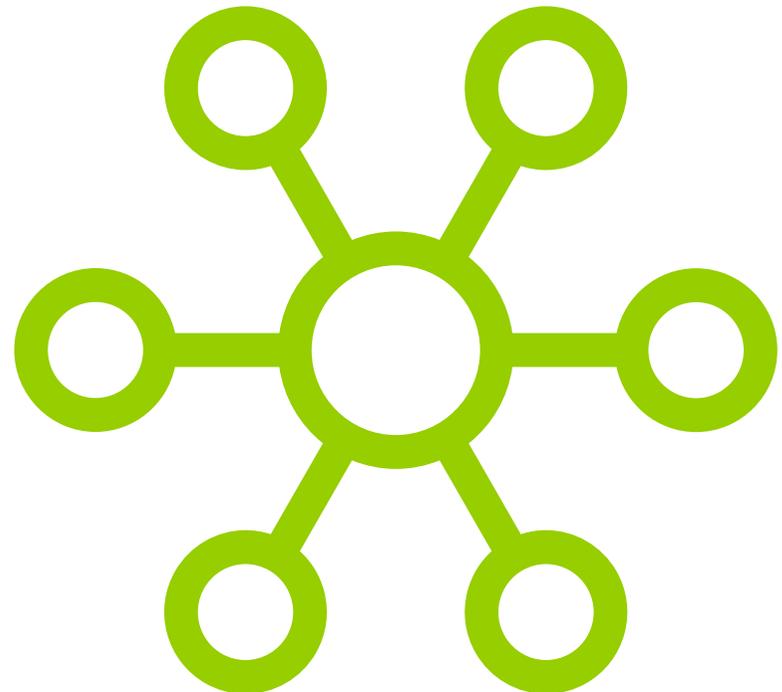




Consolidated **Management Report**

2021

Extract corresponding to the
Non-financial Information Statement (NFIS)



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ABOUT THIS REPORT²⁰⁴

Content Index Law 11/2018 Content= Index
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Report Sustainability Accounting Standards Board (SABS)
Links of Interest

EXTERNAL VERIFICATION REPORT 233

Executive Summaries of Annual Corporate Governance Report and Annual Report on Remuneration of Directors

Executive Summary Annual Corporate Governance Report

Executive Summary Annual Report on Remuneration of Directors

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Introduction

1. Overview of the Document

The Consolidated Management Report presents information related to the activity of the Aena Group (hereinafter 'Aena' or 'the Company') during the 2021 fiscal year, and must be understood in the context of said fiscal year, taking into account the characteristics thereof and as a response to stakeholder expectations of receiving relevant information.

The health situation caused in 2020 by the covid-19 pandemic and its evolution during 2021 continue to be an event of extraordinary relevance, characterised by the uncertainty surrounding the evolution of the pandemic and the recovery, thus requiring a detailed analysis of its effects on the Company's activity.

Despite the current situation, this Aena Report seeks to demonstrate how the Company creates value in the short, medium and long term. To present this information in a truthful, relevant and accurate manner, in accordance with most recognised reporting practices, the Company's economic and financial information is supplemented with a Non-financial Information Statement and a Corporate Governance Report for the 2021 fiscal year. As a novelty with respect to preceding fiscal years, the Annual Report on Remuneration is included in response to the requirements of the applicable regulations.

The Company's website¹ offers additional detailed information on different aspects, which are relevant to the different stakeholders.

As detailed in Note 5 of the Consolidated Annual Accounts for the year 2021, the Group conducts its activities based on the following classification of segments: Airports, Real Estate Services, International and SCAIRM.

The Airports segment substantially includes the Group's operations as an airport operator, as described in note 1 of the Consolidated Annual Accounts for the year 2021, which are identified within the Aviation activity. Likewise, the Airports segment includes the activity of managing the commercial spaces in the airport terminals and the network of parking lots, which are identified under the activity called Commercial.

The Real estate services segment essentially includes the Group's operation of the industrial and real estate assets that are not included in the airport terminals.

The operations of the subsidiary Aena Desarrollo Internacional S.M.E., S.A. relate to the Group's international development activity, which consists of investments in other airport operators, mainly in the United Kingdom, Brazil, Mexico and Colombia.

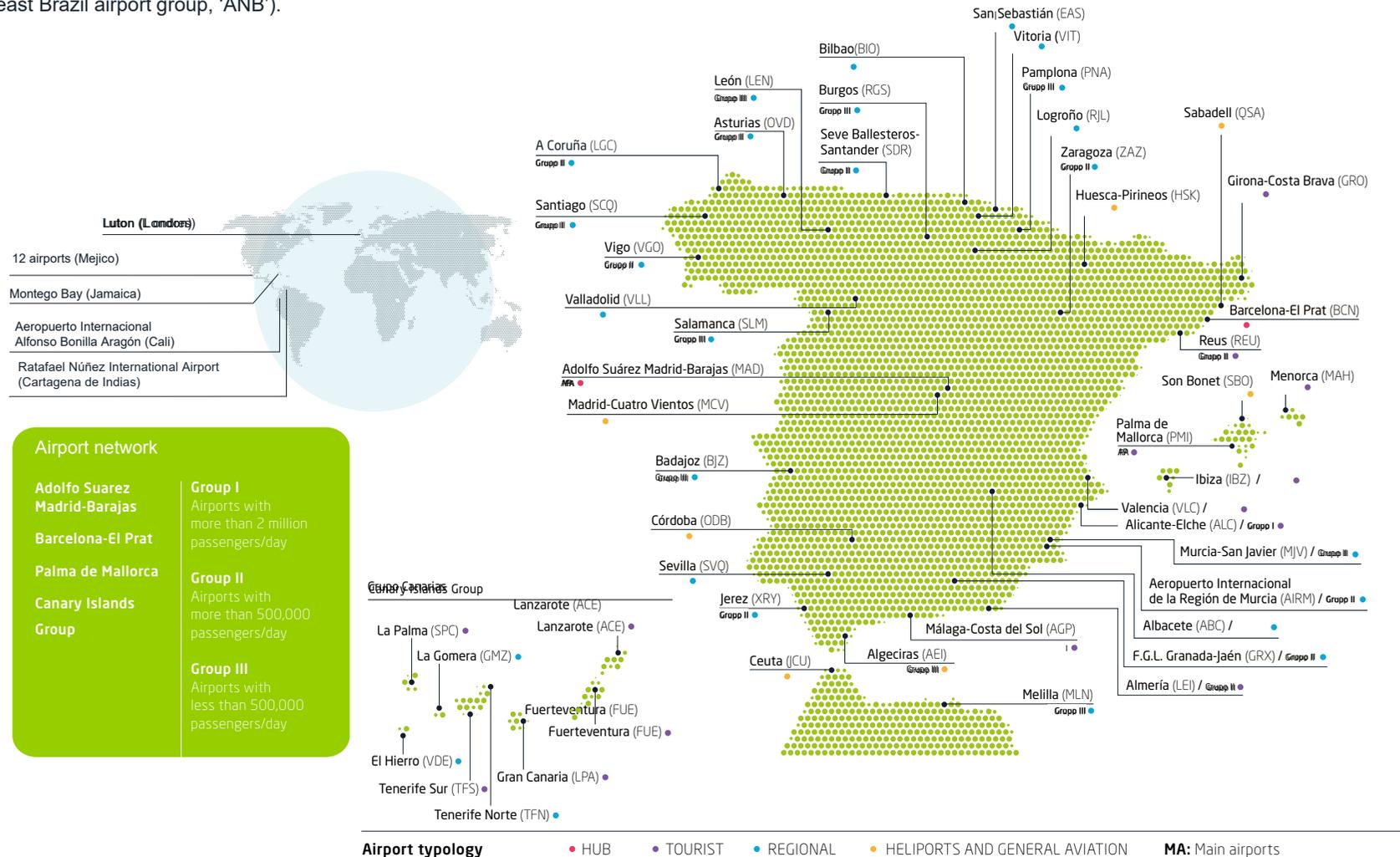
The SCAIRM segment relates to the activity of the Company 'Aena Sociedad Concesionaria del Aeropuerto Internacional de la Región de Murcia S.M.E., S.A.' which is in itself also considered as a single cash-generating unit. For analytical purposes and with the aim of offering a better understanding of the results of the Group's management of the airports it operates in Spain, the operational information as well as the financial data of the Company 'Aena Sociedad Concesionaria del Aeropuerto Internacional de la Región de Murcia S.M.E., S.A.' are integrated within the network's data when presenting the evolution of the aeronautical, commercial and real estate services activity in Block A of this Consolidated Management Report.



¹ See section 'On this report – Links of interest.'

Aena airport network (GRI 102-3, 102-4; 102-6)

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



The evolution of the Group's business is explained in Block A of this Consolidated Management Report, which provides a detailed analysis of the operational data of the aeronautical activity, as well as the results of the business areas developed by the Group.

As for data relating to aeronautical operations, in Block A: Chapter 'Activity Data' Section 2.1 includes a comprehensive description of the evolution of traffic in the network's airports in Spain, and Section 2.2. includes the evolution of operations corresponding to airports where the Group has an international presence. For their part, the financial results of the business areas are analysed by segment in Chapter 3 of Block A. For these analytical purposes and with the aim of offering a better understanding of the results of the Group's management of the airports that it operates in Spain, the traffic data, as well as the financial data of 'Aena Sociedad Concesionaria del Aeropuerto Internacional de la Región de Murcia S.M.E., S.A.' are integrated with the network's data when presenting the evolution of the aeronautical, commercial and real estate services activity in the Consolidated Management Report.



1.1. Structure of the Consolidated Management Report 2021

In order to avoid duplicate entries and to respond to some of the issues included within the scope of the Non-financial Information Statement, the correlation table (see Indexes section Act 11/2018), includes a brief mention of such issues, as well as a reference to the chapter in which they are developed.

• Executive Summaries of Annual Corporate Governance Report and Annual Report on Remuneration of Directors:

- Executive Summary Annual Corporate Governance Report: offers a general overview of the content detailed in the Annual Corporate Governance Report (this document follows the National Securities Market Commission [CNMV] format).
- Executive Summary Annual Report on Remuneration of Directors: offers a general overview of the content detailed in the Annual Report on Remuneration (this document follows the National Securities Market Commission [CNMV] format).

Appendices

- Consolidated Financial Statements.
- Annual Corporate Governance Report (this document follows the CNMV format).
- Annual Report on Remuneration (this document follows the CNMV format).

1.2. Level of Review by External Auditors

The content of the 2021 Consolidated Management Report has been submitted, as required by current legislation, for different levels of review by external auditors and verifiers, with their corresponding degrees of assurance:

- KPMG Auditores, S.L.². has verified that the consolidated non-financial information statement and certain information included in the Annual Corporate Governance Report, referred to in the Auditing of Accounts Act, have been provided. It has also evaluated and provided information on the consistency of the rest of the information included in the Consolidated Management Report with the Consolidated Annual Accounts, and has provided information on whether the content and presentation of this part of the Consolidated Management Report are in accordance with the applicable regulations.
- KPMG Auditores, S.L. has issued an Independent Reasonable Assurance Report on the Internal Control System relating to the financial information of Aena S.M.E., S.A. and subsidiaries as of 31 December 2021³.
- Deloitte, S.L. has issued a verification report with a limited scope of review of the contents in terms of non-financial information and diversity required by Act 11/2018 and included in this consolidated management report⁴.

² Other information: Consolidated Management Report' in the 'Audit Report', under 'Audit Report and Consolidated Annual Accounts'.

³ See appendix of Section F of the Annual Corporate Governance Report of Aena S.M.E., S.A. dated 31 December 2021.

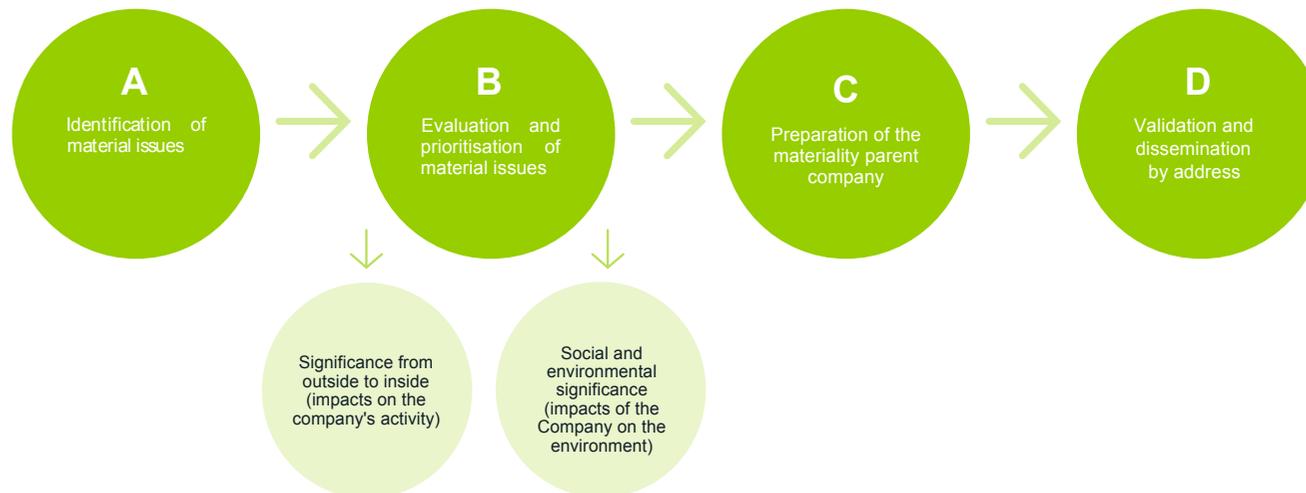
⁴ See 'Independent Verification Report' in Section 'B. Non-financial Information Statement'.

2. Materiality (GRI 102-15; 102-46; 102-47; 103-1)

In 2021, the Company updated the process to be followed when conducting the materiality analysis. As the main novelty, this new methodology incorporates the concept of double materiality, which allows the Organisation to identify:

- How non-financial issues affect the Company's situation and results (financial significance or inward impacts).
- The impact the company has on the environment and in society (environmental and social significance or outward impacts).

This is in keeping with the following process:



A. Identification of potentially material issues, across the value chain, for which the following sources have been used⁵:

- Internal reference information (Sustainability Strategy, Risk Management and Control System⁶, Study of Aena's reputation⁷, etc.).

- Trends and main aspects evaluated by investors and ESG rating agencies in financial and extra-financial matters (Sustainalytics, DJSI, Vigeo Eiris, MSCI, ISS Oekom, etc.), including the applicable legislation (Act 11/2018), the most recognised reporting standards (mainly GRI, SASB, Global Compact and the United Nations Sustainable Development Goals).

- Reports of the Company's presence on social networks, complaints appearing on Twitter and Facebook 2021.
- Other relevant information received from shareholders and investors, proxy advisors, information published by public agencies and reference organisations (Glass Lewis, J.P. Morgan, Barclays, etc.).

⁵ The analysis of some of these sources allows for a sector-based approach to be incorporated in the evaluation of the materiality.

⁶ See chapter '2021: one year towards recovery'.

⁷ 'The reputation of Aena among key stakeholders' Study, based on the RepTrak Model, whereby a correlation with the material issues identified by Aena is applied to the rational dimensions and attributes of the model, reflecting the relevant information for the different sources used.

Based on these sources, the issues identified in 2020 are reviewed, and there follows the modification and updating of those deemed to be required to be shown as relevant in the analysis, to form the materiality matrix.

As a result of this analysis, 32 material issues were identified in 2021, grouped into 16 topics.

B. Evaluation and prioritisation of material issues from a perspective of double materiality, including those aspects with the capacity to impact the growth of the Organisation (from outside to inside/financial significance) and, in turn, relevant to the stakeholders, which may be affected by the impact of the activity of the company (from inside to outside/environmental and social significance).

- Analysis of financial significance (Y axis) and its prioritisation: each material aspect has been evaluated and assessed internally due to its ability to impact the Organisation, incorporating the economic and risk perspective.
- The results obtained from the aforementioned reputational study conducted by Aena during 2020 and 2021 have been taken into account in the analysis of environmental and social significance (axis X) and the corresponding prioritisation. Within the framework of this study, the Company has conducted interviews with the main stakeholders (suppliers, customers, regulators, etc.) obtaining information both on the perception and the importance of the different material issues identified for each of them.

Once the values of the perception variable are obtained, a correction factor is applied based on the importance given to each material issue, so that the valuation that each stakeholder makes to each material issue is obtained. Finally, to calculate the

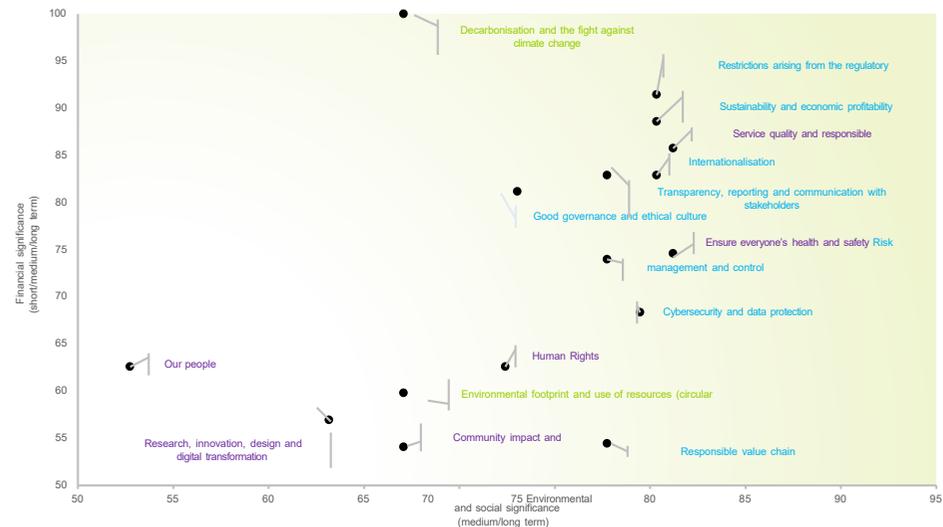
overall value of each of these material issues, the average of the scores given to each material issue for each stakeholder is calculated.

- C. Preparation of the materiality matrix: based on the assessments obtained in the previous point.
- D. Validation by management within the framework of the process for preparing the non-financial information statement and its dissemination.

After conducting this process, a number of critical issues have been identified, which are aligned with the main ESG megatrends, that focus on protecting the environment and mitigating the negative environmental impacts and footprint (including those related to GHG emission, the use of resources, atmospheric pollution, noise, etc.) as well as

promoting positive impacts, in particular those related to social aspects (protecting health and safety, respecting human rights, creating value in the community, service offering, encouraging active dialog, fostering innovation, etc.). All this under the supervision of the Governing Bodies responsible for the Organisation's proper performance, who must incorporate all these matters at the highest level, thus guaranteeing a sustainable business model.

The resulting materiality matrix incorporates issues that the Organisation considers instrumental in improving performance and in minimising the impact of the main identified ESG risks, and in ensuring its economic, environmental and social sustainability:



Material issue	Why is it material?	Impact (Internal/External)	Strategy/measures implemented and metrics (Block B: Non-financial information statement)
Decarbonisation and fight against climate change	Meeting the most ambitious objectives of the Paris Agreement and limiting the increase in temperature to 1.5°C, requires that the business sector contribute to decarbonisation by proposing and developing climate change adaptation and mitigation measures, to effectively reduce CO ₂ emissions.	I & E	Section titled 'Aena and the climate emergency', Chapter 2. Section titled 'Sustainability Strategy', Chapter 1.
Good governance and ethical culture	The Governing Bodies are responsible for the proper performance of the Organisations, for implementing an ethical culture that is applicable and extendable to all members of the Organisations, and for fully integrating ESG aspects in the activity. Therefore, it is essential for them to have the required tools to regulate aspects such as the composition of the Board, the profile of the Directors, the Committees, the remuneration or its evaluation, and to ensure the establishment of a solid culture of compliance and sustainability.	I & E	Section titled 'The Board of Directors' and 'Corporate Culture and Ethics', Chapter 1.
Environmental footprint and use of resources (circular economy)	Reducing the impacts and effects that any activity generates on the natural environment (atmospheric pollution, use of water resources generation of waste, noise, etc.) is a top priority that requires re-adapting the business models and business management to ensure the sustainable coexistence of their activity with the care of the environment.	I & E	Sections titled 'Efficiency in the Use of Energy and Use of Renewable Energy', '2.3. Pollution'; '2.4. Sustainable Use of Resources'; '2.6. Waste Management and Circular Economy in Airport Facilities', Chapter 3. Section titled 'Sustainability Strategy', Chapter 1.
Ensure everyone's health and safety	As basic infrastructures for transporting people and goods, used by thousands of people daily, ensuring the health and safety of all their users is essential. Adopting a preventive attitude regarding possible risk situations is important, as is continuously evaluating the possible contingencies that may affect the normal development of activities. There must be sufficient mechanisms, measures and human and material resources to ensure the safety of both employees and passengers, and in general, all airport users.	I & E	Section titled 'Operational Safety', 'Airport Safety', 'Health Safety', Chapter 6 and Section titled 'Occupational health and safety', Chapter 5.
Human rights	Companies must ensure respect for human rights in the development of their activities, establishing the appropriate mechanisms to ensure their protection in all the communities in which they operate. Therefore, moving forward with the implementation of a due diligence procedure that guarantees the detection and mitigation of risks to human rights is a top priority, as is the design of mechanisms to control and remedy any possible violations.	I & E	Section titled 'Human Rights', Chapter 3. Section titled 'Sustainability Strategy', Chapter 2.
Our people	Organisations must adapt to an increasingly changing and demanding workforce, and adjust their people management models to encourage the recruitment and retention of the best talent, the promotion of diversity and equal opportunities, the implementation of sufficient and effective well-being and work-life balance measures, or the promotion of a corporate culture based on corporate values.	I & E	Section titled 'Stable and Quality Employment'; 'Remuneration Model and Wage Gap', 'Organisation of work time and disconnection'; 'Diversity and inclusion'; 'Promotion and Development of Talent, Skills and Knowledge', 'Labour Relations', Chapter 5.
Research, innovation, design and digital transformation	In order to ensure the continuous improvement of their business activities and face present and future challenges, it is essential for organisations to integrate innovation, co-create internal and external innovation poles, and move forward in the implementation of new technologies that guarantee the improvement of services.	I & E	Chapter 7. Innovation.
Impact and contribution in the community: creation of shared value, contribution to social	Companies are called upon to be direct agents that participate in the socio-economic development of the societies in which they operate, meeting their demands and the expectations of stakeholders. In order to, beyond guaranteeing the proper provision of the services, generate added value for society based on co-responsibility.	I & E	Section titled 'Commitments to Sustainable Development and to Society' and 'Impact of the Activity on Society and the Environment', Chapter 3.

