0	0	176
<i>Reused (%)</i>	0.1%	0.0%	0.0%	0.1%	0.4%	0.0%	0.0%	0.4%
<i>Recycled (t)</i>	2,255	1,783	3	4,041	1,065	1,709	30	2,804
<i>Recycled (%)</i>	5.7%	81.8%	0.1%	8.9%	2.6%	80.4%	0.6%	5.8%



ESRS 2: General disclosures

E1: Climate change

E2: Pollution

E3: Water and marine resources

E4: Biodiversity and ecosystems

E5: Resource use and circular economy

S1: Own workforce

S2: Workers in the value chain

S3: Affected communities

S4: Consumers and end-users

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Hazardous and non-hazardous waste generated

	2024				2025			
	Spain	United Kingdom	Brazil	Consolidated total	Spain	United Kingdom	Brazil	Consolidated total
<i>Other recovered (t)</i>	25,971.60	398	0	26,370	31,653	417	0	32,070
<i>Other recovered (%)</i>	66.1%	18.2%	0.0%	57.8%	76.2%	19.6%	0.0%	66.1%
Total disposed waste (t)	11,028.82	0	4,154	15,183	8,662	0	4,834	13,495
Disposed waste (%)	28.1%	0.0%	99.9%	33.3%	20.8%	0.0%	99.4%	27.8%
<i>Incinerated (t)</i>	14.29	0	0	14	0	0	0	0
<i>Incinerated (%)</i>	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
<i>Landfill (t)</i>	10,795.87	0	0	10,796	7,441	0	4,834	12,275
<i>Landfill (%)</i>	27.5%	0.0%	0.0%	23.7%	17.9%	0.0%	99.4%	25.3%
<i>Other disposed (t)</i>	218.66	0	4,154	4,373	1,220	0	0	1,220
<i>Other disposed (%)</i>	0.6%	0.0%	99.9%	9.6%	2.9%	0.0%	0.0%	2.5%
Non-Hazardous Waste, NHW (t)	39,278.97	2,181	4,157	45,617	41,555	2,126	4,864	48,545
Total HW and NHW (t)	40,139.12	2,209	4,299	46,647	42,296	2,233	4,982	49,510

	2024				2025			
	Spain	United Kingdom	Brazil	Consolidated total	Spain	United Kingdom	Brazil	Consolidated total
Not recycled waste (HW+NHW) (t)	37,790.01	425.70	4,295.91	42,511.62	41,199.12	417.12	4,951.09	46,567.34
% Not recycled waste (HW+NHW)	94.1%	19.3%	99.9%	91.1%	97.4%	18.7%	99.4%	94.1%



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

The Aena Group does not generate radioactive waste, as all devices that use radioactive sources have the corresponding type approval, according to current regulations, which ensures that their use does not lead to the generation of this type of waste.

E5-6: Anticipated financial effects from resource use and circular economy-related risks and opportunities

E5-6 43 (a), E5-6 43 (b), E5-6 43 (c)

The Aena Group has not identified any material risks or opportunities related to resource use and circular economy, and therefore there are currently no financial effects related to this topic. However, it will consider the anticipated financial effects should any related risks or opportunities be identified in the future.

Non-applicable datapoints

- DPs not included because, after the Double Materiality Assessment, it has been concluded that they are non-material to the Company: E5-1 15 (a), E5-1 15 (b), E5-2 20 (a), E5-2 20 (b), E5-2 20 (c), AR 18, E5-4 28, E5-4 29, E5-4 30, E5-4 31 (a), E5-4 31 (b), E5-4 31 (c), E5-4 32.
- DPs not included because, due to the Company's activity, they are considered not to be applicable: E5-3 24 (a), E5-3 24 (b), E5-3 24 (c), E5-3 24 (d), E5-5 35, E5-5 36 (a), E5-5 36 (b), E5-5 36 (c).
- DPs not included as they are contextual information or conditional requirements, i.e., the answer is provided in another linked DP: E5-1 13, E5-2 18, E5-2 20 (d), E5-3 22, E5-5 33, E5-5 34 (a), E5-5 34 (b).

3. Social Information

ESRS S1 Own workforce

- S1-SBM-2: Interests and views of stakeholders
- S1-SBM-3: Material impacts, risks and opportunities and their interaction with strategy and business model
- S1-1: Policies related to own workforce
- S1-2: Processes for engaging with own workers and workers' representatives about impacts
- S1-3: Processes to remediate negative impacts and channels for own workers to raise concerns
- S1-4: Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions
 - Working conditions
 - Equal treatment and opportunities for all
- S1-5: Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities
 - Working conditions
 - Equal treatment and opportunities for all
- S1-6: Characteristics of the undertaking's employees
- S1-8: Collective bargaining coverage and social dialogue
- S1-9: Diversity metrics
- S1-10: Adequate wages
- S1-11: Social protection
- S1-12: Persons with disabilities
- S1-13: Training and skills development metrics
- S1-14: Health and safety metrics
- S1-15: Work-life balance metrics
- S1-16: Compensation metrics (pay gap and total compensation)
- S1-17: Incidents, complaints and severe human rights impacts

ESRS S2 Workers in the value chain

- S2-SBM-2: Interests and views of stakeholders
- S2-SBM-3: Material impacts, risks and opportunities and interaction with strategy and business model
- S2-1: Policies related to value chain workers
- S2-2: Processes for engaging with value chain workers about impacts
- S2-3: Processes to remediate negative impacts and channels for value chain workers to raise concerns
- S2-4: Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those actions
- S2-5: Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

ESRS S3 Affected communities

- S3-SBM-2: Interests and views of stakeholders
- S3-SBM-3: Material impacts, risks and opportunities and their interaction with strategy and business model
- S3-1: Policies related to affected communities
- S3-2: Processes for engaging with affected communities about impacts
- S3-3: Processes to remediate negative impacts and channels for affected communities to raise concerns
- S3-4: Taking action on material impacts on affected communities, and approaches to managing material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions
- S3-5: Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

ESRS S4 Consumers and end-users

- S4-SBM-2: Interests and views of stakeholders
- S4-SBM-3: Material impacts, risks and opportunities and their interaction with strategy and business model
- S4-1: Policies related to consumers and end-users
- S4-2: Processes for engaging with consumers and end-users about impacts
- S4-3: Processes to remediate negative impacts and channels for consumers and end-users to raise concerns
- S4-4: Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions
 - Consumer experience
 - Cybersecurity
 - Consumer safety
- S4-5: Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities
 - Consumer experience
 - Cybersecurity
 - Consumer safety



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

S1 Own workforce

A double materiality assessment has been carried out to evaluate the existence of impacts, risks and opportunities (IROs) of relative importance related to our own workforce, applying the process described in section **IRO-1 of chapter ESRS-2**. All individuals within our own workforce who could be affected by the Group are included within the scope of this report. Following this analysis, the Aena Group identifies the following material impacts and risks related to the Group's own workforce:

Material IROs - Impact materiality (Impacts)

Topic	Sub-topic	Sub-sub-topic	Impact	Location of the value chain	Positive/Negative	Actual/Potential	Time horizon
S1 Own workforce	Working conditions	Secure employment / Working time / Fair wages / Work-life balance	Promotion of a respectful and dignified work environment and work-life balance for employees	Own operations	Positive	Actual	Short term / Medium term / Long term
S1 Own workforce	Working conditions	Social dialogue / Collective bargaining, including the proportion of workers covered by collective bargaining agreements / Secure employment / Working time/ Fair wages	Promotion of fair and equitable remuneration, freedom of association, trade union rights, and collective bargaining	Own operations	Positive	Actual	Short term / Medium term / Long term
S1 Own workforce	Working conditions	Health and safety	Impact on the safety and health of Aena workers due to working conditions (stress, extreme weather conditions - heat stress, commuting to and from work, constant exposure to traffic routes, etc.)	Own operations	Negative	Potential	Short term / Medium term / Long term
S1 Own workforce	Equal treatment and opportunities for all	Gender equality and equal remuneration for jobs of equal value / Employment and inclusion of persons with disabilities / Diversity / Training and skills development	Promotion of equal opportunities, inclusion, diversity, merit, and capacity for the professional development of employees	Own operations	Positive	Actual	Short term / Medium term / Long term

Material IROs - Financial materiality (Risks and Opportunities):

Topic	Sub-topic	Sub-subtopic	Driver	Risk / opportunity description	Location of the value chain	Risk / Opportunity	Time horizon
S1 Own workforce	Working conditions	Secure employment Working time Fair wages	Given its legal status, Aena in Spain is required to comply with the applicable regulations governing the hiring of personnel in public enterprises; this may create constraints when recruiting staff	Limitations in planning and managing recruitment for the incorporation and training of new personnel	Own operations	Risk	Short term / Medium term / Long term



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
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S1-SBM-2: Interests and views of stakeholders

S1-SBM 2-12, S1-SBM 2, AR4, AR5

The Aena Group recognises that its workforce is not only essential for long-term success but also for the sustainability of its operations and organisational well-being. The effective management of employee interests and opinions therefore becomes a strategic priority for the Group, which, through open and accessible communication, fosters constant dialogue with its employees, allowing their concerns and suggestions to be heard and taken into account.

Within this framework, the Aena Group's business model incorporates the needs and perspectives of its workforce through effective and structured communication channels. Furthermore, it regulates labour relations through Collective Bargaining Agreements, which ensure the participation of worker representatives.

To address specific issues impacting employees, in Spain, Joint Committees are created, composed of Aena representatives and members of the trade unions belonging to the State Trade Union Coordinator (CSE) and/or those who signed the new Collective Bargaining Agreement. Their function is to develop and address specific aspects affecting employees, as well as to implement and ensure the application and monitoring of agreements adopted within the framework of the Collective Bargaining Agreement, which is public and, therefore, permanently available to all employees. These Joint Committees hold meetings where trade unions participate, disseminating relevant information to the workforce, ensuring they are aware of the latest developments. In turn, in the United Kingdom, surveys have been conducted to ascertain employee opinions on human rights and working conditions, fostering their active participation in the decision-making process. Aena Brasil provides a QR code for employees to report on working conditions and also has worker representatives who are part of the Internal Accident Commission (CIPA).

This approach ensures that the Group can anticipate and respond to challenges and opportunities arising in relation to the workforce, promoting a positive and sustainable impact both within the Group and across its value chain, and reaffirming its commitment to sustainable development.

S1-SBM-3: Material impacts, risks and opportunities and their interaction with strategy and business model

S1-SBM 3-13 (a-b), S1-SBM 3-14 (a-g), S1-SBM 3-15, S1-SBM 3-16, SBM-3 AR 6-9

The effective management of workers constitutes an essential pillar for achieving the strategic objectives of the Aena Group. Therefore, the Group's strategy and business model are based on the recognition and respect for the interests, opinions, and rights of the workforce, promoting stable and quality employment, supported by labour policies that prioritize contractual stability and professional development. Furthermore, diversity and inclusion are fostered through strategies that guarantee equal opportunities and the active promotion of inclusive work environments, aligned with sustainability objectives.

The Aena Group's Strategic Plan is developed annually through operational plans, ensuring that planned programs are consistent with the commitments outlined in said plan. In this context, the 2022-2026 Strategic Plan cycle is being finalized, and work has begun on the preparation of the new 2027-2031 Strategic Plan, in line with the Airport Regulation Document (DORA III), which will set the course for the organization for the coming years.

During the 2025 Operational Plan, the Organization and People Directorate managed matters within its area of competence, focusing, additionally, on finalizing the negotiation process and seeking consensus for the signing and approval of a new collective bargaining agreement. These efforts resulted in the signing of the II Collective Bargaining Agreement of the Aena Group²⁴, which constitutes a true milestone for the management of labour relations and working conditions of the workforce, more than 13 years after the approval of its predecessor.

This new regulation has not only allowed for a regulatory update, incorporating legislative developments, but has also provided the Organization with a framework adapted to its business reality and needs, which foresees new mechanisms to guarantee operational continuity in the centres and is fully aligned with its strategy, its business model committed to sustainable growth, and the objectives set in the new DORA III. Among these mechanisms, the creation of the Operational Staff Reinforcement (RPO) role is included, as an agile instrument for covering operational needs, ensuring service continuity and quality. All of this has contributed to fostering a more balanced, stable, and motivating work environment.

In parallel, the implementation and management of the Flexible Remuneration Plan is being promoted, facilitating tax optimization and adaptation to the individual needs of the workforce, and the migration of the Integrated People System to the cloud is being carried out, modernizing people management processes and systems.

²⁴ When the Aena Group Collective Bargaining Agreement is mentioned in this Report, it should be noted that the definition of "Aena Group" used in said Agreement differs from the one used in this Report. The scope of the Agreement includes the entities and/or companies Aena S.M.E., S.A., Aena SCAIRM (excluding Aena Desarrollo Internacional and its subsidiaries) and the Public Business Entity ENAIRE.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
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On the other hand, the improvement of internal communication and the development of strategic competencies have been addressed through the *Comunicarte* Programme, while training in Customer Centricity and Artificial Intelligence focuses on improving service and user experience, as well as training the workforce in the responsible and ethical use of these technologies, addressing key aspects such as digital transformation, process automation, and compliance with current regulations on AI.

Other programmes included in the 2025 Operational Plan have been the LGTBI+ Diversity Management Plan, which includes different measures aimed at guaranteeing respect for human rights and equality, as well as the *Aena Saludable* Programme, which promotes health and well-being at work.

Furthermore, within Aena's Corporate Risk Management System (CRMS), other measures include the *Plan de Sucesiones*, participation in remuneration studies, potential detection programs, and the Employer Branding strategy. These actions are aimed at promoting the identification, attraction, and development of key talent, offering employees the necessary tools and knowledge to adapt to an environment that is constantly transforming, and thus contributing to responsible, inclusive, and efficient management that favours the sustainable development of the Aena Group and the well-being of its workers.

Regarding Aena's legal nature, as a state-owned commercial company and a listed public limited company, it entails the application of certain regulations, among other matters, regarding the free hiring of personnel. The risks inherent in people management are recorded in Aena's risk map and are evaluated annually through Key Risk Indicators. Among these risks is the limitation in the planning and management of recruitment for the incorporation and training of new personnel with sufficient anticipation to ensure adequate generational replacement.

Regarding the characteristics of the Group's workforce, most personnel have an indefinite contract and work full-time. In terms of workforce organization, there is a wide catalogue of occupations, which are grouped into five broad professional categories: Senior Management, Executives and Graduates, Coordinators, Technicians, and Support Staff.

The entire workforce is composed of salaried personnel who work directly for the Company and does not include non-salaried workers (self-employed workers or those provided by companies dedicated to employment-related activities). However, some services such as passenger ground transport, security, cleaning, and passenger screening are outsourced to contracted companies. In these cases, the Aena Group does not maintain a direct employment relationship, nor does it exercise control over these workers. The management of the impacts that the Aena Group may have on these services is considered in chapter **S2**. For detailed information on the characteristics of the workforce, including breakdown by gender, contract type, working hours, and country, refer to section **S1-6**.

Within the framework of its commitment to responsible people management, the Aena Group ensures compliance with the most demanding labour standards in all its operations. In this regard, no operations with a significant risk of forced labour or child labour have been identified. Likewise, the health and safety of the workforce is a priority for the organization; for more information on the management of impacts related to this matter, refer to section **S1-3**.

S1-1: Policies related to own workforce

S1-1 17, S1-1 19, S1-1 20 (a-c), S1-1 21, S1-1 22, S1-1 23, S1-1 24 (a-d), S1-1 AR 10, S1-1 AR 11, S1-1 AR 13, S1-1 AR 15

Policies related to social areas are approved by the Board of Directors as the highest responsible level and apply to Aena (parent company) and any of the companies integrated into its group (Subsidiaries), under the terms established in Article 42 of the Commercial Code (the "Aena Group"). Subsidiaries domiciled outside Spain may make the necessary adaptations to the policies to comply with applicable local law.

Below are the policies adopted to manage positive impacts, negative impacts and material risks related to the Group's own workforce, which are publicly available on the [Aena's website](#), the [Aena Brasil's website](#) and the [United Kingdom's website](#).

The Aena Group:

Code of Conduct:

Approved by the Aena Board of Directors at its meeting on June 30, 2015, and subsequently last updated on May 27, 2025, this document establishes the ethical principles of action aimed at guaranteeing, among other aspects, compliance with human and collective rights, with a particular emphasis on the commitment to the public rights and freedoms recognized in national and international legislation, and, especially, with the principles established in the Universal Declaration of Human Rights. Through this Code, the Aena Group establishes the rules and principles that must guide the conduct of all its employees, regardless of their responsibilities or geographical or functional location, thus fostering a dignified and respectful work environment.

This Code applies to all levels of the organization, including members of the Governing Bodies, Senior Management, and in general, without exception and regardless of their position, responsibility, occupation, or geographical location, to all Aena Group employees (Covered Persons). In other companies in which the Aena Group participates directly or indirectly without having effective control over them, it will promote the adoption of codes of conduct through its participation in their governing bodies.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
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The persons affected by this Code are all stakeholders, including, internally, all Aena Group personnel. It also covers customers, suppliers, collaborating companies, investors, shareholders, authorities, public administrations, and the local communities in which it operates.

The Compliance Bodies of the Group's companies are responsible for the supervision, control, and evaluation of the correct functioning of the Aena Group's Regulatory Compliance Systems, and have, among other obligations, to promote knowledge and compliance with the Code of Conduct, interpret it and guide decision-making in case of doubt, as well as make proposals for its improvement as deemed appropriate.

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

The Aena Group promotes best practices in safety, health (both physical and mental), and well-being to safeguard the health of employees and facility users. Consequently, the Health and Safety Management System covers 100% of the Aena Group's employees.

This commitment is clearly established in the Policy on Integrated Quality, Environment, Energy Efficiency and Occupational Health and Safety Management, approved by the Board of Directors. This policy, applicable to the Aena Group, to all its employees, and to companies carrying out their activities at Aena, in accordance with current regulations, advocates for the systematic integration of health and safety management into the Company's regular operations. It ensures compliance with relevant legal requirements and other commitments undertaken in this area, including the participation of employees and their representatives in health and safety management, as provided for in applicable regulations. It prioritizes and integrates action plans with quantified objectives to address risks (from risk and hazard assessments to identify potential workplace harms). Furthermore, it establishes measures to increase awareness among key stakeholders and the commitment to inform employees and companies operating at Aena about their rights and obligations.

The Policy includes a series of specific objectives and actions, supported by the principle of continuous improvement, which is based on the participation and commitment of senior management, taking the Company's values and strategy as a reference. The document integrates the following principles and commitments aimed at accident prevention:

- **Active prevention and risk elimination:** committed to promoting occupational risk prevention by minimizing risks to safety and health at work. This commitment ensures a proactive approach to preventing accidents and occupational diseases, adopting safety measures that prevent incidents before they occur.
- **Safe and healthy working conditions:** the policy emphasizes the need to provide safe and healthy working conditions. This includes not only the implementation of physical measures and safety procedures but also continuous training and awareness-raising for personnel to reduce risks. The Aena Group makes significant efforts to create a work environment where health and safety are a priority in all operations..
- **Training and awareness:** the Aena Group ensures continuous training and awareness of personnel in occupational safety and health. Through training programs, the company seeks to equip its employees with the necessary knowledge to identify and manage risks, which strengthens the safety culture and reduces the likelihood of accidents.
- **Employee consultation and participation:** the policy highlights the importance of active consultation and participation of employees and their representatives in occupational safety and health matters in accordance with current legislation. The Aena Group encourages employees to participate in risk identification and the planning of preventive measures, promoting a collaborative safety culture. Furthermore, access to information on prevention means and measures is guaranteed for all personnel, which is essential for fostering a safe work environment.
- **Compliance monitoring and control:** the Sustainability and Climate Action Commission is the body responsible for supervising and committing to compliance with this policy.
- **Continuous assessment and improvement of the System:** the Aena Group is committed to conducting periodic evaluations of the management system to measure its performance and detect areas for improvement. This continuous evaluation allows the company to identify any deviations or risk areas, enabling an agile and effective response to maintain high standards.

In Spain, this policy serves as a guide for Aena's Occupational Risk Prevention Management System, which is also supported by the Manual, the Prevention Plan, and the Procedures and Instructions for occupational safety and health. These commitments are concretized in the 2021-2030 Sustainability Strategy, which considers comprehensive occupational well-being as a key area of action (Wellbeing). It is deployed through the Occupational Risk Prevention Plan and associated procedures, which are periodically reviewed.

It is important to highlight the awareness campaigns and the execution of periodic inspections, created by the Aena Joint Risk Prevention Service (SPMA), and the performance of legal audits by an Accredited Auditing Entity.



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Human Rights Policy

Approved by the Board of Directors on January 28, 2020, and amended on December 17, 2024, this policy, disseminated through the website, establishes the commitment and responsibility to respect and protect Human Rights, including fundamental principles such as equal opportunities, non-discrimination, occupational health and safety, and the right to collective bargaining.

Furthermore, it seeks to prevent contributing to any form of adverse impact on the Human Rights of workers, both in the prior and subsequent phases of its value chain, through its services and commercial relationships. The objective is to refrain from participating, in any way, in acts of abuse or violation, establishing the general principles necessary to ensure compliance with said commitment and responsibility.

Through this policy, the Aena Group establishes:

- The Company's main commitments and specific principles regarding human rights that may affect its labour practices, the services offered, and its relationship with the environment and the community.
- The Company's commitment to disseminating the Policy throughout its value chain, promoting that its suppliers, contractors, business partners, and other collaborating companies formalize their commitment to human rights.
- The mechanisms to ensure the effective development of the Policy, as well as for any third party to express their concerns or to address, report, denounce, and communicate behaviours or facts related to the non-compliance with human rights principles.
- The foundations to ensure its correct development, supervision, control, and review.

The scope of this policy extends to all subsidiaries integrated into the Aena Group, in accordance with the provisions of Article 42 of the Commercial Code. Likewise, the commitments assumed in this policy have a direct impact on all salaried workers of the Aena Group, as well as on customers, suppliers, and business partners.

This policy constitutes the basis upon which the creation of material positive impacts affecting the workforce is promoted, specifically:

- Promotion of a respectful and dignified working environment and work–life balance for employees.
- Recognition of the right to fair remuneration aligned with employees' training, experience, responsibilities and duties, in accordance with applicable regulations and legislation.
- Promotion of equal opportunities, inclusion, diversity, merit and capability for the professional development of employees.
- The Company undertakes to respect weekly working hours and employees' rest periods, in line with applicable labour legislation, and to facilitate the balance between work and family life.
- Promotion of fair and equitable remuneration, freedom of association, the right to organise and collective bargaining, and all other rights provided for by applicable regulations.

In relation to the link between policies and internationally recognized instruments, the Aena Group has adopted a comprehensive approach to ensure that its human rights policies are aligned with the principles contained in the United Nations Global Compact, the Guiding Principles on Business and Human Rights, the International Bill of Human Rights, and the covenants and protocols approved therein. In addition, it integrates the principles and declarations of the OECD Guidelines for Multinational Enterprises, and the ILO declarations, among others.

Sustainability Policy

The Sustainability Policy, addressed in more detail in the **“Environmental Policies”** section, establishes among its principles the respect and promotion of internationally recognized fundamental human rights, such as freedom of association, the right to organize and collective bargaining, the eradication of child labour, and the elimination of forced or compulsory labour. In this regard, the Company expresses its strong opposition to modern slavery, human trafficking, and any other practice that violates individual or collective dignity. Furthermore, the policy reaffirms the commitment to provide a safe and healthy work environment, based on equal opportunities and non-discrimination, promoting diversity, talent management, and work-life balance, with special attention to the needs of people with difficulties or special requirements.

Thus, the Policy constitutes the internal reference framework with which the Company reaffirms its commitment to creating long-term value for all its stakeholders, ensuring that its activity is carried out in accordance with a set of values, principles, criteria, and attitudes that promote sustainable social and environmental development.

Risk Control and Management Policy

This policy defines the process for identifying and mitigating risks, including material risks related to personnel. For more information on its content, and especially the minimum disclosure requirements (MDR-P), refer to section **GOV-5 of ESRS 2**.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
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Digital Disconnection Policy

In Spain, as a result of collective bargaining, the Digital Disconnection Policy has been developed, which is aimed at strengthening the right to work-life balance for all salaried personnel and improving their well-being. During 2025, this policy was reviewed and updated, with the new version being internally published in August 2025.

This policy includes fundamental guidelines and recommendations, among which the following stand out:

- Recognition of the right to digital disconnection through measures that support work-life balance.
- Establishment of rules for meetings, whether in person or virtual, outside working hours, except in cases of force majeure or urgent need.
- Promotion of the responsible use of digital tools.
- Digital disconnection is established as a right, not an obligation. Therefore, individuals who send emails outside the recipient's working hours must assume that they may not receive a response until the start of the next working day.
- Promotion and guarantee of the right to digital disconnection during holidays, weekly rest periods or between working days, and other non-working days such as personal leave, rostered days off, authorised leave, situations of incapacity, extended leave or licences, etc.

Among other issues, it is guaranteed that the practice of digital disconnection will not result in negative consequences for promotion or the imposition of disciplinary sanctions. In addition, digital disconnection is promoted through training and awareness activities aimed at protecting and respecting this right.

This policy contributes to the management of the material positive impact "Promotion of a respectful and dignified work environment and work-life balance for workers". To this end, its content is published on the Intranet, available to the workforce, so that they are aware of the proper use of electronic work equipment and usage times.

In the case of London Luton Airport, the Information Technology department has issued guidelines that address various aspects, such as procedures to follow in case of disconnection or frequent problems when working remotely. In addition, employees are encouraged to avoid checking their phones and emails outside working hours.

Remote Work Policy

The Remote Work Policy in Spain aims to determine the criteria for access and organization of this form of work, as well as to promote work-life balance, the well-being of employees, and operational efficiency. By offering the possibility of teleworking in positions where it is compatible with the functions performed, the policy promotes flexible working conditions, improves commitment, and talent retention. Likewise, it guarantees equal treatment, information security, and compliance with occupational risk prevention regulations, while maintaining productivity levels, collaboration, and service quality.

The first teleworking policy came into force on September 16, 2021, establishing six days of teleworking per month for remote positions, or two days and eleven afternoons, depending on the chosen modality. Within the framework of the implementation of the new Collective Bargaining Agreement, this policy was updated on August 1, 2025, improving what was agreed in the previous policy by extending an additional eight days of teleworking per year.

Policies and Plans related to Equality, Diversity and Inclusion

- **The II Aena Equality Plan in Spain**, negotiated within the Equality Joint Committee and approved by the Collective Bargaining Agreement Negotiating Committee on December 22, 2021, registered and recorded in REGCON by Resolution of the General Directorate of Labour on October 26, 2022. As mentioned above, this document aims to integrate the principle of effective equality between women and men, as well as non-discrimination based on gender, across all Aena's actions. This plan includes concrete measures on key areas such as selection and hiring processes, training, prevention of workplace and sexual **harassment**, work-life balance and co-responsibility, attention to victims of gender violence, occupational risk prevention, female underrepresentation, remuneration, and working conditions. Likewise, it includes its commitment to equality and non-discrimination as protected by the constitutional precepts of equality before the Law, without any discrimination based on birth, race, sex, religion, opinion, or any other personal or social condition or circumstance being able to prevail. Furthermore, among the antecedents of the principle of respect and equitable treatment, the Aena Group includes the general guidelines of the Code of Conduct related to people, such as the commitment to non-discrimination and equal opportunities, promoting equal opportunities in access to employment and professional promotion, rejecting any type of discrimination based on race, nationality, social origin, sex, marital status, sexual orientation, political ideology, disability, or any other personal, physical, or social condition of individuals.
- In 2025, within the framework of the drafting process for what will be its III Equality Plan, Aena carried out the qualitative and quantitative data analysis phases corresponding to the diagnostic phase. This diagnosis has served as the basis for defining the measures included in Aena's III Equality Plan in Spain, approved by the Negotiating Table on December 16, 2025, and sent to the corresponding body for registration. This III Equality Plan will be valid for 4 years, from January 1, 2026, to January 1, 2030.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
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- **LGTBI+ Diversity Management Plan**, agreed by the Equality and Diversity Joint Committee on February 28, 2024, and ratified by the Collective Bargaining Agreement Negotiating Committee. Its objective is to improve the inclusion of LGTBI+ individuals in the workplace, as well as to provide all workers with an instrument that allows them to prevent situations that may cause prejudice or discrimination. To this end, the Plan establishes measures and actions that contribute to the advancement of equal opportunities and are aimed at avoiding any discrimination based on sexual orientation, gender identity, and expression. In addition, a set of indicators has been established to periodically monitor the progress and impact of the proposed measures.
- **Aena Board of Directors ember Selection Policy**. This policy establishes diversity as a fundamental pillar for the selection and optimal performance of the Board of Directors, highlighting gender and age diversity as key factors. In addition, it details the criteria used in the selection of candidates, as well as incompatibilities for being part of the Board. It applies to all individual members of the Board of Directors, is supervised by the Appointments, Remuneration, and Corporate Governance Committee, and subsequently approved by the Board itself.
- **Aena Board of Directors Regulations**. It moves the discussion in terms of diversity and non-discrimination to the highest level of the Company, explicitly assuming the commitment to establish a representation objective for the less represented sex and to report on its evolution.

To guarantee the implementation of the commitments established in the aforementioned policies, the Aena Group has procedures that act as key tools to effectively prevent, mitigate, and address discrimination once identified.

- **Procedure for the prevention of and response to workplace harassment**. Its objective is to prevent workplace harassment behaviours and establish a clear protocol for action in response to complaints related to these types of situations.
- **Protocol for the prevention of and action against situations of sexual harassment, harassment based on sex, sexual orientation, sexual identity, or gender expression..** Like the previous protocol, its objective is to establish a clear procedure for situations of harassment, promoting equal treatment and non-discrimination, fostering inclusion through visibility.

In addition, the Aena Group has inclusive hiring practices for people from **vulnerable groups** supported by specific commitments. This is evidenced in the II Equality Plan, which aims to increase the representation of women and other underrepresented groups in key areas and positions within the Company.

In the United Kingdom - London Luton Airport:

Recruitment and Selection Policy

This policy aims to hire the most suitable candidate for the position following best practices and anti-discrimination legislation. London Luton Airport prioritizes internal recruitment to foster the professional development of its employees, and resorts to external recruitment only when suitable candidates are not found in internal searches, in accordance with the Recruitment Strategy Plan. This policy also gives priority to employees displaced by organizational changes or medical incapacity to access new positions. All recruitments are carried out in accordance with the Equal Opportunities Policy, ensuring a fair process free from discrimination based on race, gender, sexual orientation, religion, disability, age, or union affiliation.

Modern Slavery Statement

Defines London Luton Airport's commitment to combating slavery, servitude, forced labour, and human trafficking, implementing ethical practices in its operations and demanding the same standard of conduct from its suppliers, in order to prevent such abuses both in its business activities and in its supply chain.

Equal Opportunities, Inclusion and Dignity at Work Policy

This policy addresses and prevents any form of discrimination or harassment, through the **Disability Policy Statement** that guarantees the inclusion of people with disabilities, and with the **Equality, Diversity, and Inclusion Strategy** that includes initiatives designed to foster an inclusive work environment, especially for those groups facing a higher risk of discrimination.

Health, Safety and Wellbeing Policy

This policy is a version of Aena's policy, adapted to the local context of the country. This policy reflects the commitment to promoting a safety and health culture by the airport management, as well as fostering safety management for both employees and users of the airport facilities.

Aligned with the Policy, the Health and Safety Management System in the United Kingdom promotes the adoption of a proactive approach to safety culture, the establishment of open and transparent reporting practices, and continuous improvement. This system ensures effective health and safety management based on:

- Identification of hazards.
- Monitoring, measurement, analysis and improvement of performance.
- Compliance evaluation.
- Opportunities for continuous improvement.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
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- Performance analysis and assessment.
- Inspections.

The Health and Safety Management System is externally audited every 6 months in accordance with ISO 45001 standards and with the same frequency in accordance with ISO 45003 by the British Standards Institution (BSI) and internally twice a year, demonstrating the good maintenance of the system and the commitment to continuous improvement.

In Aena Brasil:

In the case of Aena in Brazil, in addition to adopting all Aena Group policies, it has a **Collective Agreement** that covers aspects such as gender, medical conditions, freedom of affiliation or union participation, and non-discrimination in employment decisions (such as hiring, promotions, or dismissals). It also guarantees equality in working conditions, including working hours, training, salary, and social security, and promotes non-discrimination based on race, ethnicity, nationality, social origin, religion, sexual orientation, family responsibilities (such as pregnancy), disabilities, political opinions, and age. In addition, it includes protection clauses for women against sexual harassment and domestic violence.

Monitoring and evaluation of policies:

The Aena Group is committed to ensuring that human rights values and principles guide all its practices, both internal and external, based on due diligence, transparency, and continuous improvement. To ensure compliance with the described policies, an impact assessment is carried out annually to identify areas of opportunity, and if necessary, documents are updated to adapt to changes in the regulatory or social environment.

Senior Management and the Board of Directors are responsible for overseeing all policies, ensuring that their application is consistent with the Aena Group's corporate strategy. At the operational level, there are other bodies responsible for promoting, guiding, and supervising policy compliance, as well as achieving established objectives and action plans, such as the Sustainability and Climate Action Commission, the Appointments, Remuneration, and Corporate Governance Committee, and the Audit Commission. Regarding the internal Digital Disconnection and Remote Work policies, they are reviewed and signed by the Organization and People Directorate and labour representation.

In addition, the Aena Group offers human rights training programs for all its employees to ensure that its commitments are integrated into the entity's operations, ensuring that Aena Group personnel are informed about the importance of human rights and the principles that guide the Group's practices.

S1-2: Processes for engaging with own workers and workers' representatives about impacts

S1-2 25, S1-2 26, S1-2 27 (a - e), S1-2 28, S1-2 AR 24 (a - e)

The Aena Group maintains continuous dialogue with its workforce, both directly and through their representatives, ensuring that the voices of all individuals are heard. In this way, the Aena Group complements its digital tools with a culture of open communication, visible in its physical spaces, such as the headquarters, designed to foster teamwork, energize the work environment, and stimulate creativity and innovation.

Over the past year, the Group has promoted direct internal communication between managers and their teams through the **Comunicarte Programme**, which offers strategies, resources, and tools to improve this communication. Interactions with personnel occur at various stages throughout the year, through collective bargaining, periodic meetings of Committees and working groups, as well as consultation sessions.

These meetings are held regularly, and different communication channels are used to ensure that information reaches all employees clearly and accessibly.

Among the different communication channels with Aena's workforce in Spain, the following stand out:

- **Employee portal in SAP SuccessFactors:** this portal, accessible from any web browser or mobile device, focuses on fostering communication and interaction among employees.
- **Intranet:** it includes more than 30 thematic portals, among them the Communication portal and the Organization and People portal. The intranet structure offers relevant, up-to-date information on the homepage, along with direct access to the most frequently used work tools.
- **Email:** used to inform about campaigns affecting all personnel or specific centres to which the communication is addressed.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
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- **Aena 360°:** this weekly newsletter compiles all news about Aena and the people who work in it. It is an open channel that includes a mailbox for receiving proposals and contributions from employees.
- **Independent local channels:** several airports have their own local channels to communicate with employees at their centres and, in some cases, their own intranets.
- **Employee surveys:** carried out to gather feedback from staff on various issues and to establish necessary actions to improve aspects arising from the responses received. For example, in Spain surveys have been conducted on communication quality and on equality and diversity.



Internal Communication Spain

Intranet

SAP SuccessFactors

Internal Publications - Aena 360°

Conecta2 Programme

Wellbeing 360°

Suggestions box

National trade union coordinator

Joint committees

Mailboxes and email

Whistleblowing channel

Working groups

Own channels (digital or analogue) in workplaces

In the United Kingdom, London Luton Airport has implemented a new platform that functions as an internal social network, facilitating communication among employees. This initiative is reinforced with weekly newsletters highlighting key messages, news, and surveys. Workers have the opportunity to join a union where they are represented. The whistleblowing channel policy is available to all employees and is communicated in the weekly newsletter; concerns raised through the whistleblowing channel are collected and reviewed/managed by Human Resources and the Legal department, and are reported quarterly.

Additionally, quarterly union meetings are held, as well as quarterly safety visits by the union representative with the Health and Safety team. Labour consultations are carried out on an ad-hoc basis depending on the nature of the activity, for example, restructurings. Risk Governance meetings are an opportunity for staff to raise concerns or potential risks for discussion/escalation as needed.

The airport also has the Safety Managers Leadership Alliance, for all airside stakeholder representatives to attend, participate, and engage; and the Service Chain Alliance, for all Terminal stakeholder representatives to attend, participate, and engage. Likewise, quarterly meetings are held for Well-being and Solidarity ambassadors who interact with colleagues, as well as meetings with airport management.

Regarding surveys, the Employee Engagement survey is conducted annually with feedback and follow-up actions. The Safety Culture Survey, Airside Safety Culture Survey, Safety Engagement Survey, Staff Travel Survey, and Equality, Diversity, and Inclusion Survey are also carried out.

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Internal Communication United Kingdom

Intranet

Yammer

Suggestions box

State Union Coordination

Email

Whistleblowing channel

Working groups

Newsletters

Informative QR codes

Webinar

In Aena Brasil, various channels have been developed to strengthen internal communication. These include *Aena Brasil Comunica*, the monthly communication on promotions and transfers between departments or locations called *Decolando*, the monthly communication of new employees called *Chegadas*, the *Estamos Conectados* Programme, and the monthly magazine *Aena Brasil 360º*, which provide relevant information periodically and in different formats to keep employees informed and connected. In addition, a workplace climate survey has been carried out. Continuous communication with in-house staff is maintained, and annual meetings are held with trade union representatives, followed by regular meetings until agreements are approved.



Internal Communication Brazil

Aena Brasil Comunica

"Estamos Conectados" Programme

Monthly magazine *Aena Brasil 360º*

In Spain, the management of labour relations and collective bargaining falls under the responsibility of the Organization and People Directorate, specifically the Labour Relations and Legal-Labour Advisory Directorate. On the other hand, in the regions of Brazil and the United Kingdom, the responsibility for ensuring effective interaction with their workforce lies with the Human Resources Directorates. In the case of London Luton Airport, the General Manager is the highest-ranking position with operational responsibility for ensuring that engagement with the workforce takes place and that the results underpin the company's approach. These units are responsible for facilitating dialogue and carrying out actions that reflect the perspectives and concerns of the workers.

Measures to understand workforce perspectives, including vulnerable groups:

In addition to the communication channels mentioned above, the Aena Group evaluates the effectiveness of its relationships with the workforce through various mechanisms that allow for understanding employee well-being. These measures include:



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
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- **Consultations and assessments:** Psychosocial risk assessments are periodically carried out, and the engagement index is measured using the experiences and perceptions of the workforce, to adjust practices as necessary. Both periodic psychosocial risk assessments and employee climate surveys ensure participation and confidentiality.

The results obtained are analysed and communicated to the workforce through dissemination emails or other channels, and to employee representatives for their knowledge. The results are used to adjust policies and practices, reinforcing the culture of well-being and inclusion in the Organization. Furthermore, the minutes of meetings between labour representation and the company are disseminated to the entire workforce by being published on the intranet.

In addition, a Diversity Group has been specifically created to foster an inclusive environment and establish a set of measures and resources to achieve equality in all Aena centres.

- **Training and awareness:** The Aena Group provides training to workers on diversity and inclusion, focusing on raising awareness about the difficulties faced by vulnerable groups.

- **Trade union representation:** Worker representatives, as well as members of joint committees and unions, communicate directly with workers to ensure that their concerns are addressed in collective bargaining.

In this regard, the LGTBI+ Diversity Management Plan has been negotiated through labour representation to establish the necessary measures to guarantee respect for the rights of these groups and avoid any form of discrimination.

- **People with disabilities:** The Aena Group supports the inclusion of people with disabilities, seeking to ensure that people with special needs have access to employment opportunities and support in the workplace, and promoting knowledge of the needs and opinions of people with disabilities. In Brazil, the creation of an internal inclusion committee is planned for 2026 to provide space for vulnerable groups and ensure their concerns are represented.

Likewise, Aena also takes into account functional and/or working hour adjustments due to reduced physical or mental capacity of workers through what is stipulated in the entity's own collective bargaining agreement.

These measures are supported by **global frameworks and agreements** that allow for considering the perspectives of the workforce:

- In Spain, the provisions on freedom of association and other rights of Aena workers are regulated through [Organic Law 1/2002](#) - Regulating the Right of Association, the [Workers' Statute](#) and the Collective Bargaining Agreement, which clearly establish the mechanisms of interaction that can be developed in collective bargaining.

- At London Luton Airport, United Kingdom, the framework is oriented towards complying with the country's legal regulations, following the Trade Union and Labour Relations Act, which establishes that every employee has the right to join and request the assistance of a union representative through Unite the Union.

- In Brazil, the Collective Agreement was signed by mutual agreement between the representatives of Aena Brasil and the workers through the National Union of Airport Managers (SINA), which addresses issues related to labour rights, including freedom of association or union activities.

The Aena Group has not identified any material impact related to its personnel that may arise from transition plans aimed at reducing negative environmental impacts and achieving greener and climate-neutral operations, including potential impacts that may arise due to the Company's initiatives to reduce carbon emissions, and that may affect the working conditions of the workforce.

S1-3: Processes to remediate negative impacts and channels for own workers to raise concerns

S1-3 30, S1-3 32 (a-e), S1-3 33, S1-3 AR 30

The Aena Group has established a series of processes and structures to ensure the protection of its workers' rights, all framed within a regulatory and ethical compliance model based on mutual respect and transparency.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
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In relation to the negative impact linked to the health and safety of workers, this includes individual cases affecting the safety and health of Aena Group workers derived from certain working conditions, such as exposure to extreme weather conditions and constant exposure to traffic lanes, among other factors. After analysing the exposure of all groups of workers, the company has determined that this impact, as in the case of other workers in the value chain, is only material for airside workers. On the airside, most of the exposed personnel belong to the value chain, mainly service providers, tenants, cargo companies, tour operators, and construction companies. However, a limited part of the own workforce also carries out its activity in this environment, particularly certain technical and operational profiles linked to airport operations, infrastructure and systems maintenance, airfield management, operational safety, and coordination and supervision tasks on the apron. These groups may be occasionally exposed to risks associated with airside conditions, although such exposure is subject to specific prevention and control measures.

Mechanisms to ensure the prevention and remediation of negative impacts on the workforce:

- **Regulatory Compliance System:**

This system allows for identifying, managing, preventing, and mitigating risks associated with non-compliance with applicable laws and regulations. In addition, it ensures compliance with commitments and obligations acquired through policies, training, and internal procedures, and facilitates the evaluation of the effectiveness of the measures implemented. In this way, the Aena Group can adapt and respond appropriately to the needs of its personnel.

- **Prevention and Action Protocols:**

The Aena Group adopts the Protocol for the prevention of and action against situations of sexual harassment, harassment based on sex, sexual orientation, and sexual identity or gender expression, which facilitates the reporting of harassment situations and establishes a process for investigating and resolving cases. In case of receiving a complaint of this nature, the aforementioned protocols are activated as elements to facilitate the remediation of impacts. These protocols ensure confidential reporting channels, rigorous investigation, and remedial measures, including psychological support and adjustments in the work environment. They are complemented by continuous training to raise awareness and prevent such behaviours.

In addition to harassment protocols, Aena has organizational programs and resources that reinforce prevention and comprehensive well-being:

- **Work-Life Balance Support Programme (PAC):** legal, fiscal, social advice, and support for personal and family well-being.
- **Collaborative Action Protocol:** conflict management and improvement of the work environment in teams with the participation of management and the social partners.
- **Emotional Support Programme:** specialized, voluntary, and confidential psychosocial support.
- **Programme for the Prevention and Treatment of Addictive Behaviours:** comprehensive intervention with specialized professionals.
- **Wellbeing 360° Space:** preventive culture and promotion of health, emotional well-being, and work-life balance and benefits, including the new section "Healthy Teams 360".
- **GoodHabitx platform:** online training in personal skills, positive leadership, and well-being.

These resources complement existing protocols and guarantee a comprehensive approach to preventing and remediating negative impacts, fostering an organizational culture focused on health, inclusion, and well-being.

- **Data protection and privacy of workers:**

The Aena Group has an Information Security Policy that identifies risks and commits to the proper treatment of data of all stakeholders, including personnel information. To ensure its correct implementation, it has specialized teams in information security and regulatory compliance. In order to evaluate the effectiveness of the processes, internal audits, impact assessments, and incident and response reports are carried out. In addition, continuous training is provided to personnel on data protection, fostering an organizational culture focused on information security.

- **Workplace climate surveys:**

These surveys allow for understanding employees' opinions on key issues related to human rights and working conditions.

- **Health and safety:**

Aena has implemented joint organizational structures that facilitate the active participation of workers in occupational safety and health matters, establishing formal communication channels that allow for the proactive identification of risks, consultation on changes that may affect occupational well-being, and effective representation on safety issues. These participation bodies hold regular meetings on some of the following actions: risk assessments, accident or incident investigations, and the development of preventive policies, ensuring that workers' concerns are heard and addressed systematically.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
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For the remediation of negative impacts, the Aena Group deploys comprehensive processes that include internal incident reporting systems with immediate activation of health surveillance protocols, exhaustive investigations to determine additional measures, and specific training programs aimed at mitigating future impacts. Complementarily, psychosocial evaluations through anonymous surveys and well-being conversations led by the management line allow for early detection of risk situations, establishing direct links with specialized occupational health services and assistance programs that ensure a comprehensive approach, both preventive and corrective, to identified needs.

Channels for communication concerns:

Workers have various channels to submit requests or complaints, such as the Group's own suggestion box available in both Spain and the United Kingdom, in addition to other channels described in chapter [S1-2](#), managed by the corresponding human resources unit at each workplace.

Likewise, in addition to direct management with personnel and to strengthen social dialogue, the Collective Bargaining Agreement in Spain establishes various Joint Committees that will be composed of representatives of the Company, as well as representatives of the Trade Union Organizations, with the purpose of collecting, transferring, and resolving the approaches and needs of the workforce. In Spain, some of Aena's committees that meet periodically to address these matters are the following:

- State Trade Union Coordinator
- Joint Training Committee
- Joint Promotion and Selection Committee
- Joint Equality and Diversity Committee (formerly known as the Joint Equality Committee)
- State Health and Safety Committee
- Joint Social Action Committee
- Committee for the Interpretation and Monitoring of the Collective Bargaining Agreement (formerly known as the Interpretation, Monitoring, Conciliation, and Arbitration Committee (CIVCA), until the entry into force of the Aena Group's II Collective Bargaining Agreement)

On the other hand, when a member of the workforce decides to file a complaint, they have different channels to report any human rights violation or express concerns related to their working conditions.

At London Luton Airport, there is a formally established Grievance policy for the management of labour matters. This policy adheres to the Advisory, Conciliation and Arbitration Service (ACAS) Code of Practice on disciplinary and grievance procedures, which ensures a fair, transparent, and structured process. The protocol begins by encouraging informal resolution, but if necessary, it allows the employee to file a formal complaint that triggers an investigation, which leads to a meeting to discuss the matter. Subsequently, a decision is made by the company and, finally, if the employee is not satisfied with the resolution, they have the right to appeal.

Additionally, at LLA, the Whistleblower Channel is available on the corporate website and its existence is reminded weekly in the internal newsletter.

In the specific case of Aena Brasil, the following complaint management mechanisms are available:

- *Cartão de Segurança* (Safety Card): Through the Internal Accident Prevention Commission (CIPA), a monthly commission is held where all airports elect their representatives. Employees have a QR code that allows access to the system from mobile, PC, or any device to add information about any issue related to evaluations of working conditions that are not in regulatory compliance. The information is received and managed through Microsoft Forms by the Health and Safety Coordination.
- Meetings with Human Resources: Monthly meetings are held with human resources managers, with a monthly agenda where suggestions and complaints are heard. Although there is no specific form yet like the one for Health and Safety, the new intranet will incorporate a local system where people can submit suggestions and complaints.

Detailed information on the monitoring and control of the issues raised and addressed, and how the effectiveness of these channels is ensured, is explained in section [G1-1](#). Additionally, section [ESRS G1-1](#) discloses how it evaluates that its own personnel know and trust these structures and processes as a way to raise concerns and needs, and how these are addressed. Furthermore, it concludes with a description of the policies in place and how they protect personnel from possible retaliation.



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S1-4: Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions

S1- 4 35, S1-4 37 (MDR-A), S1- 4 38 (a - d), S1- 4 39, S1-4 40 (a), S1-4 41, S1-4 42 (MDR-T), S1-4 43, S1-4 AR 43

Working conditions

The Aena Group, committed to employment stability and quality, implements measures that not only comply with current labour legislation in each country but are also designed to prevent, mitigate, and remedy potential negative incidents, while strengthening positive impacts in the work environment. In this regard, the actions described below specifically address aspects such as fostering a dignified and respectful work environment, the health and safety of workers, work-life balance, and limitations in recruitment planning and management.