Material issue	Why is it material?	Impact (Internal/External)	Strategy/measures implemented and metrics (Block B: Non-financial information statement)
and economic development and measurement of impact			
Transparency, reporting and communication with stakeholders	The value that the activity brings to society must be clearly measured and communicated, and the necessary communication channels must be in place to build relationships based on transparency and characterised by open conversations and the highest standards capable of generating trust.	I & E	Section titled 'Relationship and Dialogue with Stakeholders', Chapter 'Overview of the Document'.
Sustainability and economic profitability	A sustainable business model, capable of handling the current changing environment and new challenges and which, at the same time, enables sufficient levels of profitability to be obtained and guarantees the best ESG performance, is essential in order to satisfy the interests of investors and other stakeholders.	I & E	Sections titled 'The Crucial Role of Aviation in Tourism' and 'Evolution and Impact of the Pandemic caused by COVID-19 in Aena', Chapter '2021: One year for recovery'. Sections titled 'Sustainable Finances', Taxonomy, Chapter 1.
Cybersecurity and data protection	Digital transformation and exposure to cyberattacks can jeopardize the security of computer systems, databases with sensitive information, or cause a data protection breach. Strengthening computer security mechanisms and protocols is essential for a company such as Aena, for which the comprehensive protection of all (employees, external companies, general users, etc) takes precedence.	I & E	Sections titled 'Data Protection' of Chapter 1 and 'Cybersecurity', Chapter 6.
Quality of the services and responsible services	Meeting consumer demands and their expectations is especially necessary in this context of growing customer empowerment. To ensure excellence and that all services are provided with the highest quality, excellence and innovation, special efforts must be made to detect and foresee new needs, while, at the same time, meeting the highest quality and safety requirements.	I & E	Section titled 'Quality of Services', Chapter 6.
Responsible value chain management	The quality of the services offered depends to a large extent on the relationship and behaviour of the organisations' value chain. Thus, inadequate management of the value chain can have significant repercussions at all levels. Extending ESG values and their ethical commitment to their supply chains is key to them achieving their common goals.	I & E	Chapter 3 Contracting.
Risk management and control	Having robust and defined systems, and sufficient mechanisms to address new risks, becomes relevant in a context as changing as the current one. In this context, getting ahead of emerging risks and those related to ESG becomes especially important in ensuring the proper performance of the organisations.	I & E	Section titled 'Risks and their Management', Chapter 'One Year for Recovery'.
Restrictions derived from the regulatory framework	Aena's legal status may entail certain limitations (for example, in the hiring of personnel, in bidding processes or organisational development), which could pose a competitive disadvantage compared to other privately owned listed companies, making it difficult to respond to new challenges and opportunities. In this context, maintaining strict and timely compliance with the applicable regulations and properly complying with the mandates received from its stakeholders is essential.	I & E	Section titled 'Corporate Culture and Ethics', Chapter 1.
Internationalisation	Aena takes advantage of and shares its management capacity by expanding its operational excellence model in airports located outside of Spain, thus diversifying the risk and trying to take advantage of opportunities, and undertaking its responsibilities as an active and relevant member of the different communities.	I & E	Chapter '2021: a year for recovery'.

3. Relationships and dialogue with stakeholders

Aena recognises the importance of stakeholder management as a key element in achieving social interest and developing a responsible and sustainable business model, setting its objectives, creating long-term value and contributing to the Sustainable Development Goals.

Aena fosters a framework of relationships with its stakeholders on the basis of transparency, dialogue, the generation of trust and the creation of shared value.

In 2021, Aena's Board of Directors approved a specific policy on relationships with stakeholders, which establishes the principles and guidelines on which to project the Company's values, and promote a framework of relationships on the basis of transparency, dialogue, the generation of trust and the creation of shared value. To this end, this relationship is based on the following principles:

- Relationships based on ethics, integrity, sustainable development, respect for human rights and the communities affected by the Company's different activities.
- Compliance with the laws that are in force in relationships with third parties, respecting the principles of legality, efficiency, transparency and ethical behaviour and full submission to Aena's Policy against corruption and fraud.

- The protection of the rights and interests of Stakeholders, using clear, direct and effective communication channels to receive the appropriate information, guaranteeing they receive equal treatment with regard to information, participation and the exercising of their rights.
- Cooperation and transparency in relations with competent authorities, regulatory bodies and administrations.
- Focusing on achieving consensus, especially with the local communities and indigenous peoples of the countries where the company operates, taking into account their needs, points of view and expectations.
- Continuous improvement, ensuring it provides the most efficient response to requirements at all times.

To this end, Aena has a set of tools aimed at establishing the necessary guidelines to segment, identify and prioritise the groups, as well as effective communication mechanisms, which facilitate proper communication and fluid dialogue with the identified groups, their needs and expectations.

In order to carry out this segmentation, identify stakeholders and ensure communication and the monitoring and review of the relationships with them, the different units and centres of the company, within the framework of the Integrated Management System (SGI [Sistema de Gestión Integrado]), identify and analyse the characteristics of the stakeholders with which they interact, which allows them to

adapt the different processes, infrastructures and services to the specific circumstances.

The system is reinforced with awareness training and communication actions aimed at employees, especially among the directly involved areas.

The Company's commitment to its stakeholders is formalised through the Stakeholder Relations Policy, the Code of Conduct and the Sustainability Policy.

One of the most relevant examples in 2021 of how the relationship with stakeholders constitutes a key element of Aena's management can be found in the Airport Regulation Document DORA 2022–2026 (hereinafter, DORA II), approved in September 2021. The procedure for preparing the DORA begins with a document proposal by Aena, which is submitted for consultation with representative user associations, as established in Act 18/2014. This transparency and consultation procedure was completed between the months of December 2020 and March 2021. The approval process has taken into account the results of these consultations, so that all those aspects in which no controversy was observed in such consultations have been respected, taking into account that this could not affect the interest of users or the general interest.

The stakeholder participation process in the Company comprises a series of active and two-way communication tools and mechanisms, which facilitate dialogue, collaboration and continuous accountability, while helping to evaluate and permanently reinforce Aena's commitment.

Each Unit/airport, locally, analyses the following information:



Out of all the stakeholders with which Aena interacts, passengers and airlines are the main customers for the provided services. In both cases, the Company periodically conducts a specific analysis of their needs and expectations using the Stakeholder Matrix, which is used as the basis to prepare a specific segmentation for each customer.

- In the case of passengers, the starting point for learning about the types of customers who come to Aena's airports, are the EMMA surveys (Survey on the Characteristics and Reasons for Air Mode Mobility) that are carried out. They allow the Company, among other aspects, to get details on the reasons for the trip, means of transportation used to arrive at the airport, as well as other passenger characterisation data. These studies are supplemented by the programme of *Airport*

Service Quality (ASQ) surveys by Airports Council International (ACI), to measure the degree of customer satisfaction. These surveys measure the feedback of passengers regarding a wide range of service parameters, and monitor the customer's experience within the airport from the time of their arrival until the moment they pass the boarding gate.

Through a comparative analysis with other airports, ASQ allows airports to understand their position relative to their competitors. The programme also makes it easier for airports to make decisions to prioritise investments related to the improvement of airport services and infrastructures. The ASQ survey is the leading customer satisfaction programme in the airport sector with more than 200 airports in more than 50 countries which study their passengers every month of the year. All airports use the same questionnaire and

follow the same methodology. The detailed ASQ sampling plan, adapted to the traffic of each airport, allows the results to be compared. In Aena airports, 33 centres use this type of survey.

Each month the airports analyse the results they have obtained; and on a quarterly basis, ACI issues the results reports and comparisons with other airports of similar characteristics.

These tools are supplemented by others aimed at specifically finding out the passenger's opinion about the services provided, for example, through *Happy or not* devices or specific surveys carried out by the Passenger, User and Customer Service Agents association (AAPUC [Agentes de Atención al Pasajero, Usuarios y Clientes]).

The airports that have these *Happy or not* devices are able to obtain real-time results relating to their users' opinions, enabling more agile decision-making and allowing them to adapt the services according to the passengers' priorities.

- For airlines, Aena has designed its own methodology and conducts annual Airline Company Surveys (ECA

[Encuestas a Compañías Aéreas]) that allow us to obtain information about their level of satisfaction, regarding the main elements related to the provision of services related to operations, security, services, commercial, communication systems, environment, infrastructures, etc.

The obtained results are analysed both at the general and individual level by each centre, proposing good practices/relevant improvement actions that are shared among the airports that make up the Aena network.



Communication from Aena with its stakeholders

(GRI 102-43; 413-1; 413-2)



Major stakeholders	Communication tools		Expectations	
PASSENGERS (low cost, seniors, business, family, leisure, etc.)	<ul style="list-style-type: none"> Complaints, suggestions and compliments tracking and management Periodic analysis of ASQ surveys 	<ul style="list-style-type: none"> EMMA surveys Monitoring of process indicators DORA indicators 'HappyorNot' devices 	<ul style="list-style-type: none"> Absence of supervening costs Good quality/price ratio Excellence in service 	<ul style="list-style-type: none"> Commercial and catering offer Efficiency, attention and friendliness of staff
AIRLINES (budget and traditional)	<ul style="list-style-type: none"> Surveys to companies Direct contact/meetings Indicators associated with company processes 	<ul style="list-style-type: none"> Attendance at specialised forums and conferences User committee Work groups 	<ul style="list-style-type: none"> Efficient and coordinated work procedures Service quality Active collaboration 	<ul style="list-style-type: none"> Operational information and analysis of potential markets
EMPLOYEES AND OTHER UNITS	<ul style="list-style-type: none"> Suggestion box/Intranet Training surveys HR management process indicators Performance management system Regulatory compliance system 	<ul style="list-style-type: none"> Meetings with union representatives Internal satisfaction surveys Internal meetings Internal and external audits 	<ul style="list-style-type: none"> Acknowledgement Professional development Transparency and ethics 	<ul style="list-style-type: none"> Ease of providing ideas
PUBLIC ADMINISTRATION, REGULATORY BODIES AND OTHER BODIES (ENAI, AEMET)	<ul style="list-style-type: none"> Public noise information and consultations Regulatory compliance system Specialised committees Internal and external audits Evaluation of compliance with legal requirements 	<ul style="list-style-type: none"> Meetings/contacts Work groups Inspections Presentations 	<ul style="list-style-type: none"> Inter-ministerial Commission for Defence and Development meetings/ Centre-specific committees 	
MINISTRY OF DEFENCE, SECURITY FORCES AND BODIES, CIVIL PROTECTION AND OTHER EMERGENCY SERVICES	<ul style="list-style-type: none"> Specialised committee (emergency, national security, simulations, etc.) Meetings 	<ul style="list-style-type: none"> AESA and internal audit committees Inter-ministerial Commission for Defence and Development 	<ul style="list-style-type: none"> Inter-ministerial Commission for Defence and Development meetings/ Centre-specific committees 	



Common objectives

Communication from Aena with its stakeholders

(GRI 102-43; 413-1; 413-2)

Major stakeholders	Communication tools		Expectations
 <p>SOCIETY, LOCAL COMMUNITIES/ NEARBY COMPANIES/ NGOS/ ASSOCIATIONS</p>	<ul style="list-style-type: none"> • Commissions and committees • Public information • Complaints, suggestions and compliments tracking and management 	<ul style="list-style-type: none"> • Meetings • Work groups • Inter-sectoral committees 	 <ul style="list-style-type: none"> • Commissions and committees • Public information • Complaints, suggestions and compliments tracking and management <ul style="list-style-type: none"> • Meetings • Work groups • Inter-sectoral committees
 <p>INVESTORS AND SHAREHOLDERS</p>	<ul style="list-style-type: none"> • Meetings • General meeting • Public information 	<ul style="list-style-type: none"> • Communications to the CNMV • Contact Channels for Relations with Investors 	 <ul style="list-style-type: none"> • Participation in meetings and conferences Public regulatory • Information • Publication of results and activity data <ul style="list-style-type: none"> • Monitoring of the Climate Action Plan Business model • Consultations • Consultations on social and corporate governance aspects
 <p>COMMUNICATION MEDIA</p>	<ul style="list-style-type: none"> • Meetings • Complaints, suggestions and compliments tracking and management • Follow-up of news in the media 		 <ul style="list-style-type: none"> • Meetings of the Board of Directors • Annual shareholders' meeting • Publication of results • Internal Control over Financial Reporting System (ICFR) <ul style="list-style-type: none"> • Risk management system • Internal and external audits
 <p>SUPPLIERS SERVICE-PROVIDING PARTNERS AND OTHER LEASEHOLDERS CARGO COMPANIES TOUR OPERATORS</p>	<ul style="list-style-type: none"> • Direct contacts and meetings with contractors; leaseholders; handling agents; user committees; complaints, suggestions and compliments management • Indicators • Follow-ups and analysis 	<ul style="list-style-type: none"> • Work groups • Analysis of results of the service rendered • VIP room surveys, parking and commercial services, companies • Specialised forums and conferences 	 <ul style="list-style-type: none"> • Meetings with contractors, user committees • Contractor follow-up/service provided • Work groups • Complaints, suggestions and compliments tracking and management <ul style="list-style-type: none"> • DORA, technical specifications, process-related indicators • Company and operator surveys • Direct contact/meetings • Attendance at specialised forums and conferences • Direct contact/meetings • Cargo facilitation committees
 <p>GENERAL AVIATION</p>	<ul style="list-style-type: none"> • User committee • Direct contact/meetings • Work groups 		 <ul style="list-style-type: none"> • User committee • Direct contact/meetings • Work groups



Common objectives

4. Communication and transparency

In providing its services, Aena provides all its stakeholders with a series of communication channels (among which, the website and social networks are worth noting), focused on guaranteeing effective and bidirectional communication with them.

The commercial services that are provided to the different users (passengers, travel companions and employees), are adapted to their profiles. This commercial offer presents varied and attractive types of concepts, both locally and internationally.

In 2021, Aena's public web renewed three of its websites (passengers, shareholders, investors and airlines) with a dual goal:

- Provide a response for digital users.
- Move forward with one of the pillars of its Strategic Plan, its digital transformation.

The new sites have a *responsive* design, that is, one which is accessible and adaptable on all devices (tablets, smartphones, computers, etc.).

With the new passenger site, users are offered the possibility of learning about and booking everything they need during their trip quickly and in a straightforward way: booking parking, information on all airport services (shops, restaurants, companies, check-in, etc.), booking of VIP services (lounges, *fast lane* and *meet & assist*), airport procedures (check-in, customs, controls, etc.) and of course, flight information in a more visual and intuitive manner.

In addition, and as a strong point, the content has been structured and optimised to integrate all commercial services into a new section: *Market place*, where the user can access *Aena Maps*, *Aena Travel* and *Food&Fly*.

The website for shareholders and investors, which is the Company's main official communications channel, provides clear, transparent and permanently updated information to all Aena shareholders, investors and to the markets in general. The new portal provides access to the content on: (i) Aena's share performance (including information relating to the share price, dividends and share capital); (ii) economic-financial information (in particular financial and operational publications, credit rating, average supplier payment period, as well as other relevant financial information); (iii) other general information; and (iv) corporate governance information.

The airlines website presents the potential routes, incentives, rates and operational and commercial aspects that may interest airlines when expanding or consolidating their business model.

With regard to accessibility, Aena works to ensure that the contents of its website are validated with Double A certification, according to the recommendations given by the *Web Accessibility Initiative* (WAI), an international working group belonging to the *World Wide Web Consortium* (W3C) that ensures that no group suffers any kind of discrimination that may cause social fractures in the virtual world. In this sense, the techniques used on Aena's site meet the WAI recommendations, for both XHTML marking and CSS, with the exception of PDF documents, subtitling and the audio-description of all videos and the multimedia player used.

In 2021, Aena was one of the top ten companies on the Ibex-35 having the greatest impact on social networks in 2020, according to the Ibex-35 Epsilon Icarus Analytics Panel.



Corporate website and intranet

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

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

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

Some specific sections*

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

COVID-19: communication and transparency

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

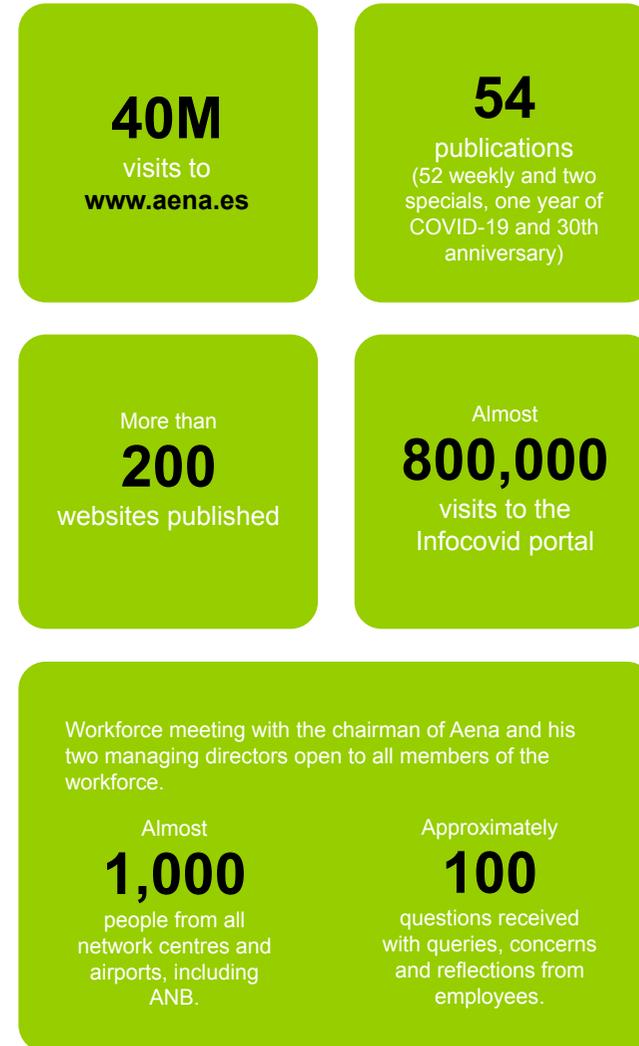
External

Aena has made available to users the Infocovid website, which provides information on all measures established at airports to ensure the safety of all passengers. The requirements and recommendations of the authorities for being able to fly are also included.

Internal

Specific campaigns have been organised among the staff to celebrate the company's 30th anniversary, internal innovation initiatives, dissemination of the company's sustainability plan or promotion of training, always in coordination with the human resources area.

* See links to these sections in the "Annex - Links and links of interest" included in this document.





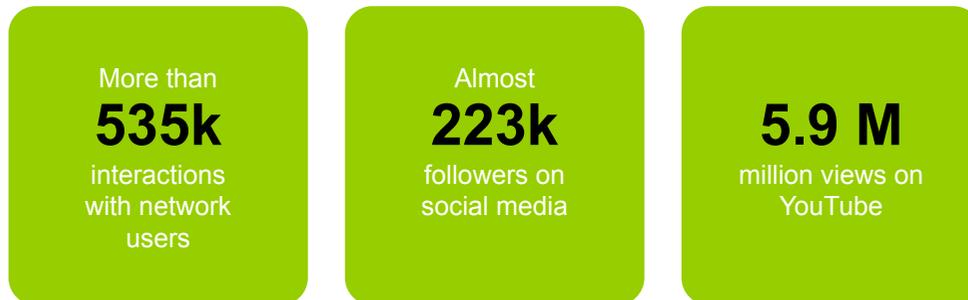
Social media*

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

The Company makes an ever-increasing effort to promote its presence on digital media and social networks, by offering periodic information about its activities and sharing actions, proposals and initiatives relating to innovation and sustainable development with stakeholders.

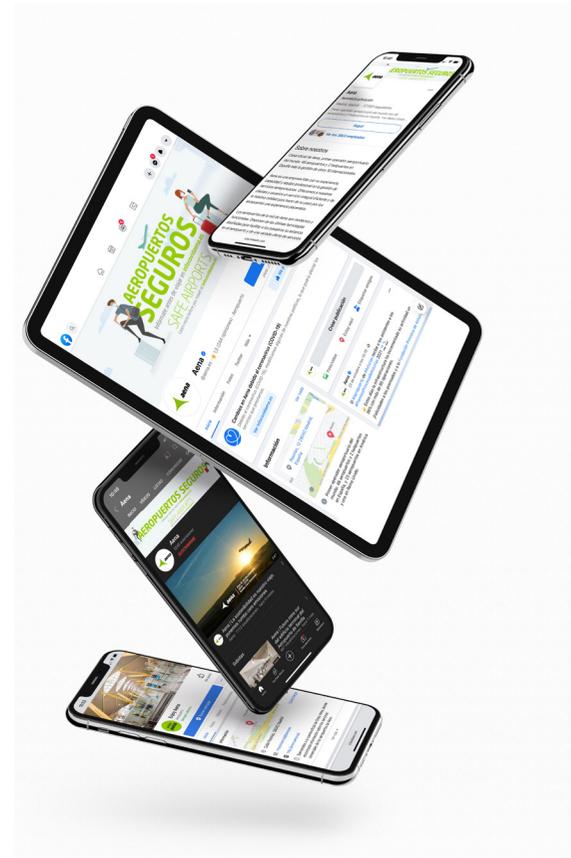
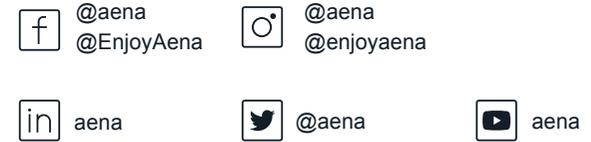
Aena has corporate accounts on Twitter, Instagram, Facebook, LinkedIn and YouTube. They transmit real-time information on the status of airports and the services they offer; they also respond to questions, complaints, claims and suggestions made by users.

In addition, the Enjoy Aena accounts on Instagram, Facebook and LinkedIn publish information about Aena's commercial services, and those of Aena Ventures on Twitter and LinkedIn disseminate content about the Company's start-up accelerator.



During the eruption of the Cumbre Vieja volcano on La Palma (19 September-15 December), Twitter, which was Aena's main communication channel, reached more than 3.7 million views and registered more than 3,000 clicks on links, alongside more than 4,000 retweets and more than 10,000 likes.

* See links to these sections in the "Annex - Links and links of interest" included in this document.