Secure employment

In terms of employment and labour relations in Spain, the most notable event of fiscal year 2025 is the publication of a new conventional standard, the II Collective Bargaining Agreement of the Aena Group, effective since July 31, 2025. This new regulation, which represents the balance between improving working conditions and the need to respond to new business requirements, entails a comprehensive review of the most notable aspects of people management. Among the most relevant novelties, measures such as the following are included:

- Job provision processes: more agile mechanisms are regulated, which improve options for covering personnel needs and reduce temporary contracts, evidencing the company's commitment to promoting stable and quality employment.
- Operational continuity tools: existing mechanisms are updated to align with current needs, and new ones are regulated, serving as a complement and greater guarantee to avoid interference in the provision of the public service developed. Linked to this measure, 300 permanent jobs have been created, as reinforcement for operational personnel.
- Organization of work systems: corporate policies on remote work and digital disconnection are reviewed, as tools that contribute to the well-being of teams.
- Remuneration conditions: salary conditions are adjusted to current reality, compensating for achievements and contributions to employee objectives, and tools for revitalization and fiscal efficiency are incorporated, such as flexible remuneration, which entails benefits for workers who voluntarily subscribe to this regime. The agreement recognizes the work and dedication of each worker by establishing new productivity linked to annual objectives, as well as additional incentives to foster the involvement and commitment of the entire team.
- Union participation: the system of joint committees is reconfigured with the presence of employer and union representation, guaranteeing employee consultation and participation processes, through their representatives, in various aspects of human resources.
- Organize conferences or other initiatives that publicize the functions performed by other areas to improve interdepartmental collaboration and establish synergies.

All these novelties and improvements incorporated in the new Collective Bargaining Agreement strengthen the Company as a leading airport management operator and as an employer, increasing its levels of efficiency and effectiveness, while enhancing the commitment and well-being of the workforce.

Regarding employment security and social protection, the Group, in all countries where it operates, prevents negative impacts derived from income loss due to significant events such as maternity, paternity, or adoption, by guaranteeing the enjoyment of public benefits and in many cases complementing them with specific benefits that improve upon what is legally established. In addition, complementary benefits are offered such as private medical insurance, life and accident insurance, and programs such as the Work-Life Balance Support Program and the Wellbeing 360° Program. These resources prevent the deterioration of workers' health and well-being, mitigating situations of stress or vulnerability, and address personal needs through comprehensive advice and support. Gender-neutral parental leave promotes co-responsibility in care, favouring equality and better family conciliation. Breastfeeding rooms in airports and workplaces are a tangible example of measures that foster a respectful and dignified environment.

In Spain, the material risk related to limitations in Aena's recruitment planning and management is particularly influenced by its legal nature. As a public company in Spain, Aena is obliged to comply with applicable regulations regarding personnel recruitment, which can generate significant restrictions and limitations in the planning and management of personnel recruitment and in the incorporation and training of new talent with sufficient anticipation to ensure adequate generational replacement.



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This situation is exacerbated by the high number of people potentially eligible for retirement in the coming years. The analysis of the evolution of the workforce's age shows an upward trend in expected retirements between 2026 and 2030, with an increase of 57.5% between the beginning and the end of this period. This growth is not homogeneously distributed but is especially concentrated in the 2028-2029 interval, when a significant generational handover is expected. The main risk derived from this limitation is, therefore, operational, potentially affecting the continuity of services, and also reputational, if the quality and efficiency of the personnel are not maintained.

To reduce this risk, Aena defines a set of mitigating measures in Spain, included in the Corporate Risk Management System (CRMS), among which are the **Succession Plan** to anticipate replacement needs, the performance of **remuneration studies** to ensure competitiveness, the **Employer Branding Programme** to improve talent attraction, and the **Potential Detection Program** to strengthen internal promotion. Likewise, the review and updating of corporate policies are carried out, as well as the monitoring of compliance with associated operational procedures. Added to this is the specific selection procedure for management positions, as well as actions for the adaptation or modification of the labour regulatory framework, forming a comprehensive system that reinforces the capacity to incorporate and train new personnel.

Additionally, the new Collective Bargaining Agreement regulates personnel selection with more agile and dynamic processes, adapted to the organization's current and future needs. Likewise, this new agreement includes the possibility of launching personnel selection processes through training contracts to obtain professional experience in hard-to-fill occupations and where the incorporation of young talent is favoured through contracts for recent graduates, providing the organization with a tool that helps guarantee the personnel renewal that will be necessary in the coming years.

Aena is promoting a series of actions for the adaptation or modification of the labour regulatory framework, which allows for better planning and comprehensive management for personnel recruitment and adequate generational replacement. However, Aena's legal nature and the limitations and restrictions inherent in the applicable regulations regarding recruitment and resource management may condition the impact of the aforementioned measures and the mitigation of the identified risk.

Together, all these actions form a comprehensive approach that not only minimizes risks and impacts but also enhances opportunities to consolidate a sustainable, inclusive work environment committed to the dignity, equality, and well-being of all Aena Group workers.

Adequate wages

The Aena Group ensures fair and equal remuneration through its compensation model, based on the principles of pay transparency, equality, and non-discrimination. Beyond complying with current regulations and conducting financial controls, measures are implemented to promote equal treatment and opportunities between men and women in terms of selection, professional promotion, training, remuneration, prevention of gender-based harassment, as well as communication and awareness.

During 2025, the actions carried out ensured compliance with three objectives: timely payment of salaries to personnel, respect for remuneration conditions in accordance with applicable legislation and regulations, and maintenance of pay parity. Thus, 100% of payments were made on time, and salary increases were applied in accordance with current legislation and regulations. These results demonstrate the effectiveness of the measures adopted to promote the identified positive impact.

In Spain, to ensure proper management, monthly controls are carried out to verify that payrolls reflect the correct amounts, especially reviewing differences greater than €200 compared to the previous month (SCIIF Control AA-CN08-C05). The areas responsible for these measures are mainly the Organization and People Directorate, in charge of management, and the Financial Directorate, with additional supervision from the Internal Audit Directorate, which ensures internal control and financial transparency.

In Brazil, CIPA conducted a survey on the salary situation in 2025, the results of which were presented to the Human Resources Director and will continue to be presented to the other directors. The general conclusion indicates that Aena Brasil is at the average of the surveyed market.

Another relevant action has been the creation of a committee, which includes not only Aena Brasil employees but the entire airport community. Its function is to evaluate occupational risk conditions through monthly meetings, and they have started a pilot in two airports: Recife and Congonhas (the largest in Brazil), generating minutes and inspection records. Although the committee operates functionally, it does not yet have a formally described regime or established procedures with steps to follow.

The Aena Group's remuneration model ensures a living wage and compliance with social security contributions, applied uniformly for employees in Spain and Brazil, with variations based on the level of responsibility and achievement of objectives, but regardless of gender or age. At London Luton Airport (United Kingdom), an equal base salary is applied for men and women in all categories, regardless of age, which allowed it to once again obtain the Real Living Wage Employer Accreditation in 2025.

Social dialogue and collective bargaining

The Aena Group includes its commitment to the rights of freedom of association, unionization, representation, and collective bargaining in its Code of Conduct, Sustainability Policy and Human Rights Policy (based on the ILO Declaration on Fundamental Principles and Rights at Work).



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In Spain, after holding meetings during 2024 with worker representatives regarding the update of the I Collective Bargaining Agreement, on July 30, 2025, the **II Collective Bargaining Agreement of the Aena Group** was published in the *Boletín Oficial del Estado* (BOE) in Spain, as a result of dialogue, collaboration, and joint effort. Thanks to this, a balanced agreement was achieved, designed to respond to the needs and expectations of all individuals who make up Aena.

It should be noted that the regulation has a general scope over the entire Aena workforce in Spain. This agreement, which represents a true milestone in the management of labour relations, dedicates an entire chapter to the regulation of collective rights and union participation, in addition to other articles distributed throughout the text. Through these mechanisms, the concerns and interests of the workforce are channelled in an organized manner, which fosters a favourable and stable work environment, as well as equality, worker cohesion, and productivity, as it increases the commitment of workers who feel heard by the Internal Organization. This contributes to the promotion of the positive impact Promotion of fair and equitable remuneration, freedom of association, trade union rights, and collective bargaining".

In the United Kingdom, it is guaranteed that all Aena employees have the possibility to join and request the support of a union representative through Unite the Union. In this regard, in 2025, a review of compliance with the guidelines of the Advisory, Conciliation and Arbitration Service (ACAS) was carried out, which stipulate that union representatives must participate in any consultation related to significant changes in employment, in order to safeguard and protect labour rights.

Finally, Aena Brasil applies the Internal Regulations Manual, a document that materializes respect for the rights of freedom of association, unionization, and collective bargaining, as well as the commitment to maintain a respectful relationship with the union. In turn, Aena Brasil's Collective Agreement recognizes the right of assembly as a fundamental principle for workers.

Health and safety

In Spain, Aena's State Health and Safety Committee is the joint body for information, consultation, and participation in the company's actions regarding Occupational Health and Safety. It is composed of representatives designated by Aena and representatives of the workers. The Committee holds regular meetings to participate in hazard identification, risk assessment and control determination, incident investigation, development and review of Occupational Health and Safety policies and objectives, consultation on changes that could affect Occupational Health and Safety, and representation on Occupational Health and Safety issues.

Aena continues to develop, in Spain, the **Wellbeing 360 Programme**, applicable to all personnel, with the aim of promoting and fostering a preventive culture that encourages health, emotional well-being, and work-life balance. Within the framework of this program, webinars and publications are carried out to promote the health and well-being of its workers, conducting a total of 9 webinars in 2025 (8 in 2024), and 9 specific newsletters (40 in Aena 360 in 2024). Throughout 2025, the program has published monthly publications, such as:

Webinars, covering the following topics:

- 2024 personal income tax campaign.
- PAC – Social benefits and social resources.
- Prevention of cardiovascular diseases.
- Digestive health, allergies and intolerance.
- Endocrine health: Andropause and Menopause.
- Promotional video presenting the new well-being project.

Occupational risk prevention campaigns:

- Heat prevention.
- Psychosocial risk prevention.

Health promotion campaigns:

- Awareness session on skin cancer.
- Session on cardiovascular health.
- Flu vaccination campaign.
- Blood donation campaigns.

Taking advantage of the influence and visibility of airports, various illuminations have been carried out on the facades of their terminals. On the occasion of World Cancer Day, February 4, 2025, the airports of Valencia, Ibiza, Menorca, Girona-Costa Brava, Alicante-Elche Miguel Hernández, Bilbao, and Gran Canaria illuminated their facilities in green. This commemoration aimed to disseminate and raise awareness about cancer, the promotion of its prevention, detection, and treatment.



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Regarding medical services, in 2025, 6,742 health examinations were performed (6,561 in 2024), and trivalent flu vaccination was offered to 100% of the workforce, with a total of 1,074 vaccinations administered (1,253 in 2024), ensuring continuous monitoring of the workforce's health status. These examinations allow for the early detection of possible conditions and contribute to disease prevention.

Among the initiatives for promoting physical health, workshops on cardiovascular health stand out, aimed at preventing heart diseases through information on healthy habits and risk factors.

In parallel, psychosocial risk assessments are carried out, which include, among others, metrics for measuring stress and job satisfaction, whose results serve for the implementation of improvements and action plans aimed at ensuring the well-being, satisfaction, and motivation of workers. These assessments, managed by the Occupational Risk Prevention Service, through anonymous surveys, follow the F-PSICO 4.1 method of the National Institute for Safety and Health at Work. Topics such as workload, autonomy, psychological demands, and social support are analysed.

In Aena Brasil, addressing the identified material risk related to the impact on the safety and health of workers due to working conditions, a comprehensive occupational health management program has been developed that includes exhaustive monitoring of all own personnel based on the risk mapping carried out, incorporating mental health support, annual medical follow-up, and periodic well-being surveys. When workers are identified as ill due to activities related to the operation, a specific management and follow-up program for affected personnel is implemented, in collaboration with the company responsible for occupational health, which even covers situations not directly related to work problems, thus ensuring comprehensive care.

As part of its commitment to continuous improvement in occupational safety and health, and to effectively respond to this material risk, a general indicator per service centre unit (airports or corporate centre) has been established to monitor accident rates and set specific targets per workforce. This approach allows for differentiated management according to the characteristics of each operational unit. In addition, the legal requirement for accident communication is rigorously complied with through the CAT document (*Comunicación de Accidente de Trabajo*), which must be completed within established deadlines according to the severity of the incident (48 hours in serious cases) and once the investigation by the CIPA is concluded.

Aena Brasil's occupational health structure complies with the requirements of NR4, which determines the necessary staffing according to the number of employees, maintaining agreements with specialized companies to guarantee the adequate coverage of these services.

Additionally, also in Brazil, various prevention and well-being programs have been implemented to ensure the comprehensive health of employees. Among them, the **Wellhub Programme** stands out, a well-being platform that offers access to physical and health activities. Additionally, medical agreements are provided to guarantee quality healthcare, as well as psychological support to address the mental health needs of personnel, and dental health coverage, ensuring a holistic approach to worker well-being.

At London Luton Airport, the well-being of its staff is actively promoted through "well-being conversations" led by managers, designed to proactively identify any impact on employees. If needs are detected, a direct link is established with Human Resources, who can refer personnel to occupational health services or the **Employee Assistance Program (EAP)** for more specialized support.

In the event of an accident, it is reported through an internal system, and a notification is activated through health surveillance. A thorough investigation is carried out to determine if additional measures should be implemented, always complying with relevant legal obligations. To mitigate future impacts, specific training is provided. It is worth noting that the occupational health department also offers services such as physiotherapy.

In addition, specific events dedicated to physical well-being and comprehensive health are organized. In September, the LLA Fest event is held, dedicated to well-being, where employees can participate in physical and health activities with their families, promoting an active lifestyle. Additionally, "Women's Health Month" in October and "Men's Health Month" in November are organized, with the purpose of raising awareness about gender-specific health challenges and promoting prevention through activities, informative talks, and health assessments. Regarding actions to improve the well-being and mental health of its employees, it has the Wellbeing program, which promotes:

- Training in mental-health first aid.
- Creation of a Wellbeing Strategy Planning Group, which designs programmes based on needs/risks identified through surveys, stress assessments, absence data, occupational health information and current external impacts.
- Webinars focused on mental health.
- The #LetsTalk campaign, which encourages employees to share their well-being-related experiences.

Working time and work-life, personal and family balance

Work-life balance is key to the well-being and satisfaction of the own workforce, which directly impacts their commitment, work environment, and talent retention. Conditions for flexibility, leaves, licenses, and work-life balance measures are regulated by current labour legislation in each country and the Aena Group's collective bargaining agreements. However, the Aena Group goes beyond regulatory requirements, implementing initiatives that promote a balance between professional and personal life, such as paid leave, flexible working hours, and specific aid for employees.



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The Aena Group promotes various initiatives aimed at fostering work, personal, and family conciliation, as well as flexible working time management. Shared measures include:

Flexibility and working hours

- Flexible start and finish times.
- Possibility to adjust or reduce working hours, especially for employees with family responsibilities.
- Intensive or adapted working hours during certain periods (such as summer).
- Possibility for shift personnel to change shifts.

Leave and licences

- Granting of leave for birth (maternity/paternity), adoption or fostering, in accordance with or exceeding local regulatory requirements.
- Leave for bereavement or relocation, with extensions depending on the degree of kinship or distance of the move.
- Paid leave for personal matters, breastfeeding, birth of premature or hospitalised children, and attendance at examinations.
- Parental or emergency leave, including periods longer than those legally required.

Holidays

- Guarantee of full enjoyment of the allocated holiday entitlement, including additional days beyond legal requirements and/or seniority-based days.

Benefits and well-being support

- Private medical insurance for employees and, in some cases, the possibility to extend coverage to family members.
- Well-being, inclusion and prevention programmes and resources.
- Confidential assistance services providing personal, psychological and/or legal guidance to employees and their families.

In addition to the common measures, in Spain additional actions are applied to support work–life balance and employee well-being:

- One additional day of holidays for every five years of service, starting from 20 years.
- Leave for marriage or registration of a civil partnership.
- Leave for serious illness or hospitalisation of relatives and accompaniment for invasive diagnostic tests when required by medical prescription.
- Unpaid leave of up to one month in the event of the death of a spouse, civil partner or child.
- Leave to undergo assisted reproduction techniques during working hours, leave for prenatal examinations and childbirth-preparation techniques, or equivalent preparation in cases of adoption.
- Leave to attend medical appointments during working hours.
- Two hours of daily flexibility for employees with children with disabilities equal to or greater than 33%.
- Possibility of functional and/or working-time adjustments due to reduced physical or psychological capacity.
- Adjustment of working hours or the workplace during pregnancy and breastfeeding periods.
- Leave for reasons of force majeure or special situations.
- Possibility of teleworking, with the maximum number of teleworking days increased in 2025 by eight additional days per year, in addition to the six monthly days already established in the previous policy.
- Digital disconnection, which contributes to improved work–life balance and employee well-being.

Additionally, to ensure compliance with working hours and to guarantee that limits on working time, breaks, and overtime are respected, Aena maintains a daily record of its employees' working hours. For this purpose, a time registration system is available, both in physical offices and on the intranet. This system allows workers to consult their daily movements and extract a detailed history.

Within the framework of compliance with Flexible Working Regulations and the 1996 Employment Rights Act, Aena in the United Kingdom extends its commitments through:



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- Five additional days of holidays above the legal requirement.
- Emergency parental leave of up to five days, exceeding legal requirements.
- Family private medical insurance through BUPA.

In accordance with the Collective Agreement of the Aena Group's airports in Brazil, specific measures are established such as:

- Reduced working hours for pregnant women.
- Complementary benefits such as dental insurance and life insurance, in addition to medical insurance.

In Spain, additionally, the **Wellbeing 360 Programme** stands out, applicable to all Aena personnel, which fosters a culture of prevention, health promotion, emotional well-being, and work-life balance. This program includes the **Work-Life Balance Support Programme**, which offers basic and specialized resources to promote family and work-life balance for workers and their first-degree relatives. Available services include advice on vital protocols (such as chronic illnesses or births) and support in legal, fiscal, financial, social, and personal well-being areas. In 2025, 5,212 uses of the Programme's services were registered (4,213 in 2024).

Additionally, Aena in Spain has a **Social Action Program**, regulated by the current Collective Bargaining Agreement and managed through the Joint Social Action Committee. This program acts as a preventive mechanism by addressing various personnel needs, such as educational expenses, family conciliation, health, and disability, which foster staff motivation and improve the work environment. Likewise, by offering direct financial aid, negative impacts associated with personal and family difficulties are mitigated, thus remedying situations that could affect employee productivity and well-being. As a result, the program promotes a respectful and dignified work environment and encourages work-life balance, directly contributing to the identified material positive impact in this area. This is evidenced by high staff satisfaction and the significant volume of aid provided, amounting to over 12,000 with an investment of 1.58 million euros in 2025.

Regarding employees' retirement options, in addition to ordinary retirement, the current Collective Bargaining Agreement also establishes the option of voluntary and early retirement, as well as partial retirement. For all those who retire, Aena has developed a comprehensive retirement transition program in Spain, as a preventive measure to anticipate and manage the challenges associated with this life stage. This program, reactivated through the Talent, Diversity, and Well-being Directorate, mitigates possible negative impacts related to adaptation to retirement and offers tools for a planned and satisfactory transition, addressing uncertainties and promoting the well-being of senior staff. Likewise, this program contributes to the orderly transfer of institutional knowledge, critical for mitigating the operational risk derived from limitations in skill renewal. The program includes retirement preparation workshops that address financial, emotional, and planning aspects of the new life stage. Specialized financial advice is provided on pension optimization, savings management, and post-retirement expense planning, ensuring that employees have the necessary tools for a secure economic transition. In the emotional sphere, psychological support is offered to facilitate the change in professional identity and adaptation to new routines, recognizing that retirement represents a significant change in people's lives. Likewise, knowledge transfer programs through mentoring are implemented, allowing personnel nearing retirement to transmit their experience and institutional knowledge to their successors, ensuring organizational continuity and valuing the contribution of senior employees. This comprehensive retirement transition program reflects the Aena Group's commitment to the well-being of its personnel at all stages of their working life, recognizing the valuable contribution of senior employees and ensuring that their departure from the Company is dignified, planned, and respectful.

Equal treatment and opportunities for all

The Aena Group promotes equal opportunities, diversity, and inclusion as strategic pillars for the professional development of its workforce, contributing to the positive impact "Promotion of equal opportunities, inclusion, diversity, merit, and capacity for the professional development of workers". The Group takes into account its employees' opinions on equality through anonymous and confidential surveys, whose purpose is to understand the perception of employees who wish to participate regarding various aspects related to equal opportunities in the workplace, as well as their vision of diversity management within the Group.

Below are the main actions implemented in 2024 and 2025, organized by region:

In **Spain**, Aena annually funds **High Specialization Programmes**, with the objective of achieving at least 50% female participation. In 2025, this objective was met, achieving 50% women (64% in 2024). Additionally, in 2025, 3 women participated in the **"Promociona"**, **"Progres"**, and **"Proactiva"** Programmes (3 in 2024), boosting female presence in senior management.

Furthermore, the **"Comunicarte"** Programme, initiated in 2024, has continued with the aim of improving the communication skills of personnel in positions of responsibility. This program favours the professional development of women, focusing on female managers/middle management within the company. In this regard, in-person training has been provided on team cohesion and alignment, as well as online training on active listening, how to give feedback, and how to develop a mindset for change.



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During fiscal year 2025, priority was given to the incorporation of women into underrepresented positions such as Maintenance and Science, Engineering, Technology (SET). To this end, job offers were disseminated in universities, professional associations, and educational centres, attracting female talent. These actions aim to consolidate the Aena Group's presence in forums, institutes, universities, and fairs to attract women and young talent to strategic roles.

The Joint Equality and Diversity Committee supervises the effectiveness of the implemented actions and monitors compliance with the established goals (described in section **S1-5**). Among the initiatives on equality, diversity and harassment prevention are:

- **“Embajadores de marca y diversidad” Programme:** involves employees who embody the corporate identity and identify with its culture, purpose, and value proposition, helping to disseminate them to highlight Aena's strengths and improve its attractiveness in the field of professional development, both internally with all employees and externally with clients and the general public. During 2025, brand ambassadors participated in several initiatives, held in various geographical locations, disseminating the value proposition as Aena employees in Spain. In this regard, they participated in cross-cutting internal dissemination projects as ambassadors of the **Innova Programme**. Currently, the number of Ambassadors is 216, of whom 107 are women and 109 are men (153 in 2024, 82 women and 71 men). This initiative is framed within the **Employer Branding Programme**, aimed at attracting and retaining talent by fostering a sense of belonging and pride, participating annually in job fairs at universities, training centres, as well as chambers of commerce and other institutions, to promote job vacancies and publicize the company's different job opportunities. The ambassador's activity helps generate a positive impact on the Employer Brand, and therefore, on talent attraction. In this framework, in 2025, 36 job fairs were attended (33 in 2024) in different geographical locations, and it also has 33 collaboration agreements with Universities (33 in 2024) and Educational Centres for academic or training internships, with a total of 119 students during 2025 (108 in 2024).
- Within the framework of the situation analysis carried out for the closure of the **II Equality Plan** and preparation for the elaboration of the **III Equality Plan**, a survey on equality and diversity was conducted in October 2025. This aims to gather the opinion of workers on Aena's policies and actions regarding equality and diversity, as well as to assess whether equitable treatment between men and women is perceived. It should be noted that, according to the results, most respondents consider that in Aena there is equal treatment and opportunities between men and women, especially regarding access to training, promotion systems, and equal pay.
- Dissemination of job selection process calls in associations of women victims of gender violence, as well as carrying out awareness actions through the publication of articles or the illumination of airports on significant dates.
- Regarding **harassment prevention**, we periodically disseminate the Protocol for the prevention of sexual harassment and/or harassment based on sex, sexual orientation, and sexual identity or gender expression. Likewise, we include said protocol in the information provided to new hires.
- Equality **training** programmes offered to 100% of the workforce; including awareness actions on harassment and diversity, which contributes to an inclusive and respectful work environment. These trainings include: inclusive and non-sexist language, equality in selection processes, prevention of and action against sexual harassment and harassment based on sex, and the elimination of biases.
- **Awareness and Visibility Actions.** During 2025, a specific section "*Contamos por igual*" was periodically published in the newsletter with interviews with professional women from Aena in Spain, about their role in the company, their experience related to equality, parity, the organizational model, and Corporate Social Responsibility, being another way to give them visibility.

In addition, participation has been made, among others, in the following **events**:

- Publication in the newsletter of a special feature for 8 March (International Women's Day), as well as the holding of the event "*Contamos por igual: contexto de la igualdad de género en the Aena group*".
- 12th Summit of Women Jurists of the Madrid Bar Association.
- Celebration of international days such as the International Day of Women and Girls in Science.
- Participation in the "*Muy Scient Fes*".
- Participation in the event "*Visibles*", aimed at women in male-dominated professions.
- Attendance at various roundtables on equality, in which professional women represented the Aena group.
- Participation in the fifth edition of the "*Mujeres Tech*" session organised by Womenalia on the occasion of International Women in Technology Day.
- Participation in the event "*Yo soy ingeniera*", organised by Womenalia on the occasion of International Women in Engineering Day.
- Attendance at the "Women of the Year" gala organised by Glamour Spain magazine to receive the "Leadership" award granted to our Chief Commercial and Real Estate Officer.



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- Lighting of airport facilities with coloured lights to enhance the visibility of International Women’s Day, World Breast Cancer Day and the International Day for the Elimination of Violence against Women.

Actions related to the LGTBI+ community have also been carried out. In 2024, the **LGTBI+ Diversity Management Plan** was launched, aimed at improving the inclusion of LGTBI individuals in the workplace. Throughout 2025, the following objectives were achieved in the development of the Plan:

- Creation and dissemination of a video to introduce the LGTBI+ Diversity Group.
- Celebration of the first LGTBI+ Diversity Corner to reinforce the idea of Aena as an inclusive space where people can express themselves freely. The event was very well received. As a result of this event, the number of members of the Diversity group grew significantly.
- Illumination of airports with the colours of the rainbow flag, and inclusion of these colours in the dissemination of Aena 360 news on the occasion of Pride Day.
- Publication of a series of articles on Gender Diversity topics: LGTBI+ in sports, international bisexuality day, international non-binary visibility day, etc.
- Participation in events organized by REDI (Business Network for LGTBI Diversity and Inclusion), to promote respectful, inclusive, and safe workplaces, guaranteeing equality regardless of identity, sexual characteristics, gender expression, or sexual orientation.
- Awareness actions: International Day Against Homophobia, Transphobia, and Biphobia, to raise awareness about the discrimination and abuse still suffered in our society by homosexual, transgender, and bisexual people (LGBTI). Pride Day (LGTBI+ Diversity Corner, "LGBTI D&I Awareness for the Workforce" Workshop, given by REDI), International Bisexual Visibility Day, and International Intersex Visibility Day.

As a result of the actions described, in Spain, Aena has achieved various **milestones and recognitions** in 2025:

- **Best Company For All Talent 2025 Award.** This award recognizes companies' commitment to the development of all talent, with special attention to female talent and diversity. It is granted by *Equipos y Talento* magazine, the reference medium in Human Resources aimed at managers in this field, Selection, Training, and People Management of the best companies in the country.
- **Honorary Mention for Equality.** Within the framework of the XII Summit of Women Jurists, the Illustrious Bar Association of Madrid has awarded Aena the Honorary Mention for making equality "an essential principle of its structure and culture". In a historically masculinized sector, Aena has shown that female leadership is not an exception, but a possible and necessary norm.
- **Empowering Women Talent.** Aena has been recognized for the second consecutive year for its commitment to equality and the promotion of female talent. *Equipos y Talento* is a long-standing association that promotes training, development, and the exchange of good practices that recognizes Aena's commitment to becoming and developing as a reference employer.
- **Europe's Best Employers 2025 by the Financial Times.** Aena has been included in the Financial Times' list of Europe's Best Employers 2025, ranking 265th (out of a thousand), and 10th among the 33 Spanish companies. The list is compiled through an independent survey among a broad sample of employees from companies with at least 500 workers within Europe, which allows for a representative sample of the workforce employed by large organizations in each country.
- **2025 Top Employer Spain Certification.** Which recognizes Aena as one of the best employers. This certification, granted by the Top Employer Institute, recognizes companies committed to achieving the highest standards in people management. The Top Employers Institute certification is a global benchmark for excellence in good practices that recognizes Aena's commitment to becoming and developing as a reference employer.
- **Merco Talento.** Aena has been distinguished as a leading company in its sector (infrastructure, services, and construction) in attracting and retaining talent, according to the *Merco Talento* Spain 2025 ranking. The company ranks 37th in the general classification prepared by *Merco*, the reference corporate reputation business monitor in Spain and Latin America.
- **Ranking of companies for equality granted by Woman Forward 2025 (18th position).** Recognition of organizations for their commitment to gender equality in the business environment.
- **In 2025, Aena carried out the required actions to maintain the Equality in Business (DIE) distinction obtained in 2023.** This distinction implies a constant effort, as distinguished companies are periodically evaluated to ensure that they continue to comply with the equality standards that motivated its concession. In addition, this implies the integration of Aena into the DIE Network in Spain, a platform that facilitates interaction between distinguished organizations and the Women's Institute, promoting the exchange of good practices and tools in terms of equality.

Regarding **London Luton Airport**, the following actions have been carried out:



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- LLA has joined the Aviation Industry Skills Board (AISB) with the **“Classroom to Careers” Skills Development Programme**: these are development opportunities and employment pathways for local young people, through essential skills workshops delivered by LLA employees and an environmental education program aimed at primary school children in the area.
- A learning program was launched that currently offers opportunities in Customer Experience, Health and Safety, Commercial, Digital Marketing, and Sustainability for over 18s residing in LU1 – LU4 postcodes.
- The Business Commitment "Vision for Literacy" to improve literacy levels in the United Kingdom. The National Literacy Trust was announced earlier this year as one of LLA's two new charity partners, along with Tokko Youth Hub, a charity dedicated to supporting children and young people in Luton. Both partnerships will aim to provide skills development opportunities and learning interventions throughout students' school careers.
- LLA Book Exchange: promoting well-being and literacy through a book-exchange programme.
- Support for various well-being events, such as men's and women's health month, recognizing and celebrating various events from various religious calendars, fostering conversations about mental health and well-being, as well as menopause; offering support to employees with care responsibilities, supporting the LGBTQ+ community through pride month, celebrating LSE (British Sign Language) speakers.
- In addition, a variety of resources are offered on the intranet to encourage employees to reflect on what diversity means to them and how this can be reflected in our ways of working.
- An ED&I (Equality, Diversity, and Inclusion) survey was also launched in 2025 to collect employee demographic data; the survey is currently voluntary, and employees are under no obligation to complete it.

For its part, Aena **Brasil** has carried out the following actions:

- International Women's Day has been celebrated, exceeding sector figures for women hired, with more than 38% of women in the workforce and 16% in the infrastructure sector.
- The **Inclusive Leadership Training Programme** has been developed, offered to directors, managers, coordinators and specialists.
- Awareness actions on **Gender Equality** have been carried out, such as the women's month campaign, which sought to show recognition for women's work. It has exceeded the target of 25% women in its workforce, established by the International Air Transport Association (IATA) to be achieved by 2025. In 2024, the percentage of women in the Brazilian workforce already reached 37%, and in 2025 it was 38.55%.

Furthermore, within the framework of Aena Brasil's 2024-2040 Sustainability Strategy, the following lines of action for the **Social Commitment Programme** have been established:

- Diversity and inclusion: Establish structured guidelines, committees, and practices to promote diversity and inclusion throughout the organization, with the main objective of reaching 50% women in leadership positions by 2040.
- Professional career development: Align sustainability, ESG, development, and career planning with Aena Brasil's objectives.
- Work-life balance and motivation: Stimulate balance, commitment, and well-being with structured management, ethical leadership, mental health, occupational safety, and continuous social responsibility, seeking a score of 9 in the climate survey with 90% engagement and voluntary turnover below 5% by 2040.
- Customer satisfaction: Structure sustainable policies and continuous management for excellence in customer relations, with the aim of increasing customer satisfaction to 8.75 and having an NPS greater than 85 in accessibility by 2040.
- Develop a sustainable culture: Promote inclusion, local development, sustainability, transparency, and respect for human rights, involving stakeholders and increasing development programs and outreach campaigns by 2040.

Training and skills development

S1-4 37, S1-4 38 (c), S1-4 38 (d)

The Aena Group promotes the professional development of its workforce through strategic initiatives that strengthen competencies, foster cultural and digital transformation, and promote equality and talent retention. These initiatives include development programs (coaching, mentoring, leadership, digital transition, cultural education, etc.), which cover all employees, including those on part-time or temporary contracts.

From the Aena, in Spain, the following initiatives have been carried out:

- **New training pathways** that contribute to cultural and digital transformation.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

- **Potential management programmes:** development of Career Plans and improvement of the Key Position Succession Plan. In this regard, during 2025 the **"Personas 4.0"** potential-management Programme has continued, with the completion of in-person Assessments, totalling 7 editions (30 in 2024) for 56 employees (224 in 2024).

Among the training provided by the Aena group for employees, the following stand out:

- **Equality Training:** throughout 2025, 1,043 people participated in training programs on equality between men and women (8,344 until 2024); of these, 251 people (585 in 2024) completed the course "Equal opportunities between women and men" this year. All new hires at Aena in Spain receive an invitation to this course. In Brazil, there is no structured training as such, but talks with external speakers on this subject are organized.
- **Core business development:** in relation to maintaining leadership in safety and efficiency, a catalogue of courses is available that contribute both to the technical training of the workforce for the correct performance of their duties, and to the promotion of airport and operational safety.
- **High Specialisation Training Programmes:** designed primarily for management positions, taught by prestigious business schools such as IESE, ESADE, IE, and various universities. In 2025, 6 executives participated in these programs (18 in 2024), focused on the development of management skills.
- **Compliance:** courses to ensure compliance with current legislation, internal regulations, and the observance of best ethical and business practices in the development of Aena's activities and businesses.
- **Sustainability:** courses to improve energy efficiency, reduce the carbon footprint, and implement the BREEAM certificate in buildings. Waste and water management, investment in R&D&I, environmental legislation, and occupational safety courses, among others, are also addressed.
- **Innovation, technology and digitalisation:** specific training plan to promote digital transformation towards agile methodologies, covering both technical and behavioural training, aimed at various Aena teams. In Brazil, there is no established training in Innovation, while Artificial Intelligence training is only available to collaborators of the Legal Advisory Directorate.
- **Cybersecurity and ICT:** promotion of safe use of information and communication technologies.
- **Customer Orientation:** training actions focused on contributing to improving the passenger and user experience, and knowledge of airport culture.
- **Development of behavioural skills:** training to improve team skills, focusing on communication, proactivity, emotional intelligence, and teamwork. In this regard, the following programs stand out: *"Comunicarte"* Programme and Customer Centricity Programme.
- **Sexual harassment, Health and Safety:** training actions aimed at promoting a preventive and responsible culture against general and specific risks in the workplace.

The Aena Group conducts annual **performance evaluations** of its workforce, with the aim of aligning individual, team, and corporate objectives with the Company's overall results and strategy. This measure seeks to strengthen the individual capabilities of workers and optimize team performance, promoting their personal and professional growth.

Regarding the promotion of personal and professional growth, the following programs stand out:

- **Coaching Programme:** a creative transformation process, based on the reflection-action cycle, to boost the potential of behavioural competencies and improve professional performance. It is based on a personalized non-directive methodology, based on dialogue, which enhances self-knowledge, self-confidence, self-motivation, independence, and the responsibility of the coaches. Team processes are fundamentally focused on improving the cohesion of their members and energizing their functioning (vision, communication, interaction, leadership, role alignment, change and conflict management), to improve team performance, taking into account its starting situation. This program began in 2007 with external coaches, and since 2011, we also have internal coaches, who perform their function with deontological codes and common procedures. In 2025, 23 people participated (20 people in 2024), of whom 39% are women (25% in 2024) and 61% men (75% in 2024). The average satisfaction in this fiscal year is 7.8 (7.81 in 2024), on a scale of 0 to 8.
- **"Líderes desarrollando líderes" Mentoring Programme:** promotes knowledge management, cultural transformation, and networking, through the accompaniment of experienced professionals for career development and critical competencies. The objective is to transmit experience and know-how, foster collaboration and connection between different areas, develop talent, facilitate adaptation to roles of greater responsibility, and enhance critical competencies in mentees. Until 2025, 327 people have participated as mentors or mentees (304 until 2024), of whom 142 are women (131 until 2024), representing 43% (43% until 2024). Of the people incorporated into the program in 2025, women represent 48%. The evaluated satisfaction level reaches 3.9 out of 4 in the 11 editions fully completed and evaluated to date.

The Aena Group has implemented non-traditional mentoring approaches:



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
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- **International Reciprocal Mentoring:** This innovative program, launched in 2024 to promote the integration of international subsidiaries (Brazil and London Luton Airport) with the Aena parent company in Spain, seeks to foster mutual knowledge between units starting with critical positions, integrate multiculturalism between Spain, the United Kingdom, and Brazil, generate relationship and understanding links between key people who radiate a positive attitude towards the different business groups, and enrich the experience and vision of those who participate. The pairs are made up of a top-level person from Brazil and a top-level person from Spain, as well as a top-level person from London Luton Airport and another of a similar level in Spain. In the completed processes, the overall program evaluation is 3.75 out of 4, with a high degree of personal satisfaction and understanding among participants. In 2025, the program continued with the launch of two new Spain-Aena Brasil editions (6 pairs) and a new Spain-London Luton Airport edition (two pairs). The total number of people incorporated into the program in 2025 was 16, which are added to the 8 incorporated in 2024, totalling 24 participants in the program until December 2025.
- **Cross Mentoring:** connects mentors and mentees from different companies in different business areas. Two editions of Cross-Mentoring Programs have been developed: "The leaders of the future" and "Empowering Women Talent". In 2025, participation in both initiatives was maintained with 1 mentor-mentee pair in the first and six mentor-mentee pairs in the second: 14 people in 2025. The purpose of these programs is to boost female talent and promote the incorporation of women into management positions, so all mentees in these programs are women.
- **Reciprocal Mentoring between directors:** connects a director with extensive experience at Aena with a newly appointed director, preferably from different functional areas. The program aims to facilitate the integration of the newly appointed person and enrich the vision of the expert at Aena. In 2025, two pairs (4 people) were incorporated.

In relation to actions concerning its own personnel, the Aena Group monitors and evaluates their effectiveness through a comprehensive approach. Firstly, meetings are held with the corresponding joint committees to evaluate the implementation of policies and plans, which facilitates the identification of areas for improvement and ensures that the measures adopted are producing the expected results. Additionally, periodic reports are generated detailing the results of the actions undertaken and analysing the evolution of results by calculating specific KPIs, which allows management to evaluate the impact of the initiatives and make necessary adjustments, based on feedback obtained from employees. All these initiatives require the allocation of operating expenses (OpEx) for their execution and are included in Aena's budgets.

Among the examples of monitoring the effectiveness of actions, the Aena Group conducts surveys among its employees where it records the level of trust and perceived well-being. Throughout this process, worker representatives are involved in the evaluation of these initiatives, ensuring that the concerns and suggestions of the workforce are considered in decision-making. In Spain, during 2025, surveys were carried out across the entire workforce on team communication and on equality and diversity. The communication survey's main objective is to identify areas for improvement in internal communication, to design actions and establish action plans that help achieve more effective and fluid communication, both within teams and between different teams, as well as to detect strengths to enhance them. All of this is based on the conviction that improvements in communication result in greater satisfaction and emotional well-being of employees, aspects directly linked to maintaining a respectful and dignified work environment. As a result of the findings and analysis of the previous edition of this survey, conducted in December 2024, an action plan integrated into the second phase of the **"Comunicarte" Programme** was established during 2025, whose actions are summarized as follows:

- Deepen discussions during team meetings on strategic issues, new projects, sustainability, innovation awards, etc., and on compliance matters, to increase awareness in this regard.
- Place greater focus on communication between teams from different functional areas within the same directorate or between different areas of the same centre/airport, organizing meetings in which another functional area can participate, with the aim of broadening knowledge about the functions and projects of other areas and thus improving interactions and cooperation between them.
- Conduct, by team leaders, periodic individual or collective meetings, sharing their knowledge and experience, as well as supporting and getting involved in the development programs of their collaborators, promoting their participation in forums, training, events, committees, external meetings, and involving them in the challenges of the area.
- Promote professional development with constructive feedback periodically.
- Foster dialogue spaces, such as breakfasts, formal or informal meetings, to delve into the needs and concerns of the team itself, incorporate new initiatives, or share objectives and projects.
- Organize conferences or other initiatives that publicize the functions performed by other areas to improve interdepartmental collaboration and establish synergies.

In order to globally identify its employees' opinion about working at Aena, which allows evaluating the effectiveness of the measures adopted in relation to the work environment and staff satisfaction, the Group has implemented the *Merco Talento* methodology. The Organization and People Directorate invites its employees to actively participate in this survey to gather employees' opinions about Aena, regarding talent attraction and retention, and the opinion of other companies in the *Merco Talento* ranking.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
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S1- 5: Targets related to managing material impacts, advancing positive impacts, as well as to risks and opportunities

S1-5 44, S1-5 46 (MDR-T), S1-5 47 (a-c)

Working conditions

Regarding safe employment goals, the Aena Group makes an exhaustive effort to ensure that, through the correct management of the aforementioned actions, the values and principles established in the policies are integrated.

In Spain, Aena establishes strategic objectives in collaboration with the heads of each area and the directorates. The Sustainability and Climate Action Commission supervises the fulfilment of these objectives, working with its departments to ensure the correct implementation of the necessary actions.

Among the objectives established in **Aena's 2025 Operational Plan**, aligned with the objectives of the **Strategic Plan**, in Spain, we find:

- Signing and implementation in 2025 of the **II Collective Bargaining Agreement** of the Aena Group, which has involved the regulatory and technical adaptation of the organization. The new agreement includes measures aimed at improving working conditions and, at the same time, strengthening the company's efficiency by providing it with tools to guarantee the continuity of airport activity. After months of work and as a result of constructive dialogue, the regulation came into force on July 31, 2025, following its publication in the Official State Gazette of Spain the day before. Since then, and even before, the Organization has been preparing and focusing on the implementation and application of the new regulation, which reflects a shared vision of the future, in which progress, well-being, involvement, and human capital development are linked.
- Creation of the **Operational Staff Reinforcement (RPO)** figure, as an agile mechanism for covering operational needs, ensuring service continuity and quality. The RPO figure was created in 2025.
- Implementation and management of the **Flexible Remuneration Plan**, with the aim of offering workers the possibility of voluntarily adhering to systems that allow them to adapt their remuneration package to their personal needs. During fiscal year 2025, the necessary actions for the design and development of the Plan were initiated, with its implementation planned throughout 2026.
- Development of health promotion actions among workers through the **"Aena Saludable" Programme**. In 2025, the *Aena Saludable* certification was achieved.

In addition to the objectives and programmes included in the Operational Plan, the following targets related to work-life balance were established in 2025 in the **Sustainability Dashboard**, which is presented to the Sustainability and Climate Action Commission:

	Results 2025	Objective 2025
Annual uses of the Work-Life Balance Support Programme (PAC) and other wellbeing programmes (no.)	5,212	4,300
Wellbeing talks/events (no.)	9	9

In line with the positive impact "Promotion of fair and equal remuneration, freedom of association, union membership and collective bargaining", it has the following objectives included in the Equality Plan in order to continue ensuring equality in the remuneration system:

- Facilitate the pay audit in accordance with the validity established for each Equality Plan with a monitoring frequency every 4 years.
- Annual review of the Pay Register for the staff covered by the collective agreement of the Aena group and Aena SCAIRM, with an annual monitoring frequency, in the first half of each year.
- Report to the Joint Equality and Diversity Committee on the conclusions obtained in the corresponding review of the pay register, with an annual monitoring frequency, in the second quarter of each year.
- Review by the Joint Equality and Diversity Committee of the conclusions drawn from the review of the pay register in order to approve the necessary measures should deviations in the gender pay gap be detected, with an annual monitoring frequency, in the third quarter of each year until 2025.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
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With regard to the targets related to **health and safety**, in Spain a series of targets are established seeking continuous improvement based on historical data:

		2024	2025
Accident incident rate	Target ^(A)	771	679
	Results	621	760
No. of accidents	Target ^(A)	58	58
	Results	53	67

^(A) The targets are established based on the performance of the parent company in Spain (Aena, SME, S.A.). For target setting, calculation model and accident category, the doctrine of the National Institute for Safety and Health, a body belonging to the Ministry of Labour and Social Economy of Spain, is used. Taking as the object of improvement the number of accidents occurring during working hours and establishing the accident incidence rate as [(No. of occupational accidents with sick leave during working hours (excluding "in itinere") × 100,000 workers) / (Accumulated average workforce)]. For this reason, the results obtained are not comparable with the CSRD framework, as they include "in itinere" accidents with and without medical leave.

In the **United Kingdom**, London Luton Airport has the following targets regarding working conditions:

- Share more than 90% of the lessons learned from our medium- or high-risk incidents or accidents in 2025.
- Increase the reporting of safety observations compared with last year's performance. Thus, each year, the number of reports must be higher than the number made the previous year.
- Ensure that 80% of internal audit actions are closed within the established deadlines.
- Establish a minimum of 6 commitments at management level regarding safety management (SMT/ELT).
- 90% of training must achieve a level 2/3.
- 80% of continuous-improvement actions must be closed within the planned deadline.
- Complete 100% of health-risk assessments in each department.

In Brazil, the targets are defined taking into account the opinions of employees gathered through the monthly meetings with the Human Resources managers of the airports, where suggestions are heard and improvement action plans are created. These targets are established by the ESG Directorate with the support of the Human Resources Directorate. In addition, within the framework of the Aena group Brasil Sustainability Strategy 2024–2040, specific objectives have been established in the area of social commitment, which include:

- Workplace climate survey with a score of 9 with 90% engagement (commitment and involvement)
- Accident severity rate below 1000 for 2025.
- Increase customer satisfaction to 8.00 and have an NPS above 75 in accessibility by 2025.
- Increase development programmes and outreach campaigns by 2040.

Equal treatment and opportunities for all

In Spain, the Aena group has defined the following targets, included in the Sustainability Dashboard, which allow both compliance and the effectiveness of the actions to be evaluated, and which would be in line with the objectives pursued in the Aena group's Second Equality Plan and Aena SCAIRM:

- Increase in the presence of women in managerial positions.
- Unit of measurement (relative): Percentage of women.
- Scope: operations of the Aena group in Spain.
- Specific target:



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
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	2024	2025	Objective
Women on the Board of Directors (%) ^(A)	46.7%	40.0%	Maintain or exceed 40%
Women Directors Airports ^(B)	26.9%	29.4%	Reach 25% in 2026
Women Directors Central Services ^(B)	42.5%	41.5%	Reach 45% in 2026

Consolidated calculation, performed on the total number of men and women in each group/class.

^(A) Aena Board of Directors member selection Policy in Spain. Organic Law 2/2024, of August 1, on equal representation and balanced presence of women and men.

^(B) Established in the Strategic Plan according to ESRS 2 in the parent company.

The objective of maintaining 40% women on the Board of Directors has been met, in line with the legal requirement.

Regarding the objectives for women directors, in the Airports, the target set for 2026 in the parent company has already been exceeded in 2025, reaching 29.4% women directors. Meanwhile, in Central Services, the percentage is 41.5%, close to the 45% target set for 2026.

The evolution of the number of women in positions of responsibility at Aena has generally shown sustained growth over recent years, which has resulted in an advancement in female presence at higher organizational levels.

The authority to monitor the application of agreed actions and evaluate the degree of achievement of the objectives established in the Equality Plan resides with the Joint Equality and Diversity Committee, which meets as stipulated in said Plan, to analyse the implementation of the measures contained therein and resolve any possible impacts that may arise from their application. This Committee is composed of seven representatives from the trade unions present in the State Trade Union Coordinator (CSE), and an equivalent number of business representatives, thus guaranteeing collaboration with worker representatives, and therefore indirectly with the workforce itself, in the establishment, monitoring of results, and evaluation of goals. On the other hand, equality objectives included within the Sustainability Scorecard are supervised by the Sustainability and Climate Action Commission, working with its departments to ensure the correct implementation of the necessary actions.

In relation to Aena Brasil, the Strategic Sustainability Plan seeks to establish structured guidelines, committees, and practices to promote diversity and inclusion throughout the organization, along with the following objectives:

- Achieve 38% women in the workforce in 2025, having exceeded this goal with a result of 38.55% at year-end.
- 50% of women in leadership positions, in management and in airports by 2040.

Finally, although no quantifiable targets with defined deadlines have been established in the United Kingdom, at London Luton Airport the Equality, Diversity and Inclusion Strategy “At Work It Is Easy to be me” includes general supervised objectives to continuously improve diversity and equality conditions.

- Strengthen the presence of women across the organisation, reaching 42% by 2025.
- Ensure that employees are included, heard and treated fairly.
- Create a more diverse senior team when roles become available.
- Incorporate Equality, Diversity and Inclusion (ED&I) in newsletters and updates.
- Create an inclusion calendar that celebrates cultural and religious events.
- Creation and implementation of the Diversity and Inclusion Programme, with the objective of having the full programme in place by 2026 and carrying out two annual diversity and inclusion actions from 2030 onwards, remaining continuous in 2040.

Training and skills development

Regarding the promotion of personal and professional growth, the following objectives established in the Aena group for Spain stand out:

	Results 2025	Objective 2025
Employees in Mentoring programmes (cumulative no.)	374	352
Employees trained in digital and cultural transformation (cumulative no.)	2,204	1,600
Employees trained in Customer Centricity & Excellence (cumulative no.)	131	156
Scholarship students (no.)	119	105



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
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In Brazil, the Sustainability Strategy includes targets on the development of training actions in quality of service, aimed at staff who interact with the airport and corporate public, with the objective of ensuring that at least 90% of the group receives the corresponding training in 2025.

S1-6: Characteristics of the undertaking's employees

S1-6 48, S1-6 50 (a), S1 - 6 50 (b) i, S1 - 6 50 (b) ii, S1 - 6 50 (b) iii, S1 - 6 50 (c), S1-6 AR 55, S1 - 6 50 (d) i, S1 - 6 50 (d) ii, S1-6 50 (e), S1-6 50 (f)

Regarding the methodology used to calculate the information presented in the following tables, the results are expressed as the total number of salaried persons at the end of the financial year, that is, as of 31 December 2025²⁵.

Below is the number of workers by sex, country and type of employment contract.

In the total workforce, the percentage of women is 38%. By occupations, the percentages of women and men are very balanced, except in the Maintenance and Fire-Fighting Service groups, where women are under-represented.

Table 1 - Information on employee head count by gender		
Gender	2024	2025
Male	6,510	6,831
Female	3,999	4,222
Others	0	0
Not reported	0	0
Total	10,509	11,053

Table 2 - Employee head count in countries		
Country	2024	2025
Spain	8,714	9,141
United Kingdom	944	999
Brazil	851	913
Total	10,509	11,053

²⁵ For reference, the total workforce figure can also be found in Note 28. Expenses for employee benefits of the Consolidated Annual Accounts 2025 - Block A.

Table 2.1 - Distribution of employees in the workforce by nationality

	% of the workforce		% in managerial and director positions	
	2024	2025	2024	2025
Spanish	82.42%	82.16%	91.51%	91.27%
Brazilian	8.03%	8.19%	2.19%	2.17%
British	6.81%	6.88%	5.13%	5.47%
Romanian	0.65%	0.77%	0.08%	0.11%
Polish	0.60%	0.59%	0.15%	0.14%
Italian	0.24%	0.23%	0.11%	0.18%
German	0.10%	0.08%	0.08%	0.04%
French	0.10%	0.09%	0.04%	0.07%
Others	1.05%	1.01%	0.71%	0.55%
TOTAL	100%	100%	100%	100%

Table 3 - Information on employees by contract type, broken down by gender

	2025				Total
	Female	Male	Other ^(A)	Not disclosed	
Number of employees	4,222	6,831	0	0	11,053
Number of permanent employees	3,852	6,373	0	0	10,225
Number of temporary employees	362	453	0	0	815
Number of non-guaranteed hours employees	8	5	0	0	13
Number of full-time employees	3,835	6,549	0	0	10,384
Number of part-time employees	387	282	0	0	669
	2024				
Number of employees	3,999	6,510	0	0	10,509
Number of permanent employees	3,554	5,945	0	0	9,499
Number of temporary employees	437	561	0	0	998
Number of non-guaranteed hours employees	8	4	0	0	12
Number of full-time employees	3,650	6,275	0	0	9,925
Number of part-time employees	349	235	0	0	584

^(A) Gender as specified by the employees themselves.
Data recorded in terms of headcount as of the year-end date.

Table 4 - Information on employees by contract type, broken down by region
2025

	Spain	United Kingdom	Brazil	Total
Number of employees	9,141	999	913	11,053
Number of permanent employees	8,368	986	871	10,225
Number of temporary employees	773	0	42	815
Number of non-guaranteed hours employees	0	13	0	13
Number of full-time employees	8,622	883	879	10,384
Number of part-time employees	519	116	34	669

2024

Number of employees	8,714	944	851	10,509
Number of permanent employees	7,745	932	822	9,499
Number of temporary employees	969	0	29	998
Number of non-guaranteed hours employees	0	12	0	12
Number of full-time employees	8,268	823	834	9,925
Number of part-time employees	446	121	17	584

Data recorded in terms of headcount as of the year-end date.

Regarding temporary contracts in Spain, as of 31 December 2025 the temporary employment rate is 8.46%, 24% lower than the previous year (11.12% in 2024). Of this percentage:

- 1.26% (2.16% in 2024) corresponds to contracts linked to partial retirement ("*contratos de relevo*") (remaining temporary contracts linked to partial retirement prior to the entry into force of Royal Decree-Law 11/2024 of 23 December, which introduces the amendments for this type of contract, changing them from temporary to full-time permanent contracts as of April 2025).
- 1.66% (2.11% in 2024) corresponds to temporary substitution contracts (*interinidad*) until the definitive coverage of vacancies through permanent contracts, while the selection processes established in the current Collective Bargaining Agreement are carried out, this type of contract being a particular feature of the Public Sector.

Therefore, if these types of contracts were not taken into account, and only substitution contracts (5.10%) and contracts due to production circumstances (0.44%) were considered, the temporary employment rate would decrease to 5.54% (19% lower than the previous year).

This significant reduction in temporary employment is driven by the increase in permanent contracts in the workforce and by the new national regulation on contracts linked to partial retirement, which change from temporary to full-time permanent.

In the case of the Aena group in Brazil, the temporary employment rate is 4.60% (3.41% in 2024). In addition, of the 42 employees (29 in 2024) who at year-end have temporary status, 34 (15 in 2024) are subject to the "Young Apprentice Programme". These apprenticeship contracts allow young people to have an employment contract with financial remuneration while receiving training.

Even considering these contracts, the temporary employment rate is significantly lower than the regional average.

Lastly, in the United Kingdom, the temporary employment rate is zero, in line with the region's framework.

In the Aena group, the data on people leaving the Company and turnover rate are as follows:



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
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	2024	2025
Number of employees who leave the company	420	473
Employee turnover rate ^(A)	4.15%	4.57%
Voluntary turnover rate ^(B)	1.97%	2.03%

^(A) Turnover: Number of employees who leave the organisation, voluntarily or due to dismissal, retirement or death while in active service.
 Turnover rate % = Employees who leave the company for any turnover criterion during the financial year / Total number of employees in the previous financial year.

^(B) Voluntary turnover: Number of employees who leave the organisation voluntarily.
 Voluntary turnover rate % = Employees who leave the company voluntarily during a financial year / Total number of employees in the previous financial year.
 The turnover included in this table is calculated based on the methodology and concepts proposed by the CSRD, that is, as the accumulated number of people who have left the Company in 2025 due to voluntary resignation, dismissal, retirement or death, excluding departures resulting from not passing the probationary period. This type of exit is included in the tables shown below, "Turnover rate by age, sex and region", which is why the total turnover rate figure differs slightly in 2024 (4.15% vs. 4.23%).

The voluntary turnover rate is only 2%, which reflects that the existing working conditions and measures ensure the retention of workers in the organisation, while also demonstrating the Aena group's commitment to talent loyalty.

This indicator translates into solid workforce stability, which allows for maintaining the knowledge and experience necessary to uphold the quality and safety standards required for managing critical infrastructures such as airports. This would be difficult to achieve otherwise, as Aena is such a regulated and public service-oriented company.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
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Employee turnover rate broken down by age, gender and region ^(A)

2025

	Spain			United Kingdom			Brazil			TOTAL		
	F	M	Total	F	M	Total	F	M	Total	F	M	Total
Total turnover rate (%)												
Over 50 years old	4.24%	5.52%	5.01%	9.09%	12.59%	11.21%	16.67%	14.63%	15.09%	4.57%	6.03%	5.45%
30-50 years old	1.05%	1.86%	1.56%	8.23%	6.40%	7.16%	14.47%	12.87%	13.46%	3.37%	3.54%	3.48%
Under 30 years old	—%	6.25%	4.65%	2.70%	9.09%	6.17%	18.46%	15.96%	16.98%	7.22%	9.65%	8.77%
Total	2.61%	3.65%	3.26%	7.38%	8.35%	7.94%	15.38%	13.54%	14.22%	4.08%	4.87%	4.57%

Voluntary turnover rate broken down by age, gender and region ^(B)


2025

	Spain			United Kingdom			Brazil			TOTAL		
	F	M	Total	F	M	Total	F	M	Total	F	M	Total
Total turnover rate (%)												
Over 50 years old	0.49%	0.37%	0.42%	4.55%	6.67%	5.83%	8.33%	9.76%	9.43%	0.75%	0.83%	0.80%
30-50 years old	0.99%	1.64%	1.41%	6.06%	5.18%	5.55%	8.09%	7.43%	7.67%	2.36%	2.63%	2.53%
Under 30 years old	—%	6.25%	4.65%	2.70%	4.55%	3.70%	13.85%	11.70%	12.58%	5.67%	7.31%	6.72%
Total	0.73%	1.20%	1.02%	5.09%	5.44%	5.30%	9.29%	8.35%	8.70%	1.83%	2.15%	2.03%

Employee turnover rate broken down by age, gender and region ^(A)

2024

	Spain			United Kingdom			Brazil			TOTAL		
	F	M	Total	F	M	Total	F	M	Total	F	M	Total
Total turnover rate (%)												
Over 50 years old	3.80%	4.85%	4.43%	3.90%	9.48%	7.25%	20.00%	15.00%	16.36%	3.95%	5.23%	4.73%
30-50 years old	1.22%	1.53%	1.42%	5.82%	7.19%	6.67%	9.41%	15.19%	13.23%	2.46%	3.57%	3.16%
Under 30 years old	9.76%	8.92%	9.09%	7.27%	16.90%	12.70%	16.07%	18.39%	17.48%	11.18%	13.33%	12.63%
Total	2.55%	3.21%	2.96%	5.61%	9.13%	7.74%	11.36%	15.71%	14.21%	3.44%	4.71%	4.23%

	ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
	E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
	S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

Voluntary turnover rate broken down by age, gender and region ^(B)

2024												
Total turnover rate (%)	Spain			United Kingdom			Brazil			TOTAL		
	F	M	Total	F	M	Total	F	M	Total	F	M	Total
Over 50 years old	0.46%	0.21%	0.31%	2.60%	6.90%	5.18%	6.67%	5.00%	5.45%	0.62%	0.60%	0.61%
30-50 years old	1.16%	1.39%	1.30%	4.76%	5.88%	5.45%	6.44%	6.33%	6.37%	2.01%	2.34%	2.22%
Under 30 years old	9.76%	8.92%	9.09%	7.27%	11.27%	9.52%	12.50%	16.09%	14.69%	9.87%	11.43%	10.92%
Total	0.93%	1.10%	1.04%	4.67%	6.90%	6.02%	7.69%	7.85%	7.80%	1.73%	2.11%	1.97%

^(A) Turnover: Number of employees who leave the organisation, voluntarily or due to dismissal, retirement or death while in active service.

Turnover rate % = Employees who leave the company for any turnover criterion during the financial year / Total number of employees in the previous financial year.

^(B) Voluntary turnover: Number of employees who leave the organisation voluntarily.

Voluntary turnover rate % = Employees who leave the company voluntarily during a financial year / Total number of employees in the previous financial year.

As part of the promotion of a positive working environment, the Employee Engagement Index is measured periodically. This indicator reflects employees' perception of fundamental aspects such as the content of their work and the recognition received from the Company:

	2024	2025
Engagement rate ^(A)	81.98%	86.20%
Percentage of workforce covered ^(B)	2.14%	18.30%

^(A) Engagement index: Taking into account all psychosocial assessments carried out during the year, this index is calculated by averaging the data obtained for two psychosocial factors: "Variety/Content of work" (VC) and "Interest in the worker/Compensation" (ITC). As set out in the INSST F-PSICO 4.1 method:

- The factor "Variety/Content" (VC) includes the feeling that the work has meaning and usefulness in itself, for the worker, within the company as a whole and for society in general, and is also recognised and valued, providing the worker with a sense beyond economic compensation.

- The factor "Interest in the worker/Compensation" (ITC) refers to the degree to which the company shows personal and long-term concern for the worker. These issues are reflected in the organisation's concern for the promotion, training and career development of its workers, for keeping workers informed about such matters, as well as the perception of both job security and the existence of a balance between what the worker contributes and the compensation received in return.

^(B) Percentage of workforce covered: Proportion of employees covered by the survey compared with the total workforce of the parent company.

The total number of salaried persons is reflected in Note 28. Employee benefits expenses - the number of employees in the 2025 Consolidated Annual Accounts.

The Aena group does not have non-employees in its workforce, and therefore the S1-7 disclosure requirement is not material. Consequently, no information is included regarding the characteristics of non-employees, in accordance with application requirement AR 61.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

S1-8: Collective bargaining coverage and social dialogue

S1-8 58, S1-8 60 (a - c), S1-8 63 (a - b), S1-8 AR 69, S1-8 AR 70

In 2025, 99.54% (99.70% in 2024) of salaried persons of the Aena group were covered by a collective bargaining agreement.

In the European Economic Area (EEA), and specifically in Spain, in 2025, 99.86% (99.85% in 2024) of employees were covered by a collective bargaining agreement. These data show consistency in the coverage of workers' representatives over time. The high coverage rate reflects the Aena group's commitment to the rights of its employees across all its locations.

In the workforce of Aena, SME, S.A. and AIRM, the Aena Group Collective Bargaining Agreement applies, whose update entered into force in 2025, while in the workforce of ADI (Aena, Desarrollo Internacional, SME, S.A.), 26 people are subject to the Offices and Workplaces Agreement (26 people in 2024).

This level of coverage ensures that employees have access to representatives who safeguard their rights and working conditions, and thus ensures that employees in Spain have adequate representation mechanisms for the defence of their interests. This percentage includes all of its operations and reflects the commitment to provide regulated working conditions through formal agreements.

Outside the EEA, in regions such as the United Kingdom and Brazil, employees are also covered by collective bargaining agreements. In the United Kingdom, in 2025, 90.90% were covered by an agreement (100% in 2024), while in Brazil, coverage in 2025 is 95.95% (97.77% in 2024).

Below is a summary of the information:

Year	Spain	United Kingdom	Brazil
2025	99.86% employees covered by a collective bargaining agreement ^(A)	99.90% employees may join a union recognised by the Company, or any other union for representation purposes	95.95% employees covered by a collective bargaining agreement ^(B)
2024	99.85% employees covered by a collective bargaining agreement ^(A)	100% employees may join a union recognised by the Company, or any other union for representation purposes	97.77% employees covered by a collective bargaining agreement ^(B)

Corporate commitment to the right to freedom of association and collective bargaining of workers, endorsed in the Human Rights Policy of the Aena group, which takes as reference, among others, the ILO Declaration on Fundamental Principles and Rights at Work, and applies to all companies of the Aena Group.

^(A) The special employment relationship of senior management personnel is not subject to the Collective Bargaining Agreement (RD 132/1985).

^(B) In Brazil, the General Director, the Operations and Infrastructure Director, the President Director, and 34 employees hired under the "Jovem Aprendiz" (Young Apprentice) modality are not included. Special employment contract under the CLT (Consolidation of Labour Laws), designed for specific technical-professional training for young people.

Coverage rate	Collective Bargaining Coverage		Social dialogue
	Employees – EEA (for countries with >50 employees, representing >10% total employees)	Employees – Non-EEA (estimate for regions with >50 employees, representing >10% total employees)	Workplace representation (EEA only) (for countries with >50 employees representing >10% total employees)
0-19%	-	-	-
20-39%	-	-	-
40-59%	-	-	-
60-79%	-	-	-
80-100%	Spain (99,86%)	Brazil and United Kingdom (98,01%)	Spain (100%)

This approach is based on the corporate commitment of the Aena Group to respect the freedom of association and collective bargaining of its workers, as reflected in its Human Rights Policy, which takes as a reference the ILO Declaration on Fundamental Principles and Rights at Work.

At the European level, there is no European Works Council, nor a Works Council of a European Company (SE) or a Works Council of a European Cooperative Society (SCE).



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

S1-9: Diversity metrics

S1-9 64, S1-9 66 (a), S1-9 66 (b), S1-9 AR 71

Below, in order to facilitate understanding of gender diversity within senior management and age diversity among its salaried employees, the distribution by gender in senior management, in number and percentage, and the distribution by age among salaried employees is detailed.

Senior Management	2024		2025	
	F	M	F	M
Total by gender (no.)	6	7	6	7
Total by gender (%)	46%	54%	46%	54%

With regard to senior management, parity among its members is maintained with 46% female representation, which is also notably higher than the percentage held by women in senior management bodies of IBEX 35 companies (23%).

	Distribution of the workforce by age (%) (Consolidated)			
	2024		2025	
Under 30 years old (%)	536	5.10%	635	5.75%
30-50 years old (%)	5,608	53.36%	5,697	51.54%
Over 50 years old (%)	4,365	41.54%	4,721	42.71%

This age distribution is correlated with the low turnover rate, long-term retention in the company and loyalty of workers.

Furthermore, observing the evolution of the distribution by age groups compared with the previous year, it can be seen that the largest percentage increase occurred in the under-thirty age group. This highlights the relevance of and the effort made by the Aena group in incorporating young talent.

S1-10: Adequate wages

S1-10 67, AR 72, AR 73 (a - b), S1-10 69

At the end of the 2025 financial year, the minimum wage of the Aena Group was higher than the minimum wage in all the countries in which it operates and for all its salaried employees.

In Spain, in accordance with Royal Decree 87/2025 of 11 February, which sets the minimum interprofessional wage for 2025, the minimum wage is set at €1,184/month (€1,134/month in 2024), equivalent to €16,576 per year (equivalent to €15,876 per year in 2024). Specifically, in 2025, the lowest equivalent salary received in the Aena Group companies in Spain was € 26,109 (€25,224 in 2024).

When compared with the Minimum Interprofessional Wage, it can be observed that the lowest equivalent salary is 58.0% (59.0% in 2024) higher than the Minimum Wage.

In the United Kingdom, the minimum remuneration exceeds the national minimum wages, established by the national minimum wage, which in 2025 was €14.25 / £12.21 per hour (€13.8€ / £11.44 per hour in 2024). On the other hand, the minimum wage at the airport was €15.17 / £13.13 per hour (€15.17 / £12.58 per hour in 2024).

In Brazil, the minimum wages for each category are established in the Aena group Brazil Collective Agreement. In 2025 the lowest wage was €381.63/month (€360.80/month in 2024). These salaries exceed the national legal minimum wage for 2025, set at €240.59/month, equivalent to R\$1,518/month (€219.38/month, equivalent to R\$1,412/month in 2024). In percentage terms, the increase is 59.0% (64.5% in 2024) in relation to the legal minimum wage.

In all cases, the Company's minimum wage is calculated based on the gross salary of the lowest remuneration category, excluding interns and apprentices.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

S1-11: Social protection

S1-11 72, S1-11 74 (a - e)

The salaried employees of the Aena group are covered by social protection, through public programmes or through benefits offered by the corresponding subsidiary, against loss of income due to significant life events, such as:

Major life events	Spain	United Kingdom	Brazil
a) sickness	Aena complements 100% of the state remuneration. All employees have health insurance after 3 months of employment.	Employee Assistance Programme (EAP), Bupa Healthcare, occupational health and physiotherapy.	Governmental Programme.
b) unemployment starting from when the own worker is working for the undertaking	Economic benefits for unemployment and protection measures against cessation of work activity (established in each national legislation).		
c) employment injury and acquired disability	Aena complements 100% of the remuneration. The agreement establishes a procedure for functional adaptation and/or adaptation of working hours due to reduced physical or psychological capacity.	Reporting and health-surveillance system.	Compensation for loss of work capacity and mandatory coverage for occupational diseases.
d) parental leave	Women and men: 19 weeks paid and 4 unpaid (established in legislation). ^(A)	Paid birth/adoption leave (4 weeks of paid leave plus 28 paid weeks). Parental leave of up to 5 days as required by the government.	Women: up to 180 paid days. Men: up to 20 days.
e) retirement ^(B)	Retirement at 68 years as the maximum date. Planned retirement processes published annually.	Flexible working.	–

^(A) Spain. Royal Decree-Law 9/2025, of July 29, has significantly extended the duration of parental leave. This extension can be requested and taken from January 1, 2026, and is applicable to events occurring on or after August 2, 2024. Parental leave for the birth and care of a child is now 19 weeks for each parent, of which 17 weeks can be taken during the child's first year and an additional 2 weeks for childcare up to the age of 8. In the case of single-parent families, the leave is primarily 32 weeks.

^(B) Information on early retirement can be found in Note 22, Employee Benefits, of the 2025 Consolidated Annual Accounts - Block A.

In Spain, social protection is primarily articulated through public programs, complemented by specific benefits, among which private medical insurance, life and accident insurance, work-life balance and emotional support programs, as well as various leaves and licenses that improve upon what is legally established in the Workers' Statute, such as:

- Granting of up to 7 days per calendar year for personal matters.
- Improved leave in the event of the death, hospitalisation or serious illness of relatives and examinations.
- Improved breastfeeding leave compared with what is provided for in the Workers' Statute, allowing one hour per day of absence from work until the child reaches 12 months of age, or a reduction of normal working hours by half an hour, or paid leave of four weeks' duration immediately after maternity leave, provided that the working hours are normal, or in the case of workers on shift schedules or special working hours, 140 hours in scheduled services.
- In the case of premature children, workers shall be entitled to be absent from work for two hours.
- Unpaid leave of one month in the event of the death of a spouse, civil partner or children.

In the United Kingdom, London Luton Airport has a comprehensive health and well-being system for its employees. Managers receive training to identify signs of stress or mental-health issues, and when such situations are detected a protocol is activated that includes coordination with Human Resources, referral to Occupational Health and access to both the Employee Assistance Programme and Bupa Healthcare, a private provider that complements NHS public healthcare. Mental-health issues are monitored regardless of their origin, whether work-related or external.

In the event of work-related accidents or physical ailments, a reporting and occupational-surveillance system is applied that complies with UK RIDDOR regulations for accidents involving absences longer than seven days or specified injuries. The Occupational Health service offers physiotherapy, ergonomic assessments and individual follow-up. After each investigation, the results are shared with staff to promote prevention and training needs are reviewed.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
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Regarding parental leave, LLA offers enhanced paternity/maternity/adoption/shared parental leave policies. In addition, employees can also benefit from legally established Unpaid Parental Leave and Neonatal Care Leave. In the event of an employee's death, their beneficiaries are covered by the company's life insurance.

Furthermore, the airport has a documented flexible working system that allows for adjusting schedules and modalities according to personal and family circumstances, including parental responsibilities and the needs of older employees, facilitating their transition to retirement.

In Brazil, social protection combines government benefits with company measures. In case of illness, the company pays the full salary for the first fifteen days, after which coverage transfers to the public system, which pays a percentage of the salary. Regarding accidents and disability, compensation is granted in case of reduced work capacity, and for occupational diseases, there is mandatory coverage that the company strictly complies with.

As for birth leave, Brazil offers an extensive period: women are entitled to 120 days of maternity leave, extendable to 180 days, all paid, while men have five days of paternity leave, extendable to twenty. These measures promote work-life balance and co-responsibility in childcare.

S1-12: Persons with disabilities

S1-12 77, S1-12 78, S1-12 79, S1-12 AR 76

The Aena Group guarantees universal accessibility in employment for people with disabilities in all countries where it operates, promoting equal opportunities and eliminating any type of barrier. The Group applies an inclusive access model in its calls for applications and selection processes, ensuring adaptations according to the needs of candidates with disabilities.

For the collection of data on workers with disabilities, the Aena Group has guaranteed respect for the confidentiality and privacy rights of workers, complying with the legal definitions and requirements established in each country in which it operates. However, these local regulations may influence the reported percentages, given that they vary according to national regulations.

In all the countries in which it operates, data is collected in accordance with current legislation that determines who is considered a person with a disability. In Spain, the definition stipulated by the State Public Employment Service is followed, as well as the labour integration regulations, which establish specific hiring measures. In this case, a person is recognized as disabled when they have a degree of disability equal to or greater than 33%. In the United Kingdom, equality and labour accessibility legislation is followed, which determines that a person is disabled if they have a physical or mental impairment that has a substantial and long-term effect on daily activities, while in Brazil, they are based on the requirements of the Collective Agreement, using their own recruitment method in compliance with the percentage obligation for the workforce. For this purpose, they work with *Inklua*, an accredited specialized consultancy in the recruitment and selection of people with disabilities, and the *Recrutei* platform, where exclusive vacancies are opened for this group.

It should be noted that, in Spain, in employment calls, both for internal promotions and external selection processes, candidates who prove a degree/situation of disability may request an assessment of possible adaptations to the tests they aspire to, and each case will be evaluated together with the occupational medicine service. Applicants with disabilities who request adaptation of times and/or means must attach to their application the Facultative Technical Report issued by the Technical Assessment Body that determined the degree of disability. Regarding the adaptation of time for carrying out selective tests, the provisions of Order PJC/804/2025, of July 23, which establishes general criteria for the adaptation of means and times and the implementation of other reasonable adjustments in selective processes for access to public employment for people with disabilities, apply.

In quantitative terms, at the end of 2025, 1.76% of salaried employees in the Aena Group²⁶ workforce had some form of disability (1.65% in 2024), distributed as follows:

²⁶ In Note 28. Employee benefits expenses of the 2025 Consolidated Annual Accounts - Block A, it is indicated that the Group's average disabled workforce was 186 (165 in 2024), data that differs from those reported in S1-12, because here total annual data are indicated and not averages.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

Employees with disabilities				
2024		2025		
Actual	% of total workforce	Actual	% of total workforce	
Spain ^(A)	124	1.42%	128	1.40%
United Kingdom	27	2.86%	35	3.50%
Brazil	22	2.59%	32	3.50%
TOTAL	173	1.65%	195	1.76%

^(A) Data corresponding to the actual number of employees with disabilities on staff as at 31 December, without considering the equivalent number resulting from compensatory measures.

In accordance with the legislation in force in Spain, the percentage of employees with disabilities is calculated based on the actual number of persons with disabilities on staff as at 31 December, and the equivalent number of persons resulting from the compensatory measures approved by Resolution of the Directorate-General of the Public State Employment Service (SEPE) on the Declaration of exceptional circumstances and adoption of alternative measures for compliance with the reserve quota in favour of workers with disabilities, ensuring compliance with the quota through contributions to entities.

At the date of publication of this report, the process to update the exceptional-circumstances declaration data for 2025 has begun. In the first four months of 2026, the updated data for the latest financial year and the traceability of the data for the 2022, 2023 and 2024 financial years will be communicated to SEPE through the administrative management processes that SEPE has in place for this purpose.

S1-13: Training and skills development metrics

S1-13 81, S1-13 83 (a-b), S1-13 AR 77, AR 78

The Aena Group is committed to the continuous training of its personnel, considering it fundamental for the sustainability of its business model and a positive impact for its employees. Employee training not only enhances the competencies and skills of teams but also fosters a culture of innovation and safety. Below is the total number of training hours and the average training hours per employee.

	2024			2025		
	Total training hours	Total employees	Average training hours per employee ^(A)	Total training hours	Total employees	Average training hours per employee ^(A)
Male	484,196	6,510	74.38	509,412	6,831	74.57
Female	247,191	3,999	61.81	216,768	4,222	51.34
Total	731,387	10,509	69.60	726,179	11,053	65.70

^(A) Average training hours per employee: Number of training hours / total number of employees in the workforce at year-end

For a more detailed breakdown of training hours and other training parameters additional to the CSRD requirements, please refer to Chapter 5: "Information requirements of Law 11/2018 not covered or subject to transitional rules by the ESRS - CSRD".

Practically the entire workforce participates in the Performance Management System, as in 2024. Professional performance evaluation is a key tool of the Performance Management System, as it allows guiding the performance of workers and complementing the development of competencies through the identification of possible training actions.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

	2024			2025		
	Percentage of the workforce that has received a performance evaluation by sex (%)	Number of evaluations carried out per person	Number of evaluations carried out over the total agreed by Management	Percentage of the workforce that has received a performance evaluation by sex (%)	Number of evaluations carried out per person	Number of evaluations carried out over the total agreed by Management
Female	100%	1	100%	99%	1	100%
Male	100%	1	100%	100%	1	100%

Note: In 2024, only structural staff (middle management) were taken into account in Spain and Brazil, as they participate in a performance evaluation interview in addition to the performance assessment, which is why the data have been updated. In Brazil, "apprentices" do not have performance evaluations.

S1-14: Health and safety metrics

S1-14 86, S1-14 88 (a-e), S1-14 AR 80, S1-14 AR 89, AR 91, S1-14 AR 92

The Occupational Health and Safety Management Systems in the Group are designed in accordance with the legal and regulatory requirements in force in each country, apply to the entire workforce and ensure the protection of their health and safety. At present, 100% of its workforce is covered by the health and safety management system.

Own employees covered by the Health and Safety Management System of the Aena Group (%)				
Region	2024		2025	
Spain	100%	8,714	100%	9,141
United Kingdom	100%	944	100%	999
Brazil	100%	851	100%	913

The information on incidents is collected, assessed and reported in accordance with the requirements established by the CSRD, which standardises the definitions of work-related injuries and health problems.

	2024	2025
Number of days lost to work-related injuries, illness or fatalities related to work	3,166	3,756
Fatalities as a result of work-related ill health	0	0
Fatalities as a result of work-related injuries	0	0
Recordable work-related ill health	0	1
Number of work-related incidents	203	263
Work-related injuries rate ^(A)	12.38	16

^(A) Work-related injury rate: (No. of accidents / Total no. of hours worked) * 10⁶

The injury rate included in this table is calculated based on the methodology and concepts proposed by the CSRD, including the number of accidents occurring in the workplace and those registered "in itinere", with or without sick leave for in-house personnel. For the value presented of 12.38, all these types of accidents in Spain and Brazil have been taken into account, while "in itinere" accidents from the United Kingdom cannot be included, as they are not required under UK Health and Safety regulation.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

S1-15: Work-life balance metrics

S1-15 91, S1-15 93 (a-b), S1-15 94

The Aena Group considers work-life balance to be essential. In this regard, it develops work-life balance measures that go beyond those required at a regulatory level in each country, such as paid leave, flexible working hours, employee assistance, etc., aimed at facilitating said balance and promoting the exercise of their rights.

In Spain, all these actions have been agreed upon with the legal representatives of the workers. Regarding the already established measures, aimed at facilitating the enjoyment of work-life balance and promoting the co-responsible exercise of their duties by both parents, the Collective Bargaining Agreement highlights, among others, the possibility of having flexible working hours at the start of the daily workday of two hours and thirty minutes, two hours of daily flexibility for workers with disabled children, the possibility of shift changes for shift workers, as well as facilitating the adaptation and retraining of personnel who return to their positions after long-term leave, union activity, extended leave, etc.

At consolidated level, 100% of its workforce has the right to take leave for family leave, of which during the current fiscal year 32.48% of the own workforce (30.70% of men and 35.36% of women) took such leave (in 2024, 31.79%; 30.46% of men and 33.96% of women).

	Family-related leave			
	2024		2025	
	Female	Male	Female	Male
Percentage of employees entitled to take family-related leave (%)	100%	100%	100%	100%
For birth, adoption or fostering	68	164	62	178
Other leave related to birth	57	88	42	75
Percentage of employees that has taken leave for birth, adoption, fostering or related reasons	3.13%	3.87%	2.46%	3.70%
Leave for the care of family members	1,233	1,731	1,389	1,844
Percentage of entitled employees that took leave for the care of family members	30.83%	26.59%	32.90%	26.99%
Percentage of entitled employees that took family-related leave ^(A)	33.96%	30.46%	35.36%	30.70%

^(A) Percentage of employees who have taken leave for family reasons: Number of people who have taken leave for family reasons in 2025 / Total number of employees on staff. (Situations that began during the analysis period).
Types of leave considered in the calculation: Maternity, Paternity, Partial Maternity and Paternity, Multiple Maternity and Paternity, Premature Maternity, Breastfeeding Leave, Maternity and Paternity Leave for Large Families, Adoption/Foster Care (National, International, or Multiple), as well as leave for personal care or assistance to family members who need urgent care or for serious medical reasons.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

S1-16: Compensation metrics (pay gap and total compensation)

S1-16 95, S1-16 97 (a - c), S1-16 98, S1-16 99, S1-16 AR 98, S1-16 AR 99, S1-16 AR 100, S1-16 AR 101, S1-16 AR 102

	Pay gap (%) ^(A)								
	Spain			United Kingdom			Brazil		
	2023	2024	2025	2023	2024	2025	2023	2024	2025
Senior Management	1.1%	-0.4%	-1.5%	—%	—%	—%	—%	—%	—%
Executives and graduates	3.5%	2.6%	1.9%	35.0%	41.7%	29.4%	21.6%	25.6%	18.4%
Coordinators	4.4%	3.9%	4.6%	-1.3%	7.1%	7.3%	5.4%	3.9%	1.6%
Technicians	4.3%	3.9%	4.4%	100.0%	26.3%	100.0%	-1.0%	0.5%	0.3%
Support staff	4.0%	3.7%	4.5%	12.3%	7.2%	10.2%	23.2%	23.5%	22.1%
Total	1.6%	1.1%	1.1%	18.4%	18.6%	16.9%	14.6%	15.7%	21.5%

^(A) Gender pay gap: (Average gross hourly pay level of male employees – Average gross hourly pay level of female employees) / Average gross hourly pay level of male employees × 100.

In Spain, the remuneration system for Aena and Aena SCAIRM is fully included in the Aena Group Collective Bargaining Agreement, which specifically details emoluments and supplements, and salary scales, whose amounts are based on the occupation performed, seniority in the company and position, and the location of the workplace. The management or structural position supplement, not regulated in the aforementioned annex, is received according to the level defined for the development of the job position.

In summary, the salary scales and all supplements approved and included in the Agreement are independent of the gender of the person holding the position. These scales are updated annually based on the salary review approved in the State General Budget Law, which applies to Aena and Aena SCAIRM as State Commercial Companies, and is additionally agreed upon with worker representatives.

Under Royal Decree 902/2020, of October 13, on equal pay between women and men, the Remuneration Register is prepared, which ensures pay equality and guarantees its transparency and monitoring.

For the analysis of the remuneration model, total remuneration has been used, including all remuneration concepts such as base salary, occupation salary, seniority, variable remuneration, shift work, night work, medical insurance, life and accident insurance, pension plan, transport, housing, food, allowances and travel, among others. Based on this, normalized remuneration is calculated, which is defined as that which, considering all concepts of the remuneration model, the person would receive if they had been employed full-time for the entire fiscal year.

As a result, in 2025 pay parity between men and women has been verified, obtaining a value for the gender pay gap of 1.1% in Spain (1.1% in 2024, 1.6% in 2023). This pay difference is mainly due to the weight of remuneration received by groups (such as Fire-fighting Services, Maintenance and Information Systems) in which there is under-representation of women, which have a high percentage representation in the overall workforce, and for which very few women apply in the selection processes.

At London Luton Airport, the gender pay gap in 2025 was 16.9% (18.6% in 2024, 18.4% in 2023), mainly due to the nature and characteristics of the sector and the difficulty in attracting and retaining female talent. Furthermore, as part of the transparency exercise, the Gender Pay Gap Report is published annually, responding to the regulatory requirement in terms of pay gap reporting, all in accordance with the Gender Pay Gap Guidance. Although technical and leadership positions have historically represented a challenge for the aviation sector, the organization is focusing its efforts on internal development and training in order to align with future strategic plans and ensure that women play a fundamental role in consolidating and maintaining the necessary capabilities for their execution. Likewise, progress continues to be made on long-term diversity objectives through specific recruitment campaigns and educational outreach programs aimed at encouraging young people to consider developing their professional careers in aviation.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
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In the case of Aena's subsidiaries in Brazil, defined salary scales are applied without gender distinction, making effective the right to equal treatment and non-discrimination between women and men in remuneration matters. In this sense, the remuneration difference in Brazil, which emerges from the average remuneration figures for men and women, is 21.5% (15.7% in 2024, 14.6% in 2023), mainly due to the low female representation in the sector.

Finally, the annual remuneration ratio, understood as the relationship between the total annual remuneration of the highest-paid person and the median total annual remuneration of all employees (excluding the highest-paid person), is as follows:

Annual total remuneration ratio ^(A)											
2023				2024				2025			
Spain	United Kingdom	Brazil	Total	Spain	United Kingdom	Brazil	Total	Spain	United Kingdom	Brazil	Total
5.20	12.80	42.60	12.40	5.10	27.64	44.65	24.25	4,76	13.49	37.72	11.94

^(A) Total annual remuneration of the highest-paid individual / Median total annual remuneration of the entire workforce (excluding the highest-paid individual)
 Calculation method used: Purchasing Power Parity (PPP) index. World Bank (Link). USD-PPP conversion factor (international dollar adjusted for purchasing power parity).

As in the previous case, the calculation of the annual remuneration ratio has been based on total remuneration, including all salary supplements. To ensure comparability between the different contractual situations of workers, these salaries have been normalised.

S1-17: Incidents, complaints and severe human rights impacts

S1-17 100, S1-17 102, S1-17 103 (a - d), S1-17 104 (a), S1-17 104 (b)

Below are the data relating to cases investigated in matters of human rights (discrimination, harassment and other human-rights categories) reported through the whistleblowing channels available to employees, in addition to complaints submitted through other internal channels related to the ESRS S1 sub-subtopics:

Incidents, complaints and impacts on human rights	
2024	2025

Number of incidents of discrimination (including harassment), in the reporting period

See table in section G1-1

The Aena Group has not found any serious human rights impacts related to its workforce in any of the cases investigated in this matter, nor has it received fines, sanctions, or compensation for damages as a result of complaints or claims for discrimination, harassment, or serious human rights violations in 2025 or 2024.

Non-applicable Datapoints

- DPs not included because, after the Double Materiality Assessment, it has been concluded that they are non-material to the Company: SBM-3 14 (f - g), SBM-3 16, S1-4 40 (b), S1-4 AR 43.
- DPs not included because, due to the Company's activity, they are considered not to be applicable: S1-7 55, S1-7 56, S1-7 57.
- DPs not included as they are contextual information or conditional requirements, i.e., the answer is provided in another linked DP: S1-2 29, S1-3 34, S1-10 70, S1-11 75



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
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S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

S2 Workers in the value chain

Aena Group, aware of the key role played by the workers in its value chain in the development of its activity, recognizes the importance of ensuring responsible working conditions aligned with sustainability principles. As a leading airport operator, it assumes the commitment to promote ethical and safe practices among suppliers, contractors, and business partners, ensuring respect for labour rights, occupational health and safety, and regulatory compliance in complex operational environments. To this end, it promotes policies and supervision mechanisms that seek to ensure that all individuals who indirectly contribute to its operation do so under dignified, safe conditions, and in accordance with international standards and the Group's values.

Material IROs - Impact materiality (Impacts)

Topic	Subtopic	Subsubtopic	Impact	Location of the value chain	Positive / Negative	Actual / Potential	Time horizon
S2 Workers in the value chain	Working conditions	Secure employment Working time Adequate wages	Contribution to the generation of decent and respectful employment and generation of fair contracting conditions for workers in the value chain.	Upstream and downstream value chain	Positive	Actual	Short term / Medium term / Long term
S2 Workers in the value chain	Working conditions	Health and safety	Impact on the safety and health of value chain workers due to working conditions (stress, extreme weather conditions - heat stress, commuting to and from work, constant exposure to traffic routes, etc.)	Upstream and downstream value chain	Negative	Potential	Short term / Medium term / Long term
S2 Workers in the value chain	Equal treatment and opportunities for all	Gender equality and equal pay for work of equal value Diversity	Equal opportunities and inclusion for value chain workers	Upstream and downstream value chain	Positive	Actual	Short term / Medium term / Long term

Material IROs - Financial materiality (Risks and Opportunities): There are neither material risks nor opportunities based on financial materiality.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
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S2-SBM-2: Interests and views of stakeholders

S2-SBM-3: Material impacts, risks and opportunities and their interaction with strategy and business model

S2-SBM-2 9, SBM-3 10 (a), S2-SBM-3 11 (a - d), S2-SBM-3 12

Aena Group recognizes the strategic relevance of its value chain, a fundamental driving element for sustainable and responsible business development, and accordingly manages the material impacts, risks, and opportunities derived from its activities and relationships.

As a sector leader, Aena Group consolidates its privileged position by responding efficiently and adequately to the expectations and needs of stakeholders involved throughout its value chain. Through this management, Aena Group not only establishes trust relationships with customers, suppliers, employees, and local communities but also generates differential value that strengthens its leadership and contributes to the sustainable development of the airport sector.

In its operations, Aena Group ensures not only efficiency and service quality, but also safe and well-structured working conditions that benefit the workers involved. In its relationships with suppliers, the Company applies a responsible and sustainable management approach, selecting and supervising its business partners under sustainability and social responsibility criteria. This approach ensures that suppliers share the Company's ethical values. In this way, Aena Group contributes positively to improving the working conditions of its suppliers' employees.

Furthermore, Aena Group promotes a respectful and dignified work environment for its suppliers' employees and other third parties involved in its operations. This culture of respect improves the emotional and physical well-being of personnel throughout its supplier network, generating a positive impact on their quality of life and job motivation.

Policies and contractual conditions facilitate work-life balance for value chain workers, contributing to job satisfaction and the well-being of workers, also benefiting their families and communities. For more information on policies related to value chain workers, see section [S2-1](#).

Finally, the Group promotes fair and equal remuneration throughout its value chain, contributing to reducing inequalities and establishing a work environment where every worker is valued and fairly compensated. Fair and equal remuneration reflects Aena Group's commitment to social and economic aspects in its operations, promoting a business model that considers well-being and equity at all levels of its supply chain.

Given the strategic relevance of the value chain within Aena Group, and of the workers that comprise it, an analysis of the impacts, risks, and opportunities that could affect them has been carried out (for more information, consult the [double materiality](#) section). As a result, two positive actual impacts and one potential negative material impact have been identified, which are detailed below.

The impacts identified on value chain workers have been grouped into two main categories: working conditions, and equal treatment and opportunities. All these material impacts are systemic in nature and cover aspects developed throughout the section, such as the promotion of dignified working conditions, work-life balance, and equal opportunities. For more information related to the management of the negative impact, see [S2-4](#).

Aena also commits to establishing requirements and coordination mechanisms for Occupational Risk Prevention between Aena and all companies carrying out activities in the managed facilities, as established in the Business Activities Coordination Procedure (CAE, from the Spanish "*Coordinación de Actividades Empresariales*"). This procedure aims to improve actions in this area and ensure compliance with the obligations established for the exchange of information on the impacts and risks to third parties generated by the activity of concurrent companies.

Proper management and communication with stakeholders is key for Aena Group and the achievement of its objectives: creating long-term value, achieving social interest, and developing a responsible and sustainable business model.

To this end, Aena Group articulates its relationships with stakeholders based on the pillars of transparency, active listening, dialogue, trust-building, co-responsibility, and shared value creation. The Company's commitment to its stakeholders is formalized through the Stakeholder Relations Policy, the Code of Conduct for Third Parties, Human Rights Policies, and the Sustainability Policy.

Additionally, the Group seeks in all its procurement processes with suppliers to have a positive impact on the employees of its value chain through efficiency and respect for the principles of equal treatment, non-discrimination, transparency, proportionality, and integrity, as indicated in section [G1-2](#). To materialize this commitment and mitigate the identified negative material impact, Aena includes specific clauses in its procurement specifications that reinforce occupational risk prevention, operational safety, and airport security.



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Aena's Sustainability Strategy 2021-2030 in Spain, along with the Responsible Business Strategy in the United Kingdom, include measures for the protection of human rights, the prevention of occupational risks, and the promotion of diversity and inclusion, with an emphasis on ensuring that Aena Group's commercial relationships do not expose value chain workers to adverse conditions.

In addition to what has been mentioned for Spain, in the United Kingdom, London Luton Airport has the so-called **Sustainable Supply Chain Charter**, which aims to establish standards and principles for all operators, including all concessionaires, suppliers, and airlines, as well as key sustainability areas where improvements are sought, thus defining sustainability requirements and extending good practices and positive impact benefits. In this way, it allows for the recognition of differences in activity and the maturity of sustainability management. Based on the information managed therein, the airport requires its suppliers to collaborate in specific areas and relevant actions in terms of sustainability. For the development of this tool, the airport has followed the same practices established in its Environment Policy and the actions defined in the **Responsible Business Strategy**. All this allows for continuous evaluation of the management of environmental, social, and corporate governance issues.

In Aena Brasil, the consideration of human rights of value chain workers is formalized and integrated into both the strategy and the business model, explicitly including the value chain in its social strategy. This commitment is articulated through the Human Rights Policy, which extends responsibility to suppliers and business partners in line with the UN Guiding Principles and ILO guidelines. Operationally, this commitment is materialized through a robust Supplier Chain Due Diligence Procedure, which establishes due diligence prior to contracting, including the verification of suppliers on government lists regarding slavery-like labour. Additionally, it implements a monthly monitoring system to audit compliance with suppliers' labour obligations, which includes an effective enforcement mechanism that contemplates the retention of payments to those who do not meet the required levels of conformity, thus ensuring a real impact on the protection of workers.

S2-1: Policies related to value chain workers

S2-1 14, S2-1 16, S2-1 19, S2-1 AR 13, S2-1 AR 15

To comprehensively manage the impacts on its value chain workers, Aena Group has policies approved by its Board of Directors. These guidelines aim to enhance positive material impacts and address potential negative risks to safety and health. In the event that any of the companies participating in the value chain does not have a Code of Conduct, their formal commitment to adhere to the principles and values established in Aena Group's Code of Conduct for Third Parties. This document constitutes the framework for ensuring a respectful and ethical work environment, promoting integrity and respect for fundamental rights throughout the value chain.

Below are the specific policies adopted by Aena Group to ensure the management of identified impacts, promoting a safe, fair, and respectful work environment in all its operations and commercial relationships. These policies are made available to value chain workers on Aena's website.

Stakeholder Relations Policy:

This policy, as reported in previous chapters, seeks to guarantee responsible and ethical relationships, based on respect for human rights, sustainable development, and current legislation, promoting transparency, cooperation, and consensus with all Stakeholders. It also promotes the creation of shared value, the fostering of diversity, the protection of human and labour rights, and ensuring continuous improvement in interactions with the communities and territories where Aena Group operates. Therefore, its impact extends to value chain workers through commercial relationships established with suppliers and business partners.

Stakeholders, particularly value chain workers, can express their concerns related to this policy through existing communication channels. These contributions may influence future modifications to the policy. For more information on this policy, see chapter **ESRS 2 SBM-2**.

Code of Conduct for Third Parties:

Aena Group has a Code of Conduct for Third Parties, which aims to define the minimum standards of ethical and responsible behaviour that must be observed by suppliers, clients, and professionals with whom it works in the development of its activity, in accordance with the Group's corporate culture. This commitment includes that third parties, regardless of the country in which they carry out their activity, must:

- Act diligently and responsibly to prevent, detect, or mitigate situations that may compromise Human Rights, as well as nationally or internationally recognized labour rights.
- Their commitment to providing a safe, accessible, and quality service for all.
- Commitment to and care for the environment.
- Maintaining ethical, honest, integral, and transparent behaviour in their activity at all times.



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- The fight against any type of corruption, influence peddling, and defence of competition.
- Fulfilment of their responsibilities, with loyalty, honesty, independence, in any situation of conflict of interest.
- The obligation to preserve the integrity and confidentiality of information and the duty to act clearly and transparently and transmit information truthfully and completely.
- Ensure respect for the rights of local communities in which their activity operates.

The Code of Conduct for Third Parties applies to third parties contracted by companies not domiciled in Spain, provided it is compatible with the local regulations applicable to them and they do not have their own Code with a similar scope. In this regard, Aena's airports in Brazil and the United Kingdom have their own Code of Conduct for Third Parties, adapted to their specific context.

Likewise, in the event that third parties subcontract part of the activities they carry out for Aena Group, they will, in turn, ensure that said subcontractors comply with the provisions of said Code.

The Code must be expressly accepted by all third parties before initiating their contractual relationship, agreement, collaborative agreement, or sponsorship with any Aena Group company, unless they have Codes of Conduct with equivalent principles of action.

For more information on the relationship with suppliers, see sections [G1-2](#) and [G1-6](#).

Sustainability Policy and Human Rights Policy

These two policies, developed in more detail in chapter [S1](#), aim to include the interests and labour rights of value chain workers, and are directly related to the material impacts identified for this group affected by Aena Group's activities.

The purpose of these policies is to broaden the focus and scope of commitments to respect and promote fundamental, internationally recognized human rights for all value chain workers. These rights include freedom of association, the right to organize and collective bargaining, the prohibition of child labour, and the elimination of forced or compulsory labour, among others. The Company also declares its absolute opposition to modern slavery, human trafficking, and any other practice that violates individual or collective dignity in its commercial relationships.

As stated in the Human Rights Policy, Aena Group establishes effective grievance mechanisms in its operations, so that individuals who may potentially have their Human Rights violated have the ability to inform the Group of such a situation. That is, Aena Group provides value chain workers with mechanisms to facilitate communication and remediation of impacts if they occur. These are described in section [S2-2](#).

In the case of London Luton Airport, in accordance with Aena Group guidelines, there is a commitment to manage material impacts on its value chain workers through a comprehensive set of policies and practices that align with the standards established by British law:

- LLA's Code of Conduct, which applies to anyone the company works with, is based on Aena's guiding principles. It demonstrates its commitment to human rights, individual respect, and equal opportunities by cultivating a respectful work environment and supporting work-life balance for all value chain workers.
- Environment Policy, which extends its ESG practices to the entire supply chain, covering all stakeholders, including value chain workers at LLA.
- Airport Management Notice, regarding the Contractor Code of Practice 2024, which establishes the minimum operational standards and procedures for health, safety, environment, and quality that must be complied with in any facility or under its control.
- Modern Slavery Statement, which includes the following commitments:
 - Acting ethically and with integrity in all business relationships;
 - Implementing and enforcing effective systems and controls to ensure there are no cases of slavery and human trafficking;
 - Ensuring transparency in our own company and in the approach to combating modern slavery across all our supply chains.
 - Whistleblowing Policy: This policy applies to all individuals employed in the Group's UK subsidiaries, as well as contractors and consultants. Its objective is to encourage staff to report suspected wrongdoing and provides an independent and confidential channel to communicate any workplace concerns. This policy seeks to ensure clarity on the purpose and use of the hotline. Whistleblowing details have also been added.
 - Equal Opportunities, Inclusion and Dignity at Work Policy: Establishes the commitment to offer equal employment opportunities and prevent discrimination.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
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- Procurement Policy: This policy establishes the ethic of striving to acquire goods and services that are produced and delivered under conditions that do not involve abuse or exploitation.