2021: a year for recovery

<p>JANUARY</p> <ul style="list-style-type: none"> • Storm Filomena. The workers of the airports affected by the event do a great job in restoring normality after the passage of the storm. • Secure airports. Adolfo Suarez Madrid-Barajas Airport receives the certification of the Airport Health Accreditation programme of the Airports Council International (ACI). In the following months of the year, the rest of the network airports will join this certification. 	<p>FEBRUARY</p> <ul style="list-style-type: none"> • Aena joins the National Alliance for Zero Childhood Poverty from the High Commissioner against Childhood Poverty to align efforts and ensure that all children and adolescents in Spain have the same future opportunities. • Towards self-sufficiency. Tenerife Sur Airport starts up its first self-consumption photovoltaic solar plant: Aena aims to achieve 100% energy self-sufficiency at airports from renewable sources by 2026. 	<p>MARCH</p> <ul style="list-style-type: none"> • 2020 economic results. Aena recorded losses for the first time since 2012 after a drop in revenue of €2,262.9 million due to COVID-19. • Aena Ventures selects the projects that will be part of its first acceleration programme, aimed at solving the five challenges that have been set: agility in procedures and transport to the airport, passenger experience, communication with the passenger, sustainability, and baggage overall. • Maximum rating for Aena of the Carbon Disclosure Project. Aena, for the second consecutive time, achieved the maximum rating granted by the Carbon Disclosure Project (CDP) in terms of climate change. • Airports among the best in Europe. The Airports Council International (ACI) awards San Sebastián Airport and F.G.L. Granada-Jaén Airport with the 'Prize for the Best Airport in Europe, in the category of airports of up to 2 million passengers per year', and Alicante-Elche Airport, F.G.L. Granada-Jaén Airport, Menorca Airport, Seve Ballesteros-Santander Airport, Región de Murcia International Airport and Pamplona Airport with the award for the 'Best Hygiene Measures'. • The 2021 airport tariffs come into force, based on freezing the Adjusted Annual Maximum Revenue per Passenger (IMAAJ) for 2021 at the IMAAJ set in 2020, established at €10.27 per passenger, which means a 0% charge variation. • The first phase of the implementation of the Information Systems strategic plan begins, which aims to transform the ICT operating model and modernise Aena's technology in order to offer a better service to all business areas. 	<p>APRIL</p> <ul style="list-style-type: none"> • Aena, the best company in its sector for Merco Talento. It places Aena in 57th position of the general ranking (improving 3 positions on 2019), and in the first position in the sector ranking (infrastructures, services and construction). • Aena Ventures starts. Welcome Week sees the launch of the five participating projects that will develop technologies in an innovative, sustainable and efficient way to provide solutions to the challenges of air transport. • Aena presents the Climate Action Plan to a consultative vote at the Shareholders' Meeting, thus becoming the first Spanish company, and one of the first in the world, to report to its shareholders on its climate plan. 	<p>MAY</p> <ul style="list-style-type: none"> • Aena is bidding for its supply of electricity with a 100% source of renewable sources. • Aena renews its website, with the aim of responding to digital users and advancing in one of the pillars of its Strategic Plan: digital transformation. 	<p>JUNE</p> <ul style="list-style-type: none"> • The preparation of the Equality Plan begins, which responds to the new legal requirements introduced by current regulations. • Policies on teleworking and digital disconnection are approved, in order to achieve the necessary balance between proper planning and organisation of work, and the work-life balance and well-being of workers..
<p>JULY</p> <ul style="list-style-type: none"> • Commitment to innovation and internal talent. Innova 2020 awards ceremony and presentation of Customer Centricity programme projects. • Secure airports. All airports in the network receive certification from the Airport Health Accreditation programme of the Airports Council International (ACI). • Aena introduces, to potential investors, the first area of logistical development of the Adolfo Suárez Madrid-Barajas Airport City. • Results for the first half of 2021. Aena closes the first six months of the fiscal year 2021 with losses of €346.4 million. 	<p>AUGUST</p> <ul style="list-style-type: none"> • The supply of 100% electricity from renewable energies is awarded. • Three Aena airports are among the 14 recognised by Skytrax. Adolfo Suárez Madrid-Barajas Airport, Barcelona-El Prat Josep Tarradellas Airport and Alicante-Elche Airport have been recognised by the 'COVID-19 Airport Excellence Awards' from Skytrax. 	<p>SEPTEMBER</p> <ul style="list-style-type: none"> • The government approves the DORA 2022-2026, which establishes the conditions to be met by the airports in the Aena network in terms of quality and environment, capacity and investments, as well as the tariff path for the next 5 years. • Minimum annual guaranteed rent (MAG): O&A H&C F&A • Eruption of La Palma Volcano. The employees of La Palma Airport, assisted by personnel from other Canary Island airports and employees of various town councils on the island, coordinated by the Emergency and Security Coordinating Centre (CECOES) 1-1-2 of the Government of the Canary Islands, perform cleaning tasks to remove the ash produced by the volcano. The airport manages the operations of this special situation. 	<p>OCTOBER</p> <ul style="list-style-type: none"> • Digital meeting with employees. Maurici Lucena, Chairman and CEO of Aena, Javier Marín, Executive Director and Managing Director of Airports and Maria José Cuenda, Commercial and Property General Director, answer employees' questions in a digital meeting. • Aena tenders the first logistical development area of the Adolfo Suárez Madrid-Barajas Airport City, which involves the start of the process to select an investment partner, predicted to be awarded during the first quarter of 2022. 	<p>NOVEMBER</p> <ul style="list-style-type: none"> • 30th anniversary of Aena. Aena celebrates its 30th anniversary with various employee events. • Financial results for the second half of the year. Between January and September 2021, Aena recorded losses of €123.7 million, a figure that continues to reflect the impact of the COVID-19 crisis. • Aena and ALA launch the Sustainable Aviation Revolution campaign, an initiative to promote the decarbonisation of air transport. 	<p>DECEMBER</p> <ul style="list-style-type: none"> • Payslip solidarity: Aena and its employees donate €50,000 to World Central Kitchen for people affected by the eruption of the Old Cumbre volcano, on the island of La Palma, and for emergency personnel working on the ground following this natural disaster. • Aena Ventures reaches its final stage. The start-ups participating in this initiative present their projects.

1. The crucial role of aviation in tourism

Tourism makes an important contribution to the world economy. It supports 319 million jobs and contributes \$8.8 trillion to the global GDP (10.4% of the world economy). By 2029, the World Travel and Tourism Council expects tourism will provide 421 million jobs worldwide.

The aviation industry supports 87.7 million jobs worldwide, either directly within the industry or with support through the industry supply chain, employee spending and the aviation-enabled tourism sector.

Tourism is quickly becoming the world's largest industry, and air transport plays a vital role. The contribution to tourism employment and GDP is equally significant. It is estimated that tourism generates more than 44.8 million direct, indirect and induced jobs worldwide, contributing around \$1 trillion per year to the world's GDP¹.

Air travel provides vital links for the thriving tourist industry worldwide. It is estimated that more than half (58%) of all international tourists travel by plane, so the aviation and tourism industries depend on one another for sustainable growth.

In Spain, air transport is a cornerstone of the economy, and contributes decisively to the development of one of the main drivers of activity: tourism—a sector that in 2019, prior to the health crisis, reached 12.4% of GDP² and generated 2.72 million jobs.

Despite the severe impact that the sector has been suffering as a result of the unprecedented mobility crisis caused by COVID-19, air travel will continue to be key to facing a solid recovery of our economy.

In the context of this recovery, Aena's airport network is configured as an essential element, which decisively contributes to the development of air activity and is, in addition to our country's main gateway to tourism and international activity, a guarantee of mobility for our citizens, especially in non-mainland territories.

Despite the difficult current situation, the airport network has shown a high degree of resilience in this period, and this has allowed quality services to be maintained with the necessary continuity despite the obvious difficulties caused by the pandemic, which has severely affected the air transportation sector.



¹ See section 'On this report – Links of interest'

² Source: Spanish National Statistics Institute (INE)

1.1 Evolution and impact of the pandemic caused by COVID-19 in Aena (GRI 102-2; GRI 102-45)

As already happened in 2020, the Group's activity has been drastically affected in 2021 by the extraordinary, unexpected, external and unpredictable circumstances entailed by the COVID-19 pandemic and the appearance of new variants worldwide. Especially in Europe, they have led to a very significant reduction in operations and passenger traffic in the aeronautical sector, with a very negative impact on the companies in the Aena Group.

The aviation sector and countries in the Aena Group continue to suffer from the reduction in operations and passenger traffic from the start of the pandemic. The main international aviation bodies (ICAO, IATA and ACI) confirm that the decline in global passenger volume in the sector is without historical precedent. In the medium to long-term, these bodies estimate that Europe will not recover the 2019 activity levels until some point in the broad period between 2024 and 2027.

Among the latest advances in the fight against this pandemic, the following are worth noting: the greater efficacy of the measures taken to control the spread of the virus based on a greater knowledge of the circumstances in which it is transmitted; the improvement in therapeutic treatments to combat this disease; and, in particular, the commencement of vaccination campaigns in several countries. All of this has contributed to an improvement in demand and in the supply provided by airlines, which began in the middle of the year.

The reactivation of tourism and the increase of air traffic have led to the opening in July of the terminals that remained closed due to low airport activity during the pandemic.

The appearance of new variants of COVID-19, such as Omicron, has pushed many countries to restore or intensify restrictions on air mobility or to resume more severe entry controls by means of diagnostic tests or quarantines since the end of November.

Although the uncertainty inherent in the current circumstances does not allow us to foresee when the recovery will begin, the management mechanisms and measures that were adopted by the Company's management at the time to mitigate the most significant risks that the Group had to face, have ensured the capacity, strength and sustainability of the Company.

Measures adopted at Aena

In order to contain the spread of infections caused by COVID-19, the Government declared the state of emergency in Spain in mid-March 2020, which entailed the confinement of the entire country and the prohibition of any non-essential displacement until 21 June 2020. Subsequently, a new state of emergency was decreed again on 25 October 2020 and some restrictions on mobility were prolonged with selective closures in certain areas based on the evolution of the pandemic. The last state of emergency was lifted on 9 May 2021.

During the first half of the year, traffic levels, mainly of passengers, continued to be low due to restrictions on mobility both in Spain and in the rest of the world caused by COVID-19, although the progress made with the vaccination campaigns, the evolution of the

epidemiological situation and the relaxing of restrictions on mobility have allowed for an improvement in the behaviour of demand and in the supply of flights by airlines from the months of May and during the summer months.

The emergence of the *Omicron* variant has led many countries to resume or intensify restrictions and entry controls since the end of November. These measures continue to impact air mobility and have slowed down the rate of recovery that was taking place over the past few months.

The potential emergence of new variants of the virus, such as *Omicron*, and their spread, constrain the flexibility of the restrictions imposed in the different countries and make it difficult to specify when and with what intensity the traffic recovery will take place.

Despite the circumstances, and during this time, Aena has acted quickly to adjust the capacity of its airports to the specific needs of the operation and the mobility measures adopted by the different Governments at each moment.

In order to contribute to the reactivation of air traffic in Spain, Aena offers incentives that encourage airlines to schedule operations regardless of the number of passengers transported. In winter 2020, between November 2020 and March 2021, a discount on the landing fee was applied if at least 20% of the operations was recovered from the level in the same month of the previous winter season. In the summer season of 2021, a new scheme was implemented for certain thresholds for the recovery of operations. For the winter 2021 season, Aena is offering an incentive for the recovery of operations when the recovery threshold of 75% is

exceeded monthly with respect to the 2019 winter season.

It should also be noted that on 1 March 2021, the 2021 airport charges entered into force, with a 0% change in the rates.

At the end of 2021, there was a recovery of 43.6% in the number of passengers in the airport network in Spain in 2019, 64.3% in the number of aircraft operations and 93.4% in the cargo volume.

London Luton Airport recovered 25.5% of passengers in 2019, 43.5% of aircraft operations and 71.5% of cargo volume.

The concession company of London Luton Airport and Luton Borough Council, the airport owner, have agreed on a set of measures aimed at the sustainable recovery of the airport after the severe impact from the COVID-19 pandemic through the Special Force Majeure (SFM) mechanism recognised in the concession contract. The agreement contemplates a reduction in the concession fee of £45 million (until 2023), an extension of the concession for 16.5 months (from 31/03/2031 to 15/08/2032), as well as an agreement on other environmental and economic-social measures valued by both parties.

The traffic of the six airports of Aeroportos do Nordeste do Brasil (ANB) has recovered by 85.2% of the volume of 2019 (the Concession Company took on operations throughout the first quarter of 2020).

On 14 December 2021, *Agência Nacional de Aviação Aerea* (ANAC) approved the request for an economic-financial rebalancing of the concession agreement for the fiscal year of 2020. The amount of the approved imbalance is R\$69.7 million, before tax.

Within the financial scope, it is worth noting that Aena has continued to adopt the measures deemed necessary to reinforce its liquidity due to the effect of the situation created by COVID-19 on its business activity. To this end, in 2021 loans were signed with various financial entities for a joint amount of €700 million. In addition, in order to reduce the financial cost, an ESG-linked loan of €500 million was taken on with Intesa Sanpaolo to pay off debt for the same amount in January 2022.

Likewise, as a result of the exceptional situation caused by COVID-19 and its impact on EBITDA, Aena has obtained temporary exemptions for compliance with financial ratios until 30 June 2023 from all banking institutions. The London Luton Airport has obtained temporary exemptions from financial institutions regarding the fulfilment of ratios until 31 December 2021 and has agreed on a modified ratio as of 30 June 2022.

1.2 The Airport Regulation Document (DORA 2022-2026)³

(GRI 102-2; 102-14; 102-20; 102-26)

Since the approval of the first Airport Regulation Document (DORA [Documento de Regulación Aeroportuaria] 2017-2021)⁴ in 2017, efficiency and progress in managing the network of Aena in Spain have resulted in an improvement in the services provided to passengers and their companions, as well as to airlines.

In this context, DORA 2022–2026, the second Airport Regulation Document (hereinafter, DORA II) approved by the Council of Ministers and emanating from Act 18/2014, of 15 October, on the approval of urgent measures for growth, competitiveness and efficiency, becomes even more important, as it is an essential piece for the recovery of this sector, an objective that will be key during the next five-year period.

In addition to this essential objective, i.e. recovery, this second DORA considers the following aspects to be strategic aims: excellence in the service to passengers and their companions, as well as to airlines; sustainability; innovation and an efficient management of the network.

This is with the aim of continuing to guarantee, on the one hand, the mobility of citizens in the best service and quality conditions, as well as economic and social cohesion throughout the territory; and on the other, to ensure

³ See the link to the document in the Appendix – references and links of interest.

⁴⁴ Act 18/2014, of 15 October, on the approval of urgent measures for growth, competitiveness and efficiency (hereinafter, Act 18/2014) provides, in various areas, the legal framework applicable to Aena's airport network of general interest. Act 18/2014 establishes that the Airport Regulation Document (hereinafter, DORA) is the instrument that must determine the five-year regulation conditions for the entire airport network of Aena S.M.E., S.A. (hereinafter, Aena), which is regarded as a service of general economic interest.

the competitiveness of our air transportation sector through rates that contribute to its recovery.

The DORA provides stability and the necessary momentum to ensure an environmentally sustainable, high-quality recovery in the aviation sector and in tourism.

The DORA mentions that at the time of its approval, there is still uncertainty regarding when and to what extent the complete recovery of the sector's activity levels will be achieved, but it is expected to be consolidated before the end of this regulated five-year period, 2022–2026. Therefore, the development of the DORA II will be marked by the aforementioned progressive recovery of traffic.

In accordance with the regulatory framework, and as with DORA 2017–2021, the preparation of the Regulation Document has been the result of a consultation process with user companies and valuable contributions from the National Commission on Markets and Competition, the General Directorate of Economic Policy for the Ministry of Economic Affairs and Digital Transformation and the Spanish Aviation Safety and Security Agency. Its drafting has been similarly enhanced by contributions from the Airport Coordination Committees and all other agents involved in the aviation sector. In short, the DORA 2022–2026 will contribute to the recovery of the air transportation sector by allowing the airport network to have the resources necessary to provide a safe, quality and sustainable service with sufficient capacity to cover the recovery of traffic when it occurs, while also maintaining competitive charges. To achieve these objectives, service innovation and digitisation will be key,

among others, and will contribute to the provision of excellent quality services.

The conditions established in the DORA 2022–2026, on the one hand, oblige the airport operator to offer, among other things, a quality service with sufficient capacity to meet demand during the five-year regulatory period and, on the other, the predictability necessary to develop an efficient, competitive and sustainable service in the long-term.

Strategic lines for the 2022–2026 period

(GRI 102-14)

In recent years, two relevant objectives have been achieved in Aena's airport network of general interest. Firstly, an expansion and renewal of the main infrastructures that has provided the network with the capacity necessary to meet the traffic demand in the medium-term, maintaining high levels of quality. Secondly, the modernisation of the network management model following the entry of private capital and the application of the new regulation model.

Today, Spain has a robust network of airports that ensures the connectivity of citizens, territorial cohesion and that has the strength necessary to face a solid recovery process. Despite the significant difficulties that the COVID-19 crisis is posing for all actors in the economy, the airport network has shown high resilience and a capacity to provide airport services in terms of security, quality and continuity.

However, in the immediate future, significant challenges such as air traffic recovery, environmental challenges and the continuous improvement of quality must be faced, all under the premise of safety. To provide the

best possible response to these challenges, the DORA 2022–2026 includes these strategic pillars, on the basis of which Aena will perform its activity during the next five-year period:

- The recovery of air traffic.
- Excellence in service and commitment to safety.
- Environmental sustainability.
- Enhancing competitiveness through innovation and digitisation.
- Efficiency in management.

In addition, due to its importance for the general interest, the Aena airport network will continue to ensure the accessibility and mobility of citizens, workers and goods and services, as well as territorial cohesion.

1.3 Towards the recovery of air transportation (GRI 103-2)

In order to recover air traffic, and place it at levels similar to those reached in 2019, and despite the fact that recovery depends to a large extent on exogenous factors, Aena will foster the growth of air traffic by acting through four levers:

- Regaining the passenger's confidence, offering maximum health safety at airports through the coordination of actions and protocols with relevant actors such as, among others, airlines, health authorities and other European airports. Likewise, in this five-year period, Aena must promote the deployment of technologies to minimise contact and streamline processes, thus reducing the risk of spreading COVID-19.
- Actively working with airlines to attract demand to the airport network.
- Enhancing the design and application of commercial incentives that drive the development of new routes and growth in the existing ones; and collaborating closely with local and regional authorities, economic and social agents, through Airport Coordination Committees, among others.
- Preparing the airport network to meet the long-term needs of air transportation, balancing these needs

with those of the territories in which they provide services, through the necessary consensus.

Together with the measures planned to recover traffic, the DORA 2022–26 includes aspects focused on maintaining the rates with respect to 2021 levels during the next five years, among which the following stand out⁵:

- The total recognised investment for the period of the DORA amounts to €2,250 million, with the average annual investment level during the period being €450 million. Aena considers that these investments will contribute to achieving the appropriate level of quality in the provision of airport services, especially in terms of sustainability and digitisation.
- Sustainability is configured as a strategic aim of the company. In this regard, it sets the conditions for the sustainable development of the Aena airport network by establishing environmental standards that are articulated through 6 indicators regarding:
 - absolute emissions of CO₂,
 - energy efficiency,
 - zero carbon,
 - water consumed,
 - noise levels,
 - non-hazardous waste collected.
- Commercial incentives with environmental criteria: As part of its sustainability strategy, Aena will be

able to establish commercial incentives aimed at improving environmental sustainability at the network's airports.

The sector's biggest challenge for the next five-year period will be to recover air traffic levels prior to the pandemic and work together with airlines to achieve that common goal.

2. Context of the sector⁶

Aena is exposed to a diversity of risk factors that affects its activity at all levels. Identifying, assessing and managing potential events and their impacts correctly are essential to ensuring the creation of value for the Organisation and the achievement of its objectives⁷.

Risk management

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

⁵ For more information, see Block A: Economic and Financial Information.

⁶ This section is completed with the Financial Statements.

⁷ The main risks to which Aena is exposed in its operating and financial activities since 2020 remain in 2021.