To ensure the achievement of the objectives set out in the aforementioned policies, Aena Group will continue to develop its procurement actions, as it has done to date. For more information on these measures, see section [S2-4](#).

S2-2: Processes for engaging with value chain workers about impacts

S2-2 22 (a-e), S2-2 23

Aena Group, aware of the strategic relevance of its value chain workers, has various channels to maintain effective interaction with them, and thus consider their interests and opinions in decision-making. Although operational responsibility belongs to the companies of the contracted activities, the Contract Managers are responsible for ensuring information management, collaborating closely and continuously, from the publication of the file. In this phase, a mailbox is made available to bidders to submit their questions about the files, thus being able to interact with the Contract Manager and clarify their doubts, which are published for the knowledge of all potential bidders. Subsequently, this same manager continues communication with the contract managers of each supplier company finally linked to the file and the associated needs.

In Spain, Aena uses its web platform for Business Activities Coordination (CAE). Through this channel, detected risks and impacts are systematically communicated, including those generated by the interaction of the multiple actors operating in the airport environment. For this purpose, an established protocol governs this communication and relevant information for all contracted companies.

In Spain there is a specific landing page, [Aena's Supplier Procurement Portal](#), where files and minor contracts, specifications, commercial tenders, awards, and other additional information related to tenders are published. Likewise, the Public Sector Procurement Platform publishes the various announcements of supplier procurements.

Additionally, there is an electronic bidding platform, which is complemented by specific email mailboxes, created so that suppliers can obtain information about the participation process in tenders, commercial contracts, resolution of doubts or technical problems, and any query related to clients and billing. Technical and economic offers are encrypted, with their opening being sequential.

Other tools, such as the user manual, the support centre, or the mailbox for real-time queries, reinforce the digitalization mechanisms of processes and aim to facilitate communication with suppliers and tenants to avoid possible problems arising from a lack of familiarity with electronic means.

In the United Kingdom, there is a dedicated electronic tendering portal (Jaggaer Procurement Portal). After the supplier is contracted, the possibility of establishing communication with them through online or in-person meetings is offered. London Luton Airport's website, as well as specific emails (such as those of the purchasing team), are existing portals and tools to facilitate communication with internal and external stakeholders. The contract manager is responsible for taking into account the perspectives of value chain workers, as each department has its own suppliers.

On the other hand, in Aena Brasil, suppliers have emails and Sharepoint sites for resolving queries. In addition, the SAP Ariba tool is also available to facilitate communication with suppliers in addition to the central email of the contracting team. Additionally, Aena Brasil has a risk management program for its value chain outsourced to an external consultancy, with which due diligence is carried out on third parties with whom Aena begins a contractual relationship. This collaboration takes place from the beginning of the contract and periodically during its execution, through the exchange and review of contractual documentation which includes, among other things, aspects related to safety and health. This collaboration is not limited to resolving queries but includes conformity analysis and incident management, with a monthly frequency and specific communications when necessary. The Contracting area is the operational responsible for ensuring this communication takes place, with the support of contract managers and the operational safety coordinator.

Finally, the Group adopts measures aimed at understanding the perspectives of those workers who may be particularly vulnerable or marginalized, such as people with disabilities. This approach is carried out through dialogue with different stakeholder groups, whose needs and concerns are taken into account when developing and incorporating social and environmental criteria into bidding processes. In this way, Aena Group integrates these perspectives into its decisions. For more information on these measures, see section [G1-2](#).



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
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S2-3: Processes to remediate negative impacts and channels for value chain workers to raise concerns

S2-3 27 (a - d), S2-3 28

As a result of the double materiality assessment, a material negative impact linked to the health and safety of value chain workers was identified. To manage this impact and ensure compliance with regulations, Aena Group provide communication channels for third parties. These allow for reporting, denouncing, or consulting on infringements of the Code of Conduct or internal regulations, violations of labour rights (especially regarding safety and health), as well as any other action or omission that constitutes an infringement of European Union Law.

To manage and remedy this negative impact, Aena uses its web platform for Business Activities Coordination (CAE). Based on this procedure, Aena commits to:

- Monitor compliance with regulations on occupational risk prevention and impacts by third parties, as well as ensure the presence of preventive resources in each workplace.
- Require that corresponding operational risk assessments and preventive activity planning be carried out, as well as compliance with third parties' obligations regarding information and training.
- Verify that contracting companies and their subcontractors have established the necessary coordination means.

The final responsibility for implementing appropriate preventive and corrective measures lies with each company, which must act according to the specific risks identified for its activity.

In the specific area of physical climate risks, and in extreme situations, Aena Group activates specialized Crisis Committees. These committees are tasked with evaluating the situation, coordinating the response, and ensuring the implementation of urgent measures to mitigate adverse impacts and protect airport operations and the safety of people and assets. This approach allows for an agile and effective response to scenarios of high complexity and potential impact.

In addition to specific risk management, Aena promotes prevention at a broader level. To this end, it relies on a prevention service and, when Aena deems it necessary, coordination meetings are organized with the different airport stakeholders. These instances operate under specific criteria and conditions, seeking to reinforce the safety culture and preparedness for possible incidents, complementing more detailed risk management and emergency protocols.

In the context of construction works and projects, specific and additional protocols are applied to ensure maximum safety and compliance with the law. The management and supervision of these projects falls to the Head of Infrastructure and Works and a Health and Safety Coordinator is designated. When risks directly associated with Aena's own facilities arise, a particular procedure is activated that involves generating a formal notification addressed to the Contract Manager. Following this notification, a comprehensive risk assessment is carried out to determine the necessary preventive and corrective measures.

In Spain, general communications can be processed through the Contract Manager. Additionally, any complaints can be directed to the Whistleblowing Channel. Additionally, if they wish to report any aspects, they can refer to the Whistleblowing Channel. For these purposes, the Whistleblowing Channel (or its equivalent in subsidiaries: *canal da ética*, whistleblower channel, etc.) becomes the main tool for any third party, including consumers or end-users, to express their concerns or to address, report, denounce, and communicate conduct or facts related to the non-compliance with Human Rights principles, as well as other current regulations, in any company of the Aena Group and/or its value chain. For more information on the management of these channels, see section [G1-1](#).

On the other hand, tools such as the user manual, the support centre, or the real-time query mailbox, reinforce the digitalization mechanisms of processes and aim to facilitate communication with other stakeholders (suppliers and tenants) to avoid possible problems arising from a lack of familiarity with electronic means.

Other tools and channels are also available to understand the needs and expectations of:

- Suppliers: preliminary market consultations, working groups for information exchange and service improvement, user committees, complaint monitoring and management, DORA indicators, etc. Through these channels, among other expectations, the need to improve contractual requirements, including clear, achievable, and stable objectives; improved transparency; promotion of equal treatment; and agility in procedures has been detected.
- Service providers to Aena Group clients and other tenants: trade fairs and commercial meetings to publicize tenders, analysis of service performance results (commercial attributes from ASQ surveys and RQS management monitoring); VIP lounge, parking, and commercial services surveys; meetings with tenants; meetings with handling agents. Identified expectations include the implementation of acceptable operating standards or requirements, and stability.



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S2-4: Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those action

S2-4 30, S2-4 31, S2-4 32 (a - d), (MDR-A), S2-4 33 (a - c), S2-4 35, S2-4 36, S2-4 38, S2-4 AR 28

To ensure a positive impact on its value chain, Aena Group develops and implements various measures aimed at ensuring respect for Human Rights and improving the working conditions of all individuals linked to its ecosystem. These actions seek not only to comply with international standards but also to foster a responsible, ethical, and sustainable environment in all phases of its operations and commercial relationships.

In relation to the negative impact, after its analysis with stakeholders in the [double materiality assessment](#), it was determined that this impact is material in the case of airside workers. For more information on the diverse types of suppliers that provide goods and services to the Company, see the "[Value Chain](#)" section of ESRS 2.

Given the nature of the actions carried out by Aena Group to manage and address the different identified impacts, resource allocation is structured through the following actions. For this, it primarily requires internal resources, complemented by an increase in the amounts allocated to service contracting:

- The inclusion of social aspects and human rights clauses in procurement specifications. In this regard, since 2024, mandatory clauses have been incorporated into 100% of contracts. Additionally, a new clause has been included requiring companies with more than 50 employees to have accreditation of compliance with the 2 percent job reservation quota for people with disabilities and to have an equality plan.
- Regarding commercial procurement specifications, it is worth noting the new tender for the lease agreements of duty-free shop spaces, which included ESG aspects for their evaluation in the technical offer, accounting for 10% of the overall score. Among the social criteria required is, for example, having the SA 8000 Social Responsibility Management certificate, the ISO 45001 Occupational Health and Safety certificate, or the AENOR gender equality/remuneration certificate. This type of criterion aims to assess the availability of proven systems and methodologies for the application of various aspects additional to those traditionally used as technical solvency criteria (environmental and quality management system certificates).
- Aena Spain's II Equality Plan includes the incorporation of tie-breaking criteria aimed at promoting the contracting of companies with a higher percentage of female employees in the workforce, to be met in the 2022-2026 period. Additionally, in 2025, Aena Spain's III Equality Plan was approved, which comes into force at the beginning of 2026.
- In terms of training, the value chain is provided access to an external platform that offers specific training, including AVSAF Training Organizations (OFAs) and driving permit management, among other relevant training.
- Aena Group and its subsidiaries in Brazil and the United Kingdom have other tools that enhance the proper internal management of supplier and commercial contracting. These include:
 - The Internal Contracting Instructions, which apply to Aena Group Companies in Spain.
 - Aena's Internal Commercial Contracting Standard, adapted to the criteria of current regulations, governs the tender procedures for commercial spaces at airports in the Spanish network, with full respect for principles.
 - Internal Manual of Supplier Contracting Procedure. This manual aims to complement, in a procedural and mandatory manner, certain aspects of the contracting process that, under the legislation applicable to Aena in Spain, require more detailed regulation. This will allow for specifying its application at a procedural level.
 - Guide and tool for the technical evaluation of supplier files, whose purpose is to serve as a framework for the various proposing units of Aena Group regarding the selection of technical evaluation criteria for files of any nature.
 - Other internal circulars and procedures on related operations.

Particularly, in the United Kingdom, London Luton Airport has a Supplier Strategy 2022-2025, designed to provide a clear framework for the Airport's own procurement activities. This strategy supports the effective provision of services and revolves around five fundamental pillars: recovery, expansion, people, customer experience, and sustainability. Likewise, the Responsible Business Strategy also includes specific objectives regarding suppliers, and the [Sustainable Supply Chain Charter](#) has the following actions:

- Collaboration: Establish working groups in key areas to explore shared innovation opportunities.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
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- Integration: Identify the opportunity to broaden the scope and aspirations in our procurement process, including additional questions on sustainability and KPIs.
- Exploration: Explore strategic opportunities to align our sustainability and procurement priorities to achieve maximum results.
- Additionally, London Luton Airport prevents, mitigates, and corrects negative impacts related to health and safety data reporting, ensuring transparency, accuracy, and a safe reporting environment. Measures include:
 - Clearly defined reporting requirements for all partners.
 - Accessible reporting systems for near-misses and hazards. Accidents/incidents must be reported to the contract manager, operational teams, or through the operations centre, or by LLA staff if present (e.g., first aid support).
 - Data verification through joint investigations, audits, cross-checks, and safety forums.
 - Robust governance through LLA's governance management systems and ISO 45001 and ISO 45003 standards, ensuring safe data handling, fair reporting, and psychological safety.
 - Routine trend analysis and feedback to ensure proactive risk reduction.
 - Furthermore, there is a robust program of preventive and mitigating actions throughout the value chain, which includes:
 - Mandatory induction and competency checks for all contractors and airside workers.
 - Regular inspections of construction sites, retail and catering concessions, airside areas, and shared spaces.
 - Active promotion of hazard and near-miss reporting through the 'Airport Community' app.
 - Specific safety campaigns (e.g., #SideBySide, #OneTooMany). An LLA safety awareness campaign for 2026 (in design phase) aimed at the entire LLA ecosystem.
 - Improved management of disruptive passengers through enhanced staff protection, de-escalation training, improved security, body-worn camera trials, CCTV expansion, and panic button installation.
 - Multi-agency coordination with airlines, handling operators, police, Border Force, concessions, and PRM providers.
 - Emergency drills and scenario-based exercises with partner participation.
 - Continuous improvement supported by audits, inspections, management engagement visits, and ISO certified frameworks.
 - Joint incident investigations and sharing of lessons learned.
 - Formal corrective action plans and enhanced site supervision or assurance.
 - Contractor framework meetings and monitoring of SLAs (Service Level Agreements), managed by contract managers.
 - Updates to risk assessments, procedures, or safe work systems.
 - Additional training, including conflict management, de-escalation, fire safety, evacuation, airside safety, and customer service.
 - Improvements in equipment, welfare facilities, and safety infrastructure.
 - Behavioural safety interventions through the Safety Leaders Program and interaction points (airside teams).
 - Support for affected workers through TRIM, Mental Health First Aid, well-being tools, and access to trauma support.

London Luton Airport requires all external organizations, including stakeholder groups most vulnerable to the identified negative impact on the health and safety of value chain workers, to comply with LLA's health and safety policies, site rules, and relevant legal requirements. Key expectations include:

Completion of mandatory contractor induction and compliance with Contractor Control systems, work authorization, and Work Permits.

- Demonstration of competence, including SSIP (Safety Schemes in Procurement) accreditation where applicable.
- Adherence to safe work systems and active participation in inspections and audits.
- Compliance with the Aerodrome Manual and completion of the airside induction process, including the Airside Driving Permit for relevant positions.
- Reporting of all incidents, near-misses, and hazards through established channels (e.g., the Airport Community app / to the contract manager).



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
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- Support for a Just Culture, ensuring fair and transparent reporting without fear.
- These expectations ensure consistent safety standards across all collaborating organizations.

For its part, Aena's subsidiaries in Brazil are governed by the local Procurement Standard to regulate tender procedures for supplier and commercial space procurements, thus respecting the principles and values of transparency, competition, efficiency, legality, and confidentiality in the process. Within this framework, key actions include:

- The inclusion of specific clauses in the procurement standards to ensure the safeguarding of labour rights.
- Collaboration with an external company to conduct due diligence on contracts, verifying compliance with the conditions agreed upon in the agreements and minutes.
- The implementation of a pilot project for 'integrated CIPA' (Internal Accident Prevention Commission) at Recife and Congonhas airports. This innovative model groups the value chain with health and safety technicians, ensuring a collaborative and effective identification and addressing of risks, with plans for expansion to other facilities.
- A payment retention mechanism is applied in contracts for any detected non-compliance.

Additionally, Aena Brasil carries out the following actions in its value chain through the third-party risk management program:

- Supervision of the subcontracted workforce, ensuring compliance with Brazilian legal requirements for occupational health and safety, with technical supervision from our Occupational Health and Safety team when necessary.
- Monthly labour audits, aimed at ensuring compliance with all labour obligations of subcontracted companies with their employees (wages, holidays, tax payments, etc.).

In all cases, the guiding principles of action for the internal procedures mentioned are the fulfilment of human rights and labour rights, ensuring safety and quality in service, environmental commitment, ensuring integrity and respect for legality and ethical behaviour, the fight against corruption, influence peddling and defence of competition, avoiding conflicts of interest in any of their forms, protecting the confidentiality of information and the transparency and reliability of information, protecting the rights of communities, and absolute rejection of child labour and modern slavery.

Compliance with the clauses of the procurement specifications, essential for mitigating potential negative impacts on value chain workers, is verified through various mechanisms. The Contract Manager assigned to each contract acts as the usual channel for monitoring and certifying their conformity. In addition, a public whistleblowing channel, managed by the Compliance Head, is available to report any irregularities. Finally, monitoring the procurement portal, accessible from the website, constitutes another relevant access point for value chain workers.

No serious cases of human rights violations, such as freedom of association, collective bargaining, child labour, or forced or non-consensual labour, have been identified in 2025 in any supplier contracts.

Additionally, in section [G1-2](#), more detailed information is provided on supplier management in relation to specific procurement specifications.

S2-5: Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

S2-5 41 (MDR-T), S2-5 42

Aena Group has qualitative indicators that allow for monitoring the effectiveness of policies and actions, such as the inclusion of specific clauses on sustainability and quality in contracts with suppliers. For more information on the monitoring of this matter, please refer to section [G1-2](#).

Non-applicable Datapoints

- DPs not included because, after the Double Materiality Assessment, it has been concluded that they are non-material for the Company: S2 SBM-3 10 (b), S2 SBM-3 11 (e), S2 SBM-3 13, S2-4 34 (a-b).
- DPs not included as they are contextual information or conditional requirements, i.e., the answer is provided in another linked DPs: S2-2 24, S2-3 29.

S3 Affected communities

The Aena Group, aware of the impact its activity generates on the environment, recognizes the importance of responsibly managing its relationship with the communities affected by its operations. As a leader in airport management, it is committed to minimizing negative effects while maximizing positive contributions in the regions where it operates.

Aware that its airports are located in inhabited environments, the Group understands that impacts on communities primarily encompass environmental, social, and economic dimensions. These are directly related to aspects such as noise, air quality, local employment, and territorial development, which requires an integrated approach to their management. To address these challenges, the Aena Group has designed strategies that promote dialogue with communities, impact mitigation, and the generation of shared value, all aligned with the most demanding international standards.

Material IROs - Impact Materiality (Impacts)

Topic	Sub-topic	Sub-sub-topic	Impact	Location of the impact within the value chain	Positive / Negative	Actual / Potential	Time horizon
S3 Affected communities	Economic, social, and cultural rights of affected communities	Other rights of affected communities	Contribution to economic growth, job creation, development, and mobility of local communities where the Aena Group operates	Entire value chain	Positive	Actual	Short-term / Medium-term / Long-term

Material IROs - Financial materiality (Risks and Opportunities): There are neither material risks nor opportunities based on financial materiality.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
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S3-SBM-2: Interests and views of stakeholders

SBM-2-7

The Aena Group recognizes the fundamental importance of the views, interests, and rights of the communities affected by its operations, understanding that their consideration is essential for the development and evolution of its strategy and business model. Therefore, the Group adopts a proactive and structured stakeholder-engagement approach that ensures the responsible management of material actual and potential impacts, risks, and opportunities, especially the material positive impacts related to economic development, job creation, connectivity, and the overall mobility of the local communities in which the Aena Group operates, reinforcing its commitment to sustainability, ongoing dialogue with affected stakeholders, and respect for human rights.

This approach reflects the Aena Group's commitment to continuous improvement, transparency, and participation with communities and stakeholders, consolidating a business model that generates shared value and contributes to building a more balanced and sustainable future.

S3-SBM-3: Material impacts, risks and opportunities and their interaction with strategy and business model

SBM-3 8 (a - b), SBM-3 9 (a) i-iii, SBM-3 9 (c - d)

Recognizing the importance of affected communities, the Aena Group has carried out a comprehensive analysis of the material impacts, risks, and opportunities related to these communities (see section [IRO-1: Double Materiality](#)). This analysis has identified one material positive impact and has confirmed that no material negative impacts, risks, or opportunities related to affected communities have been detected.

Based on this analysis, the Aena Group has identified and assessed the communities that may be materially affected by its activities across its own operations and throughout its value chain. In this regard, the Aena Group distinguishes two main categories of affected communities: communities living or working in the vicinity of its airport facilities and communities that are part of, or connected to, its value chain.

The Aena Group implements a structured set of measures and initiatives to promote socioeconomic development, job creation, and improvements to local infrastructure, contributing to economic growth, strengthening regional economies, and enhancing mobility and quality of life. Examples of measures supporting socioeconomic development in affected communities include the following:

- **Airport operations:** The Aena Group drives economic growth and sustainable development in regions near its airports by boosting key sectors such as tourism and transport, and by enhancing local infrastructure and regional connectivity, thereby facilitating the development of associated economic activities.
- **Economic and social contribution:** The Aena Group promotes various initiatives aimed at supporting local economies and improving the well-being of the regions where it operates. These initiatives include community engagement programmes that reinforce socioeconomic development and facilitate the integration of local communities into the Group's sphere of influence. In addition, the Group makes continuous investments in advanced technologies and airport infrastructure, prioritising passenger safety, accessibility, and comfort.

These activities, which extend throughout the Aena Group's value chain, generate significant socioeconomic impacts in the communities where it operates, both in Spain and in its international subsidiaries, strengthening the Group's commitment to shared value creation and long-term sustainable development, and reinforcing its role as a driver of economic growth, job creation, and improved quality of life in the regions where it operates.

These measures are consistent with Aena's business model as an economic and social catalyst, where each airport generates multiplier effects in its surrounding area. The strategy recognises that local communities are critical stakeholders for operational resilience, and that maintaining strong social commitment and continuous engagement supports the Group's social licence to operate, a fundamental element for the development, operation, and expansion of airport infrastructures.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
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S3-1: Policies related to affected communities

S3-1 12, S3-1 14 (MDR-P), S3-1 16 (a), S3-1 16 (b), S3-1 16 (c), S3-1 18, S3-1-AR 9

The Aena Group's commitment to affected communities is reflected in a robust and comprehensive policy framework designed to ensure the responsible management of material actual and potential impacts, risks, and opportunities associated with its operations. These **policies** aim to promote sustainable development, minimize negative impacts, and maximize long-term benefits. This approach reinforces the Group's objective of creating shared and sustainable value for all stakeholders while safeguarding human rights and the well-being of affected communities. In particular, the Group's policy architecture supports the generation of positive impacts related to economic development, job creation, local mobility, and community well-being. The Sustainability Policy establishes the commitment to social progress and economic growth; the Human Rights Policy ensures that this development is carried out with full respect for community rights; the Stakeholder Relations Policy promotes structured dialogue and shared-value creation with local communities; and the Integrated Management Policy ensures that operations are conducted in a sustainable and responsible manner.

The Aena Group's policies apply across all operations and throughout the value chain, covering both upstream and downstream activities, with a specific focus on communities that may be affected by its activities. In its international subsidiaries, policies may be adapted to comply with local regulatory frameworks, always under the oversight of Senior Management and the Board of Directors. The latter, together with the Sustainability and Climate Action Commission, monitors compliance with these policies, periodically assesses their effectiveness, and drives continuous improvement. The Sustainability and Climate Action Commission also ensures that Aena's policies integrate principles, commitments, and strategies relating to respect for human rights and for the communities that may be affected by the Company's economic activities.

Sustainability Policy

For the Aena Group, sustainability is understood and defined in its policy as a commitment to social progress, environmental stewardship, and sustainable economic growth, which must guide the Company's business model and strategic actions.

In this regard, the Policy recognises stakeholder management as a key component for achieving the Company's purpose and for developing a responsible and sustainable business model, establishing the principles and guidelines for such management and identifying stakeholders as those groups, among others, that may be impacted by the activities of the Group.

Among its objectives, the Policy sets out the Company's contribution to sustainable development, the creation of long-term value, and the maximisation of positive impacts, while minimising negative impacts on society and the environment across the entire value chain, through ethical, transparent, and responsible conduct, creating value in the geographical areas in which the Company operates, through the promotion of local business fabric and job creation, as well as through the deployment of social initiatives aligned with the business model and local needs. These initiatives focus on strengthening community participation, fostering integration within the territory, contributing to social well-being and improving people's quality of life, and on promoting, among other aspects, education, employment, cultural wealth and heritage, health, science and research, and the inclusion of the most disadvantaged groups.

Human Rights Policy

The Human Rights Policy formalises the Group's commitment and responsibility to respect and protect the human rights of affected communities and stakeholders, with the aim of preventing any form of abuse or violation. It specifically commits the Group to avoiding causing or contributing to adverse human rights impacts, including those linked to business relationships, and establishes the principles necessary to uphold this responsibility. This commitment extends beyond employees to include all collaborators across the value chain, as well as all communities located near the Group's operations, including indigenous peoples and groups in vulnerable situations. Additionally, Aena commits to providing safe, accessible, and quality services for all user groups.

This policy draws on key international frameworks, including the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and the OECD Guidelines for Multinational Enterprises.

The Human Rights Policy includes essential information necessary to ensure a complete representation of the Group's commitments and is structured around three key elements:

- **Involvement:** fostering open, respectful, and transparent dialogue with communities, taking their concerns and perspectives into account.
- **Due diligence:** implementing an ongoing human rights due diligence process to identify, prevent, mitigate, and address risks of negative impacts, not only in direct operations but also throughout the value chain.
- **Remediation:** establishing accessible reporting and grievance mechanisms for individuals or communities affected by its activities. These mechanisms ensure confidentiality, protect complainants, and enable effective responses and, where required, remediation of negative impacts.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
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The Aena Group also implements continuous risk assessment processes to identify actual and potential human rights risks and to act proactively to prevent violations. This preventive approach strengthens the Group's relationship of trust with communities and other stakeholders.

Regarding monitoring mechanisms, these support continuous assessment of risk levels and the identification of actual and potential impacts, both positive and negative, including social concerns.

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

The Integrated Management Policy, described in further detail in the "[Environmental Policies](#)" section, covers quality, environment, energy efficiency, and occupational health and safety. It focuses on operational excellence and the prevention of negative environmental and social impacts associated with airport operations. The Policy establishes principles that guide the Group's activity, including environmental protection, pollution prevention, and the integration of sustainable development criteria that reduce the impact of its operations and align with the objectives set in the Sustainability Strategy. Furthermore, it includes rigorous controls and preventive measures to ensure compliance with environmental and social regulations.

Stakeholder Relations Policy

The Stakeholder Relations Policy fosters transparent and structured dialogue, strengthening trust-based relationships with stakeholders. It defines the communities affected by the Group within its stakeholder framework and establishes principles of responsible conduct and relationship-building based on ethics, integrity, sustainable development, respect for human rights, and respect for affected communities.

The Policy also promotes ongoing dialogue and community participation in project planning, enabling effective management of reputational risks and the prevention of social conflicts.

It further establishes the principle of working towards consensus with stakeholders, particularly local communities in the areas where the Group operates, taking into account their needs, perspectives, and expectations. Finally, it includes the principle of promoting stakeholder participation in the Group's business project through strong engagement strategies and the creation of shared, sustainable value for all communities.

S3-2: Processes for engaging with affected communities about impacts

S3-2 19, S3-2 21 (a - d), S3-2 22

In the current fiscal year, information regarding noise pollution, including its impacts and associated risks, has been reallocated to chapter [E2](#), which should be consulted for further detail.

The Aena Group's interaction with affected communities is based on a structured, systematic, and continuous engagement framework designed to ensure ongoing, direct, and transparent dialogue.

The Aena Group promotes a shared-value model in the communities where it operates, ensuring meaningful participation by affected communities and continuous engagement with stakeholders. This collaboration is developed both directly with communities and indirectly through their legitimate representatives, with the objective of ensuring responsible, inclusive, and sustainable development.

Direct collaboration is carried out through accessible and immediate communication channels, including claims management systems, public consultations, and citizen participation processes linked to the environmental assessment of airport plans and projects. These mechanisms enable affected individuals and communities to express concerns, expectations, and needs, which are incorporated into operational and strategic decision-making.

Indirect collaboration is channelled through structured dialogue with institutions and legitimate community representatives, such as:

- **Airport Coordination Committees:** These consultative collegiate bodies are responsible for ensuring the participation of the autonomous communities and cities with Statute of Autonomy, local authorities, and the most representative economic and social organizations in the airports and heliports managed by Aena in Spain. They enable the development of joint strategies aligned with the needs of each territory. These airport committees, in their regular meetings, monitor the matters coordinated within them.
- **Local, regional, and national governments and administrations:** Aena establishes specific working groups with different public administrations to analyse and promote territorial connectivity, including the participation of local entities responsible for destination development and economic promotion. These forums enable stakeholders to develop joint roadmaps aligned with community needs and regional development plans.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
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- **Airport advisory committees:** At London-Luton Airport, through Luton Rising, sustainable growth and economic development are promoted in and around the Luton region. This initiative seeks to maximise the airport’s socioeconomic benefits for local communities through investment, job creation, and support for community projects, in close collaboration with the Airport Consultative Committee (LLACC) and other stakeholders to ensure balanced development.

- **Representative bodies of specific groups:** The Group maintains dialogue with organisations representing affected groups to ensure that their perspectives are systematically considered in strategic decisions and impact management.

Air transport, due to its strategic importance, reinforces connectivity and territorial cohesion, particularly in non-peninsular communities, and acts as an economic engine by boosting tourism. The Aena Group’s network of airports and heliports constitutes essential infrastructure for mobility, development, and local economic growth.

The perspectives of local communities are incorporated into the Company’s planning and daily operations through periodic meetings and public consultations. Feedback received through these processes is integrated into strategic decision-making to ensure that community priorities and concerns are reflected in corporate decisions. In addition, throughout the Aena Group, participation processes are established in the environmental assessment of airport infrastructure plans, programmes, and projects (such as public consultations), allowing communities to actively participate in decisions that may affect them and strengthening the relationship between airports and their surroundings and promoting sustainable development.

Aena Brasil works closely with local authorities and communities to ensure that its operations contribute positively to regional development. This includes job creation, infrastructure investment, and sustainability programmes to minimise the environmental impacts of airport operations. The subsidiary implements public consultation and citizen participation processes to ensure that community voices are heard, integrated, and considered in decision-making. To strengthen trust, Aena Brasil ensures that these mechanisms are accessible in local languages, promoting continuous improvement in managing community concerns.

In the case of London-Luton Airport, its integration into the Anchors’ Framework in 2025 demonstrates how local community needs are embedded in strategic decision-making. This framework brings together institutions such as local authorities, hospitals, universities, and businesses to collaborate on the Luton 2040 vision for a healthier, fairer, and more sustainable city.

By participating in this framework, London-Luton Airport commits to listening and responding to community priorities. This is reflected in initiatives such as:

- **Local employment and decent work:** promoting local hiring and supporting a Real Living Wage, addressing the need for inclusive employment.
- **Support for local suppliers:** fostering a supply chain composed of local providers to strengthen the regional economy and stimulate job creation.
- **Environmental sustainability:** implementing actions to achieve carbon neutrality by 2040 and applying measures to reduce emissions and noise in response to public concern.
- **Education and community programmes:** initiatives such as Classroom to Careers connect academic training with employment, addressing the need for opportunities for young people.

S3-3: Processes to remediate negative impacts and channels for affected communities to raise concerns

S3-3 27 (b - d), S3-3 28

The processes for remediating potential negative impacts on affected communities, as well as the channels for expressing their concerns, are detailed in section [G1-1](#), which describe the process for their remediation and monitoring.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
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S3-4: Taking action on material impacts on affected communities, approaches to managing material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions

S3-4 30, S3-4 31 (MDR-A), S3-4 32 (c - d), S3-4 38

The Aena Group positions itself as a fundamental actor in the economic, social, and territorial development of the communities in which it operates. Its commitment to mobility, social cohesion, and sustainable growth translates into a set of structured actions designed to enhance its material positive impacts. For example, the application of commercial incentives for airlines and the tariff rebates established by law for island regions in Spain, such as the Canary and Balearic Islands, supports territorial cohesion and ensures the connectivity of these communities with the rest of the country and international destinations.

In the area of employment generation, the Group generates a significant positive impact through the creation of inclusive and accessible job opportunities, with more than 10,000 employees in 2025 and a strong prioritization of local hiring, actively participating in job fairs and promoting recruitment processes in its areas of influence, consolidating its role as an economic and social development driver. Specifically, in the aviation sector, it plays a strategic role in global economic development, contributing to trade, tourism, investment, and international connectivity.

According to the most recent data from the Air Transport Action Group²⁷, collected in its latest available report from 2024, the aviation sector in Spain generated a total of 2 million jobs, of which 305,000 were direct, 300,000 indirect, 230,000 induced, and 1.2 million related to tourism, demonstrating its catalytic effect on the economy and its importance for value creation across society, thereby consolidating aviation as a catalyst for both the economy and tourism, generating value for all stakeholders while responding to the demands of an increasingly dynamic and challenging labour market.

In relation to investments in airport infrastructures, a key component of the Group's material positive impacts, the Strategic Plan sets out investments aimed at strengthening airport infrastructure to ensure that Aena's airports continue to act as long-term catalysts for local socioeconomic development.

In Spain, for example, the Airport Regulation Document (DORA) establishes minimum investment requirements for each of Aena's airports for the 2022-2026 period. The time horizons of **DORA II** actions are aligned with the Aena Group's Strategic Plan, including milestones such as the execution of major infrastructure projects by 2026 and the continued expansion of employment and local hiring programmes during the regulatory period.

All Aena airports have planned investments expected to materially impact their capacity, resilience, and sustainability, many of which will continue in future regulatory periods. Significant examples include:

- **Adolfo Suárez Madrid-Barajas Airport:** Expansion of terminals T4 and T4S and a new processor in T123. This expansion will stimulate the local economy by creating employment and increasing air traffic, benefiting surrounding businesses and services.
- **Alicante-Elche Miguel Hernández Airport and César Manrique-Lanzarote Airport:** Improvements to the airfield and parking platforms, optimizing operational capacity and supporting local economic development through enhanced transport of people and goods.
- **Palma de Mallorca Airport:** Comprehensive remodelling of the terminal area, integrating innovative technologies and personalised services, strengthening the airport's role as a regional economic engine.

In this regard, the Group Aena's 2022-2026 Strategic Plan establishes an ambitious roadmap aligned with DORA II. The plan responds to the strong rebound in air traffic, especially in tourist airports, highlighting the need for infrastructure expansion to accommodate growing demand. DORA II recognises the importance of Aena's network as an essential component of national and international mobility, acting as a driver of tourism and broader economic activity.

In this context, the regulated investments set out in DORA II, amounting to €2,250 million for the period, are already being executed as planned, ensuring improvements in operational efficiency, route optimization, and capacity expansion.

In 2025, the Council of Ministers approved an additional regulated investment of €351 million within DORA II, increasing the total investment for the period to €3,351million. This additional investment enables the early execution of actions originally planned for DORA III (2027–2031), ensuring infrastructure adaptation to new regulatory requirements, strengthening security and cybersecurity, improving the passenger experience, and minimising operational disruption during terminal works.

²⁷ Source: The Air Transport Action Group (ATAG) in [Aviation Benefits Beyond Borders](#) report of December 2024, on page 81.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
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Aena Brasil, for its part, manages 17 airports in 9 states throughout the country, ranging from important hubs such as Congonhas Airport and Recife Airport to regional airports in areas with limited terrestrial connectivity. The operation of these airports in less developed regions is fundamental for boosting economic growth and local mobility. These airports function as key enablers of territorial development by improving access to investment, trade, and tourism and facilitating the integration of isolated regions with the country's major urban centres. Furthermore, they improve access to job opportunities and contribute to reducing territorial disparities, especially in regions with limited road infrastructure.

Likewise, these airports play a key role in promoting sustainable tourism, particularly in destinations such as the Pantanal or the Amazon, generating employment and boosting local economies. However, operating in these regions entails significant challenges, including low flight demand, insufficient complementary infrastructure, and the need to balance regional development with environmental preservation.

In line with its long-term commitment, the Group has allocated more than €780 million in investments across the airports of BOAB – *Bloco dos Onze Aeroportos do Brasil*. This investment not only generates direct and indirect employment, but also stimulates other economic sectors, creating a multiplier effect on regional growth and equipping these airports with sufficient capacity and quality standards comparable to the country's main hubs, thereby significantly contributing to the economic and social development of the regions in which they operate.

In 2025, these investments reflect Aena's firm commitment to economic and social development in the territories where it operates. Furthermore, this commitment materializes in Spain through the 2021-2030 Sustainability Strategy, which places people and communities at the centre of the organisation. This strategy recognises that social, economic, and environmental sustainability together form the foundation of the Company's long-term business model, structuring its actions along two strategic pillars: Community Relations and People Management.

Some of the actions to maximize the positive impact on socioeconomic development are:

1. Culture and heritage:

- Through the Aena with Music programme, a patronage initiative supporting the training of young artists and groups at risk of exclusion, the Group promotes talent and brings culture closer to airport environments. With an annual contribution exceeding €450,000, the programme seeks to motivate and spark interest in culture through music, illustrating a management model based on coexistence between airport activity and social commitment.

To achieve this, Aena establishes collaboration agreements with prestigious cultural institutions such as the *Gran Teatre del Liceu Foundation*, the *Teatro Real Foundation*, the *Private Foundation Taller de Músics*, the *Pau Casals Foundation*, and the *Orfeó Català–Palau de la Música Catalana Foundation*. These partnerships generate impact in the following areas:

Promotion of Young Talent:

- Training of young cellists through the *Fundació Pau Casals*.
- Support for adolescents in vulnerable situations through the *Taller de Músics Escola de Música*.
- Organisation of festivals and seminars for emerging young musicians.

Promotion of Musical Culture:

- Promotion of opera with the *Fundació del Gran Teatre del Liceu*.
- Programming of lyric and choreographic activities at the *Teatro Real*.

Dissemination of Contemporary Popular Music:

- Specialised training in jazz, flamenco, rock, and pop.
- Support for leading music-training institutions.

2. Commitment to Cultural Heritage and Aeronautical Conservation:

Aena promotes cultural engagement and historical preservation through exhibition spaces open to the public at airports and through the management of aeronautical museums. These include the National Museum of Airports and Air Transport at Málaga-Costa del Sol Airport, the Lanzarote Aeronautical Museum located in the original 1940s passenger terminal, and the Aeronautical Museum of Catalonia at Sabadell Airport. In addition, heritage conservation actions are undertaken, such as the protection of historic buildings in Lanzarote.

Since 2025, Aena has also been collaborating with the *Joan Miró Foundation*, providing an annual contribution of €50,000, to support culture and promote access to contemporary art, fostering a more sustainable and excellence-driven.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
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3. Vulnerable groups:

- **Aena with Society:** Aena promotes social action projects that generate a direct positive impact in the communities where it operates, providing up to €230,000 annually to finance 15 social projects with a two-year duration. These initiatives address key areas such as education and social development, inclusion, ecological transition, health and well-being, and responsible tourism. The programme also encourages employee engagement, enabling staff to act as “solidarity sponsors” who propose, vote for, and support projects and participate in related activities.
- **Solidarity spaces:** Aena provides solidarity spaces at most of its Spanish airports, offered to social organisations to raise awareness, showcase their initiatives, and promote community-oriented actions.

4. Universal accessibility:

- In addition to the *Sin Barreras* service available across all Spanish airports, Málaga-Costa del Sol Airport has implemented dedicated waiting rooms for passengers with invisible disabilities and a Silent Room, accessible through the Passenger Assistance Service (subject to availability). This space offers a low-stimulus environment for passengers requiring calm before their flight.

Aena also maintains active collaboration with the Spanish Federation of Ostomized Persons (FAPOE) to continue expanding the availability of ostomy-adapted restrooms in airports where they are not yet operational, with the objective of achieving broader medium-term coverage.

5. Education and research:

- **Aena with Research:** In 2025, Aena launched the first call for research and technology-transfer projects in the airport sector. This initiative aims to drive innovative and sustainable solutions through collaboration with leading research groups, contributing to the sector’s development and the sustainable transformation of air transport.
- **Guided visits and open days:** Aena organises guided visits at Spanish airports and at London-Luton Airport, targeting children, students, young people and aviation professionals with the goal of bringing airport activity closer to society and promoting knowledge of air transport.

In Brazil, Aena employees have supported visits for families and minors from foster homes, reinforcing the company’s social commitment.

At London Luton Airport, several initiatives benefit local communities. In 2025, more than €300,000 were allocated through the Community Trust Fund (CTF) to projects focused on health, skills development and environmental care. Additionally, the Greener Future Fund channelled more than €170,000 into environmental and biodiversity initiatives. In the educational field, the Environmental Education Programme, 180 children from three schools participated in activities that included the planting of 1,300 trees, reinforcing the airport’s commitment to sustainability and social cohesion.

To guarantee the effectiveness of these initiatives, the Aena Group allocates significant financial, technical, and human resources. Through monitoring and control systems, it supervises impact and publishes periodic reports ensuring transparency and alignment with community expectations. Regular consultations and continuous analysis of socioeconomic indicators allow the Company to maximise positive social outcomes and mitigate risks, consolidating its role as a key agent of sustainable territorial development.

In 2025, the Aena Group allocated €5,640,619 (€4,104,682 in 2024²⁸) to foundations and non-profit entities, of which €4,803,702 correspond to Spain (€3,549,311 in 2024) and €836,917 to the UK subsidiary (€555,371 in 2024), supporting activities that drive the economic and social development of communities potentially affected by its operations.

Regarding in-kind contributions, 371 m² were allocated to solidarity spaces in 2025 (351 m² in 2024), and 19,615 m² to cultural exhibitions and aeronautical museums (19,245 m² in 2024), representing an in-kind contribution of €382,792 (€319,676 in 2024).

²⁸ In Aena Brasil’s subsidiaries, no contribution of this nature has materialized in either 2024 or 2025.



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S3-5: Targets related to managing material negative impacts, advancing positive impacts and managing material risks and opportunities

S3-5 39 b, S3-5 41 (MDR-T), S3-5 42 (a - c), S3-5 AR 44 (a - c)

In Spain, the Airport Regulation Document (DORA) 2022–2026 represents a key tool in Aena's strategic planning, establishing the necessary guidelines to ensure long-term airport capacity, safety, and service quality. This regulatory framework is designed to ensure that the airport network operates in a sustainable, accessible manner and in line with the expectations of users and the communities in which it operates.

With the aim of reinforcing the commitment to the general interest and positioning airports as essential assets for economic development, social cohesion, and territorial balance, the following strategic lines are defined for the 2022–2026 period:

- Efficient network management with a focus on safety and service quality.
- Environmental sustainability as a core pillar of operations.
- Innovation as a driver of efficiency and user experience.

DORA II establishes essential parameters that ensure the Aena SME S.A. airport network can meet projected traffic demand while maintaining high standards of quality and environmental sustainability. These parameters analyse estimated traffic, required airport capacity, service-quality indicators, investment needs, sustainability requirements, operating costs, and capital remuneration. Likewise, DORA II establishes specific targets applicable to major airports, always taking into account the activities carried out by Aena in the upstream and downstream phases of its value chain.

Among the main targets in DORA II that impact affected communities, the guarantee of territorial cohesion and citizen mobility in non-peninsular territories (Canary Islands, Balearic Islands, Ceuta, and Melilla) is particularly noteworthy, where air transport is essential and irreplaceable for connectivity. DORA II also incorporates the commitment to reducing direct and indirect CO₂ emissions generated by airport activity.

The procedure for drafting DORA II has taken into account the views of stakeholders at all times. Consultations were conducted with representative user associations, as established in Law 18/2014. This transparency and consultation process regarding the DORA II proposal was completed between December 2020 and March 2021. With regard to the approval process for DORA II, the results of these consultations were taken into consideration, ensuring that all aspects on which no controversy was observed were respected, provided that doing so did not affect the interests of users or the general interest.

The targets and methodologies applied have remained unchanged since 2022, the year in which DORA II entered into force. The State Air Safety Agency (AESA), as the supervisory authority for compliance with strategic investments and the targets set, regarding their scope and execution deadlines, as well as the amount executed at the end of the regulatory period if the investment is not completed by 2026; for other relevant investments in terms of scope and timing; and for regulatory investments, in line with the requirements and deadlines established in the applicable standards, may develop its own supervision methodologies pursuant to the second final provision of Law 18/2014.

These targets and methodologies were carefully designed and agreed upon within the DORA II framework, ensuring alignment with priorities in operational efficiency, sustainability, and service quality. Monitoring is structured through a system of continuous evaluation that includes four-monthly reports to AESA and the DGAC on investment execution; annual technical supervision reports assessing compliance with quality, environmental, capacity, and service-condition standards; and a five-year report summarising overall results and proposing adjustments for the next period.

The regulatory framework incorporates mechanisms that translate results into tangible improvements. Quality-based incentives and penalties adjust tariffs according to performance in 11 indicators, fostering continuous improvement. Penalties for delays in strategic investments encourage efficient execution, and when deviations occur, the supervisor requires corrective actions.

The results of the previous period have supported concrete improvements in DORA 2022-2026, including more ambitious quality targets through the upward adjustment of service-quality objectives, the incorporation of six new environmental indicators reflecting the growing importance of sustainability, and enhancements to investment-supervision mechanisms through strengthened monitoring of deviations.

This approach ensures rigorous, transparent, and continuous improvement-oriented monitoring, where results are systematically translated into adjustments, learnings, and future refinements.

In addition to quantitative objectives, the Strategic Plan incorporates a strong social and environmental commitment, including tripling the funds allocated to social-action initiatives by 2026 compared to 2019, and dedicating 1% of net profit to social action by 2030. Internal monitoring tracks annual progress. DORA II emphasises Aena's commitment to accessibility and mobility for citizens, workers, and goods, ensuring territorial cohesion. This includes improving airport functionality and accessibility and developing intermodal passenger and freight transport networks. These initiatives reinforce Aena's positive impact on affected communities, contributing to their well-being and long-term sustainable development.



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At London Luton Airport (LLA), collaboration with the local authority ensures a focus on supporting the community through skills development and educational opportunities to maximise local employment pathways. LLA also maintains an extensive community programme that includes the Environmental Education Programme and the Skills Builder Programme, the Community Trust Fund and the Greener Future Fund, as well as other investment and sponsorship initiatives that support the local community. The process of setting these targets is carried out in continuous collaboration with the local authority, which acts as the legitimate representative of community interests.

Monitoring of indicators is carried out through the Sustainability Committee (SusCo) using a periodic structure with clearly defined frequencies and objectives:

- **Expenditure on local suppliers:** monitored semi-annually, reaching 38% of total spend allocated to local suppliers in 2025, exceeding the target of maintaining at least 25% of supply-chain expenditure with companies located within a 25-mile radius of the airport.
- **Community programmes:** KPIs are monitored quarterly, including the development and delivery of transferable-skills workshops in at least five local schools, as well as the continued contribution to the Community Trust Fund and the Greener Future Fund.

Results are analysed periodically to identify improvements and adjust future actions, ensuring alignment with the Responsible Business Strategy and community needs.

In Brazil, the airport concession contract plays a crucial role in boosting economic growth and supporting local communities. This contract not only sets obligations for infrastructure upgrades and terminal modernisation, but also ensures efficient airport operations capable of meeting projected traffic demand. This is essential for enhancing mobility and fostering regional connectivity. In this framework, Brazil has set the priority target of fulfilling the investment plan agreed with the National Civil Aviation Agency (ANAC), to continue driving the growth of the airport sector and generating quality employment in the regions where it operates. These targets are established within the concession process, which includes participation from regulatory bodies representing affected communities. Monitoring is carried out through periodic reports to ANAC on the progress of committed investments. Compliance with this plan not only ensures modernisation and increased airport capacity, but also strengthens the local economy, creates direct and indirect employment opportunities, and contributes to the sustainable development of Brazilian communities. The results obtained are used to identify lessons learned, which are incorporated into the planning of future actions.

The Aena Group continues to progress decisively towards its strategic vision, laying the foundations for DORA III, which will introduce unprecedented levels of investment to ensure future competitiveness, sustainability, and service quality.