Main trends and risks in the short, medium and long term which may be due to the context in which Aena operates (GRI 102-14; 102-15; 102-20, 102-26; 102-29; 102-46; 102-47)

TRENDS AND IMPACTS	SCENARIOS
IMPACTS OF COVID-19 ON BUSINESS AND OPERATIONS	<ul style="list-style-type: none"> • Operational. See note 3.a.1) of the consolidated annual accounts for the year 2021. <ul style="list-style-type: none"> • Traffic levels have continued to be affected due to mobility restrictions. While some improvement has occurred thanks to vaccinations, the new variants of the virus maintain a significant level of uncertainty about the recovery of short-term traffic, which is still very much linked to the evolution of the pandemic. • With regard to the commercial business, during 2021, the rents established in the commercial lease agreements formalised between Aena and its commercial operators have been modified as a result of the entry into force of the 7th Final Provision of Act 13/2021, of 1 October and, to a lesser extent, by contractual novations agreed with commercial operators. The entry into force of the regulation has caused a reduction in commercial revenue until traffic levels of 2019 are recovered. • Legal and regulatory: Related to the uncertainty regarding the interpretation of legislation in the context of the current crisis and adherence to new legal requirements, which could lead to an increase in litigation. See note 3.a.4) of the consolidated annual accounts. • Reduction of cash flows, need to reinforce liquidity (see note 3.a.3) of the consolidated annual accounts) and possibility of breaking the financial ratios agreed with financial institutions. • Impact on the valuation of the Group's assets. The Group updates the valuations of its assets to determine whether there is any impairment as a result of the gradual recovery of air traffic, still far from the levels prior to the pandemic for all companies of the Aena Group. The valuation corrections that are made are reflected in the income statement. • Health risk: As a result of the measures taken to control, contain and foresee changes to the pandemic, Aena has incurred exceptional expenses, both in airport facilities, as well as in personal and health protection. See note 3.a.3) of the consolidated annual accounts.
MACROECONOMIC AND POLITICAL CONTEXT	<ul style="list-style-type: none"> • BREXIT: The UK's withdrawal from the European Union has led to a new relationship framework. • Crisis of issuing markets and damages derived from the financial situation of the airlines, which could mainly affect the aeronautical business and the concentration of airline companies.
CONCENTRATION AND COMPETITION	<ul style="list-style-type: none"> • Risk related to commercial and real estate business, affected by lower revenue derived from the seventh final provision of Act 13/2021 on Land Transport Management, changes in consumption trends, risk of non-payment and abandonment of premises, as well as greater concentration of customers • Related to the concentration of clients in activities, both aeronautical and commercial, and its revenue are especially dependent on its two main airports (Adolfo Suárez Madrid-Barajas Airport and Barcelona-El Prat Josep Tarradellas Airport). • In addition, the Company faces the rise of other means of transport, such as high-speed trains (for example, AVE with high passenger volume hubs). All this may affect aeronautical and commercial revenue.
SUSTAINABILITY AND CLIMATE CHANGE	<ul style="list-style-type: none"> • Sustainability is one of the greatest challenges for society today. There is a high level of consensus on the urgency of limiting the impact on the environment and the need to work collaboratively to compensate the impacts of recent years. A forceful and common response must be given, involving all the actors from public institutions, companies and citizens. • Potential restrictive consequences of the 'imposition of sustainable aviation fuel (SAF)', in reference to one of the main regulatory changes that may affect Aena's activity. • The Group is exposed to the effects of climate change. This risk entails economic, operational and reputational impacts derived from the aspects indicated in note 3.4 of the consolidated Annual Accounts <ul style="list-style-type: none"> - Regulatory changes that may result in an increase in the price of carbon emissions, a reduction in demand or other aspects related to the use of sustainable aviation fuel (SAF). - Level of implementation of the measures related to climate action and sustainability foreseen in the company's Climate Action Plan, aimed at establishing a decarbonised and sustainable economic model in the Network's airports, in a context of increasing pressure from investors and society as a whole. - Resilience of airport infrastructure and operations in facing events associated with climate change, natural disasters and extreme weather conditions, and the need to undertake adaptation actions in airports in the medium to long term. - Partial or total limitations to the operation, capacity and necessary development of airports resulting from environmental reasons or derived from compliance with existing or future environmental regulations. - Destinations that are no longer attractive to visitors, due to changes in consumer preferences and behaviours, to the stigmatisation of the sector, to policies to discourage and restrict domestic flights on routes where there is an alternative high-speed train, to a possible imposition of a new ecotax on the price of tickets, among others. - A framework of uncoordinated national and regional climate policies and regulations. <p>When making traffic forecasts, and in addition to the foreseen macroeconomic environment, the Group has analysed the main risks, uncertainties and factors affecting air traffic, both globally, as well as those specific to the aviation sector, of these the possible impact of environmental measures is worth noting.</p> <p>In the models proposed for developing air traffic projections, the impact of the following measures that are already being imposed in some European countries has been considered:</p> <ul style="list-style-type: none"> - Application of new taxes on plane tickets. - Restriction of short-haul flights on routes served by the Spanish high-speed train (AVE): any restriction with a high proportion of connecting passengers would significantly limit medium- and long-haul connectivity and would limit the hub development of the main airports. <p>The impact that these measures could have on air traffic will depend on the conditions in which they are applied, although as of today there is still not enough detail on the scope and timeframes for their implementation. For this reason, and to limit the uncertainty associated with the application of these measures, instead of the theoretical scenario that the econometric models would produce, the Base Scenario chosen is located in the medium-low range of said econometric models (Note 7.e of the consolidated Annual Accounts).</p> <p>Additionally, in recent years, various environmental initiatives that could have a major impact on the aviation sector, if they materialise, have emerged. Worth noting is the EU 'Fit for 55', which includes, among others, the following legislative proposals:</p> <ul style="list-style-type: none"> - Review of the EU emission allowances trading scheme. - Review of the Directive on energy taxation: elimination of air transport exemptions (kerosene taxes). - ReFuelEU Aviation initiative for sustainable aviation fuels: Will force fuel suppliers and airlines to combine an increasingly higher level of sustainable fuels (SAF) into current fuels - Regulation for the deployment of infrastructure for the supply of alternative fuels <p>In preparing the Group's Consolidated Financial Statements, management has taken into account the impact of climate change and assessing compliance with the objectives of the Climate Action Plan of Parent Company Aena S.M.E., S.A. These considerations have not had a significant impact on the judgements and estimates applied in preparing the financial information for the fiscal year.</p> <p>See note 3.4 of the consolidated annual accounts.</p>

Main trends and risks in the short, medium and long term which may be due to the context in which Aena operates (GRI 102-14; 102-15; 102-20, 102-26; 102-29; 102-46; 102-47)

TRENDS AND IMPACTS	SCENARIOS
PUBLIC-PRIVATE ORGANISATION AND REGULATION	<ul style="list-style-type: none"> • Limitations arising from the status of Aena as a state-owned public company.
INNOVATION AND DIGITAL TRANSFORMATION	<ul style="list-style-type: none"> • Development of innovation and technological development policies that are appropriate to the needs of the business, and which are aimed at improving passenger experience, strengthening airport security and improving operational efficiency.
CYBERSECURITY	<ul style="list-style-type: none"> • Exposure and increased threats and vulnerabilities in the face of cyberattacks. • The pandemic has changed relationship patterns in communications and businesses, and has led to a rise in teleworking.
THIRD-PARTY DEPENDENCY	<ul style="list-style-type: none"> • Failures in relevant operations carried out by third parties at the airport or under its coordination, and that may compromise the correct execution of services (controllers, handling companies, airlines, security, health controls, etc.), including labour disputes with critical service providers or air traffic management that negatively impact the capacity of infrastructure.
OPERATIONAL AND PHYSICAL SECURITY	<ul style="list-style-type: none"> • The physical or operational security risks derived from terrorist attacks, wars or aviation accidents, the probability of which has not decreased and may evolve into new scenarios, have coexisted since 2020 with an unprecedented health emergency situation that has forced all airport security protocols to be reviewed.
REGULATORY FRAMEWORK	<ul style="list-style-type: none"> • Changes in regulations and uncertainty regarding the interpretation of legislation arising in different matters, such as ESG and the need to adapt to new and ongoing legal requirements that may lead to an increase in litigation arising from conflicts with operators, suppliers and customers, as well as affect the management and reputation of the company. • Aena operates in a highly regulated sector, which guarantees that the management of the airport network is carried out with public service criteria. It also establishes a regime of airport charges and requires various airport security measures to be guaranteed. • On 3 October, Act 13/2021 entered into force, which in its seventh final provision modifies the lease agreements or assignment of business premises for food and beverage or retail trade activities that were in force on 14 March 2020 or previously tendered.
TAX COMPLIANCE AND TRANSPARENCY	<ul style="list-style-type: none"> • A good governance model allows the generation of short, medium and long-term value for shareholders, customers, suppliers and other stakeholders, and strengthens the company's control environment, reputation and credibility vis-à-vis third parties. • Aena operates in a highly regulated sector, which guarantees that the management of the airport network is carried out with public service criteria. It also establishes a regime of airport charges and requires various airport security measures to be guaranteed. Together with these obligations, determined by its unique nature as a private company of public interest, the Company has its own Regulatory Compliance System, which includes procedures and policies to fight corruption and fraud, as well as different corporate policies that are periodically reviewed.
INVOLVEMENT OF STAKEHOLDERS	<ul style="list-style-type: none"> • The way in which customers, suppliers, administrations, employees, shareholders, etc., are involved in the management of the companies has evolved towards a more digital profile, one that is more aware of environmental protection and health, more participatory and willing to be heard. • The companies must provide, in a transparent manner, sufficient information about their sustainability policies, development, implementation and results. • Need to supervise the process of preparing financial and non-financial information as well as its integrity.
PLANNING AND EXECUTION OF INVESTMENTS	<ul style="list-style-type: none"> • Delays in the execution of committed investments resulting from third-party actions or other external effects (increase in the price of raw materials, supply chain deficiencies, etc.).

3. Risks and risk management

(GRI 102-15; 102-29; 102-30; 103-1; 103-2)

3.1 Structure, control and risk⁸ management (GRI 102-31; GRI 103-2)

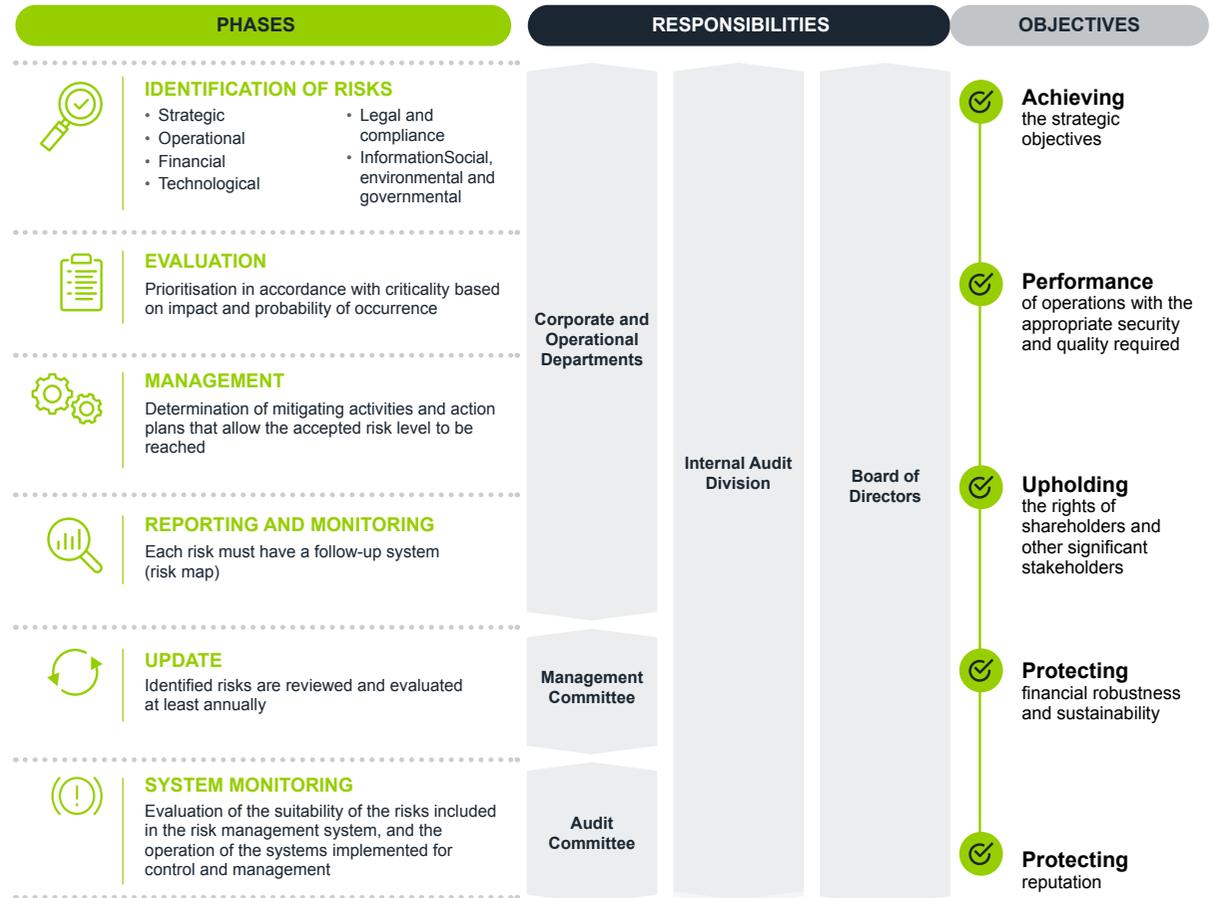
Aena has a risk management and control model aimed at guaranteeing the achievement of the Company’s objectives in a predictable way in a globalized competitive environment and a complex context. Aena’s Risk Management and Control Policy and System enable it to⁹ confidently face any threats, or uncertainties of any kind, which might affect the company.

In 2021, a new category of risks has been included, related to ‘social, environmental and good governance risks’ in the Risk Management System.

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

Risk management system develops the principles defined in the Risk control and management policy

Based on the Integrated Corporate Risk Management Framework COSO III (Committee of Sponsoring Organizations of the Treadway Commission)



⁸ Aena’s Risk Management System, and the main risks faced by the Company in the short, medium and long-term; which are taken into account in the corporate risk map, are described in section E of the Annual Corporate Governance Report.

⁹ The risks inherent to the international development of Aena are an integral part of its Risk Management System. The fundamental principles of risk management applicable in the London Luton Airport Operations Ltd. (LLAOL) and ANB subsidiaries are consistent with the contents of Aena’s Risk Management and Control Policy, adapting business risk management to its dimensions and economic reality.

This model, based on the COSO III framework methodological approach, is based on:

- The consideration of standard risk typologies that classify them as strategic; operational; financial; technological; legal and compliance; information; and social, environmental and good governance. In addition, Aena uses this system to classify financial and non-financial risks by nature, enabling it to put the necessary control mechanisms in place.
- The assessment of criticality and the definition of risk tolerance levels, by determining the impact and probability of occurrence of each risk:
 - Probability of occurrence of the risk being realised during a certain event once the controls to mitigate the risk have been considered.
 - Impact: referring to the damage that would be caused to Aena if the risk were to materialise in the form of a certain event at the following levels:
 - Economic, due to its effects on financial results.
 - Operational, affecting the provision of services.
 - Reputational, due to its consequences for the image and prestige of the Company.

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

- The association of key monitoring controls and indicators to all the risks included on the Map. Tolerance thresholds are determined for this purpose, which, if exceeded, require an assessment of the need to design mitigating activities and action plans, specific to each type of risk, which in turn contributes to minimising their effects and maximising opportunities.
- Management, reporting, monitoring, updating and supervision of the system:
 - The Risk Management and Control Policy establishes the general framework of action and the principles and responsibilities of the risk management system, and defines the general guidelines for the control and management of risks of any nature to which the Organisation is exposed.
 - The update of the system is carried out at least annually and must be submitted to the Audit Committee.
 - The risk control and management functions are articulated through a series of governance bodies with specific responsibilities within the risk control and management process:
 - Corporate and operational areas: They identify and evaluate the risks that fall within their area of responsibility and execute mitigating activities. In order to follow them up, they

propose and report the corresponding indicators, establishing action plans to mitigate risks and reporting on their effectiveness.

- Internal Audit Division¹⁰: Assists the Audit Committee, in supervising the proper functioning of the System, standardising and consolidating reports related to the identification and evaluation of risks and their corresponding indicators, mitigating activities and action plans and reporting to the Management Committee and the Audit Committee independently from the other areas/divisions.
- Audit Committee¹¹: Supervises and evaluates the risk management system, ensuring that the major risks are identified, managed, communicated and maintained at planned levels.
- Board of Directors¹²: Defines, updates and approves Policy, and sets the acceptable risk level for each situation, being ultimately responsible for the existence, and operation of an adequate and effective risk management system.

¹⁰ At the operational level, the Internal Audit Director is the highest authority in terms of risk management.

¹¹ In relation to the external auditor, the Audit Committee's functions include presenting the proposals for the selection, appointment, re-election and replacement of account auditors to the Board of Directors for submission to the General Shareholders' Meeting, ensuring and preserving the independence of the external auditor while exercising their functions, supervising their work. etc.

¹² Thirteen members of the Board have skills, knowledge and experience in auditing and risk management.

- Transparency in the information provided to third parties, guaranteeing its reliability and accuracy is one of the principles on which the system is based.
- The development of measures aimed at creating a culture of risk throughout the organisation:
 - The establishment of company objectives is linked to the most critical aspects of the organisation that, in turn, are part of the risk map.
 - Training in risk control and management, through periodic work meetings with the different units, risk delegates, management, and annually at the level of the Management Committee, which implies the materialisation of an effective process for updating and continuous improvement of the Risks.
 - Availability of the tool SAP GRC aimed at facilitating the identification, reporting and monitoring of risks for employees.

Strategic objectives



- Defend the rights of shareholders and other significant stakeholders.



- financial robustness and sustainability.



- Facilitate the performance of operations with the appropriate security and quality required.



- Protect Aena's reputation.

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

3.2 Risks in 2021

(GRI 102-2; GRI 102-15; GRI 102-30; GRI 103-1; GRI 102-46; GRI 102-47)

The risk system includes the analysis and periodic monitoring of the risk map, ensuring adequate control and management of the identified risks¹³.

The update to the risk map¹⁴ made for 2021 adapts to the situation of the environment in which the Company has developed its activity both as regards those aspects that have kept their relevance (such as the impact of the health emergency), as well as those others whose impact has been diluted with respect to previous years (as has been the case of Brexit), which has led to an update of the controls, indicators and action plans of the existing risk dossiers.

Due to its relevance, for managing the impacts derived from the COVID-19 pandemic, periodic monitoring has been carried out in 2021 by the Audit Committee.

Following the guidelines set by the Audit Committee, work has continued on specifying the risks included in the Aena Risk Management System, going from 18 risks in 2021 to 16 risks in 2022.

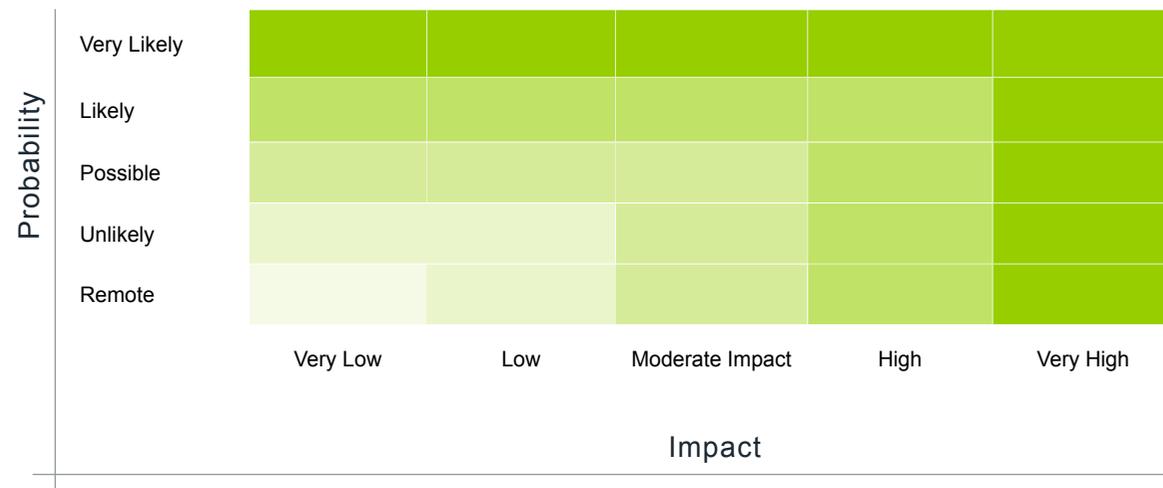
With the review of the Risk Map in 2021, a total of 16 risks have been identified that are classified as strategic;

operational; financial; technological; legal and compliance; information; and social, environmental and good governance. For this review of the Risk Map, both internal sources have been taken into account (e.g., Strategic Plan), as well as external sources (best practices of competitors).

Within the Management Committee, various sessions/workshops have been developed with a focus on assessing the criticality of risks based on their impact (economic, operational and reputational) and the probability of its occurrence, reviewing the definition of

risks and identifying possible emerging risks not detected in the previous phase.

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



¹⁴In compliance with the provisions of the Policy, and in accordance with the provisions of Technical Guide 3/2017 of the Audit Committees of the National Securities Market Commission (CNMV), the Company updates the risk map annually.

MAIN TYPES OF RISKS

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

TYPE OF RISKS	CONTENT	CONTROL MECHANISMS AND MITIGATING ACTIVITIES
STRATEGIC	Risks that can arise from a chosen business strategy, and those from external and internal sources that could have a significant direct or indirect impact on the Group achieving its long-term vision and objectives. This category includes risks arising from changes in the environment in which the Group operates (political, economic and social), in the competitive environment (aeronautical and non-aeronautical market), and changes that affect fees and operations, among others. All risks related to the governance model are included in this type.	<ul style="list-style-type: none"> • Master Plans. • Monitoring of activities related to Brexit. • Plan to attract air traffic and boost loyalty of airline companies. • Strategic Plan for Commercial Development. • Monitoring of the 2018–2021 Strategic Plan. • Monitoring of measures and controls developed within the framework of COVID-19. • Integrated Quality, Environmental and Energy Efficiency Management Policy. • Annual consultation process involving rates for the next fiscal year. • Potential detection programmes in personnel and <i>Employer Branding</i>.
OPERATIONAL	These are the risks of suffering losses or lower activity due to weaknesses or failures in internal systems, controls or processes. Operational risks include those, among others, resulting from failures in the security of infrastructure and systems, investments, coordination of operations and air control; in addition to those related to employment and human resources.	<ul style="list-style-type: none"> • Operational 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 incidents. • Corporate innovation strategy and collaboration with external companies in terms of innovation. • Civil aviation liability policy for airport operator + war and terrorism civil liability. • Policy for all risks, material damage, loss of profit and breakdown of machinery + excess coverage from the Insurance Compensation Consortium for catastrophic natural and terrorism-related risks. • Collaboration agreement between AENA and AEMET • COVID-19 measures: communications, security and systems. • Action plan for bomb warnings. • Management of noise pollution and action procedures to ensure the correct management of plans and projects with an environmental impact. • Investment planning, control and execution procedure. • Employee protection policy (life, safety and health).
FINANCIAL	This category includes financing risks, variations in interest rates and exchange rates, liquidity risk and credit risk, as well as those related to contingent liabilities and other off-balance sheet risks.	<ul style="list-style-type: none"> • Investment planning, control and execution procedures. • Corporate tax policy. • Interest rate hedging instruments, guarantees and bonds. • Internal Control over Financial Reporting System (ICFR). • Request to the External Auditor to examine, with a reasonably independent security scope, the Internal Control over Financial Reporting System (ICFR) of Aena S.M.E., S.A. (controlling company) and its subsidiaries (the Aena Consolidated Group or the Group) as of 31 December 2020, based on the criteria established in COSO. • Internal regulations and contracting control systems.
LEGAL AND COMPLIANCE	These are risks related to the mandatory nature of legal provisions established by national and international bodies and institutions in relation to compliance with general legislation (environmental, commercial, criminal, tax, labour, etc.), and sector and internal regulations, as well as risks that may affect the reputation of the Company and the Group, especially risks related to corruption.	<ul style="list-style-type: none"> • Regulatory compliance system including policies and procedures to combat corruption and fraud, and the corporate governance policy. • Monitoring of agreements and litigation with commercial operators. • Management and monitoring of compliance risks through the SAP-RICUM application and complaints channel. • Corporate Tax Policy. • DORA II • Code of Conduct.
INFORMATION	These are risks related to the reliability of the sourcing, obtainment and preparation of financial and non-financial information, both internal and external, that are significant for the Group.	<ul style="list-style-type: none"> • Internal Control over Financial Reporting System (ICFR) with certification ISAE 3000. • Oversight of financial and non-financial information by governing bodies. • General Policy for the Communication of Financial, Non-financial and Corporate information • Policy of Communications and Contact with Shareholders. • Procedure for Preparing and Sending Information to Markets.