Non-applicable datapoints

- DPs not developed because, after the Double Materiality Assessment, it has been concluded that they are non-material to the Company: **SBM-3 10, S3-3 27 (a), S3-3 31, S3-3 AR 22, S3-4 32 (a), S3-4 32 (b), S3-4 33(a),S3-4 33(b), S3-4 33(c), S3-4 34 (a), S3-4 34 (b), S3-4 35, S3-4 36, S3-4 AR 36, S3-5 AR44 (a), S3-5 AR44 (b), S3-5 AR44 (c).**
- DPs not included because, due to the Company's activity, they are considered not to be applicable: **SBM-8 b, SBM-9 (a) iii, SBM-9 (a) iv, SBM-9 (b) ii, SMB-9 d, SMB-11, S3-1 AR9, S3-1 AR10, S3-1 15, S3-1 17, S3-1 AR12,S3-2 AR13, S3-2 23, S3-2 24, S3-3 25, S3-3 29, S3-4 AR25, S3-4 AR28, S3-4 AR 40, S3-4 AR 42, S3-5 39 a, S3-4 39 c.**



ESRS 2: General disclosures

E1: Climate change

E2: Pollution

E3: Water and marine resources

E4: Biodiversity and ecosystems

E5: Resource use and circular economy

S1: Own workforce

S2: Workers in the value chain

S3: Affected communities

S4: Consumers and end-users

G1: Business conduct

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S4 Consumers and end-users

Material IROs - Impact materiality (Impacts)

Topic	Subtopic	Sub-subtopic	Impact	Location of the value chain	Positive/Negative	Actual/Potential	Time horizon
S4 Consumers and end-users	Impacts related to information	Access to products and services	Availability of communication channels for open and constructive dialogue with stakeholders	Own operations	Positive	Actual	Short term / Medium term / Long term
S4 Consumers and end-users	Social inclusion of consumers or end-users	Non-discrimination	Improvement of customer experience through agile, efficient, and innovative service using Artificial Intelligence tools	Own operations	Positive	Actual	Short term / Medium term / Long term
S4 Consumers and end-users	Social inclusion of consumers or end-users	Access to products and services	Accessible, inclusive, and quality service for people with functional diversity, PRMs, etc	Downstream value chain	Positive	Actual	Short term / Medium term / Long term
S4 Consumers and end-users	Social inclusion of consumers or end-users	Freedom of expression	Improvement of customer experience due to the implementation of efficiency measures and increased airport capacity	Own operations	Positive	Actual	Short term / Medium term / Long term



ESRS 2: General disclosures

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E2: Pollution

E3: Water and marine resources

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Topic	Subtopic	Sub-subtopic	Impact	Location of the value chain	Positive/Negative	Actual/Potential	Time horizon
S4 Consumers and end-users	Social inclusion of consumers or end-users	Access to products and services	Impact on operations due to interruption of systems or technological platforms	Entire value chain	Negative	Actual	Short term / Medium term / Long term
S4 Consumers and end-users	Personal safety of consumers or end-users	Security of a person	Impact on people due to an aeronautical accident or acts of unlawful interference (attacks)	Entire value chain	Negative	Potential	Short term / Medium term / Long term



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Material IROs - Financial materiality (Risks and Opportunities)

Topic	Subtopic	Sub-subtopic	Driver	Risk/Opportunity description	Location of the value chain	Risk / Opportunity	Time horizon
S4 Consumers and end-users	Social inclusion of consumers or end-users	Privacy	Cyberattacks can target security, operational, commercial, or management systems, which can cause negative effects such as the deactivation of surveillance systems, aircraft traffic control systems, theft of sensitive information, and more.	Service interruption or decrease in operational capacity or data breaches due to cyberattacks	Own operations	Risk	Medium term / Long term
S4 Consumers and end-users	Social inclusion of consumers or end-users	Access to products and services	The planned works at various airports may generate temporary impacts both on operations and on the experience of passengers and users of the facilities.	Occurrence of an air incident/accident or an act of unlawful interference	Downstream value chain	Risk	Short term / Medium term / Long term
S4 Consumers and end-users	Personal safety of consumers or end-users	Health and safety	In the event of accidents or incidents, a significant reputational impact occurs on the air transport sector as a whole and, in particular, on the airline, the aircraft manufacturer and the airport involved.	Impact on operations and customer experience due to the execution of planned investments	Own operations	Risk	Medium term / Long term



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S4-SBM-2: Interests and views of stakeholders

ESRS 2 SBM-2-8

For the Aena Group, the interests, opinions, and rights of its consumers and end-users are fundamental elements in the design and ongoing refinement of its strategy and business model. As a key stakeholder group, consumers and end-users are integrated into the process of identifying their expectations and needs, through an approach that prioritizes sustainability and respect for Human Rights. This approach is part of Aena's Strategic Plan 2022–2026, the Sustainability Strategy 2021–2030 for Aena Spain and the 2024–2040 strategy for Aena Brasil, and the Climate Action Plan 2021–2030 in Spain and the 2024–2040 plan in Brazil, as well as the Responsible Business Strategy at London Luton Airport in the United Kingdom.

Through these strategic frameworks, the Aena Group ensures that its business practices are aligned with Human Rights principles and international sustainability standards, fostering a safe, accessible, and reliable environment for all consumers and users. Attention to consumer rights and opinions not only strengthens the relationship with them but also informs the Group's strategic and operational decisions, ensuring that its business model remains responsive to the needs and expectations of communities.

S4-SBM-3: Material impacts, risks and opportunities and their interaction with strategy and business model

ESRS 2 SBM-3 9 (a)i, SBM-3 9 (a)ii, 9(b), 10 (a)ii, 10 (a)iv, 10 (b), 10 (c), 10 (d), 11, 12

For the Aena Group, the material impacts, risks, and opportunities arising from its relationship with consumers and end-users are intrinsically linked to its strategy and business model, as they include key aspects such as consumer experience in relation to freedom of expression, non-discrimination, and access to products and services, cybersecurity, and consumer safety.

The Group has implemented specific performance indicators, policies, and metrics that allow it to monitor, mitigate, and manage the adverse effects of material negative impacts and risks while maximizing positive impacts, thus ensuring that its business model continuously aligns with user expectations and emerging challenges.

Regarding the negative impact of operational disruption due to the interruption of systems or technological platforms, it is considered to be due to the dependence of the Group's services, as well as those of our value chain, on technological systems and platforms. For this reason, the Aena Group's systems are designed with high security parameters, and procedures are in place to act in the event of an interruption of these services, such as Business Continuity Plans. One of the reasons for these interruptions may be the risk of cyberattacks, which pose a threat to the security, operations, management, and commercial activities of the Aena Group. These cyberattacks can disable critical services, such as those related to airport management and surveillance, affecting user experience and confidence in airport operations.

To address this risk, Aena Spain has adopted a cybersecurity model based on standards such as ISO 27001 and the National Security Scheme (ENS), with the main objective of protecting the confidentiality, integrity, and availability of the information it handles. This standard defines a framework for the implementation, maintenance, and continuous improvement of the Information Security Management System (ISMS), ensuring that information security-related risks are adequately managed.

In the United Kingdom, London Luton Airport applies NIS regulations and develops security management systems in accordance with ISO 27001. In Aena Brasil, specific projects are implemented, such as identity management and phishing campaigns, as well as Pentest and Retest in critical infrastructures. Aena Brasil has a cybersecurity model based on ISO 27001 as a reference framework for establishing controls aimed at ensuring information security.

These actions, along with certified audits and the achievement of international certifications, strengthen the Group's resilience and ensure service continuity.

In terms of consumer safety and protection, air incidents/accidents and acts of unlawful interference (attacks) can affect the safety of airport users and their airport environment, understanding this negative impact systemically and in relation to the airport business. To mitigate this, surveillance systems, Emergency and Self-Protection Plans, access controls, audits, and drills have been implemented. These mitigation measures are supervised by the competent authorities in each country to reinforce passenger safety and trust.



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To improve user experience, some examples of initiatives related to non-discrimination for Persons with Reduced Mobility (PRM) and visible and invisible disabilities include barrier-free assistance for PRM, sensory rooms for people with Autism Spectrum Disorder (ASD) in airports such as Alicante-Elche Miguel Hernández, and restrooms adapted to the needs of people with ostomies, available in most airports in the network. Furthermore, in Spain, the implementation of digital tools such as Aena Maps, which facilitate accessible routes, and a bidirectional messaging system that allows PRM users and their families to communicate in real time, has continued. Likewise, in 2025, a system of invisible disability badges continued to be implemented in the main airports, allowing these individuals to receive respectful attention adapted to their needs. In the United Kingdom, at London Luton Airport, the use of sunflower lanyards allows for the identification and appropriate care of people with invisible disabilities, while in Aena Brasil airports, infrastructures such as accessible bathrooms and handrails have continued to be enhanced, ensuring a more inclusive experience.

User experience is analysed through service quality surveys and devices managed by quality committees, analysing real-time feedback and developing action plans to optimize services. In particular, in Aena Brasil, there is monitoring of service quality indicators to identify user needs. In Spain, the Oli chatbot is available to users, having assisted more than 5.4 million passengers since its launch in December 2022, which reflects the commitment to personalized attention and user satisfaction; additionally, the [Strategic Innovation and Digital Transformation Plan 2021–2026](#) was developed, aiming to optimize customer experience, increase operational efficiency, and develop business around sustainable mobility, with three strategic programs: from passenger to customer, efficient use of resources, and beyond the airport. This fosters projects such as video analytics, drones, digitalization of lost property, and international collaborations through the Airports for Innovation (A4I) alliance.

Finally, transparency and dialogue with consumers are strengthened through multiple channels, such as the [Telematic Services Portal](#), social media, the Feedback Form at London Luton Airport, or the *Canal Ouvidoria* in Brazil. These platforms ensure that user complaints, suggestions, and comments are addressed in a timely manner, consolidating the Group's commitment to accessibility, sustainability, and operational excellence.

S4-1: Policies related to consumers and end-users

S4-1 13, S4-1 15 (MDR-P), S4-1 16 (a), S4-1 16 (b), S4-1 16 (c), S4-1 17, S4-1, S4-1 AR 10

The Aena Group is committed to managing the impacts, risks, and opportunities affecting consumers and end-users, adopting a set of policies that integrate the needs and expectations of these groups into their design and application. These policies are aimed at guaranteeing sustainability, innovation, security, and the protection of human rights, responding to the requirements of the general population as well as those of specific groups with particular needs, within the framework of all its operations.

Sustainability Policy and Policy on Integrated Quality, Environment, Energy Efficiency and Occupational Health and Safety Management

The Aena Group incorporates sustainability and management excellence as fundamental pillars of its business model, aligning with the expectations of consumers, end-users, and other stakeholders.

The purpose of the Sustainability Policy is to define and establish the principles, commitments, objectives, and strategy to follow in carrying out its activity, optimizing its contribution to sustainable development and meeting present needs without compromising those of future generations, creating long-term value, maximizing positive impacts, and minimizing negative impacts on society, and managing risks throughout the entire value chain, through ethical and transparent behaviour with consumers and users.

For its part, the Policy on Integrated Quality, Environment, Energy Efficiency and Occupational Health and Safety Management reinforces the commitment to operational excellence that encompasses consumer safety and experience. Its objective is to promote the safe, effective, and sustainable development of air transport and to maintain outstanding results over time for stakeholders, including consumers.

These policies apply to all operational activities of the Aena Group, covering both upstream and downstream phases of the value chain.

Both policies are actively supervised by the Board of Directors to ensure their correct application and alignment with the corporate strategy. They are implemented through strategic lines that contribute to sustainable development and environmental protection. The 2021–2030 Sustainability Strategy and the Climate Action Plan address the commitments set out in both policies, through the definition of a series of plans for the coordination, implementation, and monitoring of the strategy and the evolution of its objectives.

For more information on minimum disclosure requirements (MDR-P), please refer to the [Environmental Policies](#) section.



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Human Rights Policy

This policy reinforces the commitment to inclusion, non-discrimination, and the protection of fundamental rights through a due-diligence-based approach. This continuous process allows for the identification, prevention, and mitigation of negative impacts, especially among the most vulnerable groups, ensuring that fundamental rights are respected in all phases of its activity and value chain.

This policy establishes commitments regarding a safe, excellent, accessible, and quality service, guaranteeing user safety. It also establishes its commitment to a relationship with users based on the principles of transparency and trust, freedom of expression, confidentiality, and non-discrimination, respecting the diversity of opinions.

Likewise, the Human Rights Policy includes the dissemination of these principles throughout its value chain, promoting that suppliers, contractors, business partners, and other collaborators adopt equivalent standards. In addition, specific mechanisms have been implemented to ensure compliance and supervision of these policies, as well as open communication channels to report possible non-compliance or violations.

Detailed information on these Human Rights commitments, their measures, as well as information regarding the approval body and policy date can be found in section [S1-1](#).

Innovation Strategic Plan, Information Security Policy and Operational Safety Policy

The Aena Group, as part of its strategic commitment to innovation, security, and sustainability, has implemented a comprehensive approach that includes policies and plans designed to optimize user experience, improve operational efficiency, and ensure the protection of personal data. This commitment also extends to consumers and end-users, serving as a key motivation for the development of these policies. These initiatives are developed transversally throughout the Company and extend to its international operations, including notable actions in the United Kingdom and Brazil, in collaboration with local authorities and specialized groups.

In the field of innovation, the Aena Group has the 2021–2026 Strategic Plan for Innovation and Digital Transformation aimed at personalizing the passenger experience through data analysis, automating processes to increase efficiency, and exploring new business opportunities beyond the traditional airport scope. This approach positions innovation as a key driver to meet user expectations and promote quality, technology, and sustainable mobility.

Regarding security, the Aena Group applies an Information Security Policy, approved by the Board of Directors of Aena S.M.E., S.A. on December 19, 2023, supported by standards such as ISO 27001 and the National Security Scheme, which guarantee secure and transparent processing of personal data. This approach includes preventive, detection, and reaction measures against cyberattacks and threats to airport digital infrastructure, ensuring information protection in all its operations.

Furthermore, all Aena Group airports integrate operational safety management into their airport processes and activities, ensuring adequate staff training in this area, as well as the allocation of necessary resources and measures to mitigate risks in critical situations. This commitment reinforces the safe provision of assigned services and prioritizes the safety of passengers and users, standing out as a fundamental pillar in all operations of the Aena Group. All Aena Group airports in Spain, the United Kingdom, and Brazil have an Operational Safety Policy and corresponding Operational Safety Management Systems, which allow for the management of possible risks, incidents, and communications or queries related to operational safety. These Policies and Management Systems are included within the certification or verification of airports by the corresponding national authorities.

The Aena Group guarantees the public availability of key policies, criteria, and action frameworks that guide the Company's management in specific aspects, through its corporate website, promoting transparency and access to information for all stakeholders. With these actions, the company demonstrates a comprehensive and structured approach to managing the challenges affecting consumers and end-users, consolidating itself as a responsible airport operator prepared to face the global challenges of the future.

Finally, the 2021–2030 Sustainability Strategy includes various actions that address both the 2021–2026 Innovation and Digital Transformation Plan and the Information Security Policy. The Strategy contemplates the use of innovation as a driver for operational efficiency and the personalization of the passenger experience. Key initiatives include the automation and digitalization of processes, the use of data analysis, sustainable mobility and electrification, and collaboration with the airport ecosystem on innovation projects that enhance sustainability and energy efficiency.

Internal Reporting and Whistleblower Protection System Policy

This policy aims to guarantee the protection of whistleblowers against possible reprisals and to state the general principles of the Internal Reporting and Whistleblower Protection System, which integrates the various Whistleblower Channels of the Aena Group, as a formal mechanism for communication, consultation, or reporting of irregularities.

The System promotes a culture of prevention and proactive risk management, ensuring that all communications are treated with the principles of confidentiality, impartiality, diligence, and respect for the fundamental rights established in this policy.



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S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

Detailed information on these commitments, their measures, as well as information regarding the approval body can be found in section [G1-1](#).

S4-2: Processes for engaging with consumers and end-users about impacts

S4-2 18, S4-2 20 (a), S4-2 20 (b), S4-2 20 (c), S4-2 20 (d), S4-2 21

The Aena Group articulates its relationships with its stakeholders on the pillars of transparency, dialogue, trust-building, and the creation of shared value. In this regard, the Aena Group has maintained excellence in the provision of its services, meeting passenger expectations by focusing on their needs, transforming the way it interacts with them, and personalizing the commercial offerings and services directed at passengers, airlines, and other users of its facilities. Furthermore, it promotes innovation and digital transformation towards the Smart Airport model, in close collaboration with its entire value chain.

The operational responsibility for ensuring effective collaboration with consumers and end-users, as well as for ensuring that the results of such collaboration serve as the basis for the Group's approach, it is specific to each area and is detailed in its corresponding section.

For the preparation of DORA II, Aena has established a process of dialogue and consensus, which is enriched by the contributions of the various stakeholders involved. The process begins with an initial proposal from Aena, which is submitted for consultation with the sector (airlines). Subsequently, a report is presented to the CNMC and the Ministry of Economy, Trade and Business, and presentations are made to the Airport Coordination Committees. Finally, the Directorate General of Civil Aviation (DGAC) of MITMA prepares the definitive document, which is submitted for final approval by the Council of Ministers.

To evaluate the satisfaction of consumers and end-users and understand their expectations, Aena in Spain uses various tools such as quality surveys and interactive devices, as well as working groups with clients, airlines, and concessionary companies. This approach follows an iterative process in which the collected information is continuously analysed to design, implement, and review recommendations and action plans, thus ensuring constant and sustained improvement of the services offered. These surveys are conducted to passengers at boarding gates and are planned through a sampling plan that establishes criteria such as airlines, time slots, and the number of surveys.

This is complemented, in the case of passengers, by the EMMA surveys (Survey of the characteristics and motives of Air Mobility), which allow, among other aspects, the identification of the reasons for travel and the means of transport used to get to the airport, as well as other passenger characterization data. In addition, in Spain, Aena has designed its own methodology through annual Airline Surveys (ECAs) that allow it to ascertain airline satisfaction in relation to the main elements related to service provision, such as operations, security, airport services, commercial services, communication systems, environment, infrastructure, etc.

The Aena Group pays special attention to vulnerable groups, such as persons with reduced mobility (PRM), people with invisible disabilities, and other passengers requiring special assistance. Close collaboration is maintained with representative associations of these groups, such as CERMI (Spanish Committee of Representatives of Persons with Disabilities) and FAPOE (Federation of Associations of Ostomized People) in Spain, and Autism Bedfordshire in the case of London Luton Airport, which provide ideas and validate new initiatives aimed at improving accessibility and personalization of services.

Regarding consumer safety, control and collaboration structures have been established that in Spain include the creation of different committees, including the Operational Safety Management System Committee (CSGSO), where issues associated with the operational safety system are addressed. Also noteworthy are the Platform Safety Committee (CSP) or, due to its relevance, the Local Runway Safety Committee (CLSP), responsible for topics such as operations and planned works, including various topics related to operational safety. These working groups bring together representatives from airport operations, airlines, air traffic providers, pilot and controller associations, among others. Their activities include hazard identification, risk analysis, and the implementation of mitigation measures. The annual planning of ordinary meetings and the possibility of extraordinary calls ensure constant collaboration adapted to the needs of each airport.

Likewise, for operational safety, there are Aerodrome Emergency Committees, in which representatives of airlines and/or ground handling agents and air traffic service providers, among others, also participate, with the aim of ensuring that the response to a possible emergency is correctly coordinated. These committees meet at least once a year, and each airport has an annual plan with specific committees.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

In the United Kingdom, in 2025, collaboration with third parties has been maintained, especially with ground handling service providers. Monthly ramp operations coordination meetings are held with the shared ground support equipment (GSE) provider, handling companies, airlines, and LLA to review shared equipment performance and any changes. Likewise, monthly meetings are held with NATS (air navigation service provider) as well as attendance at all relevant project working groups, such as runway resurfacing, as part of its Safety Management System (SMS). In addition, Safety Stack meetings are held three times a year to involve a wider group of airfield users and stakeholders, as well as to communicate changes in the Ground Operations Manuals (GOMs) and publicize new initiatives. Middle management and Safety Managers from handling companies in ramp operations participate through the Safety Leadership and Managers Alliance (SMLA), where safety recognitions for good practices are discussed and shared. Likewise, weekly safety review meetings are held to identify safety trends and agree on Action Points for the following week. In addition, all service providers have access to operational safety-related documentation through the Opscom management platform.

In Aena Brasil, there is an air operations reporting mechanism directed towards the operational safety manager. This mechanism ensures that risks are adequately addressed and that necessary corrective and preventive measures are implemented. The Operational Safety Committee (CSO) meetings are held every six months and extraordinarily when necessary, with the participation of airlines, service providers, and key departments to ensure operational safety. For any work on the airside, risks and dangerous situations encountered are discussed weekly, allowing the necessary measures to be taken so that the works do not pose any risk to operational safety.

Additionally, the Aena Group works to offer a safe stay and a quality experience in the facilities of all its airports, highlighting the communication and collaboration of all organizations and parties involved in airport security. To this end, it implements contingency plans for the orderly management and normalization of crises, as well as reporting to stakeholders.

To evaluate the quality of airport services, direct surveys are used with passengers, which collect their experience and level of satisfaction in aspects such as access, facilities, staff friendliness, or waiting times. Based on the results of these surveys, the Airport Service Quality (ASQ) awards, granted by Airports Council International (ACI), are presented.

These recognitions are, therefore, a consequence of the performance reflected in the surveys and represent compliance with international standards of service quality. In 2025, several Spanish airports were distinguished in different categories, thus demonstrating the effectiveness of collaborative work with users and the ability to meet their expectations:

- Palma de Mallorca Airport: Best Airport in Europe in the category of 25 to 40 million passengers.
- Alicante-Elche Miguel Hernández Airport: Best Airport in Europe between in the category of 15 to 25 million passengers.
- Seville Airport: Best Airport in Europe between in the category of 5 to 15 million passengers.
- El Hierro, Girona-Costa Brava, Pamplona, Reus and Zaragoza Airports: Best Airport in Europe with in the category of fewer than 2 million passengers.
- Josep Tarradellas Barcelona–El Prat Airport: “Airport with the Most Dedicated Staff in Europe”.
- El Hierro and Pamplona Airports: “Cleanest Airport in Europe”.
- El Hierro and Reus Airports: “Easiest Airport Journey in Europe”, an award received for the second consecutive year.
- Alicante-Elche Miguel Hernández and El Hierro Airports: “Roll of Excellence” (honorary mention for their trajectory in the last decade).

In 2025, the Aena Group was also recognized with other awards; Liferay granted the Project of the Year award for the modernization of its digital ecosystem, an initiative that will enable a more flexible and advanced digital experience for millions of travelers globally. Additionally, the jury of the Routes Europe Awards recognized and awarded Aena’s strategy for its excellent work in developing the connectivity of its airports. This recognition responds to a strategy that generates tangible benefits for end-users, especially in two key areas: regional airports and long-haul connectivity, with a primary focus on Asia.

In the case of regional airports, Aena established a commercial incentive scheme, from the summer 2024 season to the winter 2026 season, aimed at terminals with fewer than three million passengers. These incentives were reinforced with the approval, in the last month of 2025, of a new, even more beneficial commercial incentive for airlines that will cover the summer 2026 season to the winter 2028 season. This measure will allow airlines to reduce their operating costs at regional airports by between 60% and 65%, supporting the opening of new routes and frequencies. Thus, it increases the offer of destinations and direct connections at these airports and generates positive social and economic impacts in the host communities.

Furthermore, in the long-haul segment, it is relevant to note that in 2025, 15 new routes were inaugurated, 4 of which were to the Asian continent. That same year, the number of passengers originating from or destined for Asia increased by 41%, reaching 1.9 million. Likewise, in the commercial incentive scheme, a chapter specifically aims to boost traffic development in Asia.



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In the United Kingdom, London Luton Airport achieved its highest annual customer satisfaction score in 2025, 4.14 (compared to 4.07 in 2024), with 4 out of 5 passengers rating their experience as very good or excellent. This result, the highest in the airport's history, reflects the airport's continuous commitment to excellence in passenger experience. Additionally, London Luton Airport was distinguished for the second consecutive year at the UK Customer Experience Awards (UKCXA), winning gold for "Best Customer-Centric Culture" and silver for "Best Experience for Vulnerable Passengers", thus reaffirming its commitment to inclusive and excellent service. The LLA Way program continues to generate measurable impact, with staff scores increasing by 10% since its launch in 2021. This cultural progress has been externally recognized, placing LLA first in the UK and third worldwide in customer-centric culture.

Therefore, continuous collaboration with consumers and end-users is a key element in the Aena Group's strategy. The results derived from this approach translate into more inclusive, safe, sustainable, and efficient services, reaffirming the organization's commitment to quality, accessibility, and innovation, while strengthening its international reputation as a responsible and future-oriented airport operator.

S4-3: Processes to remediate negative impacts and channels for consumers and end-users to raise concerns

S4-3 25 (a), S4-3 25 (b), S4-3 25 (c), S4-3 25 (d), S4-3 26

The participation process for consumers and end-users consists of a series of active and bidirectional communication tools and mechanisms that facilitate continuous dialogue and collaboration. These tools not only allow for effective communication but also help to continuously evaluate and reinforce the Aena Group's commitment to its users.

The Aena Group provides its users with a practical and accessible communication channel for everyone, aiming to remove accessibility and communication barriers. With this objective, it improves its website according to criteria of maximum simplicity, reach, and effectiveness. In this way, digital barriers that hinder access to information are eliminated, allowing anyone who wishes to consult it. Additionally, a specific chat has been implemented for people with hearing disabilities, thus ensuring inclusive and effective communication for all users.

For any passenger wishing to file a complaint, grievance, or suggestion related to any service of the Aena Group, various channels are available:

- On the Aena website in Spain, through the Procedures and Claims Portal, as well as through the complaint forms available at various points in the airports, users can submit their written complaints using the official bodies and channels established in the current procedure.
- Social media: these are addressed on a general basis, as they are not included in the complaint and claims management procedure. However, comments received on "X" and Facebook social media profiles, as well as Instagram and LinkedIn, are monitored.
- In the United Kingdom, London Luton Airport provides users with a specific website ([Feedback-form](#) London Luton Airport), through which complaints can be processed via an online form. Additionally, customers can contact the airport directly by email, and since November 2025, an AI chat tool has been introduced that allows users to resolve general queries autonomously. During 2026, this functionality will be extended to a chatbot integrated into multiple web pages and, eventually, into social media channels. Furthermore, complaint forms are available to passengers at various points in the airport.
- The *Ouvidoria*²⁹ Channel at Aena Brasil airports is enabled to receive proposals for improvements related to the airport services offered, acting as a bridge between the user and the technical unit. Likewise, the email ouvidoria@aenabrasil.com.br is available.

In Spain, Aena has specialized procedures and departments in all its airports for the efficient management of passenger complaints and claims. This system ensures organized attention from reception to resolution, seeking user satisfaction and service improvement.

²⁹ In Brazil, the Management System also addresses relationships with airport users, with the aim of providing citizens with information about the Ombudsman Institution and its relationship with consumers, suppliers, employees, the community, and users. Aena Brasil's obligation is to maintain a physical and electronic service system for users and an ombudsman to investigate complaints, claims, requests for information, suggestions, and compliments related to the execution of the Concession Agreement. Furthermore, the Airport Exploration Plan - PEA establishes the obligation to implement a system for registering and processing demands related to service provision.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
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The process begins when the passenger submits their complaint through official channels, which is registered in the SIRA system. Subsequently, an acknowledgment of receipt is sent within 5 business days, and an internal investigation begins. If necessary, corrective measures are applied, including those involving external providers. Finally, a definitive response is sent within a maximum of 20 business days, detailing the actions taken and the preventive measures planned. These deadlines are set out in the procedure governing claims subject to the OTAC-01 indicator of DORA II, which measures the response time for airport management claims.

To guarantee service quality, the effectiveness of the system is continuously evaluated. Claims are analysed monthly through the SIRA system, while the directors of each airport locally supervise compliance with the process and the effectiveness of the applied corrections. In turn, specific evaluations are carried out centrally to reinforce compliance with DORA II.

In the United Kingdom, efforts are made to respond to requests and complaints within 48 hours, which are managed through their insurance companies. Dynamics 365 is currently used to manage communications with their customers, allowing for the registration and generation of corresponding reports for follow-up.

In Aena Brasil, once a complaint or claim is registered, an analysis is carried out, which must contain the minimum necessary content for processing. Subsequently, the message is forwarded to the technical unit that must respond within the established time, and then the information is transmitted to the user. The maximum period for responding to received claims and complaints is 16 days.

The Aena Group has implemented an **Internal Reporting and Whistleblower Protection System Policy**. In this way, it aims to ensure that consumers are aware of the structures and processes available to the Group to raise their concerns or needs and thus address them. This policy sets out how to protect against retaliation when these structures or processes are used.

The OTAC-01 indicator of DORA II measures efficiency in the management of airport management complaints, establishing that at least 98% must be responded to within 5 business days. This commitment by Aena reflects its dedication to the agile and effective management of user complaints.

In 2025, in Spain, the total number of complaints and claims received amounted to 15,102 (15,072 in 2024). At London-Luton Airport in the United Kingdom, the total number of complaints and claims was 7,545 (7,370 in 2024), and at Aena airports in Brazil, 1,103 (988 in 2024).

The processes for remediation or cooperation in the remediation of material negative impacts, including operational disruption due to the interruption of systems or technological platforms and harm to individuals due to an aeronautical accident or acts of unlawful interference (attacks), are described in chapter [S4-4](#).

Indicator	Main data on complaints and claims							
	Spain		United Kingdom		Brazil		Total	
	2024	2025	2024	2025	2024	2025	2024	2025
Transport agreement	2,421	1,891	0	0	0	0	2,421	1,891
Handling	1,246	1,293	433	283	45	37	1,724	1,613
Information systems	787	734	0	0	23	25	810	759
Facilities	1,088	1,545	279	236	338	362	1,705	2,143
Security services	2,338	2,669	1,655	1,388	97	136	4,090	4,193
Supplementary services	1,937	1,524	1,682	942	27	35	3,646	2,501
Access	77	176	89	25	0	0	166	201
Damage and theft	385	281	370	169	0	0	755	450
Various	400	441	1,447	1,895	428	480	2,275	2,816
Commercial and food & beverage services	588	1,065	304	253	24	22	916	1,340
Car parks	3,805	3,483	1,111	2,354	6	6	4,922	5,843
Total	15,072	15,102	7,370	7,545	988	1,103	23,430	23,750

In 2024, at London Luton Airport, noise and environmental complaints had been included within the total of airport management complaints. This issue has been corrected and, therefore, the 2025 data are presented according to the appropriate criterion, excluding these specific categories.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
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The Aena Group maintains close collaboration with airlines and concessionary companies to ensure that all users have effective communication mechanisms. In addition to the VIP Lounges at Spanish airports, Rate Now devices are used to evaluate various services such as cleaning, security filters, security controls, and other operational areas, continuously collecting and analysing passenger feedback.

Concurrently, regular meetings are held with concessionaires and airlines to review the results obtained and propose improvements, always aligned with the commitment to enhancing the customer experience.

In this regard, the Aena Group provides third parties with accessible and confidential communication channels through which they can report, file complaints, or make inquiries about violations of the Code of Conduct, non-compliance with internal regulations and the regulatory compliance system, criminal or administrative offences, labour law regarding occupational health and safety, and any actions or omissions that may constitute infringements of European Union law. Detailed information on these commitments and their measures is provided in chapter [G1](#).

S4-4: Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions

S4-4 30 (MDR-A), S4-4 31 (a - d), S4-4 32 (a - c), S4-4 33 (a), S4-4 34, S4-4 35, S4-4 37

Consumer Experience

Freedom of Expression

In the pursuit of excellence, the Aena Group strives to maintain the highest standards of service quality, ensuring satisfaction and the best possible attention for all users. Within this excellence-driven approach, the Aena Group seeks the prevention, mitigation, and remediation of negative impacts, the promotion of positive impacts, and the management of risks and opportunities. In accordance with the above, the Group promotes the availability of communication channels for open and constructive dialogue with stakeholders through the following actions:

The Aena Group evaluates the satisfaction of passengers, clients, and concessionary companies using various tools. These include the Airport Service Quality (ASQ) surveys from Airports Council International (ACI), implemented in 34 airports in Spain, which collect passenger opinions on a wide range of service parameters and monitor the customer experience within the airport, from their arrival until they pass the boarding gate. Airports analyse the results obtained monthly, and ACI issues quarterly reports with results and comparisons with other airports of similar characteristics. London-Luton Airport has achieved Level 3 of ACI's Airport Customer Experience Accreditation, an excellent achievement that reinforces all the work carried out in the Guest Experience space.

Additionally, interactive real-time feedback devices, such as Rate Now in Spain, are used to complement the information obtained through surveys and enable immediate monitoring of user perception.

At London-Luton Airport, the Voice of the Customer alignment program integrates feedback obtained through ASQ touchpoints and tools like Feedback Now, which allows for meaningful conversations with stakeholders and generates key information that translates into recommendations and action plans aimed at continuous service improvement. These devices facilitate agile decision-making and the adaptation of services according to the priorities expressed by passengers.

Furthermore, since 2022, The LLA Way has been implemented, a framework of service standards that ensures consistency and quality in all interactions with passengers. Complementarily, since June 2024, quarterly Service Chain Meetings have been held, acting as a structured dialogue channel with service stakeholders.

Finally, the LLA Excellence Academy, inaugurated in April 2024, functions as a space where the internal and external community can learn, share best practices, and collaborate on the continuous improvement of the passenger experience.

Non-Discrimination

The Aena Group reaffirms its commitment to universal accessibility, focusing on eliminating physical, communication, and social barriers to ensure that all individuals, including those with special needs, can access and move through its facilities safely, autonomously, and comfortably. This approach is aimed at preventing and mitigating any negative impact on end-users, while seeking to generate positive experiences through the continuous improvement of its services.



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Various programs and measures have been strengthened to address the specific needs of passengers, reinforcing the organization of resources, implementing technological innovations, and promoting staff awareness. Among the key actions is the assistance service for passengers with reduced mobility (PRM), provided through the “Sin Barreras” service, which is free of charge and personalized according to each passenger’s needs. This service covers the entire airport journey, including check-in processes, security controls, boarding and disembarkation, baggage collection, and movement throughout the terminals.

The table below provides a breakdown of the number of service requests from passengers with reduced mobility that were attended to during the 2024 and 2025 reporting periods:

	2024				2025			
	Spain	United Kingdom	Brazil	Total	Spain	United Kingdom	Brazil	Total
Requests from passengers with reduced mobility (PRM) (no.)	2,441,887	153,636	18,469	2,613,992	2,680,437	183,921	80,482	2,944,840

Note: In Aena Brasil, in 2024, the reported data corresponded solely to Recife Airport, whereas in 2025 information from the 17 Aena airports in Brazil is included.

In 2025, across the Aena Group’s airport network, specialized services were provided to 2,944,840 users with reduced mobility (2,613,992 in 2024), facilitating and ensuring that all users have equitable access to services.

The service “Sin Barreras” achieved a remarkable average rating of 4.94 out of 5 (4.94 out of 5 in 2024) in user surveys in 2025. This achievement demonstrates not only the quality of the service but also the positive impact it generates on the passenger experience.

To ensure the availability of necessary resources and optimize the organization of available resources, thus maintaining the level of quality, the Aena Group has continued to reinforce messages directed at passengers, reminding them of the importance of requesting this service at least 48 hours in advance.

In the airports of the Spanish network, progress has been made in improving accessibility in their facilities. During 2025, the development of several technological initiatives continued, such as the update of the mobile application and the Aena Maps tool, which enables passengers to plan accessible routes within airport facilities. These solutions are designed to prioritize the use of elevators over stairs and ensure comfortable and safe journeys.

Additionally, to cater to groups with invisible disabilities, Aena has a special badge that facilitates passage through airports. This system, available in the 19 busiest airports in its network, allows users to access security controls and be identified by airport staff to receive more appropriate attention. The initiative includes informative tools available on the Aena website, so that these passengers can plan their journey in advance.

Furthermore, magnetic induction loops are used in several airports, a technology designed to improve the experience of users with hearing aids. In addition, Aena has maintained its chat helpline for people with hearing disabilities, facilitating access to real-time information.

As in previous years, accessibility workshops continue to be organized in Spanish airports, at least annually. Their objective is to share the status of the service, disseminate best practices, and review implemented improvements to continuously enhance the level of quality offered.

Moreover, in Spain, most airports in the network have adapted restrooms for ostomized people, and new tools are being incorporated to promote the autonomy of passengers with disabilities, thus reinforcing accessibility and inclusion in the terminals.

In terms of accessibility and inclusion, specific participation forums have been created to ensure that people with special needs can express their opinions and that these are effectively integrated into service improvement. The Accessibility Forum holds regular consultations with users with reduced mobility (PRM) and specialized organizations, including structured collaboration with entities such as CERMI, the Spanish Autism Confederation, ONCE, and FASOCIDE, the Spanish Federation of Deafblind People’s Associations, to identify areas for improvement and share best practices. These alliances have been fundamental in ensuring that services and facilities respond to the specific needs of different groups, allowing Aena to better understand the needs of users with disabilities and adapt its services to minimize risks and improve the experience of these particular passengers.

The corporate website provides transparent information on services, procedures, and passenger rights, and social media allows for direct communication, real-time query resolution, and incident management.

London-Luton Airport has incorporated new infrastructure to improve the customer experience. These include 18 new help points, strategically located in different areas of the airport, which allow passengers to communicate immediately with assistance staff.



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In September, a new exclusive “Assisted Travel” lounge was inaugurated, with capacity to simultaneously serve approximately 50 people with reduced mobility. This space has a sensory area, inclusive changing rooms, a flight information screen, and greater spaciousness to facilitate the movement of passengers, resources, and equipment.

In line with the opening of this lounge, London-Luton Airport has updated its terminology, replacing the previously used concept of “Special Assistance” with the more appropriate and user-friendly “Assisted Travel”.

To encourage independent transit for passengers with reduced mobility, an “Independent Journey Booklet” has also been designed, which includes all accessible facilities in the departure area and details the route to the new Assisted Travel Lounge.

Complementarily, Accessibility Forums hold regular meetings with accessibility groups where specific needs are discussed and adapted solutions are co-created.

The Accessibility Familiarisation Day is held annually, an event where people with disabilities go through the entire passenger process and offer direct feedback on detected barriers and opportunities for improvement.

The monitoring and evaluation of these initiatives are carried out through periodic surveys and meetings with collaborating entities, which allow services to be adjusted based on results and reinforcing the positive impact of the implemented actions.

At London-Luton Airport, the results obtained demonstrate the effectiveness of these participation mechanisms. In 2025, the airport’s ASQ score reached 4.14, the highest value recorded to date, with 80% of passengers rating their experience as “very good” or “excellent”.

In Brazil, the airports managed by Aena have focused their efforts on ensuring that facilities are fully accessible. The terminals have adapted restrooms, tactile paving, handrails, and lifts, as well as wheelchairs to facilitate the mobility of passengers with special needs. Aena Brasil has an Operation Manual for People with Special Assistance Needs, which aims to define the procedures and data controls related to the assistance of people requiring special assistance.

Additionally, in Brazil’s renovation projects, specific accessibility criteria have been incorporated, consulting experts to ensure compliance with international regulations and standards. These initiatives seek to provide a safe and comfortable experience for all users.

Access to Products and Services

In Spain, DORA II guarantees compliance with the conditions to offer a quality service with sufficient capacity to meet demand, developing an efficient, competitive, and sustainable service in the long term. It establishes the conditions and tariff path that Aena’s network airports must comply with until 2026 regarding quality, environment, capacity, and investments. For more information about the collaborative process of preparing DORA II, see section [S4-2](#).

Additionally, DORA II establishes as a priority the maintenance of high-quality levels in Aena’s airport services, as well as the implementation of improvements in areas with room for optimization. To this end, 17 quality indicators are established that collect data from five main areas:

- Passenger perceived satisfaction (SPAX).
- Waiting times at passenger processing points (TEPP).
- Availability of equipment and facilities in the terminal building (DEET).
- Availability of equipment and facilities on the airside (DELA).
- Other key areas (OTAC), such as complaint response time (see section [S4-3](#)).

To achieve this, the Quality Plans for each airport include qualitative and quantitative goals and objectives, which encompass actions implemented and planned. In line with the strategic objectives contained in DORA II, qualitative objectives include efficient management of the airport network in terms of safety and quality, environmental sustainability as the backbone of actions, and innovation as a key element to achieve quality and efficiency in service provision.

During fiscal year 2025, various initiatives aimed at improving the passenger experience were developed at different airports.

At Adolfo Suárez Madrid–Barajas Airport, with the aim of reinforcing the “Sense of Place” concept and promoting local culture, agreements were reached with the Madrid City Council and the Thyssen-Bornemisza Museum to exhibit art collections from the museum in the terminal, as well as the emblematic Meninas figures, representative of the city.

At airports in the Canary Islands, events were organized under the slogan “Take the Canary Islands with You”, which included the installation of products and stands showcasing the culture and traditional items of the islands.

Likewise, at Alicante-Elche Miguel Hernández Airport, passengers enjoyed live music with Christmas carols, while at Palma de Mallorca Airport, concerts with live music were offered in the terminals.



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At Josep Tarradellas Barcelona–El Prat Airport, several musical initiatives were carried out throughout the year, including performances by scholarship students, itinerant Christmas-themed concerts, and special days with classical music at different points in the terminal. These actions were carried out in collaboration with cultural entities and aimed to enrich the passenger experience through live music.

Finally, on special dates, live performances were organized at several airports under the slogan “Enjoy the Music”, contributing to creating a more dynamic and attractive atmosphere for passengers.

In relation to operational disruptions, Aena in Spain has a Business Continuity and Activity Recovery Plan to guarantee airport operations in the event of interruptions in key technological systems, such as baggage handling or air navigation.

This plan aims to minimize the impact on basic airport processes, ensuring efficient decision-making after an emergency or crisis. All fundamental business areas and support functions are included in the planning process. To this end, an analysis of critical resources and their impact on operations is carried out, establishing a timeframe within which a response must be deployed and dimensioning the necessary resources to maintain minimum services.

The plan also includes specific procedures, such as the identification of alternative technical and human resources, the assignment of responsibilities within response teams, and the definition and coordination of necessary actions for service recovery.

To manage the situation, a Continuity Committee is activated, responsible for coordinating the recovery of airport activity and maintaining the plan. This committee works in close collaboration with the Crisis Committee, the Local Communication Committee, and the CGRH24 (Network Management Centre), ensuring effective communication about the status of the crisis and recovery actions.

In the United Kingdom, London-Luton Airport has specific plans, such as the crisis communication plan, to guarantee operability in the event of interruptions in technological systems or infrastructure and adverse weather phenomena, as well as a Crisis Management Plan if the interruption poses a significant operational or reputational risk.

In Brazil, the airports of Aena’s subsidiaries also have a Business Continuity Plan to ensure the rapid recovery of activities in the event of an interruption, with the aim of minimizing impacts as much as possible. The plan contains actions involving a series of interlocutors who coordinate their activities according to each situation.

Airports have ceased to be mere points of departure and arrival to become spaces of experiences, technology, and efficiency, driven by innovation and new social trends. In a world where global mobility is essential, the Aena Group focuses on consumers and end-users, incorporating advanced technologies into various travel processes. These innovations allow for personalized services, improving passenger comfort and well-being, and enhancing infrastructure management efficiency. This initiative benefits all users of the Aena Group, with a special focus on its own airports.

From process automation to the integration of emerging technologies such as artificial intelligence, biometrics, or the Internet of Things (IoT), airports are redefining passenger expectations and operational capabilities, improving user experience through agile, efficient, and innovative service. The digitalization of passenger interaction and infrastructure management is fundamental to raising service quality, while becoming more sustainable and efficient.

During fiscal year 2025, the Aena Group continued to validate technologies with potential for short- and medium-term implementation and participated in international innovation projects, positioning itself to face sector transformations and deploying Research, Development, and Innovation (R&D&I) projects with concrete and tangible application across its entire airport network.

Furthermore, Aena continues with the implementation of its 2021–2026 Strategic Plan for Innovation and Digital Transformation, whose objective is to optimize user experience, improve operational efficiency, and diversify the business model through technological innovation. This Plan is structured into three strategic programs: From Passenger to Customer, focused on personalization and improving customer experience; Efficient Use of Resources, focused on sustainability and operational optimization; and Beyond the Airport, which explores opportunities in sustainable mobility and territorial connectivity.

For the design and development of this Plan, various Aena units have been consulted to identify needs and define projects with agreed resources and budgets, in addition to an analysis of technological trends through a benchmark of airports worldwide.

Below, the measures and actions achieved are detailed, highlighting their impact and contribution to the achievement of strategic objectives.

INNOVA Intrapreneurship Program: The 6th edition of this program was completed. The initiative is designed to foster internal innovation and creativity, promote continuous improvement, and highlight implemented projects that have generated value in any centre.

In this edition, 246 employees submitted 219 ideas from 29 centres in Spain, Brazil, and the United Kingdom (194 employees submitted 218 ideas from 28 sites in the 5th edition). The selected initiatives will be tested as pilots in network airports to evaluate their operational viability.

The winning projects of the 6th Edition of INNOVA were:



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

- In the “Excellence in customer experience” challenge, the winning idea was “Sense of Place ANB”, which proposes incorporating representative local elements into the design and ambiance of airports, with the aim of transforming these spaces into environments with a unique and welcoming identity connected to their surroundings.
- In the “Environmental and Social Sustainability” challenge, the winning proposal was “Conscious Energy: Lighting with Efficiency and Sustainability”, which proposes the installation of an electrical control panel for the three lighting circuits of the main courtyard, with automatic and manual control options.
- In the “Data-oriented airport” challenge, the winning idea was “Data Intelligence for Baggage Flow Optimization”, which proposes a system that combines historical SATE data with short-term demand projections to anticipate flows at all times and plan baggage-related processes more efficiently.
- In the “Operational efficiency” challenge, the winning proposal was “StopCarsIncursions”, which proposes an operational safety system to prevent unauthorized vehicle incursions on the runway, combining onboard technologies, sensors at critical points, and road signage.
- In the “Best innovative project already implemented” category, the winning idea was the “Congonhas Airport Mobility Project,” which describes the optimization of the airport’s road environment through reorganized access points, curbside sectorization, technology integration, and infrastructure improvements to streamline passenger arrival and pickup.

The Aena Ventures open innovation program advanced in the deployment of projects with the best use cases from the second edition, with three of the five winning startups.

National and International Funding Projects:

- EUREKA and OPERA (SESAR3 Program): focused on the integration of urban air mobility in airports, leading concepts such as Vertiport Traffic Collaborative Management (VTCM).
- eCONPAVE (Public-Private Call – Ministry of Science, Innovation and Universities): development of a predictive tool for airport pavement management with embedded sensors.
- AEROHARVEST (Public-Private Call – Ministry of Science, Innovation and Universities): energy recovery systems with piezoelectric materials.
- AEROPAV (Public-Private Call – Ministry of Science, Innovation and Universities): application of generative AI to evaluate the Pavement Condition Index (PCI).
- PASARELAS (PID Call from CDTI): pilot test of autonomous boarding bridges at airports.

In addition, the Aena Group participates in international Working Groups, such as the ACI EUROPE Innovation Forum, and as a founding member of SESAR 3; it also leads Airports for Innovation (A4I), an international alliance formed by 10 airports or airport operators with the aim of collaborating on innovation, sustainability, and customer experience.

Outstanding Innovative Projects in 2025:

- Virtual assistant that, through generative AI, offers multilingual services in all airports of the Spanish network, improving interaction with more than 5 million passengers.
- Drone management platform in Huesca: testing of a platform to manage drones through automatic swarm flights, performing inspections on the runway, perimeter, and other infrastructures, with operational coordination and simulated critical areas.
- Testing of a LiDAR system for measuring times in airport processes: testing of LiDAR technology to measure passenger times and flows at passport controls in ALC and AGP.
- Aircraft Training for Firefighters and Signalers: development of an accessible virtual environment with haptic glasses and gloves that offers a complete and realistic learning experience.
- 3D Virtual Environment for Procurement: metaverse-based system to reduce the percentage of bidders who abandon the bidding process.
- Monitoring of aircraft turnaround: video-analysis-based solution to monitor turnaround events; project validated at PMI Airport.
- Video analytics for monitoring and control of airport processes: deployment of a video analytics system at MAD, BCN, and PMI airports for passenger tracking and process control.



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The Aena Group allocates significant resources to innovation, including 48 initiatives launched in 2025. Additionally, to foster and incentivize the participation of Aena staff in innovation initiatives, as well as to promote the development and implementation of new projects, 1,804 specific training hours in these competencies have been dedicated to 285 people (368 hours in 2024 to 88 people). These actions are complemented by Aena's active participation in international initiatives. These measures seek to ensure that the Group's practices do not cause negative impacts on consumers, and that any incident is addressed effectively through corrective and preventive solutions.

The investment made in R&D&I projects during fiscal year 2025 exceeded €44.5 million (€43.7 million in 2024).

The Aena Group's commitment to innovation is reflected in a comprehensive strategy that combines preventive actions, international collaborations, and a clear vision towards sustainability and positive impact. The Group continues to lead change in the airport sector, setting new standards of excellence for the benefit of its end-users.

Regarding the negative impact on operations and customer experience due to the execution of planned investments, the main actions or management measures for their mitigation are:

In Spain, with the aim of minimizing the impact of works on the passenger experience and maintaining operational quality standards, Aena has incorporated a specific item called "Maintenance of Operability and Passenger Perceived Quality" into its investment projects, representing approximately 3% of the Material Execution Budget (PEM) of the work. This item is variable depending on the characteristics of each project and is structured at an open price to allow on-demand measurement.

This initiative includes the following measures:

- Quality temporary enclosures: Installation of panels with aesthetic finishes and materials that reduce noise and dust generated by the works.
- Provisional detours: Enabling safe and clearly delimited alternative routes to maintain the fluidity of passenger traffic.
- Clear and attractive signage: Multilingual temporary signage and digital screens that guide passengers with positive and informative messages during the construction period.
- Safe and comfortable passage areas: Improvement of conditions in provisional areas through adequate lighting, additional elevators, freight elevators, air conditioning, charging points, and Wi-Fi connection.
- Temporary furniture and services: Installation of elements that guarantee comfort and functionality during the construction period.

In the United Kingdom, with a focus on communication and flexibility, project management includes assessments of any impact on passengers and operations, which must be kept to a minimum where possible, with specific mitigation measures depending on project requirements. These often include communication with passengers through the airport's own communication channels and directly with partner airlines, messages aligned with the airport's brand, and advertising on hoardings when these are used, as well as temporary changes to routes or infrastructure to keep disruptions to a minimum.

In Brazil, as a general rule, risk mitigation measures, aimed at minimizing the impact on operations and customer experience, are integrated from the planning phase in all investment projects, whether these are internally managed or executed by third parties.

In contrast, at São Paulo Airport, where works are the responsibility of an external construction company, the management of the communication plan and interactions with the airport community are managed directly by said contractor, this being their responsibility.

Cybersecurity

S4-4 30 (MDR-A), S4-4 31 (a - d), S4-4 32 (a - c), S4-4 33 (a), S4-4 34, S4-4 35, S4-4 37

The material risk related to cybersecurity primarily addresses the following areas: service interruption or reduced operational capacity due to cyberattacks; increased end-user waiting times due to the interruption of technological systems or platforms; and potential data breaches resulting from cyberattacks. To mitigate this risk, the Aena Group invests in improving its cybersecurity maturity level, strengthening the protection of systems that support both operations and people's safety.

The Aena Group recognizes the risks that increasing technological complexity poses to its critical assets, such as information and systems. Cyberattacks targeting its security, operations, and management systems could affect service availability, cause interruptions, or diminish operational capacity, with a direct impact on user experience. To mitigate this risk, Aena invests in improving its cybersecurity maturity level, strengthening the protection of systems that support both operations and people's safety.

The Aena Group has adopted a comprehensive approach to cybersecurity, combining prevention, detection, and response to threats.



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In Spain, Aena has an Information Security Management System (ISMS) certified according to the UNE-ISO/IEC 27001 standard and audited by AENOR. This system is fully integrated into Aena's business management system, adopting a risk-based approach that allows for supervised operation and continuous improvement. Furthermore, the 2022–2026 Information Security Strategic Plan, approved and supervised by the Audit Commission, defines the lines of action that guide the organization toward its security objectives.

Aena works in Spain to comply with [Delegated Regulation \(EU\) 2022/1645](#). This Regulation establishes a regulatory framework for airport operators to meet the requirements for detecting and managing information security risks that may affect aviation safety and impact information and communication technology systems and data used for civil aviation purposes, as well as detecting information security events and determining which of them are considered information security incidents with possible repercussions on aviation safety, responding to such incidents, and recovering from them. This Regulation, which entered into force on October 16, 2025, together with other regulations such as the National Security Plan, represents a significant effort to protect infrastructure, workers, and end-users, maintaining operational capacity against possible cyberattacks.

In Spain, the ICT and Cybersecurity Directorate leads penetration tests and attack simulations to identify vulnerabilities and ensure high security standards. In addition, Aena collaborates with relevant organizations and entities in Spain, adopting sectoral solutions that address global risks and consolidating itself as a benchmark in cybersecurity in aviation.

Likewise, awareness sessions are held in different airports, complemented by monthly newsletters that highlight the main security risks and best practices. To ensure an adequate response to possible incidents, the Information Security Policy establishes clear protocols managed by the ICT Security Incident Response Centre (CSIRT). This centre, together with the Cybersecurity Operations Centre, operates uninterrupted seven days a week, ensuring efficient monitoring and resolution of incidents.

In the United Kingdom, London-Luton Airport has made significant progress in complying with [The Network and Information Systems Regulations 2018](#) and the controls established by the UK Civil Aviation Authority. During 2024 and continuing into 2025, the implementation of an ISMS based on ISO 27001 has been maintained, significantly strengthening controls over critical systems. In addition, response and recovery plans based on these standards have been developed, with an initial focus on critical systems and with plans for future expansion.

Periodic internal audits have been introduced since 2024, initially focused on critical systems and expanded in 2025 to all important systems to comply with the requirements of the Resilience Act.

In Aena Brasil, efforts in 2025 focused on strengthening information security through projects implementing two-factor authentication tools, mobile device management, DLP solutions, and SOAR solutions. In addition, exhaustive penetration tests, known as pentest and retest, were carried out to identify vulnerabilities and ensure their correction.

Furthermore, periodic internal audits are carried out to evaluate the effectiveness of the implemented controls and ensure continuous compliance with information security policies.

Additionally, the Aena Group has a Business Continuity and Activity Recovery Plan, whose scope of application covers all fundamental business areas of the airport network. This Plan establishes guidelines for effectively responding to emergencies, including service interruptions caused by cyberattacks or technological problems. The Plan is managed by the Continuity Committee and aims to stabilize the situation and restore operability in the shortest possible time, adapting to the particularities of each airport and ensuring global coordination among its different areas.

To this end, essential processes and resources are identified, potential risks are analysed, and initiatives are proposed to mitigate them. In addition, specific procedures are developed for each area of activity, a global coordination method is established, and a Plan maintenance program is implemented. These specific procedures must include various tasks, both permanent and those to be carried out during a crisis, requiring the formation of a group for their development, supervision, and updating. Among the different aspects these procedures must reflect are available and alternative technical and human resources, and the definition and coordination of actions.

The Business Continuity Plan Implementation and Maintenance Program includes the formation of a working group to develop, implement, and maintain the Plan during normal activity. Plan maintenance involves periodic reviews, updates, continuous training, and biennial tests to ensure effectiveness and adequacy.

At London-Luton Airport, this plan is called the Business Continuity and Incident Response Plan. In 2025, the airport carried out two tabletop simulation exercises that included both the IT team and business executives, with the aim of testing response and coordination protocols for possible contingencies.

The Aena Group, to execute the aforementioned measures or actions, allocates human, technological, and financial resources for the management of material impacts on consumers and end-users, including specialized teams and communication channels.



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Consumer Safety

S4-4 30 (MDR-A), S4-4 31 (a - d), S4-4 32 (a - c), S4-4 33 (a), S4-4 34, S4-4 35, S4-4 37

Operational Safety

During 2025, the Aena Group reaffirmed its priority commitment to safety in all its aspects, focusing on the prevention of eventualities and contingencies, continuously evaluating and adapting its processes, and providing them with the necessary resources to face the challenges of airport activity. Specifically, these actions address the negative impact and risk identified in relation to the materialization of an incident or act of interference in Aena's operations.

In Spain, 79% of airports are certified according to EU Regulation No. 139/2014, which ensures that the infrastructure, systems, equipment, services, procedures, and personnel of each airport comply with European standards, improving operational safety. These certifications have been conducted by the State Air Safety Agency (AESA), which accredits compliance with community regulations in public-use aerodromes. Furthermore, certification is a guarantee for air operators, who can be certain that the highest operational safety standards are observed at Aena's airports in Spain. The remaining 21%³⁰ are certified according to Royal Decree 862/2009.

In the United Kingdom, London-Luton Airport is also certified in accordance with EU Regulation No. 139/2014, and the Civil Aviation Authority (CAA) and the British Standards Institution (BSI) are the authorities responsible for accrediting compliance with the regulations. In the case of Aena Brasil, RBAC 139 of the National Civil Aviation Agency (ANAC) is followed and accredited by the same authority.

Therefore, to prevent, mitigate, and remediate identified negative incidents and risks, an Operational Safety Policy has been implemented in each of the countries, establishing the Aena Group's commitment to the highest standards in operational safety. Additionally, it has implemented the corresponding Operational Safety Management Systems (SMS), which allow for the management of possible risks and incidents related to operational safety. This System provides the framework for coordinating, supervising, and establishing specific requirements for managing operational safety in airport facilities. The main components of the SMS include:

- Risk management procedures
- Communication and supervision mechanisms
- Supplier control
- Specific contractual requirements
- Incident investigation and treatment
- Indicator monitoring procedures
- Operational safety training
- Procedures supporting continuous improvement of operational safety

The SMS is also the reference framework for guaranteeing the operational safety of third parties carrying out their activity in airport facilities. It provides for the control, supervision, and direction of the work of those services in its area of activity that are performed by third parties in the airport movement area and other areas that may affect operability. In addition, it conducts and analyses supervisions of external providers and communicates irregularities to the Airport Operational Safety Management System Manager (RSGSO), who applies appropriate measures to ensure everyone's safety.

The Operational Safety Program (OSP) includes the objectives set annually to achieve the principle of continuous improvement in each airport regarding operational safety. This program is a tool for airports to improve operational safety in the aspects they have detected, and the monitoring of the actions proposed therein is carried out locally, as all Aena Group airports have an OSP. In airport inspections, both internal and external, it is audited that an OSP is effectively in place and adequately managed, but the scope of the proposed actions is not monitored.

In Spain, the independent Compliance Monitoring unit is responsible for monitoring operational safety management compliance processes transversally across Aena's airport network, in order to evaluate the efficiency of the actions carried out in this regard.

In addition, communication mechanisms are available between the Aena Group and third parties to address any aspect related to operational safety. Communications received and issued, as well as the treatment given to them, are reviewed for each airport.

In this sense, adequate mandatory and voluntary notification systems are established, based on the principle of fairness and a non-punitive action, through which adequate protection is ensured for whistleblowers.

³⁰ Air bases open to civil traffic and the Zaragoza joint-use airport are not certified or verified, as the requirement does not apply to them.



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Through the actions developed by the Aena Group, processes continue to be strengthened, ensuring user satisfaction and maintaining high levels of operational safety, which reinforces its position as a leader in airport management at an international level.

At London-Luton Airport, the operations team conducts daily safety inspections in the movement area, complemented by periodic audits carried out by AirDat. These audits identify areas for improvement and ensure compliance with established regulations. Airfield Operations involves all airport users through agreed Safety Engagement Points (PoE), ensuring understanding of key safety messages and instructions. These aspects are monitored through weekly governance meetings that analyse current data trends.

Additionally, the Aena Group includes clauses in contracts with third parties that integrate the requirements of the SMS. Through these requirements, the Group articulates third-party control and security obligations, operational safety communications, and the type of information to be exchanged and how it must be transmitted between interlocutors. This includes mandatory operational safety training, regular reports, and compliance controls. Training actions related to accident prevention and dangerous goods handling are particularly noteworthy, allowing the Group to mitigate the possibility of an incident occurring.

	2024				2025			
	Spain	United Kingdom	Brazil	Total	Spain	United Kingdom	Brazil	Total
Internal inspections (no.)	42	18	17	77	39	1	34	74
External audits (no.)	22	31	18	71	52	1	42	95
Drills (no.)	18	1	42	61	32	0	64	96

For Spain, the number of external audits corresponding to 2024 is 22, and not 23, due to the cancellation of one of the audits initially planned. The reduction observed in the values corresponding to the United Kingdom, at London Luton Airport, is due to the alignment with the criterion used in Spain. Under this new criterion, only general audits (internal and external) are considered, applying the same logic to the drills. In Brazil, the increase in external audits is due to a change in ANAC's methodology, which previously carried out joint audits covering several areas (Operations, Maintenance, Wildlife Management, Operational Safety and Emergency Response) and now performs them independently, thereby increasing their total number. As for the drills, the increase is the result of an internal initiative by AENA to conduct them also in airports that are not required to do so under the regulation (Class I and II RBAC 153).

Airport Security

In relation to the negative impact and identified risk concerning the materialization of an incident or act of interference in operations, the Aena Group prioritizes the safety and security of passengers, crews, ground personnel, aircraft, and airport facilities. Its approach goes beyond the minimums established by authorities, ensuring regulatory compliance and risk management with the least possible impact on users. The Aena Group implements advanced surveillance systems and specific measures to prevent acts of unlawful interference, promoting best security practices.

Incidents related to acts of unlawful interference or aeronautical accidents can affect the physical safety of users in the Aena Group's facilities. Although these incidents are potential and not linked to individual cases, they represent a broad threat across the value chain, encompassing both air and ground operations. This highlights the importance of security measures and emergency response protocols to protect users.

These negative incidents are evaluated and managed within the Aena Group's processes to minimize their impact on consumers and end-users, ensuring that mitigation and security systems are effective throughout its value chain. For this reason, Aena, as a member of the Simulation Working Group led by AESA, participates in the execution of drills. The drill program is generated by AESA, and in 2025, 4 drills were carried out (1 in 2024), which verify, among other issues, communications between the various organizations involved.

Effective management of these risks is crucial to maintaining the trust of end-users and ensuring a safe travel experience. Furthermore, these measures allow the Aena Group to position itself as an airport operator committed to high security standards, enhancing its reputation and increasing its ability to attract more users.

The Aena Group coordinates its efforts with local, regional, and international authorities, including the National Police, Civil Guard, the CAA in the United Kingdom, and ANAC in Brazil, ensuring a global approach to maintaining security in all operational locations.

Additionally, the Aena Group includes clauses in its contracts with suppliers to ensure they comply with security regulations and necessary training, and also conducts drills and audits that verify the effectiveness of these processes in managing negative incidents.



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	2024				2025			
	Spain	United Kingdom	Brazil	Total	Spain	United Kingdom	Brazil	Total
Internal verifications (no.)	31	13	24	68	34	1	44	79
External audits (no.)	34	10	7	51	32	1	3	36
Drills (no.)	1	0	7	8	4	0	7	11

For the United Kingdom, the number of external audits corresponding to 2024 is 10, and not 12, due to the cancellation of two of the audits initially planned. The reduction observed in the values corresponding to the United Kingdom, at London Luton Airport, is due to the alignment with the criterion used in Spain. Under this new criterion, only general audits (internal and external) are considered, applying the same logic to the drills.

In 2025, the Aena Group reaffirmed its commitment to passenger and user safety through the implementation of improvements in surveillance systems, access control, and security protocols at its airports. Surveillance technologies continue to be modernized through the installation of new models in airport camera expansions and replacements, incorporating advanced technologies, including motion analytics. These capabilities allow for automatic alarms without the need for constant supervision by security guards.

In access control systems, detection equipment is being updated in line with market improvements, with the aim of increasing its durability and optimizing its detection capability, while reducing the number of false alarms. In relation to Airport Security Programs (PSA), those airports whose PSA version expired in 2025 have updated their program in accordance with the new version currently in use. This update incorporates changes derived from the latest edition of the National Security Program (PNS) of July 11, 2025, allowing for a more precise understanding and more effective analysis of the security measures, means, and resources available at each airport. Likewise, this new version facilitates both its application by the airport itself and the review and supervision tasks carried out by AESA.

With each PNS update, the content of the Airport Security Program (PSA) model has been reviewed and adjusted to comply with new requirements. In 2025, the airports of Gran Canaria, Santiago–Rosalia de Castro, Reus, Son Bonet, Santander, Tenerife Norte–Ciudad de la Laguna, and El Hierro received approval for their updated PSAs, in accordance with the standards established in the PNS. Due to a future change in the PSA approval system by Aena, the following airports whose approval was due to expire during 2025 have been extended until 3/31/2027: Madrid-Cuatro Vientos, La Palma, León, and Sabadell.

Throughout the year, various measures have been developed focusing on communication and collaboration with the organizations involved, surveillance of vulnerable areas, control of restricted access, and inspection of people and goods. These actions are part of the National Security Program, which establishes guidelines for managing acts of unlawful interference, such as hijacking or bomb threats, ensuring the necessary resources for an effective response.

In Spain, the main actions in 2025 regarding airport security include:

- Improvements in security equipment, such as access control systems and CCTV. In 2024, Aena began deploying new inspection lines in the security filters of the three main airports in its Spanish network, opting for the use of new technologies that allow passengers not to remove liquids or laptops from hand luggage.
- Implementation of automated border control systems (Entry Exit System): Aena has deployed the necessary equipment for border control in the 39 airports with a border, maintaining constant coordination with the National Police. The installed equipment is already in operation and consists mainly of more than 1,400 self-registration kiosks and more than 850 automatic ABC (Automated Border Control) gates. A passport control service has also been provided to support the State Security Forces and Corps.

In the United Kingdom, London-Luton Airport has specialized groups in airport security management (authorities and airport partners), whose function is to evaluate possible vulnerabilities and risks and recommend measures to mitigate them. This group is supported by the Security Executive Group, which recommends and authorizes additional measures to those proposed by these working groups. In addition, security measures have been aligned with CAA (Civil Aviation Authority) regulations, which conduct an initial evaluation of services before their implementation, ensuring that all providers are CAA-certified and comply with established requirements. Continuous training and rigorous monitoring ensure high levels of compliance.

In Aena Brasil, advanced equipment such as CCTV cameras, access control systems, and self-service totems are available. In addition, improvements were made to control points and the security culture was strengthened through staff training in AVSEC standards. The measures adopted include participation in the Brazilian Aviation Security Group (BAsE), which promotes national security projects and facilitates cooperation between authorities. This collaborative approach has allowed for the establishment of clear goals and more effective risk management.



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S4-5: Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

S4-5 38, S4-5 40 (MDR-T), S4-5 41 (a), S4-5 41 (b), S4-5 41 (c)

Consumer Experience

Freedom of Expression

In line with the commitment to maintain open and constructive communication channels with stakeholders, the DORA 2022–2026 establishes the OTAC-01 indicator for “Response time to airport management complaints”. This indicator requires that 98% of complaints be responded to within 5 business days of their receipt, ensuring efficient, accountable, and transparent management of the complaint system. This standard is part of DORA's incentive and penalty system, reflecting the strategic importance Aena places on dialogue with its users and the continuous improvement of its services.

Internationally, the Group's subsidiaries also maintain demanding standards for handling complaints. At London Luton Airport, the response commitment is set at 48 hours, demonstrating agile and customer-focused management. Meanwhile, in Brazilian airports, the established deadline for responding to complaints is 16 days, complying with local regulatory requirements and ensuring appropriate and timely attention to users across all of the Group's operations.

Non-discrimination

DORA II includes an indicator to measure the satisfaction level of passengers with reduced mobility (PRM) regarding the assistance service offered at Aena's network airports in Spain. This indicator combines direct user evaluations with an analysis of the number of complaints related to the service, providing a comprehensive and reliable view of their perception and experience.

The accessibility objective set in DORA II is detailed in section [S4-4](#). This indicator highlights the importance of ensuring an accessible, efficient, and user-centric service for passengers with reduced mobility, aligning with the principles of inclusion and universal accessibility that guide Aena's actions.

Furthermore, it has specific qualitative goals, such as extending the invisible disabilities badge to all airports in the Spanish airport network and continuing to organize accessibility workshops to share progress and promote staff awareness and capacity-building. Likewise, the Aena Group aims to continue expanding the scope of its inclusive services and strengthening staff training in accessibility. It also seeks to foster collaboration with organizations to improve the quality of life of passengers with special needs.

In the United Kingdom, at London Luton Airport, accessibility has also been a priority, with efforts focused on reinforcing staff training and awareness-raising initiatives. By the end of 2025, 100% of the airport's workforce had completed the online disability awareness training course “How can I help you better?”. During the same year, the training was extended to third parties and other airport stakeholders, ensuring that all individuals working at the facilities have a baseline level of disability awareness. Additionally, members of the LLA Accessibility Forum have provided staff with specific awareness sessions on visual impairment, dementia (Dementia Friends program), and autism. Furthermore, awareness clauses are included in service specifications, requiring contracting companies to demonstrate a clear and verifiable commitment to diversity and accessibility.

Metrics related to accessibility or PRM services are grouped under the “guest services” category, and the airport's performance in accessibility is audited annually by the Civil Aviation Authority (CAA). In its most recent evaluation, corresponding to the 2024/25 financial year, the CAA classified London Luton Airport's accessibility services as “very good”. The medium-term objective is to continuously maintain this “very good” rating until 2030, adapting to the annual update of CAA criteria as the needs of persons with reduced mobility (PRM) in the United Kingdom evolve. In the long term, London Luton Airport aims to continue improving the accessibility experience, in line with its commitment to offer an increasingly inclusive and barrier-free airport experience.

In the Brazilian subsidiaries, there are qualitative goals set in terms of accessibility focused on facilitating the stay of passengers with special needs, such as bathrooms, tactile paving, handrails, elevators, and wheelchairs. Likewise, in renovation projects, additional accessibility measures are implemented, accompanied by a specific consultation process to ensure compliance.



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Access to products and services

The Aena Group establishes certain quantitative goals to encourage continuous improvement. In the case of indicators related to airport capacity, current capacity and utilization levels of the different subsystems (airfield, apron, passenger terminal, and cargo terminal) are presented for the airports in the Aena Group network during the regulatory period, measured through aircraft/hour and passengers/hour, and airport occupancy level, respectively. Additionally, annual targets are set according to the type of airport and the previous year's results.

Aena has an investment plan that will allow the overall capacity of Spanish airports to reach approximately 348 million passengers by 2026, with specific objectives included in Annex 2 of DORA II. These objectives include indicators such as the current overall network capacity, maximum capacity per airport and infrastructure, and annual utilization level per airport and infrastructure. Likewise, specific utilization levels are established for the airfield, apron, and terminal building, planned for the five-year period of DORA II.

Each indicator has a specific target value, which establishes the minimum quality standard required for airport services during the 2022–2026 period. This approach reinforces Aena's commitment to operational excellence, service reliability, and user satisfaction, ensuring that the airport network continues to offer quality services aligned with the expectations of passengers, customers, and concessionary companies.

DORA II establishes specific objectives regarding overall passenger satisfaction, measured through an indicator that evaluates users' overall perception based on four key areas: satisfaction with airport cleanliness, satisfaction with airport wayfinding, satisfaction with physical security at the airport, and satisfaction with the comfort of boarding areas. These indicators are calculated using the results of the ASQ surveys explained previously.

Finally, AESA produces a report verifying compliance with the established objectives. Depending on the degree of compliance with these objectives, bonuses or penalties will be applied to the remunerated tariffs for services provided by Aena. Deviations from these target values may lead to the supervisor requesting corrective actions to improve results. Likewise, the Board of Directors annually approves budgets that contain planned actions regarding quality, both those required by regulations (DORA II or concession contracts) and those identified as necessary to improve the quality of services.

Annex 3 of DORA II establishes that the specific objective regarding quality and accessibility for Aena airports with traffic equal to or greater than 100,000 passengers annually³¹, if the historical average is higher than "Very good (4)", is to maintain the perceived quality level at 100% during the DORA II period. On the other hand, if the historical average is lower than "Very good (4)", the objective is to improve the satisfaction level by 1% year-on-year until this value is reached. In those airports with traffic below 100,000 passengers annually, the objective is to ensure that the perceived quality level is maintained at 100% during the DORA II period. In relation to quality indicators, during 2025 and 2024, the following results were obtained in the ASQ surveys answered by users:

	Quality assessment (scale of 1 to 5)					
	2024			2025		
	Passenger services quality	Commercial premises quality	Food & beverage quality	Passenger services quality	Commercial premises quality	Food & beverage quality
Spain	4.18	3.62	3.78	4.21	3.60	3.59
United Kingdom	4.07	3.71	3.89	4.14	3.82	3.98
Brazil	4.43	3.95	3.41	4.45	3.93	3.41

The results obtained, along with other tools such as working groups and Rate Now devices, are essential for guiding continuous improvement plans and strengthening dialogue with stakeholders.

At the Aena Group, work continues on identifying training needs, as well as on the management, evaluation, and monitoring of training results to ensure the appropriate qualification of personnel by delivering courses related to passenger experience.

³¹ Average of 2018-2019.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

	Training to improve service quality			
	2025			
	Spain	United Kingdom	Brazil	Total
Customer experience training (No. of employees)	1,284	177	918	2,379
	2024			
	Spain	United Kingdom	Brazil	Total
Customer experience training (No. of employees)	8,009	174	568	8,751

The decrease in the total number of employees trained in customer experience compared to 2024 is due to the lower number of participants in the Introduction to Passenger Experience course, as most had already completed this training in previous years.

During 2025, Aena staff in Spain continued to receive the online course "Introduction to Passenger Experience" and the in-person course "Airport Culture", with the aim of fostering an airport culture within the Company that focuses on attending to passenger needs and ensuring their satisfaction throughout their journey at the airport. Additionally, in-person and practical sessions continued to be held, during which both public-facing staff and those who do not normally work with the public were trained to perform the passenger information function (On Job Training).

At London Luton Airport in the United Kingdom, customer experience is a fundamental pillar of the Responsible Business Strategy. Furthermore, "The LLA Way" has been developed, which defines the expected behaviours of both employees and third parties regarding quality. This programme is a mandatory component for obtaining airport access accreditation for any employee.

In Aena Brasil, the Service Quality Plans (PQS) gather information, responsibilities, procedures, and minimum requirements for the teams dedicated to passenger assistance that directly or indirectly influence the quality of services provided to airport users.

Additionally, there is the Airport Exploration Plan (PEA), which establishes the obligation to implement a system for registering and processing demands related to service provision. These plans contain all the actions, responsibilities, and procedures that define Aena Brasil's strategy to comply with the requirements of the Concession and Service Quality Contract. Furthermore, it implements quality indicators that guarantee high standards in the provision of services such as cleanliness, passenger orientation, check-in efficiency, and user satisfaction, which are rigorously monitored. These indicators not only ensure a positive experience for passengers but also contribute to the reputation and competitiveness of airports, attracting more traffic and, therefore, boosting the local economy. Thus, compliance with these standards is incentivised through a bonus system, which promotes a cycle of continuous improvement and benefits airports with significant passenger flow.

The performance results of services offered to passengers in Brazil are measured through the Service Quality Indicators (IQS), defined by ANAC. The Service Quality Report, which presents passengers' perception of the services provided at these airports, is published monthly.

Also in Brazil, these indicators are systematically monitored, evaluating the services offered to users. Based on these, actions are planned and implemented for the continuous improvement of their operation. The IQS indicators include relevant aspects such as direct services, equipment availability, airside facilities, and the passenger satisfaction survey.

For the measurement and monitoring of Service Quality Indicators in Brazil, Administrative Instructions have been prepared to serve as a basis and guide for the teams directly and indirectly involved in areas that may influence the quality of services provided at Aena Brasil airports. Among the specific quality objectives established are those such as reducing waiting times in security queues to between 5 and 15 minutes, improving thermal and acoustic comfort, and the quality of the WiFi network, among others.

The Aena Group establishes a maintenance programme to ensure the operability and effectiveness of the Continuity Plan. This programme specifies how the plan will be reviewed, updated, and disseminated, who will be responsible for these tasks, and how the information will be distributed.

In Spain, this plan must be reviewed and updated periodically by Aena, at least every three years, to reflect changes in information systems and the operations of each airport. For more information on the Business Continuity and Activity Recovery Plan, consult section [S4-4 Cybersecurity](#).

The Aena Group establishes qualitative objectives that allow the organisation to monitor the effectiveness of its innovation policies and actions. These objectives reflect its commitment to:

- Risk and Opportunity Management: consolidation of strategic international alliances and expansion of funded R&D projects.
- Reduction of Negative Impacts: implementation of predictive analysis systems and reuse of water resources to minimise environmental impact.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
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- Promotion of Positive Impacts: improvement of the passenger experience through digital tools such as Aena's virtual assistant and personalised solutions by having more customer knowledge.

These commitments ensure alignment with strategic objectives and end-user expectations.

Cybersecurity

S4-5 40 (MDR-T), S4-5 41 (a), S4-5 41 (b), S4-5 41 (c)

Privacy

The Aena Group, for the management of its risks related to this area, has set goals such as staff training and awareness, a key element in the cybersecurity strategy. During 2025, in Spain, 8,406 employees had valid training in this area (8,215 employees in 2024).

In the United Kingdom, at London Luton Airport, cybersecurity has also been integrated into the corporate culture through mandatory training for both new employees and active staff. In 2025, the scope of this training was refined according to employees' roles and levels of technological access, with cybersecurity content incorporated into the physical security training plan for positions that do not require direct use of IT equipment. As a result of this approach, in 2025, 563 employees had valid cybersecurity training (889 in 2024).

In Brazil, training has also been a priority, with 895 employees trained in 2025 in cybersecurity and data protection (838 in 2024). These mandatory trainings, linked to performance evaluations, reinforce the importance of reporting any incident through established channels.

The Aena Group has defined clear cybersecurity objectives, focused on ensuring the confidentiality, integrity, and availability of critical systems, and on mitigating risks through audits and crisis simulations.

To monitor these objectives, strategic KPIs are periodically reported to Management in various committees. These include the BitSight Rating, which measures the security level of assets exposed on the internet, the percentage of employees who complete information security training, and the proportion of the cybersecurity budget relative to the IT (Information Technology) budget. Likewise, regulatory compliance in terms of penalties for cybersecurity breaches, the click-through rate in phishing campaigns, the percentage of successful resilience tests in recovery plans (DRP), the incidence of security events with business impact, and the timely execution of improvements derived from Red Team exercises (cybersecurity attack simulation) are monitored.

	Breaches in matters of cybersecurity							
	Spain		United Kingdom		Brazil		Total	
	2024	2025	2024	2025	2024	2025	2024	2025
Information security breaches or other cybersecurity incidents (no.)	0	0	0	0	0	0	0	0
Data-related cybersecurity breaches (no.)	0	0	0	0	0	0	0	0
Employees/customers affected by such violations (no.)	0	0	0	0	0	0	0	0
Fines for cybersecurity breaches	0	0	0	0	0	0	0	0

Consumer Safety

S4-5 38, S4-5 40 (MDR-T), S4-5 41 (a), S4-5 41 (b), S4-5 41 (c)

Operational Safety

The Aena Group has operational safety objectives defined in the Operational Safety Programmes associated with the Operational Safety Management Systems (SGSO) of the airports. These objectives, aimed at continuous improvement in operations and ensuring an excellent level of operational safety, are established through an active consultation process with stakeholders, thus ensuring that they respond to the real needs of end-users. Compliance monitoring and evaluation of the effectiveness of implemented actions are managed through the SGSO Committees.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
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Within the Operational Safety Management System (SGSO), periodic supervision of the safety level achieved at the airport is fundamental. This is accomplished by measuring and monitoring a series of indicators related to various airport activities, comparing them with established reference values. This practice allows for continuous evaluation and improvement of operational safety. The objective of defining operational safety indicators is to establish a methodology for their measurement, monitoring, and implementation of corrective measures according to the behaviour of each indicator. Thus, the SGSO provides a tool to evaluate operational safety based on indicators that reflect the airport's performance in activities with a significant impact on safety. Each airport independently defines its own objectives to ensure they are achievable.

The Airport Director allocates resources for operational safety actions, the SGSO Manager defines, implements, and controls indicators, and the Production Managers collaborate in their definition, measurement, and control, proposing corrective actions.

For their part, the Production Managers, in coordination with the SGSO Manager, define, approve, and implement operational safety indicators, recorded in the Operational Safety Information Management System (SGISO). These indicators are measured regularly, and if the values obtained are not within acceptable limits, the causes are analysed and corrective measures are implemented. The SGSO Manager periodically collects and reviews these indicators and corrective actions, reporting to the SGSO Committee.

The SGSO Manager in Spain sends the indicators monthly to AESA and conducts an annual global evaluation of all indicators, presenting the results to the SGSO Committee. Additionally, the Manager reviews and adjust reference values as necessary, ensuring continuous improvement of operational safety. This review is also presented to the SGSO Committee and, when appropriate, to the Local Safety Committees.

The operational safety indicators established in the SGSO are divided into three types: reactive, proactive, and predictive, and are related to areas such as meteorology, maintenance, accidents and incidents, environment, drivers and vehicles, and training. Each indicator includes a description, objective, reference values, measurement method, responsible parties for measurement and monitoring, and minimum frequency. This ensures continuous and accurate evaluation of operational safety at the airport, allowing for the implementation of corrective measures when necessary.

For each indicator, the airport specifies the frequency of data collection, the frequency of indicator development, and the frequency of its control. Similarly, the airport also specifies the person responsible for data collection, the person responsible for indicator development, and the person responsible for its control.

	Employees trained in operational safety (no.)	
	2024	2025
Spain	7,336	7,772
United Kingdom	51	55
Brazil	372	682
Total	7,759	8,509

Airport Security

The Aena Group establishes qualitative goals to reduce negative impacts, promote positive outcomes, and manage risks related to airport security. These results-oriented and time-bound goals include:

- Risk and opportunity management: collaboration with local authorities and international organisations to ensure a safe and efficient environment.
- Negative impacts reduction: improvement of detection technology, updating of security protocols, and continuous staff training
- Positive impacts promotion: implementation of systems that optimise the user experience, such as automated border controls and more agile services

The establishment of these goals is carried out in consultation with regulatory bodies and stakeholders, ensuring that they respond to the real needs of end-users. Through continuous monitoring, the Aena Group evaluates the effectiveness of its actions, adjusting them according to the results obtained and lessons learned.

The Aena Group allocates significant resources to ensure the success of these initiatives, including investments in advanced technology, specialised training, and collaboration with strategic partners. Audit processes, verifications, and drills ensure the effectiveness of the measures adopted and allow for proactive management of risks and opportunities.

In order to promote airport security at all airports in the network, the Aena Group carries out training and awareness-raising activities for all employees whose work is performed within airport facilities.



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	Employees trained in airport security matters (no.)	
	2024	2025
Spain	1,601	1,911
United Kingdom	17	663
Brazil	67	708
Total	1,685	3,282

The increase in employees trained and accredited in airport security is due to the rise in operational activities linked to the work of Phase 1B of BOAB, which requires local credentials at different airports for supervision and monitoring tasks. In addition, natural staff turnover has made it necessary to train new workers to ensure the continuous compliance with the established security requirements.


Non-applicable Datapoints

- DPs not included because, after the Double Materiality Assessment, it has been concluded that they are non-material to the Company: **N/A**
- DPs not included because, due to the Company's activity, they are considered not to be applicable: **SBM-3-S4-10 (a) i, SBM-S4-10 (a) iii, S4-2 22, S4-3 27, S4-4 33 (b)**

4. Information on Governance

ESRS G1 Business conduct

- [ESRS 2 IRO-1: Description of the processes to identify and assess material impacts, risks and opportunities](#)
- [G1 ESRS 2 GOV-1: The role of the administrative, supervisory and management bodies](#)
- [G1-1: Business conduct policies and corporate culture](#)
- [G1-2: Management of relationships with suppliers](#)
- [G1-3: Prevention and detection of corruption and bribery](#)
- [G1-4: Confirmed incidents of corruption or bribery](#)
- [G1-6: Payment practices](#)

	ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
	E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
	S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

G1: Business conduct

The Aena Group, as a global leader in airport management, recognises the importance of having a solid corporate governance framework that guarantees transparency, integrity and responsibility in all its operations and its value chain. The Board of Directors, as the highest governing body, plays a fundamental role in defining business strategy, supervising its implementation and ensuring compliance with the highest ethical and regulatory standards.

In this regard, the Group has established various mechanisms and policies aimed at regulatory compliance and, in particular, the fight against corruption and bribery, ranging from prevention to detection and punishment of illegal practices. These policies are consistent with the main international standards and reflect the Group's firm commitment to business ethics, regulatory compliance and the strengthening of trust among all its stakeholders, focusing on the best interests of society and its shareholders.

The metrics and indicators presented in this chapter are aligned with the material aspects identified in the Double Materiality Assessment related to S2, specifically concerning the management of relationships with suppliers. This approach ensures consistency with the IROs linked to the Aena Group's value chain. For further context and understanding of these aspects, see chapter [S2](#), where the identification and management of these IROs in relation to value chain activities are described in detail.

Material IROs - Impact materiality (Impacts)

Topic	Subtopic	Sub-subtopic	Impact	Location of the value chain	Positive / Negative	Actual / Potential	Time horizons
G1 Business conduct	Management of supplier relationships, including payment practices	—	Ethical practices in supplier contracting	Own operations	Positive	Actual	Short term / Medium term / Long term
G1 Business conduct	Corporate culture Corruption and bribery	—	Promotion of business ethics and regulatory compliance	Own operations	Positive	Actual	Short term / Medium term / Long term



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
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Material IROs - Financial materiality (Risks and Opportunities):

Topic	Subtopic	Sub-subtopic	Driver	Risk / opportunity description	Location of the value chain	Risk / Opportunity	Time horizon
G1 Business conduct	Management of relationships with suppliers including payment practices	—	The Aena Group requires a large number of external services to carry out its operations, many of which are highly specialized	Dependence on services provided by third parties	Upstream and downstream value chain	Risk	Short term / Medium term / Long term



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
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ESRS 2 IRO-1: Description of the processes to identify and assess material impacts, risks and opportunities

The Aena Group has assessed the incidents, risks and opportunities of relative significance related to business conduct by applying the double materiality assessment process, described in section [IRO - 1 Double Materiality](#).

In terms of Corporate Governance, the Company's double materiality assessment highlights the importance of promoting business ethics and regulatory compliance, ensuring regulatory effectiveness and certification of due control over the activity of the Group. This impact originates in the detection and management of the risk of non-compliance with applicable regulations.

The Aena Group has opted for a decentralised regulatory compliance model, resulting in an independent management of the compliance functions in Spain, Brazil and the United Kingdom. Corporate compliance policies remain applicable to the entire Aena Group.

In Spain, Aena has a Regulatory Compliance System (or 'RCS') in place designed to identify, prevent and mitigate the risk of non-compliance with applicable laws and regulations. This RCS also ensures compliance with commitments and obligations acquired through internal policies and procedures, fosters ethical business conduct and guarantees that due preventive control is exercised over employees, managers and Board of Directors. This approach not only protects the Company against third parties, but also supports its position before judicial and administrative bodies. This RCS includes Aena S.M.E., S.A and the subsidiary companies wholly owned by Aena and domiciled in Spain, which are currently Aena Desarrollo Internacional, S.M.E, S.A (ADI) and Aena Sociedad Concesionaria del Aeropuerto Internacional de la Región de Murcia S.M.E, S.A (AIRM).

Conversely, subsidiary companies not domiciled in Spain (Brazil and United Kingdom), based on adherence to corporate policies, have developed their systems individually, in accordance with local regulations.

The Aena Group's regulatory compliance model is therefore deployed according to the specific characteristics of each country. This framework allows for effectively addressing the legal and regulatory particularities of each jurisdiction, ensuring comprehensive regulatory compliance management.

In Spain, the main regulatory framework in this area is defined by the Penal Code, specifically article 31 bis, section two, which establishes the specific requirements that the management and prevention models of companies must fulfil in order to guarantee their effectiveness. Internationally, the Group also adheres to relevant regulations such as the Foreign Corrupt Practices Act (FCPA) in the United States and the Bribery Act in the United Kingdom, which establish key standards for the prevention of corrupt practices.

This guarantees constant monitoring of controls associated not only with criminal risk but also with other compliance risks, such as risks related to competition law compliance and organizational matters, as well as the detection detecting of changes in risks and controls. Furthermore, the model also includes proposals for improvements or the development of new controls to strengthen risk coverage, thus guaranteeing a dynamic management and prevention framework able to adapt to the evolving activities of the Aena Group.

ESRS 2 GOV-1: The role of the administrative, supervisory and management bodies³²

GOV-1 5 (a - b)

Aena has two governing bodies responsible for management, supervision and control: The Annual General Meeting and the Board of Directors. The latter has the support of the Audit Commission, the Appointments, Remuneration and Corporate Governance Commission, the Sustainability and Climate Action Commission, and the Executive Commission, thereby ensuring a solid and specialised structure in the different areas of management.

Aena also counts on a corporate governance system based on internal policies, procedures and tools that reference best practices in the field, complying with applicable regulations and prioritising the social interest of its shareholders and stakeholders. Within this framework, the Annual General Meeting stands as the sovereign body where shareholders, duly convened, deliberate and decide on matters within their competence according to the required majorities or are informed about relevant issues. The rules governing its operation are set out in the Corporate Bylaws and the Regulations of the Annual General Meeting, specifying fundamental rights such as the ability to complete the agenda, present new proposals, attend and participate in meetings, and delegate representation to intermediary entities.

³²For further information, see the relevant chapter "[ESRS 2 General disclosures- 2. Governance](#)"



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
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To guarantee participation and facilitate the exercise of rights, Aena utilises various mechanisms, such as proxy voting, remote early voting, live broadcasting of meetings on its website, and the possibility of attending and holding meetings by via remote/online means. In addition, there are specific policies in place, such as the Policy on Communication and Contacts with Shareholders, Institutional investors and Proxy Advisers and the General Policy for the Communication of Economic-Financial, Non-Financial and Corporate Information. These policies define the communication channels, including the corporate website and the Shareholders’ and Investors’ Office, that guarantee the effective and accessible dissemination of information.

The Board of Directors, as the highest body of administration and representation of Aena, has the experience and powers to perform acts of management and disposal, except for those reserved for the Annual General Meeting by law or the articles of association. It also performs supervisory and control functions, always guided by the Company’s social interest and treating all shareholders equally. Its main responsibilities include defining strategies, approving the strategic plan, supervising information and internal control systems, risk management, and making important business and financial decisions. In the regulatory sphere, the Board supervises the structure and functioning of the Compliance Supervision and Control Body through the Audit Commission, ensuring that it has the necessary resources and complies with its Annual Action Plan.

As of the end of 2025, the Board of Directors of Aena is composed of 15 members (15 members in 2024) who contribute a diversity of knowledge, experience, ages, genders and backgrounds. These profiles have been selected based on criteria such as integrity, competence, dedication and commitment, ensuring robust governance aligned with the Company’s strategic objectives.

G1-1: Business conduct policies and corporate culture

G1-1 7, G1-1 9, G1-1 10 (a), (c) i, (c)ii, (e), (g), (h), G1-1 11

As part of its business conduct and corporate culture, Aena Group counts on various policies to manage and mitigate the IROs identified during the double materiality assessment, which are found on the corporate website. Moreover, the corporate policies and Codes of Conduct can also be found on the corporate website. These policies are detailed below:

Code of Conduct: this aims to establish the ethical principles and general conduct guidelines 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 applicable to all those activities, under the principle of zero tolerance for any kind of illegal behaviour.

Code of Conduct for Third Parties: this aims to define the minimum standards of ethical and responsible behaviour that must be observed by the suppliers, customers and professionals with whom the Aena Group contracts or signs a collaborative agreement, collaboration agreement or sponsorship in the development of its activity in accordance with its business culture. It is firmly based on respect for human and labour rights, a commitment to caring for the environment and the communities in which it operates and under the principle of zero tolerance for any type of illegal behaviour. In this regard, the Aena Group undertakes to provide the necessary means to ensure that third Parties are aware of and understand this Code and can assume compliance with it.

Regulatory Compliance Policy: the purpose of the Policy is to strengthen the Aena Group’s commitment to the values and principles set out in its Code of Conduct, and to the diligent exercise of due control over the boards of directors, managers and employees (bound parties) of all its companies, in order to minimise the risk of malpractice or regulatory non-compliance in the course of their activities.

Anti-bribery Policy: The objective of this policy is to strengthen the Aena Group’s commitment to the values and principles set out in the Regulatory Compliance Policy and the Code of Conduct, which send a firm message of rejection and ‘zero tolerance’ to its employees, managers and governing bodies regarding any conduct that involves an illegal act or contravenes the policies, rules, values and principles of action of the Aena Group. In this respect, this policy constitutes a commitment by the Aena Group to the permanent surveillance and sanctioning of fraudulent acts or behaviour that encourages corruption in any of its manifestations, to the maintenance of effective mechanisms for communication and awareness-raising among all employees, managers and governing bodies, and to the development of an ethical and honest business culture.

In Spain, the positions identified as having the highest exposure to corruption and bribery risk, based on the tasks and responsibilities associated with their roles, are Directors and Heads of Division.

In Brazil, with regard to positions exposed to risk, a specific workforce analysis has been carried out to identify those roles which, due to their interactions with third parties in the performance of their responsibilities, are exposed to corruption and bribery risks.

In the case of London Luton Airport, positions at risk of corruption and bribery have been identified in accordance with the regulations of the United Kingdom Civil Aviation Authority (UK CAA), and the employees in these roles have received specific training on the matter.



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Business Courtesies Policy: New policy approved by Aena Group's Board of Directors in 2024, which aims to establish general principles and guidelines to promote ethical behaviour that inspires correct decision-making when faced with the giving, promise or offer of business courtesies. This policy is aligned with international anti-bribery standards.

Internal Reporting and Whistleblower Protection System Policy: is intended to ensure the protection of whistleblowers against possible reprisals and to set out the general principles of the Internal Whistleblower Reporting and Protection System, which includes the various Aena Group Complaints Channels as a formal mechanism for communicating, consulting or reporting irregularities.

Antitrust Compliance Policy: is intended to develop the express commitment of the Aena Group to respect free competition, and good market practices and to establish the basic principles of regulatory compliance in this area in accordance with the business ethical values, principles and standards of conduct assumed by Aena Group, and in line with the main regulatory references and best practices in the area of regulatory compliance. This policy has been developed and approved during the year 2024.

Conflict of Interest Compliance Policy: A new policy approved by the Board of Directors in 2025, the purpose of which is to establish the principles and guidelines governing Aena Group's actions to ensure the proper management of situations that may give rise to a conflict between the interests of the Group and the personal interests of employees, management personnel, and members of the governing bodies. This policy strengthens Aena Group's commitment to fostering a corporate culture of ethics and honesty, based on the principles of integrity, transparency, and compliance with the law.

The Policies listed, as an internal reference framework, are binding on and apply to all members of the Board of Directors, senior management and all employees of the Company, including those of the companies forming part of the Aena Group. However, it will apply to Aena's subsidiaries in Brazil and in the United Kingdom without prejudice to the necessary adaptation required for compliance with their local regulations.

In addition to the Policies mentioned above, the following documents form part of the documentation of the Aena Regulatory Compliance System in Spain, as part of its further development:

- Regulatory Compliance System Manual.
- Regulation on the Functions of the Regulatory Compliance System.
- Procedure for the Management of the Internal Reporting System and Whistleblower Protection.
- **Protocol for the Prohibition of Reprisals**
- General Conflict of Interest Procedure
- Compliance Risk Control and Management Procedure

All these standards are reviewed at least once a year and whenever necessary to align with the company's strategic objectives, applicable regulations, and to integrate best practices.

Aena in Spain discloses and promotes awareness of its compliance policies and a corporate ethical culture through different training, communication and awareness-raising actions related to business conduct.

The Audit Commission annually approves the Annual Compliance Action Plan, which anticipates the deployment of the Training, Communication and Awareness Plan approved by the OSCC and designed by the Compliance Division. The plan approved for 2025 provides for the implementation of online training courses on the regulatory compliance system and its importance, anti-corruption measures, and the internal reporting system, as well as short training modules and communication and awareness-raising actions aimed at promoting a compliance culture. These initiatives seek to strengthen knowledge of the Regulatory Compliance System and the Code of Conduct, raise awareness of the corporate compliance policy on competition law and the new Conflict of Interest Compliance Policy, and help prevent or mitigate the risk of criminal conduct.

The Compliance Department reports periodically to the management bodies on the implementation of the Annual Action Plan and the Annual Training, Communication and Awareness Plan, particularly through the Annual Activity Report on the Regulatory Compliance System, which is submitted to the Audit Commission, the Management Committee, and the Boards of Directors of Aena, ADI, and AIRM.

Consequently, during 2025, as part of the evaluation of corporate culture, training and awareness activities related to the Code of Conduct have been developed:

- **Employee-oriented:** mass e-mails about compliance news, publications in the corporate newsletter, compliance awareness videos, updates to the compliance portal on the corporate intranet; training sessions on the Regulatory Compliance System, the internal reporting system, and anti-corruption matters; as well as specific training for functional Directors, Compliance Coordinators, and other individuals with roles in the management of compliance risks and controls; for Airport Management and Senior Management on the Regulatory Compliance System; and for Directors and Division Heads on anti-corruption and anti-fraud measures.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

- **Third-party oriented:** through the publication on the corporate website of the Code of Conduct, the Code of Conduct for Third Parties, and the corporate policies, including the new Conflict of Interest Compliance Policy. In the Internal Procurement Portal, under the ethics and compliance section, in addition to the Code of Conduct for Third Parties and the communication to third parties regarding the Business Courtesies Policy, the Antitrust Compliance Policy has also been included, with the aim of encouraging and promoting commercial relationships based on the highest standards of transparency and business ethics.

In 2025, the Aena group strengthened its commitment to compliance and anti-corruption training in the countries where it operates. In Spain, more than 6,828 employees received training on the Regulatory Compliance System (6,290 participants in 2024), complemented by awareness-raising campaigns. In the United Kingdom, the company conducts specific monitoring of adherence to the Code of Conduct. Employees are required to sign it upon joining the organization, complete mandatory training—either through in-person sessions or online modules—and renew their electronic signature of the Code on an annual basis. This process ensures full understanding of, and adherence to, the ethical principles and integrity standards that govern the organization’s conduct. In 2025, a total of 869 employees at London Luton Airport read and acknowledged the Code of Conduct, exceeding the 368 recorded the previous year. In Brazil, 781 employees participated in anti-corruption training as part of the Integrity Program (592 in 2024), further reinforcing a culture of integrity and business ethics.

Internal Reporting and Whistleblower Protection System Policy (Whistleblower Channel): Aena Group companies have formal mechanisms for communicating, consulting or reporting irregularities in order to detect, notify and investigate illegal behaviour or behaviour that goes against their Code of Conduct, guaranteeing a comprehensive approach that includes the participation of internal and external stakeholders. That is why, on the occasion of the entry into force of Act 2/2023, of 20 February, regulating the protection of persons who report regulatory violations and the fight against corruption, the Aena Group Board of Directors approved the Internal Reporting and Whistleblower Protection System Policy, which provides for the different reporting channels of the Aena Group (Spain, Brazil and the United Kingdom).

- **Spain**

In Spain, the aforementioned Policy has been specified in the Procedure for the Management of the Internal Whistleblower Reporting and Protection System, updated in may 2025, which regulates in detail the necessary steps for managing communications, reports, complaints and queries. This procedure covers everything from the receipt and recording of communications to the preliminary assessment, admission, appointment of instructors and the investigation phase. It also includes the issuing of investigation reports, the resolution of cases and the recording of proceedings, with clear processing deadlines that ensure an efficient and transparent process, in accordance with the provisions of Law 2/2023.

On the other hand, the Aena Group’s Board of Directors has appointed the OSCC as the collegiate body responsible for the Internal Reporting System, which in turn has delegated to the Compliance Director the powers to manage it and to process investigation files. Likewise, the OSCC, through the Compliance Division, supervises and manages the communications received, ensuring:

- The confidentiality, independence, data protection and secrecy of communications.
- The possibility to submit and process anonymous communications.
- The absence of any reprisal, penalty or unfavourable consequence for the whistleblower.
- Proper management of the conflict of interest.
- Respect for the rights of the accused, especially the right to privacy, the right to legal protection and defence, the right to be informed of the actions or omissions attributed to them, the right to be heard at any time, the right to be presumed innocent, and respect for the honour of the persons affected.

Communications related to workplace, sexual or gender-based harassment are managed by the People and Organization Directorate in accordance with specific procedures that ensure their proper handling, in particular:

- Procedure for the prevention of and action against workplace harassment.
- Protocol for the prevention of and action against situations of sexual harassment based on sex, sexual orientation, and sexual identity or gender expression.

The communication channels of the Internal Reporting System in Spain for reporting, filing complaints, or making enquiries regarding criminal or administrative offences whether serious or very serious, any actions or omissions that may constitute infringements of European Union law, or breaches of the Code of Conduct or the Regulatory Compliance System, are as follows:

- Whistleblowing channel: online platform accessible on the Aena’s corporate website in Spain in a separate and easily accessible section.
- Postal mail addressed to the Aena’s Compliance Division in Spain, with registered office at Calle Peonías, 12, 28042 (Madrid).