TECHNOLOGICAL	These are risks related to the security of infrastructures and systems in the technological field	<ul style="list-style-type: none"> ● Cybersecurity Plan and Information Security Director Plan. ● Implementation of the ICT Security Office. ● Disaster Recovery Plans (DRPs). ● Information Security Policy and Management Procedures for incidents and security stopgaps. ● ICT security reviews under ISO 27001. ● Technology protection policy (loss or damage to computer systems and loss of stored data).
SOCIAL, ENVIRONMENTAL AND GOOD GOVERNANCE	These are risks related to the social rights of employees and other people related to the activity of the Company; those related to potential environmental impacts, including climate change and those related to the possibility of noncompliance with an adequate direction and management of Corporate Governance and transparency standards.	<ul style="list-style-type: none"> ● Climate change strategy (Climate Action Plan) and analysis of climate scenarios, and assessment of needs to adapt airports with monitoring of indicators. ● Integrated Quality and Environmental Management System, certified by an accredited external entity in accordance with the UNE-EN ISO 9001 and UNE EN-ISO 14001 standards ● Occupational Risk Prevention Management System. ● HR processes and programmes (planning and organisation, training management, personnel recruitment and development). ● Action procedures to ensure the correct management of plans and projects with an environmental impact. ● Management of the acoustic impact on the surrounding populations: preparation of strategic noise maps, noise monitoring systems and flight paths, sound insulation plans. ● Employee protection policy (life, safety and health). ● Third Party Liability Policy for Managers and Directors. ● Sustainability Policy. ● Strategic Sustainability Plan. ● Presence in ESG indexes, such as FTSE4good, Vigeo Eiris, Sustainalytics ● Involvement in international initiatives (ACA programme, Net Zero Carbon), reporting to Carbon Disclosure Project (CDP) ● Collaboration with third parties.

Block B

Non-financial Information
Statement (NFIS)



1 Sustainable governance model

Reference airport operator

Spain:
46 general interest airports
2 heliports

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

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

51% Majority shareholder entity

Aena is part of Ibex 35

Aena has joined the IBEX Gender Equality Index to promote gender equality, which Bolsas y Mercados Españoles (BME) has launched.

In 2021, ESG issues have been present on the Board's agenda

- Non-Financial Information Report
- Approval of the Company's Climate Action Plan and Sustainability Strategy
- Approval of the Sustainability Policy
- Creation of the Sustainability and Climate Action Committee
- Information on Fit for 55

Governing bodies

- General Shareholders' Meeting
- Board of Directors
- Audit Committee
- Appointments, Remuneration and Corporate Governance
- Committee Sustainability and Climate Action Committee
- Executive Committee

15 Directors
 (40% independent)

26.67% of women on the Board of Directors
 (Objective of reaching 40% in 2022)

Unique legal nature

- State-Owned Commercial Company
- Listed Public Limited Company

2021
73 complaints received through the Complaints Channel
 (98 in 2020)

In the last 3 years, almost 100% of the workforce has participated in training activities related to the General Compliance System, Compliance Policy, Code of Conduct, Risk Maps, etc.

Data protection

- Compliance model
- Mechanisms to inform data subjects of the privacy of their data
- Measures to guarantee privacy
- Measures to guarantee compliance with regulations. Audits
- Corporate culture in matters of personal data protection

0 personal data security breaches
 detected in 2020

Sustainable finance

- Taxonomy of sustainable finances of the EU
- Disclosure of the degree of eligibility of Aena's economic activities



Commitment to SDGs



SDG 8
 Decent work and economic growth



SDG 9
 Industry, innovation and infrastructure



SDG 10
 Reduction of inequalities



SDG 11
 Sustainable cities and communities



SDG 16
 Peace, justice and solid institutions

During 2021, Aena has reinforced the ESG aspects in its **governance system**, in line with best practices and recommendations, aware of its relevance in ensuring the **sustainable creation of value** and leadership in the development of all of its activities.

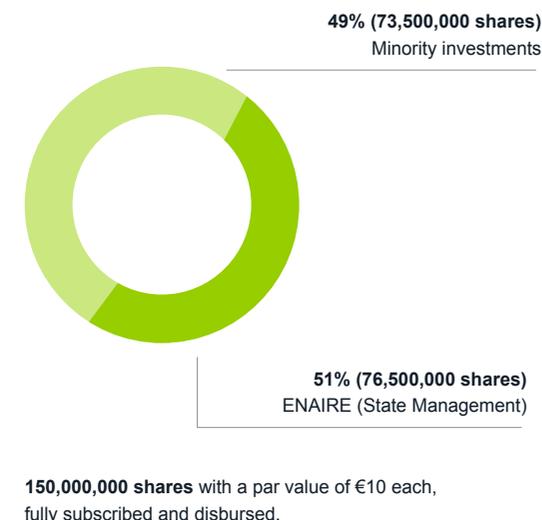
1.1.- Capital and organisational structure (GRI 102-6)

1.1.1.- Structure of the property (GRI 102-5; 102-6)

Aena S.M.E., S.A. is a state-owned commercial company configured as a public limited company. Its majority shareholder is ENAIRE (Public Corporate Entity under the Ministry of Transport, Mobility and Urban Development¹) with 51% of the shareholding. The remaining 49% consists of free float listed, as of 11 February 2015, on the Madrid, Barcelona, Bilbao and Valencia Stock Exchanges (for full details of shareholdings at the close of 2021, see the Annual Corporate Governance Report). Aena has been part of the Ibex 35 index since June 2015.

The share capital of the company is represented by one hundred and fifty million (150,000,000) shares, each with a par value of ten euros (€10), fully subscribed and paid. Aena shares are represented by means of book entries, and therefore there is no record of stockholders held by the Company.

For more information about the shareholders of the company, see the section on Significant Holdings and Treasury Shares on the website of the National Securities Market Commission (CNMV)².



Significant shareholders (December 31, 2021)

DENOMINATION	% OF VOTING RIGHTS ATTRIBUTED TO THE SHARES			% OF VOTING RIGHTS THROUGH FINANCIAL INSTRUMENTS	% OF VOTING RIGHTS % (A+B)	TOTAL
	% TOTAL (A)	% DIRECT	% INDIRECT	% (B)		
BLACKROCK INC.	3.016	0.000	3.016	0.055	3.071	
ENAIRE	51.000	51.000	0.000	0.000	51.000	
HOHN, CHRISTOPHER ANTHONY	2.968	0.000	2.968	3.607	6.575	
THE CHILDREN'S INVESTMENT MASTER FUND	0.000	0.000	0.000	3.607	3.607	

All the shares belong to a single class and series and confer the same rights and obligations on their holder.

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

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

1.1.2. Governing bodies (GRI 102-18; 102-19; 102-23; 102-24; 102-32)

Governing Bodies

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



They carry out their activity in accordance with internal and external corporate governance standards*

- | | | | |
|---|--|---|---|
| <ul style="list-style-type: none"> • Corporate Bylaws • Regulation of the Board of Directors • Regulation of the General Shareholders' Meeting • Internal Regulation of Conduct on the Securities Market • Policy of regulatory compliance • Selection policy for Board Member candidates | <ul style="list-style-type: none"> • Policy of communication and contact with shareholders, institutional investors and voting advisors • Sustainability Policy • Risk control and management policy • Corporate tax policy • Corporate governance policy • General policy for communication of Aena's economic-financial information, non-financial and corporate | <ul style="list-style-type: none"> • Policy against corruption and fraud • Information security policy • Stakeholder relations policy • Human rights policy • Data policy • Principles of the International Corporate Governance Network (ICGN) • Principles of Corporate Governance of the OECD | <ul style="list-style-type: none"> • Code of Good Governance of the CNMV Capital Companies Act • Corporate enterprises act and other applicable Spanish legislation • Technical Guide 3/2017 on Audit Committees of entities of public interest of the CNMV • Technical Guide 1/2019 on Committees of Appointments and Remunerations of entities of public interest of the CNMV |
|---|--|---|---|

* Links to internal regulations are available in the "Annexe - Links and links of interest" of this document.

General Shareholders' Meeting

The General Shareholders' Meeting (GSM) is the shareholder body duly convened to deliberate and decide, by the majorities required in each case, on matters within its competence or to be informed of any other matters that the Board of Directors deems appropriate. The organisational and operational rules are governed by the provisions of the law, the Company's Articles of Association (articles 11 to 28) and the Regulations of the General Shareholders' Meeting.

In 2021, both documents were modified to regulate remote attendance means and the exclusively remote holding of the General Shareholders' Meeting. In this way, Aena facilitates and guarantees the attendance and participation of shareholders in the GSM, as well as the interaction with the members of the Board and management bodies.

According to the Regulations of the General Shareholders' Meeting, shareholders have, among other things, the right to supplement the agenda, to receive information prior to the holding of the General Shareholders' Meeting, the right to attendance and representation, delegation of representation in intermediary entities, remote voting, to be informed during the General Shareholders' Meeting or a separate vote on the matters of the day.

GENERAL SHAREHOLDERS' MEETING 2021 (GSM 2021) held on 27 April 2021³

Minimum number of shares to attend the Meeting: 1 Attendance and shareholding: 87.236% of the capital. Average percentage of votes in favour of the approval of agreements: 98.820 %

Main characteristics of the GSM 2021	Summary of the agreements approved by the General Shareholders' Meeting 2021 ⁴	
<p>To safeguard the general interests and health of shareholders, employees and other participants in the preparation and holding of the General Meeting, it was held electronically, with remote participation, granting of the representation or issuing the vote prior to the holding of the General Meeting, or attending electronically, only possible through the electronic platform enabled for this purpose.</p> <p>The GSM was broadcast live on the Company's website, fostering open dialogue and intervention.</p>	<ul style="list-style-type: none"> • Approval, for fiscal year ending 31 December 2020, of: Individual and consolidated annual accounts and the individual and consolidated management report of the Company (including the Non-Financial Information Statement), as well as the proposal to apply the Company's results or the social management carried out by the administrators of the Company. • Modification of the Corporate Bylaws and the Regulations of the GSM to regulate its holding and attendance by exclusively remote means, as well as to incorporate the creation and regulation of the Sustainability and Climate Action Committee. • Voting, on an advisory basis, of the Annual Report on Remuneration of the directors corresponding to the fiscal year 2020 and the Climate Action Plan (2021–2030). • Ratification of the appointment of Mr Juan Río Cortés as Independent Director. • Modification of the Corporate Bylaws and the Regulations of the General Shareholders' Meeting. • Voting, in consultation, of the Climate Action Plan (2021-2030). 	<p>Among other subjects, in 2021, the Non-Financial Information Statement corresponding to fiscal year 2020 has been approved, as well as the Climate Action Plan, or the amendment of the Statutes to incorporate the creation and regulation of a Sustainability and Climate Action Committee and the regulation of remote attendance at the GSM.</p>

RIGHTS OF SHAREHOLDERS

One share, one vote ⁵	Right to convene	Right to intervene or request information	Right to include one or more points on the agenda	
<p>Each share bears the right to one vote at the GSM, without prejudice to cases of suspension of voting rights and legal restrictions.</p> <p>All shareholders are treated equally.</p>	<p>The shareholders who possess or represent, at least, three percent (3%) of the share capital, have the right to request from the Board of Directors the calling of a GSM, which shall be convened.</p>	<p>The shareholders have the right to intervene or request information or clarifications by sending this to the Company, in writing, up to two hours prior to the holding of the GSM and until 12:05, with both the first and second call.</p>	<p>Shareholders who possess or represent at least 3% of the share capital may request that one or more points be included on the GSM agenda and submit proposals for agreement based on matters already included or that must be included in the agenda of the call, within five days of its publication.</p>	<p>In 2021, Aena confirmed, by email, the correct registration of their vote to those shareholders who voted electronically at the Meeting.</p>

³ The call for the General Shareholders' Meeting of Aena, held on 23 March 2021, and the corresponding documentation, was made available to the different stakeholders more than one month in advance, including all relevant information (date, format, location, points of the agenda, supplementary documentation).

In addition, this call included instructions to follow for allowing for remote attendance at the GSM and ensure the correct exercise of rights in real time, as well as accrediting of the identity of shareholders and representatives, establishing the necessary procedures to ensure safety and efficiency. It can be consulted on the Company's website, whose link is available in the 'Appendix – Links and links of interest' in this document.

⁴ The agreements adopted and the results of the voting on the agreements included in the agenda of the GSM can be consulted on the Aena [website](#), whose link is available in the 'Appendix – Links and links of interest' in this document.

⁵ The shareholders' right to vote is expressly set out in the Corporate Bylaws and in the Regulations of the General Shareholders' Meeting.

Communication with shareholders

Aena maintains a permanent interrelationship with shareholders, which materialises in the holding of conferences, roadshows and presentations of results or the General Shareholders' Meeting. The main relationship channels are via telephone or through the investor relationship portal on the Company's corporate website or the email address of the Shareholders and Investors Services Office (ir@aena).

These relationships are based on a series of principles and commitments that guide the company's actions, which are mainly set out in the following:

- The Policy of communication and contact with shareholders, institutional investors and voting advisors of Aena attributes to the Board of Directors the power to manage and supervise, at the highest level, the information provided to shareholders, to Institutional Investors and to the markets in general, with protection, protecting and facilitating the exercise of their rights and interests within the framework of the defence of social interest, and establishes the principles and criteria that govern these relationships, such as ensuring transparency, truthfulness, immediacy, equality, homogeneity, consistency, integrity and symmetry in the dissemination of information, equal treatment in the exercise and recognition of shareholders' rights or the protection of their legitimate rights, among others.

- The general Policy for the communication of economic-financial, non-financial and corporate information, approved in June 2021, with the purpose of:
 - Establishing the principles and guidelines on which to project the values of the Company, and promote a framework of relationships with its stakeholders on the basis of transparency, dialogue, the generation of trust and the creation of shared value.
 - Ensuring that the quality of the economic-financial, non-financial and corporate information disseminated reflects all material aspects in a reasonable, balanced manner and in line with the provisions of the applicable legislation and the practices of good corporate governance.

During 2021, it is worth highlighting that, given the situation surrounding COVID-19, the 26 conferences and 16 roadshows that took place were held electronically.



The Board of Directors

The Board of Directors is the highest body of directors and representation of the Company, with the exception of some matters reserved for the General Shareholders' Meeting. It performs its functions with unity of purpose and independence of management, dispensing the same treatment to all its shareholders, and guided by social interest to preserve and promote the long-term sustainable value of the Company, in line with its long-term purpose and strategy.

At the end of 2021, it was composed of a total of 15 members, with a diversity of knowledge, skills, ages, origins, experiences, nationalities and gender, whose objective is to bring real value to the Company, working every day in its management from integrity and transparency.

As a supervisory and control body for the Company's operations, is responsible, among other things, for approving the Company's strategic plan, the company's policies (including sustainability, risk control and management, corporate governance, the selection of Directors, relations with stakeholders or human rights); financial, non-financial and corporate information; the determination of the Company's tax strategy or the supervision of the internal information and control systems⁶.

- **Leadership and independence**

At Aena, the Chairman and CEO, Maurici Lucena, guarantees the effectiveness of the Board of Directors, while ensuring the commitment to reinforcing the long-term purpose and strategy of the company. Its functions as responsible party for the effective functioning of the Board of Directors are included in Article 15 of the Board's Regulations.

The Lead Independent Director, a position held by Jaime Terceiro, elected among the Independent Directors, is authorised to coordinate and meet the non-executive Directors and maintain contact with

investors and shareholders. The latter is also specially empowered to request the summons of the Board of Directors or the inclusion of new points on the Agenda of an already convened Meeting, as well as to preside over the Board of Directors in the absence of the Chairman, and to coordinate his succession plan.

With regard to the Board's committees, with the exception of the Executive Committee, they are composed of non-executive directors, with the majority being independent (60%).



⁶ The Board of Directors carries out its activity in accordance with certain corporate governance standards, mainly included in the Corporate Bylaws, in the Regulations of the General Shareholders' Meeting, in the Regulations of the Board of Directors and in the different Corporate Policies. * Links to internal regulations are available in the 'Appendix – Links and links of interest' in this document. As established in its Regulations, the Directors are vested with the broadest powers to obtain information on any aspect of the Company. Specifically, External Board Members may request for advisers and experts to be recruited by the Company in order to be assisted in the exercise of their duties

A Board of Directors that is diverse and balanced in skills, origins, experiences, age and gender (as of 31 December 2021).

Promotes the constructive participation of shareholders, as well as the different stakeholders, in terms of sustainability and governance; guided by the best ethical and behavioural standards and practices; integrates sustainability, in its social and environmental aspect, as a basis for the Company's actions; supervises the evaluation and management of risks, as well as the integrity of the reporting systems, to ensure the creation of sustainable value, among others.

26.67% Women (4 out of 15 members) Target of 40% by 2022	4 years average term of mandate		56 years: average age of the Board				1 Lead Independent Director				5 Directors with experience in the sector, 12 with financial experience				
No. of Board meetings: 13 97.94% attendance 4 meetings of the Lead Independent Director with the Independent Directors		3 Independent Directors and 2 Nominee Directors of Aena are members of Boards of Directors at other entities ⁷				Annual self-assessment of the performance of the Board of Directors Every three years, external evaluation				Individual election of Board members ⁸		6.575% of total voting rights		Duration of the position: 4 years ⁹	
	Chairman and CEO	Executive Director	6 independent directors ¹⁰ 40% independent directors						7 nominee directors 47% nominees						
	Maurici Lucena	Javier Marin	Irene Cano	Leticia Iglesias	Josep Antoni Duran i Lleida	Amancio López	Jaime Terceiro Lead Independent Director	Juan Rio	Angélica Martínez	Pilar Arranz	Manuel Delacampagne	Juan Ignacio Diaz	Raúl Miguez	Angel Luis Arias	TCI - Christopher Anthony Hohn
															
Year of appointment	2018	2020	2020	2019	2019	2015	2015	2020	2018	2012	2021	2018	2021	2018	2015
Member of other expert committees	EC (C)		ARCGC (M) SC (C)	AC (C) SC (M)	ARCGC (M) SC (M)	ARCGC (C)	EC (M) AC (M)	AC (M)	EC (M)	SC (M)	AC (M)		EC (M) AC (M)	ARCGC (M)	EC (M) ARCGC (M) SC (M)
Training	E/F	AE, E/F	E/F	E/F, AUD	OT	E/F	E/F, AE	E/F, SC/ENG	E/F, OT	OT	E/F, OT	E/F	SC/ENG	AE, OT	E/F, AUD
Experience	FS, SM, IT, AER, UN	IT, FS, AUD, AER, INFRA, SM, UN, T, ESG	FS, AUD, IT, ESG, SM	FS, AUD, ESG, SM	UN, SM, T, OT	FS, T, SM, OT	FS, AUD, AER, UN, SM	IT, AUD, SF, INFR, SM, ESG	FS, AUD, INFR, SM	AUD, CO, AER, SM, INFR, OT	IT, AUD, FS, SM, OT	FS, AUD, T, OT, UN, SM	AUD, FS, INFR, UN, SM	AUD, AER, INFR, SM, ESG, IT, UN	SF, AUD, ESG
Directors in other listed entities (not)	1 entity of the Aena Group	2 entities of the Aena Group		2	1	1 ¹¹									9 companies of the TCI Group
% Attendance at Board meetings	100	100	100	100	100	100	100	100	100	100	100	92.30	100	100	84.61
% Attendance at Committee meetings ¹²			ARCGC:100 SC: 100	AC: 100 SC: 66.7	ARCGC:88.9 SC:100	ARCGC: 100	AC: 100	AC: 100		SC:100	AC: 100		AC: 100	ARCGC: 100	ARCGC:22.2 SC:66.7
Shares (no.) or %		340			30										4452101

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

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

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

⁷ In accordance with the provisions of the Regulations of the Board, Board Members may not be part of more than five (5) Boards (Art. 29 (xi)) or more than three (3) Boards of Directors of other companies whose shares are traded on any domestic or foreign stock exchange.

⁸ All board members were elected by the GSM with the exception of Juan Río Cortés, elected by the Board of Directors for the co-option procedure, although his appointment was ratified at the GSM of 2021, and with the exception of Mr Raúl Miguez Bailo and Mr Manuel Delacampagne Crespo, who, as there were several vacancies within the Board due to the resignation of 2 Board members, were also chosen by the co-option procedure, and will be proposed for ratification in the next GSM in 2022.

⁹ After the first 4 years, Directors may be re-elected following the indicated procedure, for equal periods, as long as the GSM does not decide to remove them or they resign from their position. In the case of Independent Directors, their position as members of the Board of Directors of the Company may not exceed twelve years (Art. 11 Regulations of the Board).

¹⁰ The definition and requirements for being an Independent Director of the Board of Directors of Aena can be consulted in Article 8 of the Regulations of the Board of Directors.

¹¹ Chairman and CEO of the Companies of the Hoteles Turísticos Unidos, S.A. Group.

¹² No meetings of the Executive Committee were held in 2021.

- **Selection, appointment, re-election and succession plan of Aena**

The policy of selecting directors ensures that the proposals for the appointment of Company Directors are based on a prior analysis of the needs of the Board of Directors, with the premise of guaranteeing the balance, diversity and wealth in the composition and decision-making.

- For the selection of candidates, the Board of Directors carries out an analysis of the needs with advice and a report from Appointment, Remuneration and Corporate Governance Committee (hereinafter, ARCGC), which has the support of external advisors for the selection of Independent Directors.
- In the case of the re-election of Directors, the ARCGC is the body in charge of preparing the proposals for appointment in the case of Independent Directors and in the case of Nominee and Executive Directors, it prepares a report prior to the proposal of the Board of Directors.
- Finally, the proposals for the appointment and re-election of Directors are submitted for the consideration of the General Shareholders' Meeting¹³. The Directors are elected individually when there is a vacancy on the Board of Directors, either due to the resignation of any of its members, or due to the end of their mandate.

- The Directors may be re-elected, where appropriate, when their mandate expires, after 4 years have elapsed since their appointment, as established in the Corporate Bylaws and in the Regulations of the Board of Directors.

In 2021, the appointment of director Juan Río Cortés was ratified by the GSM; the former, following the procedure indicated above, was first elected by co-option by the Board.

In September, the Board of Directors appointed Mr Raúl Míguez Bailo as Nominee Director for the co-opting procedure, after the resignation of a Director; and in October, it appointed Manuel Delacampagne Crespo as Nominee Director by the co-opting procedure, also after the resolution of a Director. Both appointments will be proposed for ratification by the General Shareholders' Meeting to be held in 2022.

The Corporate Governance Policy includes among its principles that of guaranteeing the orderly and efficient succession of the CEO of the Company, so that it does not affect the normal development of its activities. The ARCGC is the committee responsible for examining and organising the succession of the Chairman of the Board of Directors and the company's Chief Executive Officer. It is also responsible, if applicable, for drawing up any proposals to the Board of Directors so that such

succession occurs in an orderly and planned manner¹⁴.

The coordination of the Chairman's¹⁵ succession plan is the responsibility of the Lead Independent Director.

Following international best practice, Independent Directors may hold their position for a maximum period of 12 years. This ensures that they bring an impartial perspective to discussion and decision-making.



¹³ In the event that the vacancy occurs after the GSM, the appointment is made by the Board by the co-opting procedure which, in any case, will be ratified by the GSM.

¹⁴ Art. 24 Regulations of the Board of Directors.

¹⁵ Art. 15 Regulations of the Board of Directors.