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
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- The possibility to report any behaviour verbally by the whistleblower requesting a face-to-face meeting with the Compliance Director or a person delegated by her, within a maximum period of seven days.

In the event of non-compliance, in accordance with the approved Procedure, the following measures may be taken:

- Corrective actions: When the commission of any non-compliance that falls within the scope of this procedure has been proven.
- Proposal to initiate disciplinary proceedings: employees are sanctioned in accordance with the current Collective Bargaining Agreement of the Aena Group; members of the Board of Directors, under the Regulations of the Board and applicable regulations; and workers with Senior Management contracts, according to the provisions of their contracts and current legislation.
- Referral of the information to the Public Prosecutor’s Office: When the facts could be indicatively constitutive of a crime.
- Referral of the information to the European Public Prosecutor’s Office: When the facts affect the financial interests of the European Union.
- Referral of the information to other competent authorities or organisations, when appropriate, in accordance with current regulations.

Regardless of whether or not any type of non-compliance has been proven, operational improvement measures may be agreed when, within the framework of the investigation, the convenience of implementing some improvement to prevent future non-compliance is detected.

The Internal Reporting System expressly incorporates measures to protect whistleblowers, as established in the Protocol for the Prohibition of Reprisals. In addition, the processing of investigation files at Aena is carried out in accordance with the provisions of the Procedure for Managing the Internal Reporting and Whistleblower Protection System. In this regard, based on the investigation report, the Compliance Directorate shall issue a draft Resolution based on its conclusions, which will be submitted to the Compliance Oversight and Control Body, the collegiate body ultimately responsible for deciding on the reports submitted, thereby ensuring independence in the process. The aforementioned Procedure also establishes mechanisms for addressing conflicts of interest involving any of these actors in the management of the whistleblowing channel.

During 2025 and 2024, training and capacity-building activities were carried out for employees on the Internal Reporting System (whistleblowing channel). In addition, the activity of the channel was periodically reported to the governing bodies, particularly through the Annual Activity Report of the Regulatory Compliance System.

• **United Kingdom**

The Whistleblowing Policy is in place, which establishes a clear procedure for reporting irregularities. Among the channels enabled are the EthicsPoint platform, managed by a third party and allowing anonymous reporting, as well as an independent reporting line provided by Navex. Additionally, employees can contact the manager or the Whistleblowing Officer. There is also a confidential external telephone service managed by legal advisors. During 2025, awareness-raising activities were carried out for employees, promoting knowledge and the proper use of these mechanisms, supported by a link available in the weekly newsletter to reinforce employee awareness.

• **Brazil**

It operates through the Ethics Channel, whose functioning is governed by the Ethical Channel Management Procedure, revised in 2024, which ensures the confidentiality of whistleblowers and safeguards the right to defence and the presumption of innocence of individuals under investigation. Reports may be submitted via an external case-management platform or by email to compliance@aenabrasil.com.br, and are received directly by the Compliance Committee, which, together with the Compliance Manager, ensures independence and rigour in their assessment. This procedure, published on the corporate website of Aena Brasil, defines the processing workflow and criteria applicable to the handling of reports. It is complemented by the Protocol for Action in Cases of Sexual Harassment and Harassment on the Grounds of Sex, which includes mandatory training for all employees upon joining the organisation, in line with internal policies and current regulations.

Also, during 2025, awareness campaigns aimed at employees were carried out, emphasising the importance of the ethics channel in detecting irregularities.

• **Activity of the Aena Group's reporting channels**

The Aena Group processes all communications received within the established deadlines.

In 2025, the Aena Group has completed the investigation with 103 communications (11 in Spain, 9 in the United Kingdom and 83 in Brazil) - which is 30 fewer communications than in 2024³³, when 22 were received in Spain, 6 in United Kingdom and 105 in Brazil through the corresponding complaints channels.

³³ The categories of reports were consolidated in 2025 compared with 2024, decreasing from 40 reporting categories to 11, with the aim of streamlining the information and enhancing the focus of the analysis.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

Regarding the reports submitted by employees and under investigation in 2025, 0 (8 in 2024) have been identified as possible cases of human rights violations, 0 in Spain, 0 in the United Kingdom y 0 in Brazil (4 in Spain, 1 in the United Kingdom y 3 in Brazil in 2024). However, none of them in 2024 was ultimately considered serious.

The following table shows the total number of reports with investigations closed in 2025. The typologies of reports have been updated in the current financial year and include those received from both Aena Group employees and external personnel, as well as anonymous reports. Likewise, other communications have been received which, as of the financial year-end, remain under investigation and therefore are not reflected in the table; these will be reported in the following financial year once the investigation has been concluded.



ESRS 2: General disclosures

E1: Climate change

E2: Pollution

E3: Water and marine resources

E4: Biodiversity and ecosystems

E5: Resource use and circular economy

S1: Own workforce

S2: Workers in the value chain

S3: Affected communities

S4: Consumers and end-users

G1: Business conduct

Act 11/2018

Type of complaints	TOTAL 2025	Spain		United Kingdom		Brazil	
		Status and actions		Status and actions		Status and actions	
		Reports with closed investigations	Of which have measures adopted	Reports with closed investigations	Of which have measures adopted	Reports with closed investigations	Of which have measures adopted
Corruption and fraud ^(A)	4	2	2	0	0	2	0
Conflict of interest	9	0	0	3	0	6	0
Workplace harassment	14	0	0	0	0	14	7
Sexual or gender-based harassment	5	3	1	0	0	2	2
Human rights	0	0	0	0	0	0	0
Competition law	0	0	0	0	0	0	0
Labour rights	11	3	0	0	0	8	2
Environment	0	0	0	0	0	0	0
Protection of personal data	1	0	0	0	0	1	0
Misconduct	39	3	3	3	2	33	15
Others	20	0	0	3	2	17	5
Total	103	11	6	9	4	83	31

^(A) The allegations of corruption and fraud were not substantiated; therefore, no corrective measures have been adopted. However, in two of the cases, operational improvement measures have been implemented.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
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G1-2: Management of relationships with suppliers

G1-2 12, G1-2 14, G1-2 15 (a - b)

The Aena Group adopts a procurement strategy aimed at collaborating with the most prominent suppliers and business partners in order to meet existing needs. This strategy incorporates ESG (environmental, social and governance) criteria as long as they are aligned with compliance with applicable internal and external regulations. Within this framework, the responsible management of its suppliers seeks to ensure:

- Full technical compliance with the requested scope and a sustainable management.
- The highest quality of services to meet needs.
- The best possible economic conditions, contributing to the business result.
- Compliance with all legal obligations, including labour, environmental and those specific to the activity.

Likewise, in terms of the Company's relationships with suppliers, the Aena Group maintains a structured and detailed approach, prioritising sustainability and the management of risks associated with the supply chain, including the specific risks associated with each country. This approach is based on the Code of Conduct for Third Parties, which establishes a clear ethical and regulatory framework for all business relationships, guaranteeing operation under principles of publicity, equality, non-discrimination, competition, transparency and compliance with ethical standards.

To mitigate the risks associated with sustainability, the Aena Group requires its suppliers to comply with strict criteria relating to labour rights, the environment and safety. These include the proper management of labour and environmental risks in accordance with national and international legislation. The contracts also include specific clauses on sustainability and quality.

The Aena Group integrates social, environmental and sustainability criteria into its supplier selection processes. These criteria are reflected in the tender documents, which incorporate accessibility, innovation and environmental protection aspects, in alignment with the 2021-2030 Sustainability Strategy. The application of these criteria is backed up by the Guide for the Technical Evaluation of Supplier Proposals, which ensures their integration according to the nature of each contract, whether it be for works, services or supplies. Sustainability criteria are taken into consideration in tender processes, so that suppliers with stronger performance receive higher scores, and those that do not meet the established requirements may even be excluded.

Some examples of how ESG criteria are integrated into tender processes in Spain are shown below:

Social issues

- In the contract initiation reports, the contract manager is required to state the possibility of reserving the contract for special employment centres and insertion companies, as regulated by Act 44/2007, of 13 December, in order to facilitate the integration of workers with disabilities into the labour market.
- Tender specifications may include social criteria, such as gender-equality or pay-equity certifications, as well as other requirements related to occupational health and safety (ISO 45001).
- The conditions include labour commitments, such as employing a minimum percentage of workers with functional diversity, complying with collective bargaining agreement salary conditions, and guaranteeing the prevention of occupational risks.
- Certain supply tender 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.

Environmental issues

- The "Guide for Technical Evaluation of Supplier Proposals" includes standard clauses related to decarbonisation, sustainable water management and the use of resources. For example, the use of construction materials/products/equipment with regulatory eco-labels, the reuse of materials/products and/or recycling of non-hazardous construction and demolition waste on their own site or on others, etc.
- The submission of certificates such as ISO 14001 for environmental management and the Environmental Vigilance Plan in construction projects may be required.
- The specifications for the contracting of ground handling services include requirements for the transition to sustainable vehicle fleets, based on the maximum lifespan of vehicles depending on their type (10 years for planters, for example), a minimum overall percentage of sustainable vehicles in the fleet of each ground handling service provider per airport, annualised, and a future commitment to gradually increase the sustainability of the fleets throughout the duration of the licenses. These requirements are based on the objectives of the Climate Action Plan, which foresees that the sustainable handling fleet in 2025 will be 40% and in 2030 it will reach 78%.



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- In commercial procurement tenders, technical evaluation criteria are taken into consideration, such as the use of innovative technology that has been developed by the company, accredited by an R&D&I certificate and that is directly applicable to the work, the availability of the ISO 166002 R&D&I Management System certificate, among others. In this way, contracts are awarded based on the best value for money (economic and qualitative criteria).

- Periodic checks are carried out to verify compliance with the environmental conditions established in the specifications. In the event of non-compliance, penalties are applied that can lead to the termination of the contract.

In addition, innovation criteria are transversally included to improve environmental and social aspects.

Additionally, in Spain, Article 147 of Act 9/2017 and Article 66.11 of RDL 3/2020 stipulate tie-breaking clauses in cases where two or more bids have obtained the same score (with a similar financial bid). Through the aforementioned tie-breaking clauses, companies that guarantee the implementation of sustainable and responsible practices in their routine performance and management are favoured. In line with this same approach, the Equality Plan provides for the inclusion in the procurement specifications under Law 9/2017 and Royal Decree-Law 3/2020 of the following tie-breaking criterion: the highest percentage of women employed in each bidding company's workforce. This is because, in Spain, companies with more than 50 employees are required to have an Equality Plan and to register it in the Equality Plan Registry of the Ministry of Equality, which constitutes a requirement that suppliers must meet.

The signing of the contract by the successful bidder, whether contractor or lessee, reflects their commitment to comply with the provisions established in the Aena Group's bidding specifications. These provisions include specific clauses on social issues, such as occupational risk prevention, physical and operational security, as well as environmental protection measures. Additionally, the Aena Group encourages the implementation of good practices by suppliers that, although not contractual in nature, contribute to the sustainability of the products and services offered.

Compliance with contractual clauses is mandatory for 100% of awarded suppliers, who are subject to penalties in the event of non-compliance, which may even result in contract termination. Among the main sustainability-related obligations, the following stand out:

- Protection of the environment: Successful bidders must comply with applicable environmental legislation and the conditions established in the specifications, including proper waste management, safe storage of hazardous materials and substances, proper use of vehicles and machinery, control of atmospheric emissions, and prevention of spills.
- Labour and social obligations: Contractors must guarantee minimum percentages of permanent workers in the headcount, employ people with functional diversity, respect the salary conditions established in the applicable sectoral collective agreements and comply with all current labour legislation.
- Prevention of occupational risks: Compliance with risk prevention regulations is required, ensuring the protection of the health and safety of workers in the development of works, services and supplies.
- Airport security and operational safety: Successful bidders must strictly comply with current airport security and safety legislation, as well as with the orders and instructions of the airport authority to guarantee safety and security in the contracted activity.
- Social sustainability and human rights: Bidders and successful bidders are obliged to comply with the highest international standards in human rights and ethics. In the absence of a specific code of conduct or policy, they must adhere to the principles and values defined in the Aena Group's Code of Conduct for Third Parties and its Human Rights Policy.

In the United Kingdom, suppliers at London Luton Airport must comply with local labour and environmental regulations, including those on slavery (Modern Slavery Act 2015), the minimum wage and equality. In the event of non-compliance with the ESG criteria established in the contract, the airport reserves the right to terminate it. However, it is working in collaboration with the suppliers to establish corrective action plans to resolve any violations. In addition, tie-breaking clauses are included in the procurement specifications. These clauses form part of the social clause that evaluates ESG criteria.

In Brazil, contractual documents and specifications specify the labour and environmental obligations of suppliers. Failure to comply with these may result in the suspension or withholding of payments after formal notification, until compliance is reestablished. Moreover, suppliers operating on airport premises must present monthly documentation accrediting the payment of salaries, labour taxes, and benefits to their employees. They are also obliged to take part in the Occupational Health and Safety mobilisation process, which ensures that employees work with protective equipment appropriate to their activity. Works may only commence once this process has been approved. Additionally, certain services in Aena Brasil require specific certificates, such as those issued by the Brazilian Health Regulatory Agency, especially in waste management and cleaning at airports.

With regard to supplier performance monitoring, this is a central element of the Aena Group's strategy to ensure compliance with the contractual commitments described above. This monitoring includes periodic controls to verify the implementation of social and environmental conditions. In Spain, the Contract Manager is responsible for overseeing supplier compliance with the criteria defined in the specifications, issuing conformity certifications based on the established frequency. Specifically, concerning the environmental performance of suppliers, a Company Control and Monitoring Procedure has been established (included within the Integrated Management System), which includes:



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
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- The duty of suppliers to be familiar with and adhere to Aena Group's Policy of Integrated Quality, Environment, Energy Efficiency and Occupational Health and Safety Management .
- The implementation of a specific monitoring plan, with a frequency adapted to the environmental characteristics of each company.
- Corrective measures, such as requesting additional training from companies in the event of recurring deficiencies, and verification of remediation in subsequent follow-ups.

In the United Kingdom, the performance of suppliers is evaluated by the Services area through service level agreements and key performance indicators. Any incident detected is addressed through meetings or corrective action plans, seeking a consensual solution.

In Brazil, contract monitoring includes monthly supervision of the works performed. Contractors must submit digital documentation proving compliance with their contractual obligations, including certificates demonstrating payment of taxes. If compliance with these obligations is less than 90%, the Group may apply withholdings on payments until they are regularised.

On the other hand, the Code of Conduct for Third Parties establishes principles that suppliers must follow, including compliance with human and labour rights, environmental commitment, and safety. It establishes that all suppliers must comply with human and labour rights principles. In the event that third parties subcontract part of the activities they carry out for the Aena Group, they will, in turn, ensure that said subcontractors comply with the provisions of the Code.

Aena Group implements a control and monitoring system to ensure that payments to suppliers are made in accordance with the deadlines established in the contracts. This includes the requirement that contractors must be up to date with payments to subcontractors and suppliers participating in the contracts, which reinforces the practice of making timely payments throughout the supply chain. The average payment period to suppliers is one of the key metrics for Aena, and is calculated annually in accordance with applicable regulations.

In addition, in Spain the following regulations exist regarding supplier management:

- **Royal Decree-Law 3/2020, of 4 February**, on urgent measures, which incorporates into Spanish law various European Union directives in areas such as public procurement in certain sectors, private insurance, pension plans and funds, taxation and tax litigation.
- **Act 7/2021, of 20 May**, on climate change and energy transition, in force since 22 May 2021, which establishes the inclusion of award criteria in bidding specifications related to the fight against climate change and energy efficiency. Article 31 on public procurement is particularly noteworthy, which, in accordance with Act 9/2017, establishes that environmental and energy sustainability criteria must be incorporated transversally and on a mandatory basis in all public procurement processes when they are relevant to the purpose of the contract.
- **Act 9/2017, of 8 November**, on Public Sector Contracts, which transposes into Spanish law Directives 2014/23/EU and 2014/24/EU of the European Parliament and of the Council. Its objective is to regulate public sector procurement to ensure that the principles of free access to tenders, publicity, transparency, non-discrimination and equal treatment of bidders are upheld. Furthermore, both Act 9/2017 and Royal Decree-Law 3/2020 establish a series of guidelines, such as the assessment of environmental criteria in the awarding of contracts that may have a significant impact on the environment. These criteria include reducing the environmental impact, saving and using water, energy and materials efficiently, the environmental cost of the life cycle, ecological production methods, waste management according to the principle of hierarchy, and the use of recycled or reusable materials.

[The Supplier Procurement Portal](#) provides information on the electronic invoicing system, the Aena Group's Internal Procurement Instructions, the Contractor Profile, and the published high-value and low-value contracts (for each tender, [the Specific Administrative Clauses](#) for each procurement process are included, among other documents).

In the electronic tender submission and electronic invoicing processes, Aena provides suppliers with virtual assistants featuring 24/7 chatbot support, as well as various audiovisual materials and video tutorials, all of which facilitate commercial interactions with suppliers and contribute to greater efficiency, simplification, standardisation, traceability and transparency in procurement processes.

Regarding [Aena Group's Procurement Instructions](#), these were approved by the Board of Directors of Aena S.M.E., S.A. in July 2024 and apply to the Aena Group entities in Spain. The Board of Directors of Aena International approved their adoption in February 2025, at which point they entered into force. The Procurement Instructions respect and ensure compliance with the general principles of public procurement relating to transparency, publicity, competition, equal treatment, non-discrimination, and confidentiality.

In accordance with [Aena's Specific Administrative Clauses](#), various provisions are established to reinforce the commitment to timely payments and compliance with contractual conditions, including for small and medium-sized enterprises (SMEs). These provisions are aligned with applicable regulations and apply to both main contractors and subcontractors, thereby promoting responsible practices throughout the supply chain. Specifically:



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
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- There are clauses³⁴, depending on the nature of the procurement file, through which Aena undertakes to pay the agreed price within a maximum period of 30 calendar days from the approval of the corresponding certificates. This term is in accordance with Article 198 of the Public Sector Contracts Act (LCSP), which regulates payment times in the public sector. To guarantee speed, invoices must be approved within two working days of their submission, provided that they meet the established requirements.
- With regard to subcontracting, Clause 14 of the Specifications details that, although subcontractors are only obliged to the main contractor, the latter has the responsibility of guaranteeing timely payments to all subcontractors and compliance with contractual obligations. This reinforces an adequate flow of payments throughout the supply chain, benefiting SMEs that participate as indirect suppliers.
- Clause 20 introduces social conditions as an integral part of contracts, obliging contractors to guarantee the timely payment of salaries to their staff and to respect the salary conditions established in the applicable collective agreements. This approach ensures that responsible practices are not limited to payments between companies, but also cover labour rights.
- Finally, Clause 22 establishes penalties applicable in the case of contractual non-compliance, including late payments. These penalties are proportional to the severity of the non-compliance and can reach up to 50% of the contract budget in cases of serious non-compliance related to execution. This ensures that all contractors and subcontractors, including SMEs, comply with the agreed obligations.
- Taken together, these clauses demonstrate a solid framework by Aena in Spain to guarantee timely payments and compliance with contractual conditions, ensuring that SMEs are treated fairly and responsibly.

With regard to the geographical location of suppliers, this varies depending on the country in which the Aena Group companies operate. In 2024 and 2025, the number and percentage of local suppliers³⁵ were as follows:

	Spain		United Kingdom		Brazil	
	2024	2025	2024	2025	2024	2025
Total suppliers (Nº)	3,097	2,912	*	714	1,135	1,355
Of which local (Nº)	3,031	2,842	*	189	1,133	1,355
Local suppliers percentage	97.9%	97.6%		26.5%	99.8%	100%

* Luton updated its supplier calculation methodology in 2025; therefore, only information corresponding to 2025 is reported in order to ensure consistency in future disclosures.

G1-3: Prevention and detection of corruption and bribery

G1-3 16, AR7, G1-3 18 (a - c), G1-3 20. G1-3 21 (a - c)

The Aena Group has different types of measures in place to manage corruption and bribery:

- Preventive measures, such as all the Company's internal regulations and policies, both general and specific, that help mitigate the risk of crimes, unethical practices or regulatory breaches in the course of our business. In this regard, the entire compliance structure (three lines) of the Aena Group must ensure compliance with the internal policies or regulations of each company, and identify areas for improvement that enable the implementation or correction of procedures deemed appropriate to prevent the risk of regulatory non-compliance in each organisation.
- Measures for detecting non-compliance with regulations and/or practices contrary to the values and principles established in the Code of Conduct and in the Regulatory Compliance Systems.
- Action measures, which determine way of acting in situations involving the aforementioned regulatory noncompliances and/or practices contrary to values and principles. (See section [G1-1](#)).

In Spain, as in the United Kingdom and Brazil, there is a complaints channel, as well as other communication tools, through which possible irregularities detected in this area can be reported (see section [G1-1](#)).

³⁴ For supply contracts, Clause 34 applies both under Royal Decree-Law 3/2020 (RDL) and under the Internal Procurement Instructions (IIC). For works contracts, Clause 37 of the RDL applies, and Clause 38 of the IIC. For service contracts, Clause 34 of the RDL applies, and Clause 35 of the IIC

³⁵ In Spain, given the geographical distribution of the network's airports across virtually all regions of the country, for these purposes a local supplier is understood to mean a national supplier. The same concept applies in Brazil. In the United Kingdom, a local supplier is considered to be one located within a maximum distance of 25 miles from London Luton Airport.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
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Measures for preventing corruption

The Aena Group maintains a firm commitment to business ethics, establishing a set of measures designed to guarantee that there is no case of fraud, corruption or bribery in any of their forms. These measures cover several key areas and are aligned with the highest international standards of integrity and compliance.

Business courtesies

Aena Group has a Business Courtesies Policy that establishes the general principles and guidelines for action in the event of the giving, promise or offer of business courtesies.

In accordance with the provisions thereof, it is prohibited to give, promise or offer business courtesies to any public authorities or employees or members of private entities, and for the Persons Subject to this policy to receive the same, directly or indirectly (through third parties) whenever, due to their frequency, characteristics or circumstances, they are not acceptable in accordance with the provisions thereof.

Political contributions

Political contributions are completely prohibited at the Aena Group. Participation in, belonging to or collaborating with political parties or public institutions must be done in a strictly personal capacity, outside working hours and without using Company resources, in order to avoid any possible link between these activities and the Group.

Social content, patronage and sponsorship activities

All activities related to social content, patronage and sponsorship must comply with applicable regulations and be duly authorised. The Aena Group assures that these initiatives are not related to illegal payments or practices contrary to the Code of Conduct.

Books and accounting records

The Aena Group keeps books and accounting records that comply with all legal requirements and accurately reflect transactions and the use of assets. Rigorous internal controls have been implemented to ensure that the financial information is complete, reliable and transparent. The use of secret accounts or incorrect records for fraudulent purposes or to hide irregularities is also prohibited.

Corporate operations

In all corporate operations, the Aena Group applies maximum diligence to analyse and assess the associated legal and financial risks. Key aspects are considered, such as the legal framework of the sector, the constitution and functioning of the organisations involved, the correct management of accounting and company records, and the inclusion of anti-corruption clauses in contractual agreements.

Facilitation payments

The Aena Group absolutely prohibits facilitation payments, that is, payments made to expedite administrative procedures or influence the decisions of public officials. These activities are strictly prohibited in all the geographical areas where the Company operates.

Suppliers, business customers, representatives and business agents

The Aena Group applies the principles of legality, efficiency, transparency, publicity, competition, confidentiality, equality, and non-discrimination in its procurement processes. Likewise, it is committed to maintaining commercial relationships with qualified, reliable, and trustworthy suppliers and customers who ensure the best technical and economic offer.

Partners

In collaborative projects, clauses are included in the agreements with partners to guarantee that the relationships are developed under ethical standards and for mutual benefit.

Public officials and authorities

The Aena Group encourages compliance with the values, principles and standards of conduct in all interactions with public officials and authorities. The Company requires abstention from any interaction in the event of a conflict of interest and supervises the validity and integrity of the information presented to the Public Administrations. It also guarantees the proper conservation and safekeeping of all the documentation exchanged in these processes.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

Training in Corruption and Bribery

During 2025, the members of the Board of Directors, through the Appointments, Remuneration and Corporate Governance Commission, approved a Training Plan for the year 2025, in which training on the Aena Group's Regulatory Compliance System was provided to those new members of the Board who joined the Board of Directors during 2025.

Likewise, in Spain, general training has been provided to the workforce on the Regulatory Compliance System, which includes specific training on the fight against corruption. On the other hand, specific awareness-raising actions have been carried out on this matter aimed at 100% of the workforce, such as specific publications in the corporate newsletter, as well as a communication campaign based on an interactive video on the new Conflict of Interest Compliance Policy, launched on the occasion of International Anti-Corruption Day, and a series of videos on the content of the Business Courtesies Policy.

On the other hand, for positions identified as having higher exposure to the risk of corruption and bribery, specific training activities on anti-corruption matters have been planned.

Finally, communication actions have been carried out aimed at specific groups, such as the commercial, infrastructure, internal audit areas, and management areas of airport groups, among others, which include content related to anti-corruption matters.

In Brazil, this training was included in a general way together with training on the Integrity Programme. In addition, on International Anti-Corruption Day, an awareness session is held on this matter.

In the case of London Luton Airport, the personnel identified as having higher exposure to corruption and bribery risks have received specific training.

The positions that are in a risk situation have continued to carry out training activities, reaching the following accumulated values in 2025, with their distribution by country:

	2024				2025			
	Spain	United Kingdom	Brazil	Total	Spain	United Kingdom	Brazil	Total
Number of positions at risk of corruption and bribery (No.)	315	25	60	400	323	25	66	414
Number of positions at risk covered by the corruption and bribery programmes (No.)	218	25	60	303	277	25	66	368
Percentage of positions at risk covered by training (%) programmes on corruption and bribery	69%	100%	100%	76%	86%	100%	100%	89%

Furthermore, the Compliance Oversight and Control Body (OSCC) is the autonomous body designated by the Board of Directors and is responsible for implementing and developing the Compliance Management System. It also acts as the Responsible Body for the Internal Reporting System.

In addition, Aena has a Compliance Directorate, an independent and autonomous department responsible for carrying out the activities associated with the compliance function and providing support to the OSCC. The Compliance Directorate also serves as the delegated body responsible for the Internal Reporting System and for handling investigation proceedings.

The Aena Group's international subsidiaries have their own Compliance Bodies and maintain ongoing communication with the OSCC through the Compliance Directorate, ensuring continuous coordination and adherence to the principles of independence, cooperation and alignment. Their internal rules, protocols and procedures are defined in accordance with the Aena Group's corporate policies and applicable local regulations. Likewise, through the Compliance Directorate, they periodically report to the Aena Group's Audit Commission on the management of the whistleblowing channel and other relevant compliance-related matters (such as adherence to corporate policies, training, and compliance risk management).



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

G1-4: Confirmed incidents of corruption or bribery

G1-4 22, G1-4 24 (a - b), G1-4 25

In section [G1-1](#), information is reported on the corruption or bribery incidents notified during the reporting period, with no confirmed cases identified. The following section provides information regarding fines or sanctions related to corruption or bribery:

	2024				2025			
	Spain	United Kingdom	Brazil	Total consolidated	Spain	United Kingdom	Brazil	Total consolidated
Fines or penalties for cases of corruption or bribery (n°)	0	0	0	0	0	0	0	0

G1-6: Payment practices

G1-6 31, G1-6 33 (a - d)

The Aena Group strictly adheres to transparency regulations and payment terms, ensuring that payments are made in accordance with the applicable legislation. The procedure for calculating the average payment period (APP) includes suppliers' accounting balances and reflects the Group's commitment to ensuring transparency and compliance with its obligations. If any supplier fails to comply with the established deadlines, whether an SME or not, they may face penalties, contract termination, and, in cases of serious harm, potential claims. This reinforces the seriousness with which the Group manages its commercial relationships.

In Spain, Law 18/2022 establishes transparency requirements for payments to suppliers, and requires that payment information, particularly payment terms and conditions, to be reported in a more detailed and accessible manner, especially for companies that do not file publicly available annual accounts. This legislation reinforces Aena's commitment to transparency and compliance with payment deadlines.

In Spain, standard contractual payment conditions involve payments upon certification (confirmation of a service, supply, works, etc.). Once the service has been certified and the invoice is received within the required timeframe, payment is made within a maximum of 30 days, as Aena has a fixed monthly payment date.

The methodology used to calculate the average payment period in Spain considers the accounting balances of trade payables for its calculation, in alignment with the transparency requirements and regulations that mandate reporting of the average payment period. This procedure ensures that Aena complies with the deadlines established under applicable regulations and maintains a high level of transparency regarding its payment practices.

To ensure proper management and relationships with its suppliers, in Spain, the average supplier payment period (PMP) is published every six months, either in the annual accounts or in the semi-annual accounts, without distinguishing between types of suppliers. The average payment period in Spain in 2025 is 25 days (27 days in 2024). Payment days are understood as the calendar days that have passed from the date on which the counting period begins until the effective payment of the transaction.

The ratio of transactions paid in 2025 was 26 days (28 days in 2024), while the ratio of transactions pending payment was 6 days (7 days in 2024), which indicates that, on average, Spain makes payments within the period corresponding to its contractual obligations. For further information, please refer to the annual accounts (section 19.1: Information on the average payment period).

For further information, see Note 19.1 Information on the Average Payment Period in the 2025 Consolidated Annual Accounts – Block A.

On the other hand, in the United Kingdom, the Payment Practices and Performance Regulations 2017 are in place, designed to enhance transparency on how large companies pay their suppliers, thereby helping to combat late payments and improve suppliers' cash flow, particularly for SMEs. As for the standard payment term, it is 30 days, the average time taken to pay an invoice, calculated from the date the payment period begins, is 27 days in 2025 (22 days in 2024). More than 79% of invoices are paid within the first 30 days (80% in 2024), supported by a process for the submission, processing and validation of invoices.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

In Brazil, meanwhile, they have a Supplier Payment Procedure, reimbursement of expenses and advances to partners, which establishes guidelines to ensure that payments are made in an orderly manner and in accordance with applicable regulations ([Brazilian Civil Code - Law 10.406/2002](#))³⁶. According to this procedure, payments are made by the Treasury Department on the 10th and 25th of each month³⁷, with the option to execute payments outside those dates subject to prior approval from Management. The standard payment term is 30 days, as is the case in Spain and the United Kingdom. Taking this procedure into account, the ratio of paid operations (using the same formula as in Spain) in Brazil is 20 days in 2025 (22 days in 2024).

There are currently no ongoing legal proceedings in Spain, the United Kingdom and Brazil for late payments.

Finally, the Group has also shown a commitment to transparency through the average payment periods reported annually, which demonstrates the Aena Group's effort to comply with its contractual obligations and ensure that suppliers, including SMEs, are paid according to the agreed terms. For more information on the relationship with suppliers, see chapter [S2](#).

Non-applicable Datapoints

- DPs not included because they are contextual information or conditional requirements, i.e., the answer is provided in another linked DP: [G1-1 8](#), [G1-2 13](#), [G1-3 17](#), [G1-4 23](#), [G1-6 32](#).
- DPs not included because, due to the Company's activity, they are considered not to be applicable: [G1-1 10\(b\)](#), [G1-1 10\(d\)](#), [G1-1 10\(f\)](#), [G1-3 19](#).
- DPs not included because they are voluntary and the Company has decided not to report them: [G1-4 25 \(b - d\)](#).
- DPs not included because, after the Double Materiality Assessment, it has been concluded that they are non-material to the Company: [G1-5](#)

³⁶ Law governing private relations, including contractual obligations and payment methods. In the context of supplier payments, the relevant articles are found in the Book of Obligations (Articles 305 - 312), particularly in the chapters relating to performance, default, and extinguishment of debt.

³⁷ If these dates fall on a Saturday, Sunday or public holiday, payment will be made on the first working day.

5. Information requirements of Act 11/2018 not considered or subject to transitional rules by the ESRS - CSRD

The analysis included below refers to the requirements of Act 11/2018 that are not explicitly included in the ESRS requirements. However, it could be the case that, at least some of them, might be covered with additional disclosures within the framework of ESRS application if they are relevant to the Group.

Information on social and workforce-related matters:

- Distribution of employees by professional classification.
- Annual average of permanent, temporary and part-time contracts by age and professional classification.
- Average remuneration and its evolution, broken-down by gender, age and professional classification or equal value.
- Average remuneration of directors and executives, including variable remuneration, allowances, severance payments, contributions to long-term savings schemes, and any other compensation, disaggregated by gender.
- Work-related accidents, particularly their frequency and severity, as well as occupational diseases, disaggregated by gender.
- Number of dismissals by gender, age, and professional classification.
- Number of hours of absenteeism.
- Total number of training hours by professional category.

Information related to the fight against corruption and bribery:

- Contributions to foundations and non-profit entities (see section [S3-4](#)).

Information on society:

- Partnership or sponsorship actions (see section [S3-4](#)).
- Supervision and audit systems and their results (see section [S4-4](#)).

Tax information

- The profits obtained on a country-by-country basis, the corporate income taxes paid, and the public subsidies received.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

Information on social and workforce-related matters:

Total number and distribution of employees by gender, age, region and professional category (as of 31 December) (GRI 405-1)

2025																											
Spain						United Kingdom						Brazil						TOTAL (gender – age)						TOTAL (by gender)			
< 30 years old		Between 30 and 50 years old		> 50 years old		< 30 years old		Between 30 and 50 years old		> 50 years old		< 30 years old		Between 30 and 50 years old		> 50 years old		< 30 years old		Between 30 and 50 years old		> 50 years old		TOTAL (by gender)			
F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M		
0	0	1	5	5	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	5	5	2	6	7
49	100	636	765	495	551	13	19	50	54	20	20	0	0	15	44	1	7	62	119	701	863	516	578	1,279	1,560		
0	0	90	273	255	600	7	5	20	6	6	2	7	7	45	74	3	7	14	12	155	353	264	609	433	974		
14	119	693	1,723	908	1,358	0	5	0	32	0	22	16	39	67	166	3	20	30	163	760	1,921	911	1,400	1,701	3,484		
6	5	161	83	134	110	59	59	172	252	76	100	60	46	130	140	5	11	125	110	463	475	215	221	803	806		
69	224	1,581	2,849	1,797	2,621	79	88	242	344	102	144	83	92	257	424	12	45	231	404	2,080	3,617	1,911	2,810	4,222	6,831		
2024																											
Spain						United Kingdom						Brazil						TOTAL (gender – age)						TOTAL (by gender)			
< 30 years old		Between 30 and 50 years old		> 50 years old		< 30 years old		Between 30 and 50 years old		> 50 years old		< 30 years old		Between 30 and 50 years old		> 50 years old		< 30 years old		Between 30 and 50 years old		> 50 years old		TOTAL (by gender)			
F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M		
0	0	1	5	5	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	5	5	2	6	7	
37	62	642	743	414	517	12	14	49	52	14	20	0	0	17	38	0	7	49	76	708	833	428	544	1,185	1,453		
0	0	97	260	251	567	11	7	20	7	5	1	6	5	45	77	4	6	17	12	162	344	260	574	439	930		
11	95	693	1,688	845	1,261	0	6	1	36	0	20	13	41	62	169	3	19	24	142	756	1,893	848	1,300	1,628	3,335		
7	3	179	102	112	115	51	61	161	233	69	94	46	48	111	120	5	9	104	112	451	455	186	218	741	785		
55	160	1,612	2,798	1,627	2,462	74	88	231	328	88	135	65	94	235	404	12	41	194	342	2,078	3,530	1,727	2,638	3,999	6,510		

Data recorded in terms of workforce headcount as of the closing date of the financial year.



ESRS 2: General disclosures

E1: Climate change

E2: Pollution

E3: Water and marine resources

E4: Biodiversity and ecosystems

E5: Resource use and circular economy

S1: Own workforce

S2: Workers in the value chain

S3: Affected communities

S4: Consumers and end-users

G1: Business conduct

Act 11/2018

Total number and distribution of employment contract types by gender and region (as of December 31) (GRI 405-1)

	2024									2025								
	Total	Permanent				Temporary				Total	Permanent				Temporary			
		Part-time		Full-time		Part-time		Full-time			Part-time		Full-time		Part-time		Full-time	
		F	M	F	M	F	M	F	M		F	M	F	M	F	M	F	M
Spain	8,714	211	157	2,660	4,717	49	29	374	517	9,141	241	214	2,873	5,040	44	20	289	420
United Kingdom	944	78	43	315	508	0	0	0	0	999	77	39	346	537	0	0	0	0
Brazil	851	0	0	298	524	11	6	3	9	913	0	0	323	548	25	9	4	4
Total	10,509	289	200	3,273	5,749	60	35	377	526	11,053	318	253	3,542	6,125	69	29	293	424

Data recorded in terms of workforce headcount as of the closing date of the financial year.



ESRS 2: General disclosures

E1: Climate change

E2: Pollution

E3: Water and marine resources

E4: Biodiversity and ecosystems

E5: Resource use and circular economy

S1: Own workforce

S2: Workers in the value chain

S3: Affected communities

S4: Consumers and end-users

G1: Business conduct

Act 11/2018

Annual average of contracts according to its type by gender, age, and professional category (consolidated)^(A) (GRI 405-1)

	2024						2025					
	PERMANENT		TEMPORARY		TOTAL		PERMANENT		TEMPORARY		TOTAL	
	Full-time	Part-time	Full-time	Part-time	Full-time	Part-time	Full-time	Part-time	Full-time	Part-time	Full-time	Part-time
Male	5,705	175	529	41	6,234	216	5,984	192	474	38	6,458	230
Female	3,220	268	392	62	3,612	330	3,463	270	337	69	3,800	339
Total by gender	8,925	443	921	103	9,846	546	9,447	462	811	107	10,258	569
Senior Management	12	0	0	0	12	0	13	0	0	0	13	0
Other executives and graduates	2,378	50	73	2	2,451	52	2,593	58	85	1	2,678	59
Coordinators	1,318	67	1	0	1,319	67	1,343	70	0	0	1,343	70
Technicians	3,983	180	743	58	4,726	238	4,185	184	638	50	4,823	234
Support staff	1,234	146	104	43	1,338	189	1,313	150	88	56	1,401	206
Total by professional category	8,925	443	921	103	9,846	546	9,447	462	811	107	10,258	569
> 50 years old	3,824	236	181	21	4,005	257	4,090	266	184	20	4,274	286
Between 30 and 50 years old	4,723	194	631	60	5,354	254	4,893	184	534	51	5,427	235
< 30 years old	378	13	109	22	487	35	464	12	93	36	557	48
Total by age	8,925	443	921	103	9,846	546	9,447	462	811	107	10,258	569

^(A) Aggregated data of the total consolidated workforce.



ESRS 2: General disclosures

E1: Climate change

E2: Pollution

E3: Water and marine resources

E4: Biodiversity and ecosystems

E5: Resource use and circular economy

S1: Own workforce

S2: Workers in the value chain

S3: Affected communities

S4: Consumers and end-users

G1: Business conduct

Act 11/2018

Recruits by gender, age professional category and region

2025

	Spain						United Kingdom						Brazil						TOTAL					
	< 30 years old		Between 30 and 50 years old		> 50 years old		< 30 years old		Between 30 and 50 years old		> 50 years old		< 30 years old		Between 30 and 50 years old		> 50 years old		< 30 years old		Between 30 and 50 years old		> 50 years old	
	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F
Senior Management	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Executives and graduates	54	22	61	59	8	19	7	3	4	2	2	2	0	0	5	1	1	0	61	25	70	62	11	21
Coordinators	0	0	1	0	4	2	1	0	0	1	0	2	0	3	11	7	0	0	1	3	12	8	4	4
Technicians	52	8	288	102	60	63	0	0	2	0	2	0	11	5	20	17	3	1	63	13	310	119	65	64
Support staff	3	4	11	21	2	15	18	18	28	23	8	8	18	34	24	29	2	0	39	56	63	73	12	23
Total	109	34	361	182	74	99	26	21	34	26	12	12	29	42	60	54	6	1	164	97	455	262	92	112

2024

	Spain						United Kingdom						Brazil						TOTAL					
	< 30 years old		Between 30 and 50 years old		> 50 years old		< 30 years old		Between 30 and 50 years old		> 50 years old		< 30 years old		Between 30 and 50 years old		> 50 years old		< 30 years old		Between 30 and 50 years old		> 50 years old	
	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F
Senior Management	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Executives and graduates	46	24	93	69	12	10	5	5	8	9	1	0	0	0	4	1	0	0	51	29	105	79	13	10
Coordinators	0	0	1	0	1	3	1	4	4	6	0	1	3	4	17	8	1	0	4	8	22	14	2	4
Technicians	32	5	163	89	36	34	2	0	5	1	2	0	16	5	27	20	1	0	50	10	195	110	39	34
Support staff	1	3	10	19	5	4	29	21	32	36	15	7	20	21	16	16	1	0	50	45	58	71	21	11
Total	79	32	267	177	54	51	37	30	49	52	18	8	39	30	64	45	3	0	155	92	380	274	75	59



ESRS 2: General disclosures

E1: Climate change

E2: Pollution

E3: Water and marine resources

E4: Biodiversity and ecosystems

E5: Resource use and circular economy

S1: Own workforce

S2: Workers in the value chain

S3: Affected communities

S4: Consumers and end-users

G1: Business conduct

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Dismissals by gender, age, professional category and region (GRI 401-1)

2025

	Spain						United Kingdom						Brazil						TOTAL						
	< 30 years old		Between 30 and 50 years old		> 50 years old		< 30 years old		Between 30 and 50 years old		> 50 years old		< 30 years old		Between 30 and 50 years old		> 50 years old		< 30 years old		Between 30 and 50 years old		> 50 years old		
	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	
Senior Management	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Executives and graduates	0	0	1	0	0	0	0	0	1	2	1	0	0	0	1	0	0	0	0	0	0	3	2	1	0
Coordinators	0	0	0	0	0	0	0	0	0	0	0	0	0	0	7	2	0	1	0	0	7	2	0	1	
Technicians	0	0	1	0	0	0	0	0	1	0	0	0	3	0	8	6	1	0	3	0	10	6	1	0	
Support staff	0	0	3	0	3	0	3	0	2	2	3	1	1	3	6	7	1	0	4	3	11	9	7	1	
Total	0	0	5	0	3	0	3	0	4	4	4	1	4	3	22	15	2	1	7	3	31	19	9	2	

2024

	Spain						United Kingdom						Brazil						TOTAL					
	< 30 years old		Between 30 and 50 years old		> 50 years old		< 30 years old		Between 30 and 50 years old		> 50 years old		< 30 years old		Between 30 and 50 years old		> 50 years old		< 30 years old		Between 30 and 50 years old		> 50 years old	
	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F
Senior Management	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Executives and graduates	0	0	0	0	0	0	0	0	1	0	0	0	0	0	1	0	0	1	0	0	2	0	0	1
Coordinators	0	0	0	0	0	0	0	0	0	0	0	0	0	0	6	3	0	0	0	0	6	3	0	0
Technicians	0	0	0	0	1	0	1	0	0	0	0	0	0	0	14	2	3	1	1	0	14	2	4	1
Support staff	0	0	1	0	0	0	3	0	3	0	0	1	2	2	11	1	0	0	5	2	15	1	0	1
Total	0	0	1	0	1	0	4	0	4	0	0	1	2	2	32	6	3	2	6	2	37	6	4	3



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

Average remuneration and its evolution disaggregated by gender, age and professional categories or equal value (fixed + variable salary) ^(A) ^(B) (GRI 405-2)

		2024								2025							
		< 30 years old		Between 30 and 50 years old		> 50 years old		Average remuneration (€)		< 30 years old		Between 30 and 50 years old		> 50 years old		Average remuneration (€)	
		F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M
Spain ^(C)	Executives and graduates	43,076	43,307	56,773	57,531	62,712	65,910	58,905	60,480	44,820	46,224	61,004	61,838	67,291	70,428	63,294	64,528
	Coordinators	0	0	43,854	46,803	47,048	48,669	46,323	48,201	0	0	48,360	52,096	51,206	53,452	50,640	53,108
	Technicians	32,697	34,195	36,730	38,688	39,580	41,830	38,351	39,917	35,086	37,413	39,904	41,995	42,778	45,643	41,588	43,496
	Support staff	29,029	29,825	33,075	33,304	34,192	36,017	33,428	34,715	31,722	32,264	35,397	36,474	37,005	39,013	36,143	37,858
	Total	38,376	36,820	44,278	44,189	46,501	48,120	45,375	45,870	41,198	40,766	48,264	48,007	50,530	52,460	49,409	49,957
United Kingdom	Executives and graduates	55,774	56,391	80,494	126,428	85,648	206,140	77,527	132,888	50,650	50,092	80,118	107,977	82,786	147,434	76,157	107,856
	Coordinators	44,028	43,759	47,887	58,023	50,782	(A)	47,170	50,802	44,548	44,851	50,223	51,967	49,064	74,108	48,769	52,636
	Technicians	0	50,201	(A)	69,410	0	72,458	50,652	68,701	(A)	48,706	0	70,551	0	72,839	(A)	69,586
	Support staff	44,246	43,110	48,968	54,441	50,476	53,501	48,490	52,224	41,962	43,528	48,174	54,917	49,595	53,130	47,373	52,736
	Total	46,137	45,513	55,979	67,837	55,787	77,990	54,126	66,494	43,598	45,166	54,873	65,033	55,576	71,795	52,968	63,762
Brazil	Executives and graduates	0	0	66,906	85,747	(A)	96,209	64,956	87,273	0	0	67,750	83,911	(A)	98,385	70,345	86,197
	Coordinators	31,411	30,879	30,487	31,909	29,868	31,048	30,552	31,793	32,279	28,803	33,808	34,636	31,754	32,442	33,503	34,053
	Technicians	5,856	5,813	5,972	6,025	5,837	5,897	5,947	5,978	6,590	6,345	6,521	6,607	6,432	6,505	6,529	6,551
	Support staff	6,813	9,372	10,668	13,424	11,963	14,676	9,492	12,403	6,792	9,410	12,086	14,574	14,367	15,362	10,340	13,279
	Total	8,835	9,087	17,335	19,756	15,758	23,670	15,377	18,236	8,722	9,337	17,960	21,846	24,403	28,940	15,882	20,232

^(A) In cases where there is only one person in a specific category, remuneration is not disclosed to prevent identification; however, it has been considered for the calculation of the total average remuneration.

^(B) The remuneration of Senior Management is included in the following table: "Average remuneration of directors and executives". It has been considered for the calculation of the total average remuneration.

^(C) For Spain, a 2.5% increase has been applied, in accordance with Royal Decree-Law 14/2025 of 2 December, which approves urgent measures regarding remuneration in the public sector.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

The average remuneration of directors and executives, including variable remuneration, allowances, severance payments, contributions to long-term savings schemes and any other compensation, broken down by gender

GRI 2-19, 2-20, 2-21

The remuneration of the members of the Board of Directors is regulated by the Communicated Order of the Minister of Finance and Public Administrations dated January 8, 2013, the Communicated Order of the Minister of Finance of July 30, 2025, the Communicated Order of the Minister of Finance of October 1, 2025, Royal Decree 462/2002, of May 24, on indemnities for service, and Law 3/2015, of March 30, regulating the exercise of senior positions in the General State Administration, which approves the maximum amounts of remuneration for attendance.

Consequently, Aena has no discretionary power to set the remuneration of its Directors in accordance with the provisions of Article 217 of Royal Legislative Decree 1/2010, of July 2, which approves the revised text of the Capital Companies Act³⁸.

In 2025, the advisory vote on the Annual Report on the Remuneration of Directors corresponding to fiscal year 2024 received the support of almost the entire General Shareholders' Meeting, with a favourable vote percentage of 95.33%³⁹.

The three Aena companies in Spain (*Aena SME SA*, *Aena Sociedad Concesionaria del Aeropuerto Internacional de la Región de Murcia SME, SA*, and *Aena Desarrollo Internacional SME, SA*) are state-owned commercial companies that are subject to public regulations regarding remuneration.

The remuneration of Senior Management is regulated in Royal Decree 451/2012, of March 5, which regulates the remuneration system for top executives and managers in the public business sector and other entities. This Royal Decree, in turn, defines the positions that will be understood as "Top Executive" and "Managers", as well as the contracting regime for their professional relationship.

The members of the Executive Management Committee and the Internal Audit Director of Aena SME SA; the General Director of *Aena Sociedad Concesionaria del Aeropuerto Internacional Región de Murcia SME S.A.* and the General Director of Aena Desarrollo Internacional SME S.A. are classified as Senior Management.

The only directors who have a professional relationship with Aena SME S.A. are the executive directors: the Chairman and CEO and the Executive Vice-Chairman, who are linked, the former, through a commercial contract (as top executive) and, the latter, through a senior management contract.

³⁸ Directors can only receive a maximum remuneration for their attendance at Board of Directors meetings. For more information, please refer to the Annual Report on Directors' Remuneration.

³⁹ In 2024, the advisory vote on the Annual Report on Directors' Remuneration corresponding to fiscal year 2023 received the support of almost the entire General Shareholders' Meeting, with a favourable vote percentage of 94.07%.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

Nominee Directors receive a maximum annual amount of €11,994 as compensation for attending Board meetings, with this limit not being exceeded in any case. Independent Directors, until September 2025, received a maximum annual amount of €11,994, but since September 2025, in compliance with the new Communicated Order from the Minister of Finance applicable to Independent Directors, they receive a maximum annual amount of €75,000, distributed over a maximum of 11 remunerated sessions, each amounting to €6,800. The compensation for attendance corresponding to Directors who hold senior positions in the General State Administration is paid into the Public Treasury.^(B)

	Remuneration of Directors ^(A) (GRI 2-19; 2-20; 2-21)			
	2024		2025	
	Male	Female	Male	Female
Nominee Directors	€11,994.00	€11,994.00	€11,994.00	€11,994.00
Independent Directors	€11,994.00	€11,994.00	€37,013.15	€37,013.15

^(A) For the calculation of the average remuneration, only the remuneration received by those Directors who have held their position throughout the entire financial year has been taken into account, excluding those whose remuneration, due to their status as Senior Officials, must be paid into the Public Treasury, as previously indicated.
^(B) During the 2025 financial year, the compensation received by Senior Officials Mr. Maurici Lucena Betriu and Ms. Angélica Martínez Ortega was paid into the Public Treasury (in the case of the latter, up to June 2025, date on which she ceased to hold the status of Senior Official of the General State Administration).

For the calculation of the equivalent average remuneration, base salary, variable remuneration, per diems, indemnities, long-term provident schemes, and other annualized concepts have been taken into account. In addition, the corresponding salary review has been applied (2.5% in fiscal year 2025 and 2.0% in 2024). The variable component depends on the fulfillment of the Company's objectives, among which is a sustainability objective, which accounts for 25% of the 50% and 40% weighting of company objectives for Senior Management.

	Remuneration of Senior Management (GRI 2-19; 2-20; 2-21)			
	2024		2025	
	Male	Female	Male	Female
	€159,510.00	€160,112.00	€162,603.10	€165,050.00
Gap	(0.4)%		(1.5)%	



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

	Remunerations received by Directors and Executives ^(A) (GRI 2-19; 2-20; 2-21)			
	2024		2025	
	Chairman-CEO	Executive Vice-President	Chairman-CEO	Executive Vice-President
Fees of the Executive Directors (Chairman-CEO and Executive Vice-President)				
Remuneration is classified into basic and complementary (it cannot exceed twice the basic remuneration of the group in which the company is classified):				
Basic (fixed) remuneration	€126,216.00	€110,041.10	€130,008.60	€113,360.64
The supplementary remuneration that includes:				
Job allowance	€50,463.72	€24,198.98	€51,983.34	€23,947.61
Variable supplement (maximum 60% of the basic remuneration of the group in which the company is classified): depends on the fulfilment of Aena's objectives, among which are sustainability objectives (preparation and proposal of the Climate Action Plan), which weigh for the Chairman-CEO at 25% of 100% of the company's objectives (25% of 100% in 2024), and for the Executive Vice-Chairman at 25% of 50% of the company's objectives (25% of 50% in 2024).	€14,060.81	€73,367.98	€14,469.38	€77,552.55
Other remuneration items	€1,242.53	€4,865.14	€1,242.53	€5,499.02
Total	€191,983.06	€212,473.20	€197,703.85	€220,359.82

^(A) Information on the remuneration of the Board of Directors is detailed in the Annual Report on Directors' Remuneration.

This table reflects the remuneration actually received in 2025, in accordance with the amounts reflected in the Annual Accounts and IARC. Additionally, the Chairman-CEO and the Executive Vice-Chairman received 1,599 euros in travel allowances and 1,583 euros in insurance premiums (2024: 3,269 euros in travel allowances and 1,388 euros in insurance premiums).



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

Absenteeism hours (own workforce) (GRI 403-9)

	Spain		United Kingdom		Brazil	
	2024	2025	2024	2025	2024	2025
	No. of hours lost due to absenteeism ^(A)	977,565	986,008	82,191	81,670	57,794
Male	534,824	526,821	44,328	41,563	24,127	44,729
Female	442,741	459,187	37,863	40,107	33,667	51,728
Absenteeism rate ^(B)	7.65	7.57	4.71	4.58	3.09	5.06
Male	6.79	6.54	4.12	3.92	2.00	3.79
Female	9.02	9.24	5.66	5.53	5.06	7.12

^(A) Number of hours lost due to absenteeism = Number of hours accumulated in the year due to absenteeism from temporary disability leave and similar situations, unjustified absences, justified non-recoverable absences, and absences pending justification.

^(B) Absenteeism rate = (Total number of hours lost due to absenteeism / Total number of scheduled working hours) x 100



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

	Accidents (own workforce) (GRI 403-9)							
	Spain		United Kingdom		Brazil		Total Consolidated	
	2024	2025	2024	2025	2024	2025	2024	2025
Accidents (no.)	102	132	32	56	20	10	154	198
Male	66	95	16	35	13	6	95	136
Female	36	37	16	21	7	4	59	62
With medical leave	54	67	11	13	14	8	79	88
Male	40	50	8	10	9	4	57	64
Female	14	17	3	3	5	4	22	24
Without medical leave	48	65	21	43	6	2	75	110
Male	26	45	8	25	4	2	38	72
Female	22	20	13	18	2	0	37	38
With death	0	0	0	0	0	0	0	0
Male	0	0	0	0	0	0	0	0
Female	0	0	0	0	0	0	0	0
Minor accidents	101	131	31	55	20	10	152	196
Male	66	94	15	34	13	6	94	134
Female	35	37	16	21	7	4	58	62
Serious ^(A)	1	1	1	1	0	0	2	2
Male	0	1	1	1	0	0	1	2
Female	1	0	0	0	0	0	1	0
Rate of occupational accident injuries with major consequences	0.08	0.08	0.57	0.49	0.00	0.00	0.12	0.12
Recordable occupational accident injury rate	4.22	5.14	6.31	6.34	7.48	4.63	4.82	5.24
Death rate	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

^(A) Serious injuries are considered to be those accidents that have had significant consequences, excluding fatalities.

- Rate of serious occupational injuries = (Number of serious occupational injuries (excluding fatalities)) * 10⁶ / (Number of hours worked).
- Rate of reportable occupational injuries = (Number of accidents with sick leave x 10⁶) / (Total number of hours actually worked). This calculation is the same as the Frequency Rate.
- Fatality rate = (Number of fatalities resulting from an occupational injury x 10⁶) / (Number of hours worked).



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

	Accidents (own workforce) (GRI 403-9)							
	Spain		United Kingdom		Brazil		Total Consolidated	
	2024	2025	2024	2025	2024	2025	2024	2025
No. of days lost	2,075	2,191	253	164	132	60	2,460	2,415
Male	1,576	1,852	220	155	94	32	1,890	2,039
Female	499	339	33	9	38	28	570	376
Lost days rate	162.30	168.24	145.03	80.00	70.51	34.76	149.98	143.76
Male	200.07	229.93	204.63	127.30	77.86	29.65	186.03	196.98
Female	101.67	68.24	49.30	10.81	57.16	43.28	91.31	58.32
Incidence rate of occupational accidents	624	750	1,205	1,290	1,697	900	760	813
Male	744	900	1,476	1,724	1,698	723	884	957
Female	427	504	809	701	1,695	1,190	558	580
Frequency rate	4.22	5.14	6.31	6.34	7.48	4.63	4.82	5.24
Male	5.08	6.21	7.44	8.21	7.45	3.71	5.61	6.18
Female	2.85	3.42	4.48	3.60	7.52	6.18	3.52	3.72
Severity rate	0.16	0.17	0.15	0.08	0.07	0.03	0.15	0.14
Male	0.20	0.23	0.20	0.13	0.08	0.03	0.19	0.20
Female	0.10	0.07	0.05	0.01	0.06	0.04	0.09	0.06
Hours worked	12,785,300	13,022,752	1,744,465	2,049,917	1,872,130	1,726,043	16,401,895	16,798,712
Male	7,877,359	8,054,725	1,075,108	1,217,609	1,207,287	1,079,155	10,159,754	10,351,489
Female	4,907,942	4,968,027	669,357	832,308	664,843	646,888	6,242,141	6,447,222

For the preparation of the calculation model and accident category, the doctrine of the National Institute for Safety and Health, an body belonging to the Ministry of Labour and Social Economy of Spain, is used. The accident incidence rate is established as [(Number of accidents occurring during working hours with leave, (excluding "in itinere" accidents) x (100,000 workers)) / (Accumulated average workforce)].

For this reason, the results obtained are not comparable with the CSRD framework, which includes all accidents with and without medical leave and those occurring "in itinere".

For the present table, the calculation formulas are:

- Lost Day Rate = (Total number of lost-day cases among own workforce × 10⁶) / Total hours worked.
- Occupational Accident Incidence Rate = (Number of accidents × 100,000 workers) / Accumulated average workforce; according to the methodology of the National Institute for Safety and Health, a body under the Spanish Ministry of Labour and Social Economy.
- Frequency Rate = (Number of accidents with medical leave × 10⁶) / (Total number of hours worked).
- Severity Rate = (Number of working days lost due to occupational accidents with medical leave × 10³) / (Number of hours worked), which is equivalent to the Lost Day Rate divided by 1,000.



ESRS 2: General disclosures

E1: Climate change

E2: Pollution

E3: Water and marine resources

E4: Biodiversity and ecosystems

E5: Resource use and circular economy

S1: Own workforce

S2: Workers in the value chain

S3: Affected communities

S4: Consumers and end-users

G1: Business conduct

Act 11/2018

Number of occupational diseases by region reported by the private insurance company (own workforce) (GRI 403-10)

	Spain		United Kingdom		Brazil		Total	
	2024	2025	2024	2025	2024	2025	2024	2025
Number of deaths due to occupational disease or illness	0	0	0	0	0	0	0	0
Male	0	0	0	0	0	0	0	0
Female	0	0	0	0	0	0	0	0
Number of cases of occupational diseases or illnesses	0	0	0	1	0	0	0	1
Male	0	0	0	1	0	0	0	1
Female	0	0	0	0	0	0	0	0



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

		Main training data (GRI 404-1)							
		2024				2025			
		Spain	United Kingdom	Brazil	Total	Spain	United Kingdom	Brazil	Total
Investment in employee training and development programmes (€)		€2,620,420.81	€1,107,109.45	€144,011.20	€3,871,541.45	€2,780,437.82	€1,029,615.19	€383,068.12	€4,193,121.13
Investment in training per employee (€)		€300.71	€1,172.79	€169.23	€368.40	€304.17	€1,030.65	€419.57	€379.36
Employees who have received training (%)	Female	100%	96%	100%	100%	100%	67%	100%	99%
	Male	100%	95%	100%	100%	100%	66%	100%	100%
	Total	100%	96%	100%	100%	100%	67%	100%	100%
Average training hours per year per employee (by gender) ^(A)	Female	71.27	9.89	27.43	61.81	58.96	2.50	35.46	51.34
	Male	84.28	8.59	42.05	74.38	85.52	1.80	38.14	74.57
Average hours of training per year per employee (by professional category)	Senior Management	49.65	-	-	49.65	52.85	0.00	0.00	52.85
	Executives and graduates	62.15	10.18	25.84	58.12	49.32	3.35	57.21	46.66
	Coordinators	68.40	9.68	34.07	62.62	67.29	10.36	42.10	62.87
	Technicians	89.42	3.78	44.50	85.56	89.60	2.83	40.53	85.67
	Support staff	96.01	9.34	32.70	43.95	96.37	1.20	29.13	37.52
Average training hours per year per employee	Total	79.36	9.13	36.69	69.60	75.51	2.10	37.11	65.70

^(A)Average training hours per woman = Total number of training hours provided to female employees / Total number of female employees.
Average training hours per man = Total number of training hours provided to male employees / Total number of male employees.



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

Training hours by gender, professional category and region (GRI 404-1)

2025												
Training hours	Spain			United Kingdom			Brazil			TOTAL		
	Online training	On-site training	Total	Online training	On-site training	Total	Online training	On-site training	Total	Online training	On-site training	Total
Male	301,034	185,944	486,978	593	445	1,038	15,982	5,414	21,395	317,609	191,803	509,412
Female	140,688	62,538	203,226	782	277	1,059	10,054	2,429	12,483	151,524	65,244	216,768
Total by gender	441,722	248,482	690,204	1,375	722	2,097	26,036	7,843	33,879	469,133	257,047	726,179
Senior Management	96	591	687	—	—	—	—	—	—	96	591	687
Executives and graduates	74,591	53,448	128,039	208	382	590	2,980	853	3,833	77,779	54,683	132,462
Coordinators	51,770	30,193	81,963	364	113	477	4,400	1,620	6,020	56,534	31,926	88,460
Technicians	274,123	157,301	431,424	63	104	167	9,878	2,726	12,604	284,064	160,131	444,195
Support staff	41,142	6,949	48,091	741	123	864	8,777	2,644	11,421	50,660	9,716	60,375
Total by professional category	441,722	248,482	690,204	1,375	722	2,097	26,036	7,843	33,879	469,133	257,047	726,179
2024												
Training hours	Spain			United Kingdom			Brazil			TOTAL		
	Online training	On-site training	Total	Online training	On-site training	Total	Online training	On-site training	Total	Online training	On-site training	Total
Male	311,047	145,755	456,802	3,424	1,308	4,731	17,679	4,984	22,663	332,149	152,047	484,196
Female	179,126	55,621	234,748	2,860	1,026	3,886	7,227	1,330	8,557	189,213	57,977	247,191
Total by gender	490,173	201,376	691,550	6,284	2,334	8,617	24,906	6,314	31,220	521,363	210,024	731,387
Senior Management	37	609	646	—	—	—	—	—	—	37	609	646
Executives and graduates	101,633	48,448	150,081	266	1,373	1,639	1,131	471	1,602	103,030	50,292	153,323
Coordinators	59,262	21,103	80,365	107	387	494	2,958	1,914	4,872	62,327	23,404	85,731
Technicians	285,097	125,625	410,722	78	160	238	13,121	541	13,662	298,296	126,327	424,623
Support staff	44,144	5,591	49,735	5,833	413	6,246	7,696	3,388	11,084	57,672	9,393	67,065
Total by professional category	490,173	201,376	691,550	6,284	2,334	8,617	24,906	6,314	31,220	521,363	210,024	731,387



ESRS 2: General disclosures

E1: Climate change

E2: Pollution

E3: Water and marine resources

E4: Biodiversity and ecosystems

E5: Resource use and circular economy

S1: Own workforce

S2: Workers in the value chain

S3: Affected communities

S4: Consumers and end-users

G1: Business conduct

Act 11/2018

Employee training on occupational health and safety

	Spain		Brazil		United Kingdom		Total	
	2024	2025	2024	2025	2024	2025	2024	2025
	Training activities (no.)	302	129	34	12	9	5	345
Employees (no.)	8,656	6,281	674	412	210	25	9,540	6,718
Training hours (h)	122,682	64,057	7,620	1,813	2,989	173	133,291	66,043



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018


Tax information

GRI 201-4, 207-4

The tax information⁴⁰ of the Aena Group in 2024 and 2025 is as follows:

Tax indicators (€M) (GRI 207-4, 201-4)									
Tax jurisdictions where Aena has shares	Revenue from intragroup transactions with other tax jurisdictions	Pre-tax profit	Taxes withheld and paid on behalf of employees	Taxes collected from customers on behalf of a tax authority	Significant uncertain tax positions	Intra-company debt	Corporate income taxes paid (cash basis)	Accounting expense for corporate income tax on profit/loss (excluding deferred tax on profits and provisions for uncertain tax positions)	Other taxes payments to governments
2025									
Spain	3.377	2,659.8	263.8	50.6	14.6	21.8	579.3	628.8	257.2
United Kingdom	0	125.2	8.5	-4.70	0.0	0.0	28.8	26.7	8.2
Brazil	0	55.6	17.9	47.9	0.0	0.0	14.0	18.2	3.8
2024									
Spain	-8.99	2,391.5	230,7	27,4	0.0	20.6	373.4	544.3	236.1
United Kingdom	0	102.0	7,1	-6.70	0.0	0.0	25.8	24.8	8.8
Brazil	0	49.3	12,2	28,3	0.0	0.0	6.1	14.6	2.8

⁴⁰ All data related to the Aena Group's tax contribution has been included in Note 32. Income taxes - Tax information of the 2025 Consolidated Annual Accounts - Block A and, therefore, verified by an external auditor. Likewise, with regard to public subsidies received by the Aena Group, details can be consulted in the Annual Accounts. Additionally, with respect to the United Kingdom, London Luton Airport and the Brazilian subsidiaries, tax information is reported in their Annual Accounts, which are also audited by an independent third party.

	ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
	E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
	S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

6. Content Index Act 11/2018 vs CSRD vs GRI

The Aena Group has prepared the 2025 Sustainability Report in compliance with the non-financial information disclosure requirements established by Act 11/2018, of December 28. This report has been developed using the European Sustainability Reporting Standards (ESRS), defined by the European Corporate Sustainability Reporting Directive (CSRD), as a reference framework. Furthermore, to address the requirements of Act 11/2018 that are not explicitly covered by the ESRS, the Global Reporting Initiative (GRI) indicators have been used.

Subjects		Materiality	Reference (ESRS)	Reference (GRI)	Page
Business model	Business Environment Organisation and Structure Markets in which it Operates Objectives and Strategies Key Factors and Trends that may Affect its Future Development Main Policies Applied by the Group	Yes	ESRS 2 GOV-1 ESRS 2 GOV-2 ESRS 2 SBM-1 ESRS 2 SBM-2 ESRS 2 SBM-3		9, 19, 35, 45, 50
		Yes	E1-2		102
		Yes	E2-1		133
		Yes	E3-1		147
		Yes	E4-2, E4-4		161, 164
		Yes	E5-1		167
		Yes	S1-1		181
		Yes	S2-1		223
		Yes	S3-1		232
		Yes	S4-1		244
Main risks and impacts identified	Internal Control and Risk Management System.	Yes	ESRS 2 GOV-5		25
	Risk and Impact Analysis Related to Key Issues.	Yes	ESRS 2 IRO-1 ESRS 2 IRO-2 ESRS 2 SBM-3 S1-SBM-3		55, 62, 50,180
Environmental issues					
Subjects					
Environmental management	Current and foreseeable effects of the company's activities on the environment	Yes	E1-9, E2-6, E3-5, E4-6, E5-6, ESRS 2 IRO-1		130, 145, 155, 165, 176, 55
	Environmental evaluation or certification procedures.	Yes	E1-3, E2-2, E3-2, E4-3, E5-2		102, 133, 147, 162, 167
	Resources dedicated to the prevention of environmental risks.	Yes			
	Principle of precaution.	Yes	E1-3, E2-2, E3-2, E4-3, E5-2		102, 133, 147, 162, 167
	Quantity of environmental risks provisions and guarantees.	Yes			



ESRS 2: General disclosures

E1: Climate change

E2: Pollution

E3: Water and marine resources

E4: Biodiversity and ecosystems

E5: Resource use and circular economy

S1: Own workforce

S2: Workers in the value chain

S3: Affected communities

S4: Consumers and end-users

G1: Business conduct

Act 11/2018

Subjects		Materiality	Reference (ESRS)	Reference (GRI)	Page
Pollution	Measures to prevent, reduce or repair carbon emissions which seriously affect the environment (including noise and light pollution).	Yes	E2-2 E2-3 S3-4		133, 137, 235
Circular economy and prevention and waste management	Prevention measures, recycling, re-use, other forms of recovery and disposal of waste.	Yes	E5-2 y E5-5		167, 171
	Actions to combat food waste	No	-		Non material
Sustainable use of resources	The consumption of water and the supply of water in accordance with local limitations.	Yes	E3-4		151
	Consumption of raw materials and the measures adopted to improve efficiency in their use.	No	-		Non material. As a provider of airport services, the consumption of raw materials is not significant in the value chain of the Aena Group.
	Direct and indirect consumption, of energy.	Yes	E1-5		113
	Measures taken to improve energy efficiency.	Yes	E1-3		102
	Use of renewable energies	Yes	E1-5		113
Climate change	The important elements of greenhouse gas emissions generated as a result of the company's activities.	Yes	E1-4, E1-6		108, 121
	The measures adopted in order to adapt to the consequences of climate change.	Yes	E1-1, E1-3		93, 102
	The reduction targets voluntarily established.	Yes	E1-1, E1-4		93, 108
Protection of biodiversity	Measures taken to protect or restore biodiversity.	Yes	E4-3		162
	Impacts caused by activities or operations in protected areas.	Yes	E4-5		164
Social and personnel issues					
Subjects					
Employment	Total number and distribution of employees by gender, age, country and professional classification.	Yes	S1-6, S1-9	GRI 2-7	206, 213, 284
	Total number and distribution of employment contract types.	Yes	S1-6	GRI 405-1	206, 284



ESRS 2: General disclosures

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Act 11/2018

Subjects		Materiality	Reference (ESRS)	Reference (GRI)	Page
Employment	Annual average of open-ended contracts, temporary contracts and part-time contracts by gender, age and professional category.	Yes	S1-6	GRI 2-7	206, 284
	Number of dismissals by gender, age and professional category.	Yes	S1-6	GRI 401-1	206, 284
	Wage gap.	Yes	S1-16		219
	Average remuneration and its evolution broken down by gender, age and professional category or equal value.	Yes	S1-16	GRI 405-2	219, 284
	The average remuneration of executives, including variable remuneration, allowances, compensation, payment to long-term forecast savings and any other perception broken down by gender.	Yes	S1-16	GRI 2-19 GRI 2-20	219, 284
	The average remuneration of directives, including variable remuneration, allowances, compensation, payment to long-term forecast savings and any other perception broken down by gender.	Yes	S1-16	GRI 2-21	219, 284
	Implementation of disconnection policies.	Yes	S1-1		181
	Employees with disabilities.	Yes	S1-12		215
	Work time organization.	Yes	S1-1		181
Work organization	Number of hours of absenteeism.	Yes	S1-14	GRI 403-9	217, 284
	Measures aimed to facilitate the conciliation while encouraging the co-responsible performance by both parents.	Yes	S1-4, S1-15		192, 218
	Work health and safety conditions.	Yes	S1-14		217
Health and safety	Work accidents, in particular their frequency and severity, disaggregated by gender.	Yes	S1-14		217
	Occupational diseases, disaggregated by gender.	Yes	-	GRI 403-9	284
Social relationships	Organization of social dialogue, including procedures to inform and consult staff and negotiate with them	Yes	S1-2		186
	Percentage of employees covered by collective agreement by country	Yes	S1-8		212
	The balance of collective agreements, particularly in the field of health and safety at work	Yes	S1-8		212
	Mechanism and procedures that the company has in place to promote the involvement of workers in the management of the company, in terms of information, consultation and participation.	Yes	S1-3		189



ESRS 2: General disclosures

E1: Climate change

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S4: Consumers and end-users

G1: Business conduct

Act 11/2018

Subjects		Materiality	Reference (ESRS)	Reference (GRI)	Page
Training	The policies implemented in the field of training.	Yes	S1-1		181
	The total amount of training hours by professional category.	Yes	S1-13	GRI 404-1	216, 284
Universal accessibility for people with disabilities					
Equality	Measures taken to promote equal treatment and opportunities between women and men.	Yes	S1-4, S1-5, S1-9		192, 203, 213
	Equality plans.	Yes	S1-1, S1-4, S1-9	GRI 405	181, 192, 213, 284
	Measures adopted to promote employment, protocols against sexual and gender-based harassment, integration, and the universal accessibility of people with disabilities.	Yes	S1-4, S1-12		192, 215
	Policy against any type of discrimination and, where appropriate, diversity management.	Yes	S1-1		181
Information about the respect for human rights					
Subjects					
	Application of due diligence procedures in the field of human rights.	Yes	ESRS 2 GOV-4		23
	Prevention of the risks of violation of human rights and, where appropriate, measures to mitigate, manage, and repair possible abuses committed.	Yes	S1-3, S1-4, S2-4, S3-4, S4-4		189, 192, 227, 235, 250
	Reports of cases of violation of human rights.	Yes	S1-17		220
	Promotion and compliance with the provisions of the ILO's fundamental conventions related to respect for the freedom of association and the right to collective bargaining, the elimination of discrimination in employment and occupation, the abolition of forced or compulsory labour, and the effective abolition of child labour.	Yes	S1-1, S2-1		181, 223



ESRS 2: General disclosures

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Act 11/2018

Subjects		Materiality	Reference (ESRS)	Reference (GRI)	Page or section
Measures adopted to prevent corruption and bribery.		Yes	G1-3		279
Measures adopted to fight against anti-money laundering.		Yes	G1-3		279
Contributions to foundations and non-profit-making bodies.		Yes	S3-4 Note: Related to IROs	GRI 2-28 GRI 201-1	235, 284
Management approaches					
Commitment by the company to sustainable development	Impact of the company's activities on employment and local development.	Yes	ESRS 2 SBM-3 S3-2		50, 233
	The impact of company activity on local populations and on the territory.	Yes	ESRS 2 SBM-3 S3-2		50, 233
	The relationships maintained with representatives of the local communities and the modalities of dialogue with these.	Yes	S3-2		233
	Actions of association or sponsorship.	Yes	S3-4 Note: Related to IROs	GRI 2-28 GRI 201-1 GRI 413-1	235, 284
Subcontractors and suppliers	The inclusion of social, gender equality and environmental issues in the purchasing policy.	Yes	S2-1, G1-2		223, 276
	Consideration of social and environmental responsibility in relations with suppliers and subcontractors.	Yes	G1-2		276
	Supervision systems and audits, and their results.	Yes	S4-4 Note: Related to IROs	GRI 308 GRI414-2	250, 284
Consumers	Customer health and safety measures.	Yes	S4-4, S4-5		250, 260
	Claims systems.	Yes	S4-3		248
	Complaints received and their resolution.	Yes	S4-3		248
Tax information	Benefits obtained by country.			GRI 207-4	
	Taxes on paid benefits.	Yes	-	GRI 207-4	284
	Public subsidies received.			GRI 201-4	



7. Appendix

ESRS 1 - 29, ESRS 2 - 2 (a)

ESRS 2 - Appendix B:

List of Data Points (DPs) in cross-cutting and topical standards that derive from other EU legislation.

The following table details the aspects derived from various EU regulations included in Appendix B of ESRS 2. Additionally, the table indicates the location of these data within this report and identifies the points that have been assessed as non-material.

Disclosure Requirement and related datapoint	SDFR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Page
ESRS 2 GOV-1 Board's gender diversity paragraph 21 (d)	Indicator number 13 of Table #1 of Annex 1		Commission Delegated Regulation (EU) 2020/1816(5), Annex II		9
ESRS 2 GOV-1 Percentage of board members who are independent paragraph 21 (e)	No		Delegated Regulation (EU) 2020/1816, Annex II		9
ESRS 2 GOV-4 Statement on due diligence paragraph 30	Indicator number 10 Table #3 of Annex 1				23
ESRS 2 SBM-1 Involvement in activities related to fossil fuel activities paragraph 40 (d) i	Indicators number 4 Table #1 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453(6)Table 1: Qualitative information on Environmental risk and Table 2: Qualitative information on Social risk	Delegated Regulation (EU) 2020/1816, Annex II		35
ESRS 2 SBM-1 Involvement in activities related to chemical production paragraph 40 (d) ii	Indicator number 9 Table #2 of Annex		Delegated Regulation (EU) 2020/1816, Annex II		35
ESRS 2 SBM-1 Involvement in activities related to controversial weapons paragraph 40 (d) iii	Indicator number 14 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1818(7), Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II		35
ESRS 2 SBM-1 Involvement in activities related to cultivation and production of tobacco paragraph 40 (d) iv			Delegated Regulation (EU) 2020/1818, Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II	No	35
ESRS E1-1 Transition plan to reach climate neutrality by 2050 paragraph 14				Regulation (EU) 2021/1119, Article 2(1)	93
ESRS E1-1 Undertakings excluded from Paris-aligned Benchmarks paragraph 16 (g)		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book-Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity	Delegated Regulation (EU) 2020/1818, Article 12.1 (d) to (g), and Article 12.2		93



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

Disclosure Requirement and related datapoint	SDFR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Page
ESRS E1-4 GHG emission reduction targets paragraph 34	Indicator number 4 Table #2 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book – Climate change transition risk: alignment metrics	Delegated Regulation (EU) 2020/1818, Article 6		108
ESRS E1-5 Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors) paragraph 38	Indicator number 5 Table #1 and Indicator n. 5 Table #2 of Annex 1				113
ESRS E1-5 Energy consumption and mix paragraph 37	Indicator number 5 Table #1 of Annex 1				113
ESRS E1-5 Energy intensity associated with activities in high climate impact sectors paragraphs 40 to 43	Indicator number 6 Table #1 of Annex 1				113
ESRS E1-6 Gross Scope 1, 2, 3 and Total GHG emissions paragraph 44	Indicators number 1 and 2 Table #1 of Annex 1	Article 449a; Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book – Climate change transition risk: Credit quality of exposures by sector, emissions and residual maturity	Delegated Regulation (EU) 2020/1818, Article 5(1), 6 and 8(1)		121
ESRS E1-6 Gross GHG emissions intensity paragraphs 53 to 55	Indicators number 3 Table #1 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book – Climate change transition risk: alignment metrics	Delegated Regulation (EU) 2020/1818, Article 8(1)		121
ESRS E1-7 GHG removals and carbon credits paragraph 56				Regulation (EU) 2021/1119, Article 2(1)	129
ESRS E1-9 Exposure of the benchmark portfolio to climate-related physical risks paragraph 66			Delegated Regulation (EU) 2020/1818, Annex II Delegated Regulation (EU) 2020/1816, Annex II		130
ESRS E1-9 Disaggregation of monetary amounts by acute and chronic physical risk paragraph 66 (a) ESRS E1-9 Location of significant assets at material physical risk paragraph 66 (c).		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 paragraphs 46 and 47; Template 5: Banking book - Climate change physical risk: Exposures subject to physical risk.			130
ESRS E1-9 Breakdown of the carrying value of its real estate assets by energy-efficiency classes paragraph 67 (c).		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 paragraph 34; Template 2: Banking book -Climate change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral			130
ESRS E1-9 Degree of exposure of the portfolio to climate- related opportunities paragraph 69			Delegated Regulation (EU) 2020/1818, Annex II		130



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
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S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

Disclosure Requirement and related datapoint	SDFR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Page
ESRS E2-4 Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil, paragraph 28	Indicator number 8 Table #1 of Annex 1 Indicator number 2 Table #2 of Annex 1 Indicator number 1 Table #2 of Annex 1 Indicator number 3 Table #2 of Annex 1				141
ESRS E3-1 Water and marine resources paragraph 9	Indicator number 7 Table #2 of Annex 1				147
ESRS E3-1 Dedicated policy paragraph 13	Indicator number 8 Table 2 of Annex 1				147
ESRS E3-1 Sustainable oceans and seas paragraph 14	Indicator number 12 Table #2 of Annex 1				147
ESRS E3-4 Total water recycled and reused paragraph 28 (c)	Indicator number 6.2 Table #2 of Annex 1				151
ESRS E3-4 Total water consumption in m3 per net revenue on own operations paragraph 29	Indicator number 6.1 Table #2 of Annex 1				151
ESRS 2- IRO 1 - E4 paragraph 16 (a) i	Indicator number 7 Table #1 of Annex 1				161
ESRS 2- IRO 1 - E4 paragraph 16 (b)	Indicator number 10 Table #2 of Annex 1				161
ESRS 2- IRO 1 - E4 paragraph 16 (c)	Indicator number 14 Table #2 of Annex 1				161
ESRS E4-2 Sustainable land / agriculture practices or policies paragraph 24 (b)	Indicator number 11 Table #2 of Annex 1				161
ESRS E4-2 Sustainable oceans / seas practices or policies paragraph 24 (c)	Indicator number 12 Table #2 of Annex 1				161
ESRS E4-2 Policies to address deforestation paragraph 24 (d)	Indicator number 15 Table #2 of Annex 1				161
ESRS E5-5 Non-recycled waste paragraph 37 (d)	Indicator number 13 Table #2 of Annex 1				171
ESRS E5-5 Hazardous waste and radioactive waste paragraph 39	Indicator number 9 Table #1 of Annex 1				171
ESRS 2- SBM3 - S1 Risk of incidents of forced labour paragraph 14 (f)	Indicator number 13 Table #3 of Annex I				180
ESRS 2- SBM3 - S1 Risk of incidents of child labour paragraph 14 (g)	Indicator number 12 Table #3 of Annex I				180
ESRS S1-1 Human rights policy commitments paragraph 20	Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex I				181
ESRS S1-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 21			Delegated Regulation (EU) 2020/1816, Annex II		181
ESRS S1-1 processes and measures for preventing trafficking in human beings paragraph 22	Indicator number 11 Table #3 of Annex I				181



ESRS 2: General disclosures

E1: Climate change

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E3: Water and marine resources

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E5: Resource use and circular economy

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G1: Business conduct

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Disclosure Requirement and related datapoint	SDFR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Page
ESRS S1-1 workplace accident prevention policy or management system paragraph 23	Indicator number 1 Table #3 of Annex I				181
ESRS S1-3 grievance/complaints handling mechanisms paragraph 32 (c)	Indicator number 5 Table #3 of Annex I				189
ESRS S1-14 Number of fatalities and number and rate of workrelated accidents paragraph 88 (b) and (c)	Indicator number 2 Table #3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II		217
ESRS S1-14 Number of days lost to injuries, accidents, fatalities or illness paragraph 88 (e)	Indicator number 3 Table #3 of Annex I				217
ESRS S1-16 Unadjusted gender pay gap paragraph 97 (a)	Indicator number 12 Table #1 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II		219
ESRS S1-16 Excessive CEO pay ratio paragraph 97 (b)	Indicator number 8 Table #3 of Annex I				219
ESRS S1-17 Incidents of discrimination paragraph 103 (a)	Indicator number 7 Table #3 of Annex I				220
ESRS S1-17 Non-respect of UNGPs on Business and Human Rights and OECD paragraph 104 (a)	Indicator number 10 Table #1 and Indicator n. 14 Table #3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818 Art 12 (1)		220
ESRS 2- SBM3 – S2 Significant risk of child labour or forced labour in the value chain paragraph 11 (b)	Indicators number 12 and n. 13 Table #3 of Annex I				222
ESRS S2-1 Human rights policy commitments paragraph 17	Indicator number 9 Table #3 and Indicator n. 11 Table #1 of Annex 1				223
ESRS S2-1 Policies related to value chain workers paragraph 18	Indicator number 11 and n. 4 Table #3 of Annex 1				223
ESRS S2-1 Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines paragraph 19	Indicator number 10 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)		223
ESRS S2-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 19			Delegated Regulation (EU) 2020/1816, Annex II		223
ESRS S2-4 Human rights issues and incidents connected to its upstream and downstream value chain paragraph 36	Indicator number 14 Table #3 of Annex 1				227
ESRS S3-1 Human rights policy commitments paragraph 16	Table #3 of Annex 1 and Indicator number 11 Table #1 of Annex				232



ESRS 2: General disclosures	E1: Climate change	E2: Pollution	E3: Water and marine resources
E4: Biodiversity and ecosystems	E5: Resource use and circular economy	S1: Own workforce	S2: Workers in the value chain
S3: Affected communities	S4: Consumers and end-users	G1: Business conduct	Act 11/2018

Disclosure Requirement and related datapoint	SDFR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Page
ESRS S3-1 non-respect of UNGPs on Business and Human Rights, ILO principles or and OECD guidelines paragraph 17	Indicator number 10 Table #1 Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)		232
ESRS S3-4 Human rights issues and incidents paragraph 36	Indicator number 14 Table #3 of Annex 1				235
ESRS S4-1 Policies related to consumers and end-users paragraph 16	Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex 1				244
ESRS S4-1 Non-respect of UNGPs on Business and Human Rights and OECD guidelines paragraph 17	Indicator number 10 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)		244
ESRS S4-4 Human rights issues and incidents paragraph 35	Indicator number 14 Table #3 of Annex 1				250
ESRS G1-1 United Nations Convention against Corruption paragraph 10 (b)	Indicator number 15 Table #3 of Annex 1				270
ESRS G1-1 Protection of whistleblowers paragraph 10 (d)	Indicator number 6 Table #3 of Annex 1				270
ESRS G1-4 Fines for violation of anticorruption and anti-bribery laws paragraph 24 (a)	Indicator number 17 Table #3 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II)		282
ESRS G1-4 Standards of anti- corruption and anti- bribery paragraph 24 (b)	Indicator number 16 Table #3 of Annex 1				282

ESRS 2 Appendix C:

Disclosure and Application Requirements in Topical ESRS that are applicable in conjunction with ESRS 2 General disclosures

This appendix is an integral part of ESRS 2 and has the same authority as the other parts of the standard. The following table outlines the requirements in topical ESRS that need to be taken into account when reporting against the Disclosure Requirements in ESRS 2.

ESRS 2 Disclosure Requirement	Related ESRS paragraph	Double Materiality Yes / No	Page
GOV-1 The role of the administrative, management and supervisory bodies	ESRS G1 Business conduct (paragraph 5)	Yes	269
GOV-3 Integration of sustainability-related performance in incentive schemes	ESRS E1 Climate change (paragraph 13)	Yes	93
SBM-2 Interests and views of stakeholders	ESRS S1 Own workforce (paragraph 12) ESRS S2 Workers in the value chain (paragraph 9) ESRS S3 Affected communities (paragraph 7) ESRS S4 Consumers and end-users (paragraph 8)	Yes	180, 222, 231, 243
SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model	ESRS E1 Climate change (paragraphs 18 to 19) ESRS E4 Biodiversity and ecosystems (paragraph 16) ESRS S1 Own workforce (paragraph 13 to 16) ESRS S2 Workers in the value chain (paragraph 10 to 13) ESRS S3 Affected communities (paragraph 8 to 11) ESRS S4 Consumers and end-users (paragraph 9 to 12)	Yes	95, 158, 180, 222, 231, 243
IRO-1 Description of the processes to identify and assess material impacts, risks and opportunities	ESRS E1 Climate change (paragraph 20 to 21) ESRS E2 Pollution (paragraph 11) ESRS E3 Water and marine resources (paragraph 8) ESRS E4 Biodiversity and ecosystems (paragraph 17 to 19) ESRS E5 Resource use and circular economy (paragraph 11) ESRS G1 Business conduct (paragraph 6)	Yes	96, 132, 147, 161, 167, 269







ESRS 2: General disclosures
E4: Biodiversity and ecosystems
S3: Affected communities

E1: Climate change
E5: Resource use and circular economy
S4: Consumers and end-users

E2: Pollution
S1: Own workforce
G1: Business conduct

E3: Water and marine resources
S2: Workers in the value chain
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8. Sustainable Financing. Ratings

ESG provider	Score obtained		
	2023	2024	2025
 (Best score: 0)	8.8	9.8	12.6
 (Best score: 10)	6.1	6.4	6.5
 (Best score: 5)	5	5	5
 (Best score: A)	A-	A-	A
Member of Dow Jones Sustainability Indices Powered by the S&P Global CSA (Best score: 100)	67	69	69



AENA S.M.E, S.A and subsidiaries

**Limited Assurance Report issued by an
assurance provider on the Consolidated Non-
Financial Information Statement (NFIS) and
the Sustainability Reporting**

31 December 2025

*(Translation from the original in Spanish. In the
event of discrepancy, the Spanish-language
version prevails.)*



KPMG Auditores, S.L.
Paseo de la Castellana, 259C
28046 Madrid

Limited Assurance Report issued by an assurance provider on the Consolidated Non-Financial Information Statement and the Sustainability Reporting of AENA S.M.E, S.A and subsidiaries for 2025

(Translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

To the Shareholders of AENA S.M.E, S.A

Limited Assurance Conclusion

Pursuant to article 49 of the Spanish Code of Commerce, we have performed a limited assurance review of the accompanying Consolidated Non-Financial Information Statement (hereinafter, NFIS) of AENA S.M.E, S.A (hereinafter, the Entity) and its subsidiaries (hereinafter, the Group) for the year ended 31 December 2025, which forms part of the consolidated directors' report of the Group.

The NFIS includes additional information to that required by prevailing mercantile legislation concerning non-financial information, namely the sustainability reporting prepared by the Group for the year ended 31 December 2025 (hereinafter, the Sustainability Reporting) in accordance with the provisions of Directive (EU) 2022/2464 of the European Parliament and of the Council of 14 December 2022 on Corporate Sustainability Reporting (CSRD). This Sustainability Reporting has also been subject to a limited assurance review.

Based on the procedures performed and the evidence obtained, nothing has come to our attention that causes us to believe that:

- a) The Group's Non-Financial Information Statement for the year ended 31 december 2025 has not been prepared, in all material respects, in accordance with prevailing mercantile legislation and selected criteria of the European Sustainability Reporting Standards (ESRS), as well as the other criteria described based on each subject area in the "6. Content Index Act 11/2018 vs CSRD vs GRI" of the aforementioned Statement;
- b) The Sustainability Reporting as a whole has not been prepared, in all material respects, in accordance with the sustainability reporting framework applied by the Group and identified in the accompanying note "Disclosure Requirement (DR) BP-1: General basis for preparation of the Sustainability Statements", including:
 - That the description of the process for identifying the sustainability reporting information included in note "IRO-1-Description of the process to identify and assess material impacts, risks and opportunities" is consistent with the process carried out and that it identifies the material information to be disclosed in accordance with the requirements of the ESRS.
 - Compliance with ESRS.
 - Compliance of the disclosure requirements, included in subsection "Taxonomy of sustainable finances" of the environment section of the Sustainability Reporting, with Article 8 of Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment.



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Basis for Conclusion

We have performed our limited assurance engagement in accordance with generally accepted professional standards applicable in Spain and specifically with the guidelines contained in the Revised Guidelines 47 and 56 for assurance engagements on non-financial information issued by the Spanish Institute of Registered Auditors (ICJCE) and considering the contents of the note published by the Spanish Accounting and Audit Institute (ICAC) on 18 December 2024 (hereinafter, Generally Accepted Professional Standards).

The procedures applied in a limited assurance engagement are less than those required in a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is lower than the level of assurance that would have been obtained had a reasonable assurance engagement been performed.

Our responsibilities under this standard are further described in the Assurance Provider Responsibilities section of our report.

We have complied with the independence and other ethical requirements of the International Code of Ethics for Professional Accountants (including international independence standards) of the International Ethics Standards Board for Accountants (IESBA Code of Ethics), which is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

Our firm applies the International Standard on Quality Management 1 (ISQM 1), which requires us to design, implement and operate a system of quality management including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion.

Directors' Responsibility

The preparation of the NFIS included in the consolidated directors' report of the Group, and the content thereof, is the responsibility of the Directors of AENA, S.M.E, S.A. The NFIS has been prepared in accordance with prevailing mercantile legislation and selected criteria of the ESRS, as well as the other criteria described based on each subject area in the "6. Content Index Act 11/2018 vs CSRD vs GRI" table of the aforementioned Statement.

This responsibility also encompasses the design, implementation and maintenance of internal control deemed necessary to ensure that the NFIS is 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 information required to prepare the NFIS was obtained.

In relation to the Sustainability Reporting, the entity's Directors are responsible for developing and implementing a process for identifying the information to be included in the Sustainability Reporting in accordance with the contents of the CSRD, the ESRS and Article 8 of Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 and for disclosing information about this process in the Sustainability Reporting in note "IRO-1-Description of the process to identify and assess material impacts, risks and opportunities". This responsibility includes:



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- understanding the context in which the Group's business activities and relationships are conducted, and its stakeholders, in relation to the Group's impact on people and the environment.
- identifying actual and potential impacts (both negative and positive), and any risks and opportunities that might affect, or could reasonably be expected to affect, the Group's financial position, financial performance, cash flows, access to financing and the cost of capital in the short, medium or long term.
- evaluating the materiality of the impacts, risks and opportunities identified; and
- making assumptions and estimates that are reasonable in the circumstances.

The Directors are also responsible for the preparation of the Sustainability Reporting, including the information identified by the process, in accordance with the sustainability reporting framework applied, including compliance of the CSRD, the ESRS and the disclosure requirements included in subsection "Taxonomy of sustainable finances" of the environmental section of the Sustainability Reporting with Article 8 of Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment.

This responsibility includes:

- Designing, implementing and maintaining such internal control as the Directors consider necessary to enable the preparation of sustainability reporting that is free from material misstatement, whether due to fraud or error.
- Selecting and applying appropriate methods for sustainability reporting and making assumptions and estimates that are reasonable in the circumstances for specific disclosures.

Inherent Limitations in the Preparation of the Information

In accordance with the ESRS, the Entity's Directors are required to prepare prospective information based on assumptions and hypotheses, which are to be included in the Sustainability Reporting, regarding events that may occur in the future, as well as any possible future actions that the Group may take. The actual outcome may differ significantly from the estimates, as future events often do not occur as expected.

In determining sustainability disclosures, the Entity's Directors interpret legal and other terms that are not clearly defined and may be interpreted differently by others, including the legal conformity of such interpretations, and are therefore subject to uncertainty.

Responsibility of the Assurance Provider

Our objectives are to plan and perform the assurance engagement in order to obtain limited assurance about whether the NFIS and Sustainability Reporting are free from material misstatement, whether due to fraud or error, and to issue a limited assurance report that includes our conclusions thereon. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the decisions of users taken on the basis of this information.



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As part of a limited assurance engagement, we exercise professional judgement and maintain professional scepticism throughout the engagement. We also:

- Design and implement procedures to assess whether the process for identifying the information to be included in both the NFIS and Sustainability Reporting is consistent with the description of the process followed by the Group and allows, where appropriate, for the identification of material information to be disclosed in accordance with the requirements of the ESRS.
- Apply risk-based procedures, including obtaining an understanding of internal controls relevant to the engagement in order to identify the disclosures where material misstatements are more likely to arise, whether due to fraud or error, but not for the purpose of providing a conclusion about the effectiveness of the Group's internal control.
- Design and implement procedures that respond to disclosures in both the NFIS and the Sustainability Reporting that are likely to contain material misstatements. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.

Summary of Work Performed

A limited assurance engagement includes performing procedures to obtain evidence to support our conclusions. The nature, timing and scope of the procedures selected depend on professional judgement, including the identification of the disclosures in which material misstatements, whether due to fraud or error, are likely to arise in the NFIS and the Sustainability Reporting.

Our work consisted of making inquiries of management, as well as of the different units and components of the Group that participated in the preparation of the NFIS and the Sustainability Reporting, reviewing the processes for compiling and validating the information presented in the NFIS and the Sustainability Reporting and applying certain analytical procedures and sample review tests, which are described below:

In relation to the NFIS assurance process:

- Meetings with the Group's personnel to gain an understanding of the business model, policies and management approaches applied, the principal risks related to these matters and to obtain the information necessary for the external review.
- Analysis of the scope, relevance and completeness of the content of the NFIS for 2025 based on the materiality analysis performed by the Group and described in the note "IRO-1-Description of the process to identify and assess material impacts, risks and opportunities", considering the content required by prevailing mercantile legislation.
- Analysis of the processes for compiling and validating the data presented in the NFIS for 2025.
- Review of the information relative to the risks, policies and management approaches applied in relation to the material aspects presented in the NFIS for 2025.
- Corroboration, through sample testing, of the information relative to the content of the NFIS for 2025 and whether it has been adequately compiled based on data provided by the information sources.

In relation to the assurance work on the Sustainability Reporting:

- Making inquiries of Group personnel:



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- to gain an understanding of the business model, policies and management approaches applied, the principal risks related to these matters and to obtain information necessary for the external review.
- to understand the source of information used by management (e.g. stakeholder interaction, business plans and strategy documents) and review the Group's internal documentation on its process.
- Through inquiries of Group personnel, gaining an understanding of the Group's processes for collecting, validating and reporting information relevant to the preparation of its sustainability reporting.
- Assessment of how consistent the evidence obtained from our procedures on the Group's process for determining the information to be included in the Sustainability Reporting is with the description of the process included in the Sustainability Reporting, and assessment of whether the Group's process duly identifies the material information to be disclosed in accordance with the requirements of the ESRS.
- Assessment of whether all the information identified in the Group's process for determining the information to be included in the Sustainability Reporting is effectively included.
- Assessment of how consistent the structure and presentation of the Sustainability Reporting is with the provisions of the ESRS and the rest of the sustainability reporting framework applied by the Group.
- Inquiries of relevant personnel and performance of analytical procedures on the information disclosed in the Sustainability Reporting considering where material misstatements are likely to arise, whether due to fraud or error.
- Performance of sample substantive procedures on information disclosed in the Sustainability Reporting considering where material misstatements are likely to arise, whether due to fraud or error.
- Procurement of any reports issued by accredited independent third parties included as an appendix to the consolidated directors' report in response to the requirements of European regulations and, in relation to the information to which they refer and in accordance with Generally Accepted Professional Standards, confirmation solely that the accreditation of the assurance provider and the scope of the report issued is in line with European regulations.
- Procurement of any documents containing the information included by reference, the reports issued by auditors or assurance providers on those documents and, in accordance with Generally Accepted Professional Standards, confirmation solely that the document referred to by such information included by reference meets the conditions described in the ESRS for incorporating information by reference in the Sustainability Reporting.
- Procurement of a representation letter from the Directors and management regarding the NFIS and the Sustainability Reporting.

Other Information

People charged with governance of the entity are responsible for other information. Other information comprises the consolidated annual accounts and other information included in the consolidated directors' report but does not include either the auditor's report on the consolidated annual accounts or assurance reports issued by accredited independent third parties required by European Union law on specific disclosures contained in the Sustainability Reporting included as an appendix to the consolidated directors' report.



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Our assurance report does not cover other information, and we do not express any assurance conclusions on said information.

In connection with our engagement to provide assurance on the Sustainability Reporting, our responsibility is to read the other information identified above and, in so doing, consider whether the other information is materially inconsistent with the Sustainability Reporting or with the knowledge we have acquired during the assurance engagement that could be indicative of material misstatements in the Sustainability Reporting.

KPMG Auditores, S.L.

(Signed on original in Spanish)

Marta Contreras Hernández

24 de febrero de 2026