- **Diversity on the Board of Directors**

The Aena Director Selection Policy provides the appropriate framework for:

- Having an adequate balance in the composition of the Board that enriches decision-making and contributes various points of view to the debate of the matters within its power, considering gender and age diversity as differentiating factors when it comes to obtaining different visions;
- Promoting gender diversity, age and origin, training, knowledge and professional experience;
- Rejecting any type of discrimination based on a person's race, nationality, social origin, gender, marital status, sexual orientation, religion, political ideology, disability or any other personal, physical or social condition.

The Board of Directors is the body responsible for approving this policy and ensuring, among other things, that it is concrete and verifiable; ensuring that the proposals for appointment or re-election are based on a prior analysis of the needs of the Board of Directors, thus promoting the diversity of knowledge, experiences and gender on the Board of Directors¹⁶.

With regard to gender diversity, the Appointments, Remuneration and Corporate Governance Committee has the authority to establish a representation objective for the least represented gender on the Board of Directors, to prepare guidelines on how to achieve that objective and to inform the Board on gender diversity issues.

The Board of Directors annually evaluates diversity in its composition and powers.

Aena's objective for 2022 is that the number of female directors should account for at least forty percent (40%) of board members.

- **Training**

In line with good governance best practices, in November 2020, the Appointments, Remuneration and Corporate Governance Committee approved the Director Training Plan for 2021, which was communicated to the other Directors. Throughout the fiscal year of 2021, 8 training sessions have been given on current issues and issues of interest to the Directors, among which the session on environmental sustainability and decarbonisation stands out, due to its relevance. These sessions are held periodically, and are scheduled according to the availability and needs of the Directors.

- **Evaluation of the Board**

Every year the Board of Directors evaluates the quality and efficiency of its work, its operation and composition—and that of its Committees—the diversity in the composition and powers, and the performance and contribution of the Chairman of the Board and of each Director. As a result of this evaluation, the Board adopts an action plan, for the following year, to correct the deficiencies detected.

To carry out the evaluation, every three years, the Board of Directors is assisted by an external consultant, whose independence is verified by the Appointments, Remuneration and Corporate Governance Committee.

As already happened in 2018, the evaluation carried out in 2021 was supported by an external consultancy. The summary of its main conclusions can be found in the Annual Corporate Governance Report. These include:

- 89% of the questions raised with the Board of Directors regarding the operation and composition of the Board of Directors have been answered as 'excellent' or 'adequate'.
- 93% of the questions raised with the Board of Directors regarding the operation and composition of the Committees of the Board of Directors have been answered as 'excellent' or 'adequate'. As a result of this evaluation, the members of the Board of

¹⁶ See Art. 9 of the Regulations of the Board of Directors.

Directors have positively assessed the improvement proposals provided for in the 2021 Action Plan, considering that various actions have been carried out for its fulfilment.

A 2022 Action Plan has also been drawn up to strengthen the following aspects, among other things:

- Improve the efficiency and ease of use of the technological tools within the Board of Directors and its Committees.
- Continue dedicating monographic meetings to reflecting on the medium/long-term aspects linked to the definition of the Company's strategy.
- Encourage the incorporation of directors in the event of new vacancies.

In 2021, ESG issues were on the Board's agenda: (GRI 102-14; 102-20; 102-26)



Business Ethics

- Review of the Human Rights Policy in December 2021



Responsible relationship with stakeholders (customers, employees, etc.)

- Approval of the Stakeholder Relations Policy in September 2021



Non-Financial Information

- General Policy for the communication of economic-financial, non-financial and corporate information, approved in June 2021



Climate change

- Approval of the Company's Climate Action Plan and Sustainability Strategy and Policy

Board Meetings

In 2021, 13 meetings were held with an attendance percentage of 97.94%. Among the matters discussed, ESG issues were evaluated quarterly, among other things:

- Reporting of Non-Financial Information.
- Approval of the Company's Climate Action Plan and Sustainability Strategy.
- Approval of the Sustainability Policy, the Stakeholder Relations Policy and the General Policy for Reporting Economic-Financial, Non-Financial and Corporate Information.
- Creation of the Sustainability and Climate Action Committee.
- Information about Fit for 55.
- Modification of the Corporate Bylaws to regulate virtual attendance at the General Shareholders' Meetings.
- Approval of an incentive to encourage the recovery of activity at La Palma Airport due to the eruption of the Cumbre Vieja Volcano.

All of the matters submitted for approval by the Board of Directors were unanimously approved by those present.

Committees supporting the Board

(GRI 102-2; 102-30)

In 2021, Aena takes another step in its ESG commitment, created the Sustainability and Climate Action Committee, incorporating these matters at the highest level of the Company. The Company strengthens its leadership in achieving more sustainable air transport, prioritising care

of the environment and the social community, and leading it to be present as a first-rate element in the Company's decision-making. In this way, the Board of Directors has four delegated committees: the Executive Committee, the

Audit Committee, the Appointments, Remuneration and Corporate Governance Committee and the Sustainability and Climate Action Committee¹⁷.

	Audit Committee 	Appointments, Remuneration and Corporate Governance Committee 	Sustainability and Climate Action Committee 	Executive Committee 				
Examples of powers	<ul style="list-style-type: none"> Supervision and control of the reporting system of financial and non-financial information and risk assessment, including operational, technological, legal, social, environmental, political and reputational information. Establish and supervise a mechanism that allows employees to confidentially report any irregularities of potential significance that may be detected within the company; to coordinate the bodies responsible for compliance; review the regulatory compliance policy, and any other policies and procedures aimed at preventing inappropriate conduct; and supervise the management of the Complaints Channel. 	<ul style="list-style-type: none"> Establish objectives in the area of gender diversity. Supervise compliance with corporate governance rules and internal codes of conduct of the company, and periodically evaluate and review the corporate governance system. Supervise communication policies. Supervise and evaluate the processes of relationship with the different stakeholders. Coordinate the process of reporting non-financial and diversity information. Be informed of, promote and supervise the Company's innovation strategies and practices. 	<ul style="list-style-type: none"> Be informed of and drive, steer and monitor the objectives, action plans, practices and policies of the Company in environmental and social matters. Evaluate and verify the performance and compliance with the environmental and social strategy and practices. Ensure that the practices of the company in environmental and social matters are in line with the established strategy and policies. Support and supervise Aena's contribution to the achievement of the SDGs. Promote a coordinated strategy for social action and sponsorship. Review and supervise compliance with the Climate Action Plan, as well as the corresponding annual follow-up report. 	<ul style="list-style-type: none"> Decision-making capacity of a general scope and, consequently, with express delegation of all the powers that correspond to the Board of Directors, except those that are considered non-delegable by virtue of the law, the applicable regulations on corporate governance, the Corporate Bylaws or the Regulations of the Board of Directors. 				
Presidency	Independent director		Independent director		Independent director		Chairman and CEO	
Composition I: Independent; N: Nominee; E: executive	I I I D D		I I I D D		I I I D D		D D D I E	
Independent directors (%)	60%		60%		60%		20%	
Presence of women	20%		20%		60%		20%	
Meetings¹⁸	10		9		3		0 ¹⁹	
% Attendance	97.8%		82.2%		86.7%		-	
Other relevant information	All members have experience in the financial and/or audit and risk sectors. Three members with experience in the aeronautical sector/infrastructure and transport. Two members with experience in ESG.		Four members with senior management experience. Three members with experience in ESG. Two members with expertise in innovation, new technologies/digital transformation.		Three members with experience in ESG. One member with experience in Compliance. Aena has created the role of Chief Green Officer with the aim of making sustainability a fundamental element in decision-making.		4 members with experience in the aeronautical/infrastructure and transportation sector. 4 members with experience in Auditing and Risks. One member with ESG expertise. One member with expertise in innovation, new technologies/digital transformation.	

¹⁷ Detailed information on the functioning of these bodies can be found on the corporate website. The Regulations of the Board of Directors detail their specific powers, composition, the performance assessment process of their members, as well as their rights and duties. The links to these websites are available in the 'Appendix – Links and links of interest' in this document.

¹⁸ To find out in detail the matters addressed by the different Commissions during the fiscal year 2021, you can consult the relevant Activity Reports, whose link is available in the 'Appendix – Links and links of interest' in this document.

¹⁹ Committee that meets for urgent reasons. Did not meet in 2021.

Executive Management Committee

(GRI 102-18; 102-19; 102-23; 102-24; 102-32)

The ordinary management of the company's business is entrusted to the management team and the corresponding executive bodies, thereby creating a connecting link between the Board of Directors and the rest of the Company.

In this way, the Chief Executive Officer and the Management Committee are responsible for the day-to-day management, implementation and development of the decisions taken by the Governing Bodies.

The Executive Management Committee, formed by the Chairman and CEO and by 8 directors, has the main mission of ensuring the implementation and achievement of the strategic objectives established by the Board of Directors, maximising the value of the Company for its shareholders and ensuring its long-term viability.

50% of the directors who make up the Executive Management Committee are women

Senior management has extensive and proven experience in the aeronautical, financial and transport sectors, as well as in the commercial and real estate sector, and in sustainability. Specifically, the Directorate of Innovation, Sustainability and Customer Experience is working to deploy sustainable culture in

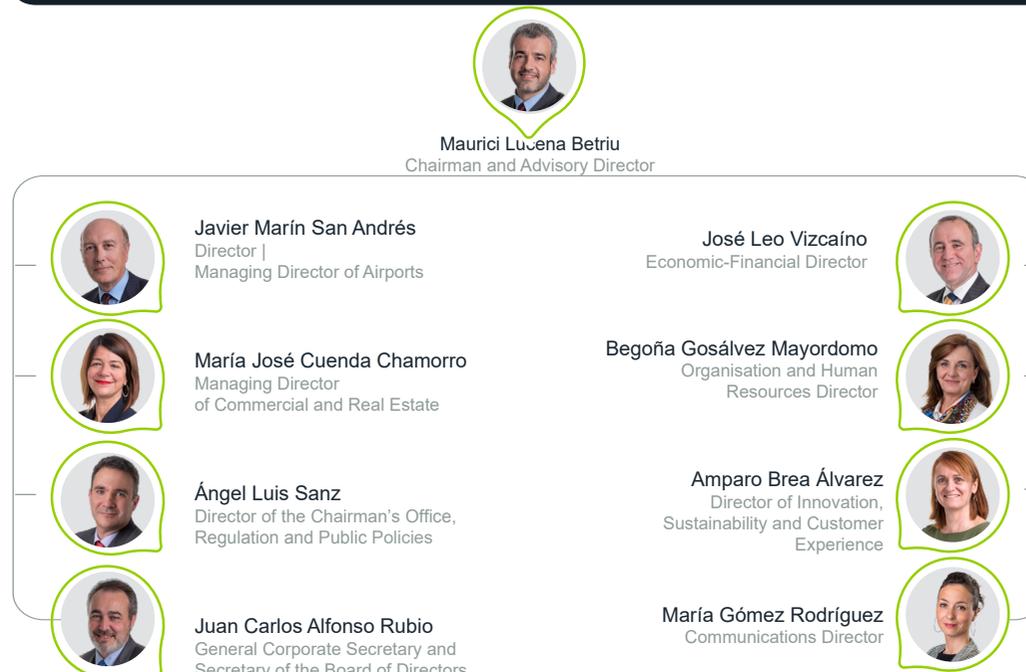
the company and strengthen the environmental sustainability of airport activity.

The Management Committee meets twice a week to make agreements regarding the implementation and achievement of the strategic objectives established by the Board of Directors, maximising the value of the Company to its shareholders and ensuring its long-term viability. Monitors the fulfilment of the objectives set, defining and developing the corporate culture, as well as those that affect the organisational aspects of the Company.

Within its remit, the Committee approves the operational and management criteria, the internal procedures affecting more than one Management, and reviews the Policies to be submitted to the corresponding Committees for subsequent approval by the Board of Directors, as the case may be.

The Management Committee is also familiar with all related operations carried out by the Aena Group.

COMPOSITION OF THE MANAGEMENT COMMITTEE AT 31/12/2021*



* See the link to the website in the "Annexe - Links and links of interest" of this document.

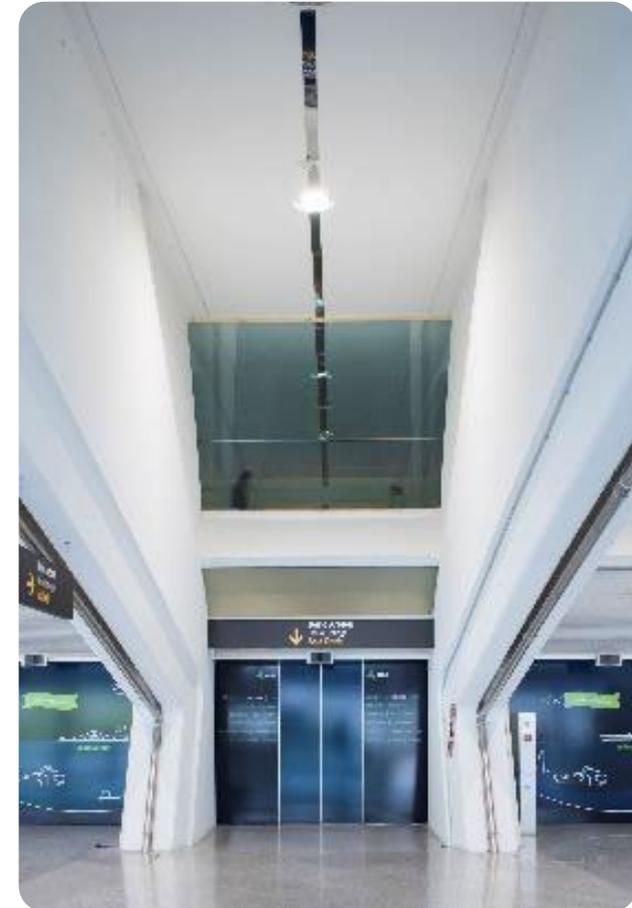
Remuneration of the Board and Senior Management (GRI 102-35; 102-36; 405-2)

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

- The contracts of the executives who are part of the Executive Management Committee of Aena, and those of the Internal Audit Manager and the Head of Aena Internacional, are subject to Royal Decree 451/2012, of 5 March, which regulates the remuneration regime of senior managers and directors in the corporate public sector, and other entities.
- The remuneration of the Directors is predetermined by public regulations, including the following: Royal Decree 462/2002, of 24 May, on the compensation for services provided; the aforementioned Royal Decree 451/2012; the Order issued by the Ministry of Finance, of 30 March 2012, which approves the classification of state-owned commercial companies in accordance with Royal Decree 451/2012, of 5 March; and the Order issued by the Ministry of Finance, of 8 January 2013, which approves the maximum amounts of compensation for the attendance to board of director meetings of state-owned commercial companies.

Due to this, the Company has no discretion to set remuneration amounts under the terms indicated in Article 217.4 of the Corporate Enterprises Act, given that the directors only receive one compensation for attending Board meetings, with this compensation being limited by maximum amounts as detailed in the aforementioned Order of the Ministry of Finance of 8 January 2013 and in the Annual Report on Remuneration²⁰.

The Annual Report on Directors' Remunerations is approved by the shareholders. In 2021, the consultative vote of the Annual Report on Directors' Remuneration corresponding to the 2020 fiscal year was supported by the practice of the entire GSM, with a percentage of vote in favour of 95.75%.



²⁰ See the link to the document in the 'Appendix – Links and links of interest' in this document.

Remuneration received in 2021 by Directors and managers²¹

Fees of the Executive Directors (Chairman-CEO and Managing Director of Airports)	Chairman and CEO	Managing Director of Airports
The remuneration is classified as basic and supplementary (it may not exceed twice the basic remuneration):		
• The basic (fixed) remuneration	€117,203.40	€94,753.08
• The supplementary remuneration that includes:		
• Job allowance	€46,881.36	€22,508.52
• Variable supplement (maximum 60% of the basic remuneration): depends on the fulfilment of the company objectives, among which are objectives in terms of sustainability (preparation and proposal of the Climate Action Plan), which are weighted for the Chairman-Chief Executive Officer in 20% of 100% of the company objectives, and for the Airport Managing Director in 10% of 50% of the company objectives	€13,047.38	€27,213.38
• Other items	€1,333.10	€4,982.39
Total	€178,465.24	€149,457.37
Remuneration of Directors²²	Men	Women
They receive a maximum annual amount of €11,994 as compensation for attending Board meetings, and this limit cannot be exceeded. The remuneration for attendance corresponding to Board Members with the status of High Ranking Government Officials is deposited into the Public Treasury ²³ .	€11,994	€11,994
Remuneration of Senior Management		
To calculate the equated average remuneration, the basic salary, variable remuneration, allowances, compensation, long-term forecast systems and other annual items have been taken into account. In addition, the salary review corresponding to fiscal year 2021 (0.9%) has been applied.	133,127	127,472
Wage gap:		4.2%

²¹ Information about the remuneration of the Board of Directors is detailed in the Annual Report on Remuneration, which can be consulted on the company's corporate website.

²² For the calculation of the average remuneration, only those remunerations received by the Directors who have held their position during the entire current fiscal year have been taken into account, excluding those whose remuneration must be paid into the Public Treasury due to their status as a High Ranking Government Official, as indicated.

²³ During fiscal year 2021, remunerations corresponding to attendance by High Ranking Officials—Maurici Lucena Betriu, Angélica Martínez, Juan Ignacio Díaz Bidart, Angel Luís Arias Serrano—were deposited into the Public Treasury.

1.2.- Culture and corporate ethics (GRI102-25)

Due to its nature, Aena is subject to a legal regime that seeks to balance the public and private regulations to which the Company is subject.

As a state-owned commercial company and, therefore, part of the institutional public sector, it is subject to the provisions of the following articles: 166.1.c) of Act 33/2003 on public administration assets, section 2.2.c) of Act 47/2003 on the national budget and Act 40/2015 of 1 October on the legal regime of the public sector.

In addition, as a publicly listed company, it is also subject to Legislative Royal Decree 1/2010, via which the consolidated text of the Corporate Enterprises Act was approved, as well as to Legislative Royal Decree 4/2015, of 23 October, via which the consolidated text of the Securities Market Act was approved.

Its unusual legal nature affected by the policy on the remuneration of directors, the range of responsibilities of the directors, the acquisition of majority interests in other companies, the hiring of personnel, the contracting of suppliers, the access to public information or the transparency in their activities.

Additionally, Aena is subject to the provisions of other types of provisions, such as:

- The Airport Regulation Document (DORA)—instrument that establishes the minimum necessary conditions in airport management—and to the requirements established in European regulations on airport and operational security.
- The provisions from the State and European Aviation Security Agencies (AESA and EASA respectively), the General Directorate of Civil Aviation (DGAC) and the International Civil Aviation Organisation (ICAO).
- The quality and environmental requirements stemming from the application of ISO 20906, ISO 9001:2015, ISO 14001:2015, ISO 27002:2013 and ISO 19600 standards; EU Regulation 139/2014 or Airport Carbon Accreditation, to which it has voluntarily subscribed.

It is essential for Aena to guarantee the legality of the actions taken by its employees, directors and managers of the Company when carrying out their professional activities

Based on the guidelines provided for in the regulatory framework, Aena has developed a structure of basic internal standards (of high level) that configure the Company's Compliance model, and contribute to effectively and efficiently articulating the management of the company with its strategic objectives²⁴.

This internal framework is periodically reviewed in order to align and integrate good practices²⁵. As a result of this review process, in 2021, various policies were approved, such as the Sustainability Policy, the Policy on relations with stakeholders, or the general Policy on communication of financial, non-financial and corporate economic information—referred to in previous sections—as well as the Data Policy²⁶.

In addition, the Regulatory Compliance Policy has been modified (founded on the commitment to the values and principles contained in the Code of Conduct and the rejection of any conduct that involves an illicit act against the principles, values or policies of the company), and the Anti-Corruption and Fraud Policy, which reflects the Company's commitment against corruption and bribery and develops what is set forth, in turn, in the Code of Conduct and in the Regulatory Compliance Policy.

²⁴ The Company policies shall apply to the directors, executives and employees of Aena subsidiaries where it has a majority shareholding and which are not domiciled in Spain (London Luton Airport and Aeroportos do Nordeste do Brasil) in accordance with its regulations, unless otherwise established in its own policies—since its Compliance bodies are responsible for implementing its Regulatory Compliance Systems, in coordination with Aena's Compliance Supervision and Control Body (OSCC [Órgano de Supervisión y Control de Cumplimiento]).

²⁵ To ensure consistency and homogeneity in the application of corporate policies and regulatory compliance throughout the Group, the new policies and modifications of those already in force approved by the Company are transferred for their record and adoption at the international subsidiaries.

²⁶ Their objective is to drive the value of data and facilitate decision-making based on the information provided by the data, as well as establish the criteria related to its quality, traceability, interoperability, security, uniqueness and ethics.

All persons who make up the Company assume the principles established in the standards and frameworks of action in the performance of their professional activities

(GRI 103-2; 102-31)



Documents that make up the Aena Action Framework

- Code of Conduct
- Regulatory Compliance Policy
- Policy of selection of candidates for directors
- Policy of communication and contact with shareholders, institutional investors and voting advisors
- Sustainability Policy
- Control and risk management policy
- Integrated Quality, Environmental and Energy Efficiency Management Policy
- General policy for communicating economic-financial, corporate and non-financial information
- Corporate Tax Policy
- Corporate Governance Policy
- Anti-Corruption and Fraud Policy
- Information Security Policy
- Human Rights Policy
- Stakeholder Relations Policy
- Data Policy

1.2.1 Regulatory Compliance System

Aena has a Regulatory Compliance System (hereinafter RCS) of a transverse nature aligned with best practices, whose objective is to prevent or mitigate the risks of noncompliance or bad practices and ensure respect for the established obligations and commitments assumed, as well as the legality of the acts carried out by employees, directors of the Company in the exercise of their professional activities²⁷, and allows, in addition, to ensure that Aena exercises the due prevention control that is legally enforceable against third parties.

This System is composed, among other elements, of the Regulatory Compliance Policy, the Code of Conduct or the Anti-Corruption and Fraud Policy and the Complaints Channel, all approved by the Board of Directors, which link and apply to the members of the Administrative Bodies, the Senior Management and in general all the employees of the Organisation.

To order and coordinate its management, the Board of Directors has appointed a Compliance Division and a collegiate internal body, the Compliance Supervision and Control Body (OSCC), whose powers include the implementation, development and application of this System - adapting to the needs and circumstances of

the Company at all times - and monitoring the operation, effectiveness and compliance with the Regulatory Compliance Policy. Likewise, the Compliance Supervision and Control Body ensures, through the corresponding representatives, the correct implementation of the Regulatory Compliance Systems in the subsidiary companies and the promotion and promotion of best practices in the participating companies.

Within the framework of the Compliance System, the Company establishes a series of due diligence measures necessary for proper selection and monitoring of compliance matters.

- Risk map. As part of the RCS, Aena has developed a risk map of regulatory compliance, in which the most significant consequences in the event of noncompliance have been identified, within the set of activities of the different organisational units of the Company, such as: Ethical principles and criminal, environmental, public sector transparency, information security and data processing, corporate governance, operational and physical security, contracting, antitrust and competition standards, which also guarantee to third parties that Aena

²⁷ The Compliance System is not linked to employee compensation or the Performance Management System (PMS) of the workforce in general, although it is linked to employees who perform functions in Compliance.

exercises the legally required preventive control²⁸. The activities that could be most exposed to risk due to the incidence of COVID-19 have been analysed.

As a result, an updated risk map has been provided on which a series of 'prevention' controls are established, such as the development and approval of internal policies; 'action' controls, for example, the implementation of a complaints channel; and 'review' controls, functions performed by the compliance supervision and control body.

- Development of training activities, employee awareness, monitoring and reporting.
- Since this is a System under continuous review, repair actions and improvement proposals are carried out on an ongoing basis, based on lessons learned.

During 2021, the criteria for establishing the single indicator of compliance risks associated with risk events or activities have been identified, and the necessary actions have been carried out by the Compliance Division to review and update the regulatory compliance risk maps of the Group's three Spanish companies (Aena, ADI and AIRM). We have also worked on extending and improving the RCS in foreign subsidiaries (London Luton and ANB Group), adhering to corporate policies and regulatory compliance policies and developing the process for preparing risk and control maps.

The Board of Directors enjoys the highest standards of ethics and business integrity in the exercise of its functions, a basis for guiding its actions and thereby achieving the goals and values of the Organisation. It also ensures that the directors of the Company comply with ethical standards in the exercise of their duties.



'Zero tolerance' of corruption in business, in all its forms.

Policies and procedures, based on a preventive culture to mitigate the risk of corruption and bribery.



Formal commitment to human rights and absolute rejection of modern slavery.

And implementation of the corresponding mechanisms to ensure compliance.



Ensure everyone's safety as a priority.

Understood in the broadest sense (health and security; physical; operational; cybersecurity; sanitary).



Encourage ethical behaviour and conduct.

Act with integrity and promote an ethical culture through standards and training, due diligence and monitoring procedures.



Tax policy.

Ensure compliance with applicable regulations and manage tax matters in a transparent, proactive and responsible manner.



Management, control and transparent communication of Information.

Through the communication policies approved by the Company, that of the relationship with stakeholders, and the Internal Rules of Conduct.



Anti-lobbying practices.

Express prohibition in the Code of Conduct to make donations or contributions to a political party, federation, coalition or constituency.



Complaints Channel.

Confidential and independent, available to all stakeholders.



Risk management system, including non-financial risks.

The Board of Directors: ultimately responsible for the existence and operation of an adequate and effective system.

²⁸ The subsidiary companies have their own risk map, adequate regulatory compliance policies, monitoring and control processes, as well as an autonomous supervisory and control body, guaranteeing in any case the proper coordination in the regulatory compliance activities at Group level. For its part, London Luton Airport has approved its regulatory compliance risk map and it is in the process of being implemented.

CULTURE BASED ON ETHICS AND INTEGRITY

ETHICAL PRINCIPLES AND GOOD GOVERNANCE

Legality	Integrity, honesty and trustworthiness	Independence and transparency	Excellence and quality in meeting our stakeholders' expectations	Respect for the image and reputation of Aena
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REGULATORY COMPLIANCE SYSTEM²⁹

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

Prevent or mitigate the risks of noncompliance or bad practices, through the appropriate principles, mechanisms and procedures	Ensure respect for the established obligations, the commitments assumed, and the legality of the acts
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GOVERNANCE, ORGANISATION AND SUPERVISION: COMMITMENT AT ALL LEVELS OF THE ORGANISATION

Board of Directors Supervises, through the Audit Committee, the operation of the Compliance Supervision and Control Body. Approves the regulatory framework	Audit Committee Oversees operations and enforcement of the compliance model	Compliance Division Annual review of policies and update of compliance risk map, training and communication plan, management of the complaints channel and measures, etc.	Supervision and Control Body Implementation, development and compliance with the Aena General Regulatory Compliance System	Definition of responsibilities at the different hierarchical levels
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DUE DILIGENCE PROCEDURE AND DEVELOPMENT OF AN ETHICAL AND COMPLIANCE CULTURE

Regulatory framework and public commitment	Risk diagnosis and default impacts	Implementation of risk control, prevention and mitigation measures ³⁰	Training, communication and awareness	Monitoring and reporting	Investigation of incidents, repairs and corrective proposals
Aena's regulatory compliance policy	Identify, analyse and systematically evaluate potential risks, adopting a proactive and preventive culture.	Prevention control: ensure compliance with internal regulations, policies and standards. Training.	Training and awareness actions to promote a corporate culture based on ethics and compliance. Express acceptance of the Code of Conduct.	Complaints channel, email, communication through the hierarchical superior.	The disciplinary measures to be adopted will be developed in the Manual for the treatment and investigation of facts communicated through the Complaints Channel in which the adaptation of the Complaints Channel to EU Directive 2019/1927 is being worked on.
Code of Conduct	All Subject Persons, as well as professionals who join or become part of Aena, are expressly affected by the full content of the Code and, in particular, the ethical principles and rules of conduct established therein.	Action control: obligation to report any possible illicit act or breach. Complaints Channel.	Partnerships with other companies to be at the forefront of best practices in the sector.	Internal and external audits, ³¹	It will be considered a breach of labour law that may be sanctioned, following the procedure set out in the Aena Collective Agreement and other applicable regulations. The penalties corresponding to disciplinary offences will be classified by Aena as minor, serious or very serious, depending on the specific circumstances of the case, and in accordance with the provisions of the disciplinary regime provided for in the Collective Agreement of Aena, and, where appropriate, the other applicable regulations. For breaches attributable to: (i) the members of the Board of Directors, the provisions of the Regulations of the Board of Directors and the applicable regulations will apply to these effects; and (ii) employees who are linked to Aena by means of a senior management contract, the provisions of the contracts that regulate their relationship with Aena will apply to these effects, as well as in the applicable regulations.
Anti-corruption and fraud policy	Complements and develops the provisions of the Code of Conduct and the Regulatory Compliance Policy. This implies its firm rejection and zero tolerance for any conduct that is illegal or that violates Aena's policies, standards, values and action principles.	Review control, through the compliance supervision and control body.	Active participation in different specialised business forums ³² .	Internal and external information and reporting.	Aena prohibits entering into any financial transaction, contract, convention or agreement whenever there are sufficient reasons to believe that there could be some link to improper or corrupt activities.

²⁹ The elements that make it up (policies, Code of Conduct, complaints channel) are binding on and applicable to the Board of Directors, directors and all employees, including those of the subsidiaries, insofar as applicable according to their regulations and except as established by their own policies, without exception, whatever their position, responsibility or geographic location. In all other companies in which Aena participates directly or indirectly without control, Aena promotes, through its participation in their governing bodies, the adoption of these policies and the establishment of compliance supervision and control systems, in case they have not yet adhered to them.

³⁰ See also information contained in the image 'Prevention of Corruption Measures'.

³¹ In 2021, the implementation of the Action Plan proposed by the Internal Audit Division was completed after the internal review of the system and the compliance function. This plan has been aimed at the remediation of detected incidents. With regard to external audits of the system, during the design process in 2016 it was audited by third parties. It is planned to audit the system in 2022.

³² For example, the Cluster of Transparency, Good Governance and integrity of Forética.

1.2.2.- Code of Conduct

(GRI 103-2; 102-16; 102-17)

The Code of Conduct is the Company's main instrument for coping with behaviours that may breach regulations or be unethical, formalising Aena's commitment and respect for the best values and Ethical and Good Governance Principles.

The principles and guidelines of conduct are structured into five large blocks: people; work; environment, stakeholders and image; information; legal obligations.

To reinforce knowledge about the Regulatory Compliance System, the Code of Conduct and to contribute to preventing or mitigating the risk of committing criminal acts, in 2021 the training and awareness actions included in the Communication and Awareness Plan designed by the Compliance Supervision and Control Body have continued³³:

- Activities aimed at employees: publications in the corporate newsletter (accessible through the intranet), awareness-raising messages on workplace information boards and training sessions for different groups.

More than 779 workers have participated in the course on 'The current importance of Compliance' in which training has been given on the Aena General Compliance System, which includes its Compliance Policies, Code of Conduct³⁴, Risk Maps and Complaints Channel. 97.05% of the active workforce of Aena, Aena international development and Región de Murcia International Airport has been trained in compliance throughout these years. In the case of Aena Brasil, 297 workers received training in the field in 2021. During 2020 and 2021, 100% of employees have been trained at London Luton Airport.

In the last 3 years, almost 100% of the workforce has participated in related training activities.

- Third-party activities: dissemination through the corporate website, messages related to the importance of the Code of Conduct and its guiding principles, etc.

The Code of Conduct includes express reference to the duty to report, complain and collaborate in the investigation of possible risks or breaches of the Code of Conduct, any other internal regulations or protocol of action established in Aena. The Code itself includes penalties for noncompliance, which may be classified

as minor, serious or very serious, depending on the specific circumstances of the case.

The Code of Conduct is reviewed annually, mainly within the framework of the process of supervision, control and evaluation of the functioning of the General Regulatory Compliance System, through which the Compliance Supervision and Control Body proposes to the Board of Directors, through the Audit Committee, modifications to the Compliance Policy and the Anti-Corruption and Fraud Policy, and therefore the Code of Conduct itself.



³³ Among its powers is to promote knowledge and compliance with the Code of Conduct, interpret it and guide decision-making in case of doubt, as well as to make proposals for improvement of the same that it deems appropriate.

³⁴ All individuals who completed the course on 'The Current Importance of Compliance' during 2020 and 2021 have acknowledged and expressly accepted the Code of Conduct. In Aeroportos do Nordeste do Brasil, 293 employees—equivalent to 100% of active employees—have confirmed in writing that they have read the Code of Conduct. For their part, at London Luton Airport all employees receive the Code of Conduct and are provided with a printed copy (included in the 'Manual').

The Code of Conduct is available for consultation by all employees on both the intranet and the internet.

Regulatory Compliance Policy

(GRI 102-31)

Aena's Regulatory Compliance Policy contributes to reinforcing Aena's commitment to good corporate governance, in accordance with the values and principles contained in the Code of Conduct, and to diligently exercise proper control to minimise as much as possible the risk of bad practices or regulatory breaches.

All those to whom it is applicable have the obligation to report any fact constituting a possible criminal offence, legal breach or irregularity of those that are recorded through the Complaints Channel, or other tools, as appropriate (see section 'Complaints Channel'). Among the aspects included in the Policy, it is worth noting:

- The principles of action on which the actions of Aena are based, and that all the people who make up the organisation must respect and ensure compliance with.
- The risk prevention, action and review controls to be implemented in the Organisation to achieve a reasonable level of security at the company.

Regulatory compliance policy



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

Legislation

Safeguarding and complying with current legislation and internal regulations.

Disclosure

Facilitating knowledge of and respect for legal obligations, the Code of Conduct, and internal rules and procedures.

Responsibility

Applying, in a fair and proportional manner, sanctions to penalise breaches, in accordance with the provisions of the applicable Collective Agreements, Regulations and Contracts.

Zero tolerance

'Zero tolerance' towards the commission of illegal or criminal acts, promoting a culture of prevention.

Complaints channel

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

Transparency and trustworthiness

Applying principles of transparency, mutual trust, good faith and loyalty in relations with Public Administrations, and companies or bodies governed by public law.

Self-monitoring

Promoting self-control processes in the decision-making, and actions of managers and employees.

Investigation

Investigating any complaint of allegedly criminal acts or those involving a breach, guaranteeing the confidentiality of the complainant and the right to counsel of the person under investigation.

Cooperation

Providing any assistance and cooperation that may be required by judicial, administrative or any national or international supervisory bodies.

1.2.3.- Prevention of fraud, corruption and bribery

(GRI 102-16; 102-17; 102-25; 102-31; 103-2; 205-2)

The Company's commitment to combat corruption and bribery, in any form³⁵, specifically recorded in Aena's Anti-Corruption and Fraud Policy, complements and develops the provisions of the Code of Conduct and the Regulatory Compliance Policy. This reflects Aena's firm rejection and zero tolerance for any conduct that is illegal or that violates the Organisation's policies, standards, values and action principles.

Like the rest of the regulations that make up the System, the Anti-Corruption and Fraud Policy is applicable to the members of the Board of Directors, directors and all employees regardless of the place where they reside or where they exercise their activity, as well as to the consultants, partners and third-party representatives of Aena³⁶.

The Policy includes the principles of action on which it bases its commitment to permanent monitoring and penalisation of fraudulent behaviour or of behaviour that might promote any form of corruption.

In addition to what is generally provided for in the Code of Conduct³⁷, which is applicable to the Individuals Obligated by it, Aena has adopted a series of due diligence measures in commercial transactions, specifically aimed at preventing corruption, among which it is worth mentioning:

- Control measures in contracting with suppliers, commercial customers, and representatives and commercial agents.
- Control measures in relations with partners, in order to determine the identity of the counterparty and its administrators, de facto or de jure, and the identity of the real holder. In this regard, Aena's partners must have anti-corruption protocols and controls.
- Control measures in corporate operations.

The due diligence measures to prevent corruption provided for in the Policy will be subject to periodic review in order to evaluate and increase its effectiveness.

- Training

In 2021, in Spain and at the London Luton Airport³⁸, specific training actions have been carried out on corruption and fraud and good practices related to structured personnel, through the courses referenced above (see section on the Code of Conduct)³⁹. Likewise, training has been given to the Compliance Supervision and Control Body on aspects related to the responsibility of the Compliance Body and its members in the development of their functions. On the other hand, the Compliance Coordinators have received training on the knowledge and management of the risk and control management tool SAP GRC RICUM, on the risk maps, as well as other functions of the tool.

In addition, awareness-raising activities aimed at the workforce in general have been carried out through internal newsletters and information boards at the work centres.

³⁵ Bribery, gifts and invitations, extortion, fraud, embezzlement of funds, money laundering, conflicts of interest, illegal financing of political parties, prohibition/restriction of facilitation of payments.

³⁶ Thus, this Policy will also apply to the subsidiaries controlled directly or indirectly by Aena, adapting, where appropriate, those procedural or other matters that are strictly essential to make them compatible and comply with the regulatory requirements applicable in each case, adapting and/or developing the principles contained in the aforementioned Policy to the particularities of their own nature and jurisdiction. In all other companies in which Aena participates directly or indirectly without control, Aena promotes, through its participation in their governing bodies, the adoption of anti-corruption and fraud policies, and the establishment of compliance supervision and control systems, in case they have not yet adhered to this Aena Policy.

³⁷ In particular, in its sections: 4.12 (Corruption and bribery of members of public or private entities. Gifts, commissions or credit facilities), 4.13 (Political or associative activities), and 4.16 (Projects with social content and sponsorships).

³⁸ In Aeroportos do Nordeste do Brasil, as previously indicated, 297 workers have received training on the Compliance System, the Code of Conduct, anti-corruption and fraud, etc.

In the case of London Luton Airport, workers receive specific training in different areas, including anti-corruption and bribery.

³⁹ A portion of the training content refers to the Anti-Corruption Policy and good practices.

MEASURES FOR PREVENTING CORRUPTION

Aena's objective is to ensure that there is no case of fraud, corruption or bribery in any of its forms

Depending on the type of transaction and/or stakeholder (*)	Gifts, commissions, invitations, credit facilities or any type of bribe (members of public/private entities)	Political or associative activities	Projects with social content and sponsorships ⁴⁰	Corporate operations
<p>(*)The Management Committee of Aena will be able to develop internal criteria to determine certain operations such as those of high risk. For an operation to be considered as high risk, this circumstance will be expressly set out in the reports of the transaction proposal to the company's decision-making bodies, so that they can take such circumstance into consideration when authorising the transaction.</p> <p>If the transaction is authorised, it will expressly be recorded and the mitigating measures adopted, if any, will be reported.</p>	<ul style="list-style-type: none"> Express prohibition on the delivery, promise or offer of any kind of payment, commission or gift to any authorities or public officials or members of private entities, provided that due to their frequency, characteristics or circumstances they could be interpreted by an objective observer as made with the intent to affect the impartial criterion of the receiver. Duly authorised, consistent and reasonable travel and representation expenses. Obligation to reject and inform the Compliance Supervision and Control Body of any illicit situation. Prohibition of receiving from customers, suppliers, intermediaries or counterparties, loans or any type of credit facility. 	<ul style="list-style-type: none"> Express prohibition on making donations or contributions to a political party, federation, coalition or grouping of electors from Company resources. When applicable, prior to the acceptance of any public office, the Persons Subject to the Code must inform the Organisation and Human Resources Management, in order to determine the existence of incompatibilities or restrictions on their exercise. 	<ul style="list-style-type: none"> Prohibition on making any financial transaction, contract, convention or agreement is prohibited whenever there may be sufficient reasons to believe that there could be some link to improper or corrupt activities, in accordance with established criteria. Express declaration by the unit proposing the Contract/Collaborative Agreement that the purpose or destination of the Contract/Collaborative Agreement is not to finance any political party. Proper recording in the Aena accounting books. Obligation to have internal and external authorisations that, where appropriate, are accurate. Continuous monitoring in order to know the correct use of resources. 	<ul style="list-style-type: none"> Analysis of the legal framework of the sector and country in which the entity operates. Anti-corruption analysis of shareholders and the entity. Verification of the proper constitution and functioning of the entity. Verification of the correct keeping of the accounting and financial records. Verification of the correct keeping of corporate books. Regulatory compliance analysis. Inclusion of anti-corruption clause.
<p>Other measures to make it effective</p>	<p>Suppliers, business customers, representatives and business agents—business transactions</p> <ul style="list-style-type: none"> Measures to verify the qualifications and integrity of every supplier and customer before initiating binding commercial relations, whenever it may be deemed appropriate by the Unit proposing the commercial relationship, thereby always considering the contracting regulations that may be applicable in each case. Specific anti-corruption clause. Ban on offering or granting, to public officials, third parties or any employee of Aena; gifts, presents or other unauthorised advantages in order to obtain favourable treatment in the granting, or conservation, of contracts or benefits of a personal nature or for the supplier company. In any relationship with third parties, in a potential situation of conflict of interest, the Code of Conduct establishes the duty of information and authorisation by the Body before making a decision or carrying out the corresponding operation. 		<p>Partners</p> <ul style="list-style-type: none"> Prove a renowned performance in the sector and a recognised ethical behaviour trajectory. Evaluation by Aena through the appropriate procedure, taking into account issues such as the type of transaction to be carried out, the type of agreement or contract to be signed, the identity of the third party or its shareholders, the jurisdiction, etc. in order to ensure that the third party is trustworthy and, consequently, does not carry out activities that may involve risks, economic damage or compromise the reputation and good image of Aena. Anti-corruption protocols and controls in place. Anti-Corruption clause. Enhanced due diligence process with the purpose of carrying out investigations of greater depth and scope and additional measures will be established, in the event that additional risks are observed, 	
	<ul style="list-style-type: none"> Adequately take into account the risks associated with fraud, corruption and bribery, in particular all those related to relations with third parties, in Aena's internal procedures and in the Risk Management Systems⁴¹. Knowledge of and respect for these procedures are promoted through adequate dissemination and specific training programmes. Receipt of employee inquiries. Management of queries and direct report to Compliance Supervision and Control Body. Submission of the corresponding complaint in the Complaints Channel. Internal (compliance supervision and control body) and external analysis (external company, when deemed appropriate by the compliance supervision and control body) of the complaints received. Internal and external dissemination of the Policy; control measures in contracting with suppliers, commercial customers and representatives, as well as in corporate operations. Internal and external audits⁴². 			

⁴⁰ They may only be carried out with organisations or institutions not linked to any political party and whose purpose is not political, and which have the appropriate organisational structure to ensure the proper administration of the resources provided by Aena.

⁴¹ The 'legal and compliance' risks (including bribery and corruption) are expressly identified in Aena's 'Risk Management System'. Consequently, action plans, mitigating activities and indicators are applied for their control and monitoring—as indicated in the Risk Control and Management Policy.

⁴² See image 'Culture based on ethics and integrity'.

1.2.4.- Procedure for Related Transactions (GRI 102-16; 102-17; 102-25; 205-2)

In 2021, on the occasion of the new regime on related transactions introduced by Act 5/2021, of 12 April, which modifies the consolidated text of the Corporate Enterprises Act, approved by Royal Legislative Decree 1/2010, of 2 July, and other financial standards, with regard to the promotion of the long-term involvement of shareholders in the listed companies, the Board of Directors has approved the new Procedure for related transactions of the Aena Group, which details the rules to follow in those transactions that Aena, or any of the companies of the group, with Related Persons.

The Procedure defines what is understood by a related person, a related operation, and the procedure to be followed for the approval of the related operation in question, distinguishing in the case of those operations that are the responsibility of the General Shareholders' Meeting, the Board of Directors or the Management Committee, as a delegated body.

It also details how to proceed with the recording of transactions and their control, both biannually and on the occasion of the Annual Accounts, and the general rules that are applicable (procedure and calculation, reporting and publication⁴³, etc.). To ensure its effective and adequate application, it gathers the commitment to organise the training sessions on the

applicable regulations on the subject of Related Operations that are deemed necessary.

With this Procedure, Aena guarantees that, in the adoption of its decisions, the sole purpose is to defend the best interests of the Company and its shareholders, avoiding the influence of the motivations or aims of the persons involved.

1.2.5. Conflicts of interest

GRI 102-16; 102-17; 102-25; 205-2)

The Board of Directors guarantees the availability and approval of internal regulations and procedures in matters of conflicts of interest⁴⁴, for their internal regulation and application by the different groups (directors, management bodies, workers, third parties, etc.). In this regard:

- Article 26 of the Regulations of the Board of Directors includes the duty of diligence, according to which Directors are obliged to clearly express their opposition when they consider that any proposed decision submitted to the Board of Directors is contrary to the law, the Corporate Bylaws, the Regulations or the corporate interest, and request that this opposition be recorded in the minutes.

In particular, Independent Directors and other Directors who do not affect the potential conflict of interest must also express their objection when dealing with decisions that may harm shareholders not represented on the Board of Directors.

- The Conflicts of Interest Procedure establishes the procedures for acting on the matter for Directors, shareholders of the Company and its Group, members of the management team and managers who are considered to be the Highest Position of the State Administration, subject to Act 3/2015 of 30 March, regulating the exercise of the High Position of the General State Administration, as well as their respective related persons⁴⁵.
- Aena has a specific Conflict of Interest Policy for Directors.
- The Regulatory Compliance Policy and its Development Regulations reinforce the regulation of potential conflicts of interest.
- The compliance supervision and control body has approved some General Instructions for managing possible conflicts of interest between Directors of Aena, ADI and AIRM.

⁴³ In accordance with the provisions of the current Procedure and the applicable regulations, the details of Aena's Related Transactions can be consulted both in the semi-annual financial information, as well as in the annual accounts and in the annual corporate governance report, as well as the section of Related Transaction available on the corporate website of Aena and on the website of the CNMV. See section 'On this report – Links of interest'

⁴⁴ The conflict of interest is regulated in the Corporate Enterprises Act where possible situations are established in which it is considered that there may be a conflict of interest. Likewise, this situation is provided for in the Aena Code of Conduct.

⁴⁵ In accordance with the provisions of current corporate and regulatory regulations and the Aena Corporate Governance system.

- The Manual of Duties of the Aena General Regulatory Compliance System and the Complaints Channel Management Procedure regulate the possible conflict of interest for the Compliance Supervision and Control Body and members of the Compliance Division.
- The Code of Conduct devotes a section to regulating conflict of interest, which applies to all persons subject to the Code, available both on the corporate intranet and on the Company's website.

During 2021, among the dissemination and awareness actions developed, one of the matters addressed was how to identify and act in the event of possible conflicts of interest, and the procedures available to follow to minimise them. To this end, bulletins have been published through the Aena 360° magazine on regulatory compliance, and in particular to raise awareness of the organisation about conflicts of interest, how to identify them and how to act when they arise, giving examples of possible situations.

1.2.6. - Specific measures against money laundering (GRI 102-16; 102-17)

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

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

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

Aena prohibits entering into any financial transaction, contract, convention or agreement whenever there are sufficient reasons to believe that there could be some link to improper or corrupt activities. Transactions with partners will only be conducted after having verified that they have a good reputation in their sector and that they have a recognised history of ethical behaviour. Third parties (partners, commercial agents and representatives) are appropriately evaluated through a due diligence procedure, which analyses, among other aspects, the type of transaction to be carried out.

At the close of 2021, Aena had no knowledge of complaints related to money laundering.

NATURE OF THE CONFIRMED CASES OF CORRUPTION	AENA S.M.E., AIRM, ADI	London Luton Airport	Aena Brasil	Total
In which an employee has been terminated for corruption or disciplinary action has been taken (no.)	0	0	0	0
In which contracts with business partners have been terminated or not renewed due to corruption-related violations (no.)	0	0	0	0
Public legal cases related to corruption filed against the organisation or its employees during the period covered by the report, and the results of those cases (no.)	0	0	0	0
Fines or penalties for cases of corruption or bribery (no.)	0	0	0	0
Contributions to political parties and/or representatives (€)	0	0	0	0
Monetary losses as a result of legal processes associated with professional integrity (€)	0	0	0	0

1.2.7.- Complaints Channel⁴⁶

The Complaints Channel receives complaints and other communications of suspicious conduct that may constitute a breach of the law, the Company's policies and procedures, or the rules of conduct as they appear in the Code of Conduct. In this regard, Aena has⁴⁷:

- Internal complaints channel: available for internal stakeholders⁴⁸, and accessible through the intranet. They must identify themselves to make their complaint, guaranteeing at all times the right to the confidentiality of the identity of the complainants, the defence and the presumption of innocence of the persons investigated⁴⁹.
- External complaints channel: accessible through Aena's corporate website so that any person, including employees, can file their report, giving them the possibility of maintaining their anonymity, if the reporter so wishes.

Both channels are managed and supervised by the Compliance Supervision and Control Body through the Compliance Division, for which it has the support of an external office that reports the actions carried out in the complaints received, without prejudice to the final conclusion of the complaints study process, which will

be carried out by the OSCC. More specifically, in this regard, the following functions are assigned:

- Ensuring that all complaints received are analysed independently.
- In the event that the complaint is not made anonymously, guaranteeing the confidentiality of the identity of the person who raises it, as well as that of the person reported or reported.
- Informing the people who are strictly involved in the process, and following up on and finalising the complaints made.
- In case of infringement, the corresponding procedures apply:
 - The disciplinary measures provided for in the Collective Agreement are applicable to employees.
 - For senior management, sanctioning measures are provided for in the contracts that regulate their relationship with Aena.
 - The members of the Board of Directors shall be subject to the provisions of the Regulations of the Board of Directors.

As far as London Luton Airport is concerned, there are also other tools available to deal with these types of complaints. These include direct communication through the manager, the Whistleblowing Officer, the airport operations service, a confidential external telephone service managed by an external company (whistle@pcaw.co.uk), the legal advisor or the CEO.

Aena Brasil also has its own external complaints channel that any user can access, and can remain anonymous if desired⁵⁰. It also has a specific email address for receiving these communications (compliance@aenabrasil.com.br).

A total of 72 complaints were received in 2021.



⁴⁶ The links to the websites mentioned in this section of the document can be consulted in the 'Appendix – Links and links of interest' in this document.

⁴⁷ Also available for the receipt of complaints from SCAIRM and ADI.

In addition to these channels, the complaint can be made by post at the registered office, informing the hierarchical superior.

⁴⁸ Members of the Management Bodies, directors and employees of Aena.

⁴⁹ If the employee wishes to remain anonymous, he or she may file a complaint through the External Complaints Channel, available on the Organisation's website.

⁵⁰ Available in Portuguese.

Steps to follow when a complaint is received



ENTRIES IN THE COMPLAINTS CHANNEL ⁵²	2020			2021 ⁵¹		
	COMPLAINTS			COMPLAINTS (admitted for processing)		
	RECEIVED VIA INTERNAL CHANNEL	RECEIVED VIA EXTERNAL CHANNEL	TOTAL COMPLAINTS	RECEIVED VIA INTERNAL CHANNEL	RECEIVED VIA EXTERNAL CHANNEL	TOTAL COMPLAINTS
AENA S.M.E., SCAIRM, ADI	23	37	60	13	19	32
LONDON LUTON AIRPORT	2	0	2	3	0	2
AENA BRASIL ⁵³	-	36	36	N/A	38	38
TOTAL	25	73	98	15	57	72

⁵¹ Details of all the entries received through the different channels that have been admitted for processing are included.

⁵² Itemised by country, if possible, or indicate countries of reference in each case.

⁵³ Available since July 2020.

2021

NATURE OF THE COMPLAINT	AENA S.M.E., AIRM and ADI			LONDON LUTON AIRPORT			AENA BRASIL		
	DISMISSED	ACCEPTED	MEASURES TAKEN	DISMISSED	ACCEPTED	MEASURES TAKEN	DISMISSED	ACCEPTED	MEASURES TAKEN
WORKPLACE HARASSMENT ⁵⁴	5 (2 pending)	0	n/a	1	2	Promotion of training. Employee withdrawal from process	0	n/a	n/a
DISCRIMINATION BASED ON GENDER	0	0	n/a	0	0	n/a	0	n/a	n/a
VIOLATIONS OF EMPLOYMENT RIGHTS	4	0	n/a	0	0	n/a	0	n/a	n/a
MONEY LAUNDERING	0	0	n/a	0	0	n/a	0	n/a	n/a
CORRUPTION AND FRAUD	2 (1 in process)	1	Financial ⁵⁵	0	0	n/a	1	0	Improvement of controls
UNFAIR COMPETITION AND MONOPOLISTIC PRACTICES	0	0	n/a	0	0	n/a	0	n/a	n/a
DATA PROTECTION	0	0	n/a	0	0	n/a	0	n/a	n/a
COVID-19/HEALTHCARE	4	0	n/a	0	0	n/a	0	1	Healthcare Protocol Compliance Conference
NONCOMPLIANCE C. CONDUCT/OTHER REGULATIONS	3 (1 pending)	0	n/a	0	0	n/a	0	0	n/a
HIRING IRREGULARITIES	3	0	n/a	0	0	n/a	0	0	n/a
OTHERS	11	0	n/a	0	0	n/a	26	10	Verbal and/or written warnings; Conducting climate research; Feedback

⁵⁴ Complaints of harassment may be received through the Complaints Channel or the programme provided in the protocol for addressing the prevention of sexual harassment, and includes a specific protocol.

⁵⁵ Measures of a financial nature:

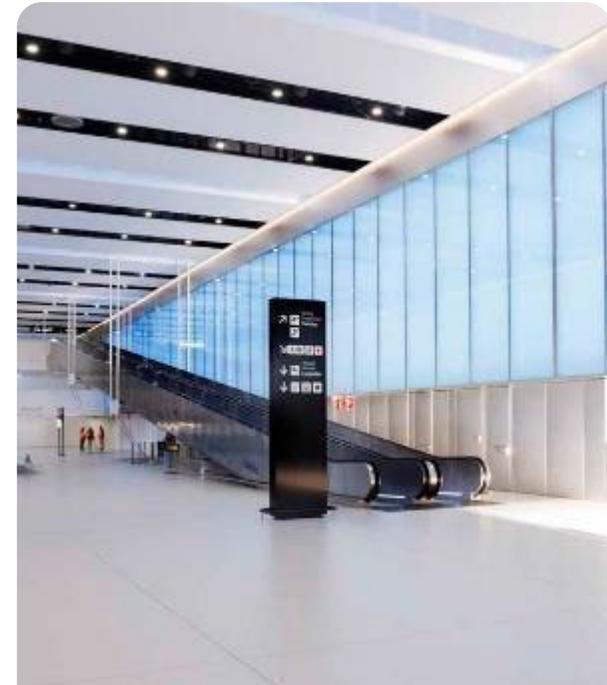
- Preparation of the inventory of the Airport's assets.
- Regularisation of inventory disposal.
- Formalisation of non-formalised donations.
- Dissemination of the procedure for fixed assets.
- Non-compliance of the IMS, an action plan is being executed to remedy the deficiencies detected.
- Compliance has sent letters to those affected reminding them of the need to observe the Code of Conduct, as well as the internal Procedures.

1.2.8.- Data protection

Aena has a compliance model for data protection and privacy, managed by the Central Data Protection Unit (CDPU) and by the Data Protection Officer⁵⁶. Likewise, there is a Data Protection Committee with the participation of Aena's Corporate Management with more implications in terms of personal data protection, performing support and advice functions. This model is based on respect for the fundamental right to data protection and privacy set forth in the Aena Code of Conduct, as well as on a set of documents in which this commitment is formally set out.

The model is part of an Information Security Policy, which also collects the privacy of the information, and a set of rules, procedures and instructions to ensure compliance with this regulation in the different companies of the Aena Group⁵⁷.

This model applies to all personal data processing operations carried out by the companies of the group of the different interested groups: employees, shareholders and investors, customers and suppliers. Aena has information privacy policies, oriented to each of these groups, through which they are informed of the processing of their personal data, in accordance with the provisions of the data protection regulations: Information privacy policy for users of the facilities, customers, suppliers and the Aena website; information privacy policy for the App, information privacy policy for shareholders and investors, information privacy policy for employees and information privacy policy for personnel of collaborating companies⁵⁸.



⁵⁶ Its main function is to ensure compliance with current legislation on data protection, maintaining and updating the Record of Processing Activities, implementing security measures, coordinating internal and external audits on the subject, advising the rest of the corporation, responding to the requirements of the Spanish Data Protection Agency (AEPD [Agencia Española de Protección de Datos]) or dealing with exercise of rights requests that any citizen may ask of Aena. The point of contact with the Central Data Protection Unit is via email at ocpd@aena.es, and with the Data Protection Officer, who has the highest responsibility in ensuring effective compliance with the regulations in question, at the following address: dpd@aena.es

London Luton Airport has its own Data Protection Officer.

⁵⁷ It includes Aena, ADI and SCAIRM.

⁵⁸ In 2021, Aeroportos do Nordeste do Brasil approved the Information Security Policies, Information Privacy Policy for facility users, customers, suppliers and the Aena website and the Information Privacy Policy for personnel of collaborating companies, aligned with those of Aena. Links to these policies can be found in the 'Appendix – Links and links of interest' of this document.

For its part, the London Luton Airport has an IT Security Policy, a Data Protection Policy, the Privacy Policy for Customers available at Privacy Notice – London Luton Airport (london-luton.co.uk), Policy of disclosure to third parties, and privacy policy of the website. Links to these policies can be found in the 'Appendix – Links and links of interest' of this document.

DATA PROTECTION AND PRIVACY COMPLIANCE MODEL			
Code of Conduct: collects respect for the fundamental right to data protection and privacy			
Formal commitment to the highest level			
Information Security Policy			
Approved by	Board of Directors		
Available on	Corporate website for all users		
Main features	It includes, among other things, the principles to ensure compliance with the regulations on data protection and privacy in all jurisdictions where it carries out its activity; as well as to guarantee the rights and freedoms of all interested parties (clients, users, employees, etc.). Defines the mode of access, use, custody and safeguarding of computer assets, always guaranteeing the integrity, confidentiality, availability, authenticity and specific traceability of Aena's critical information systems.		
Set of procedures, guides and measures			
They are applicable to directors and employees, as well as to all individuals and companies that are related to the Company, to ensure that all information assets are properly protected, limiting their use for the purpose of the processes for which they are intended and guaranteeing controlled access to them.			
Mechanisms to inform data subjects of the privacy of their data.			
	Employee Data Privacy Policy	Privacy policy for users of the facilities, websites and App	Privacy policy for personnel collaborating companies
Available on	Corporate intranet for Aena employees	Corporate website for all users, suppliers and customers	Corporate website, for all employees of collaborating companies
Main features	<ul style="list-style-type: none"> • They include information about: <ul style="list-style-type: none"> • Who is responsible for the processing of personal data • Nature of the data processed; • Purposes for which the personal data will be used • How to exercise the rights of access, rectification, deletion, opposition, limitation of processing, portability, exclusion and if not subject to automated individual decisions • Retention period of the data • Who the data is communicated to (disclosure to third parties) • Data security measures; • Mechanisms established so that the user can escalate issues related to data privacy, such as how to contact the Data Protection Officer 		

Measures to guarantee privacy. Risks⁵⁹

At the time of collection of personal data from the different data subjects, they are informed of the processing of their personal data through the corresponding information clauses and/or privacy information policies already indicated, and it is guaranteed that such data will only be used for the reported purposes and during the defined storage periods

Aena follows a model of 'privacy by design', according to which the protection of personal data is taken into account from the first stages of the manufacture of any product or service. On this basis, a series of safety measures are incorporated based on the risk. To this end, a risk analysis methodology has been defined that affects the privacy of personal data, as well as a methodology for conducting the corresponding Impact Assessments on data protection. In this way, when a new product or service is created or manufactured that involves the processing of personal data or in the event of significant changes in an existing processing, there is the participation of the Central Data Protection Unit or the Data Protection Officer, by performing the corresponding treatment analysis, including privacy risks and if applicable in accordance with regulations,

the corresponding Privacy Impact Assessment, which are reviewed periodically, by entering a continuous improvement cycle.

Measures to ensure compliance with regulations – Audits

Through an 'in situ' internal audit and review programme, the degree of compliance with data protection regulations is checked and, where appropriate, the deficiencies are detected and remedied.

During 2021, a total of four 'on-site' reviews were carried out, with 32 deficiencies being detected⁶⁰, and the action plan resulting from the review carried out in 2020 by the Internal Audit Division, which provided for a total of 24 corrective actions, with 22 being implemented and two pending due to their technical implications.

Corporate culture in matters of personal data protection

In order to promote corporate culture in the field of personal data protection, in the field of training, more than 4,253 employees took an online course in the field

of data protection during 2021⁶¹. Similarly, monthly video conferences are held with Data Protection Coordinators from Airport Groups, where the Data Protection Officer presents the most relevant issues that occurred during that period, and questions and queries raised by the Coordinators are resolved. In 2021, a total of 12 took place⁶². Bulletins on data protection have also been distributed on a monthly basis, distributing a total of 11 bulletins in 2021.

In turn, employees have a multitude of materials and general information about it (disclosure plans, as well as many of the procedures and guidelines), available through the data protection portal published on the intranet. Internal communications have also been made in Aena Brasil in this regard.

In 2021, no personal data security breaches were detected, and all Spanish Data Protection Agency requirements were met. There were no breaches of data protection regulations⁶³.

⁵⁹ Risks relating to data protection and cybersecurity are included among the so-called 'legal and compliance risks', as set out in the Company's Risk Management and Control Policy. As for their governance, supervision and review model, as it is incorporated in the Company's Risk Map, it is subject to the same governance model as the rest. The Board of Directors defines, updates and approves the Risk Control and Management Policy implemented in Aena and establishes the acceptable risk level. Subsequently, and supervised by the Audit Committee, the Aena Management Committee updates the risk map annually based on the monthly information provided by the different corporate management departments.

⁶⁰ Information relating to Spain. At Aeroportos do Nordeste do Brasil, to date, no internal audit has been conducted on data protection.

At London Luton Airport, despite being planned, until November it could not be started due to COVID-19 (still in process).

⁶¹ Data relating to Spain. At London Luton Airport, new employees receive training on this and other subjects at the start of their activities.

⁶² Data relating to Spain. At Aeroportos do Nordeste do Brasil, a workshop was held in which all of the participants involved participated and the training programme in the field is planned to begin in 2022. At London Luton Airport, the Data Protection Officer meets at least every three months with the department managers.

⁶³ In the event of a violation, in Spain, the Aena Code of Conduct establishes that breaches of data protection may lead to the application of disciplinary sanctions in accordance with labour legislation.

At Aeroportos do Nordeste do Brasil, work is being done on the implementation of the information security project for the acquisition of systems and equipment with the aim of identifying attacks and possible vulnerabilities, as well as identifying users and access controls.

Data Protection Indicators

	AENA S.M.E., SCAIRM AND ADI	LONDON LUTON AIRPORT	AENA BRASIL	TOTAL
Total identified cases of customer data leaks, thefts or losses (No.)	0	1 (less)	0	1 (less)
Violations of the data protection regulations and notified to the user	0	0	0	0
- Breaches of personal data	0	0	0	0
Affected customers (No.)	0	0	0	0
Claims received by third parties and corroborated by the organisation in data protection material (No.)	0	0	0	0
Claims from regulatory authorities on data protection material (No.)	3	* 64	0	3

⁶⁴ A total of 3/4 complaints were received regarding subject access requests and a complaint from the Information Commissioner Officer (ICO), for the direct management of the same from the Airport itself with the complainants involved. No other measure was taken.

1.3. Fiscal transparency

(GRI 207-1; 207-2; 207-3)

Fiscal approach

The determination of the Tax Strategy⁶⁵, based on the values of transparency, integrity and prudence, constitutes a non-delegable power of the Board of Directors and is intended to define the approximation of tax matters, in a manner consistent and aligned with the group's strategy⁶⁶.

Tax governance

Formally, via the Corporate Tax Policy, Aena undertakes to follow the recommendations of the codes of good tax practices that are implemented in the countries in which it develops its activity, or those developed by Group companies controlled by the Company, including the OECD Principles of Corporate Governance.

Among the competencies of the Audit Committee is the review and supervision of corporate policies, including those related to fiscal transparency, and procedures to prevent inappropriate conduct, such as those related to tax matters⁶⁷.

Every six months, the head of the Finance Department reports to the Board of Directors on the company's related-party transactions, and at least twice a year, coinciding with the drawing up of Annual Accounts and

with the submission of Corporate Tax, informs the Board of Directors of the tax policies applied, as well as the operations with relevant fiscal impact⁶⁸.

Likewise, the recently created Sustainability and Climate Action Committee has among its powers to be aware of, promote, guide and supervise the objectives, action plans, practices and policies of the Company in environmental and social matters, ensuring that such policies identify and include, at least, the principles, commitments, objectives and strategy in relation to fiscal responsibility, among others.

Aena considers it fundamental to respect and adequately comply with the obligations established and the commitments assumed in the tax matter in order to achieve the SDGs.

The principles of action of the Sustainability Policy, which take as reference the principles set forth in the United Nations Global Compact and the Sustainable Development Goals, include ensuring the application of the responsible tax principles and practices according to the fiscal policy and the Code of Conduct of the Company.

Risk control and management

The risk map of the Organisation identifies fiscal risks among the so-called 'legal and compliance' risks, and therefore the same governance, oversight and review model applies to them as to all other risks. In other words, the Board of Directors defines, updates and approves the Risk Control and Management Policy implemented in Aena and establishes the acceptable risk level. Subsequently, and supervised by the Audit Committee, the Aena Management Committee updates the risk map annually based on the monthly information provided by the different corporate management departments.

With regard to the mechanisms for reporting concerns related to unethical or illegal conduct and the integrity of the organisation in relation to taxation, through the Complaints Channel, any type of reporting can be made that reveals irregular behaviours that may imply the commission of an act contrary to the law, to the company's policies and procedures or to the standards contained in the Code of Conduct, among themselves, tax obligations.

⁶⁵ The Tax Strategy can be consulted at <https://www.aena.es/en/shareholders-and-investors/financial-and-economical-information/tax-transparency/fiscal-strategy.html>

⁶⁶ Said Strategy is subject to annual review. However, since its approval, only small wording adaptations have occurred.

⁶⁷ The Chairman of the Audit Committee informs the Board of the aspects addressed at the different Committee meetings, including, if applicable, the aspects related to the Company's tax contribution.

⁶⁸ In 2021, they were reviewed on two occasions.

Participation of stakeholders and management of tax concerns

Aena manages fiscal matters in a transparent, proactive and responsible manner with all stakeholders⁶⁹, for the purpose of complying with the tax legislation of each country where Aena operates, minimising reputational risk, and making its activity compatible with the creation of value for the shareholder and other stakeholders.

Specifically, the Company actively participates in clusters and reference work groups in matters of good governance, dealing with responsible tax management and sharing best practices, among other matters. In this sense, the company, within the Code of Good Practices, participates in different forums with the Tax Agency and with other third parties in order to reinforce its fiscal transparency.

With regard to cooperation with tax administrations, as included in the Corporate Tax Policy, the Group will maintain a relationship with Tax Authorities based on the principles of transparency, mutual trust and good faith, providing the information and documentation of fiscal relevance that is requested in the shortest time possible and with the appropriate scope, provided that it is reasonable.

Likewise, through this policy Aena undertakes to collaborate with the Tax Authority in the possible inspection procedures in order, to the extent possible and without undermining good business management

and the legitimate right to disagree in case of controversy, to reach agreements and conformity therein.

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

1.3.1. Tax paid^(*) ^(**)

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

The Aena Group tax contributions for the fiscal year 2020 amounted to €285.0 million. Taxes borne amounted to €267.3 million, the most important being taxes associated with property, which totalled €139.8 million. The tax contribution in the 2020 financial year is distributed between the €16.1 million of taxes paid in the United Kingdom, (5.7% of the total), the €258 million in Spain (90.5% of the total), and 10.8 in Brazil (3.8%).

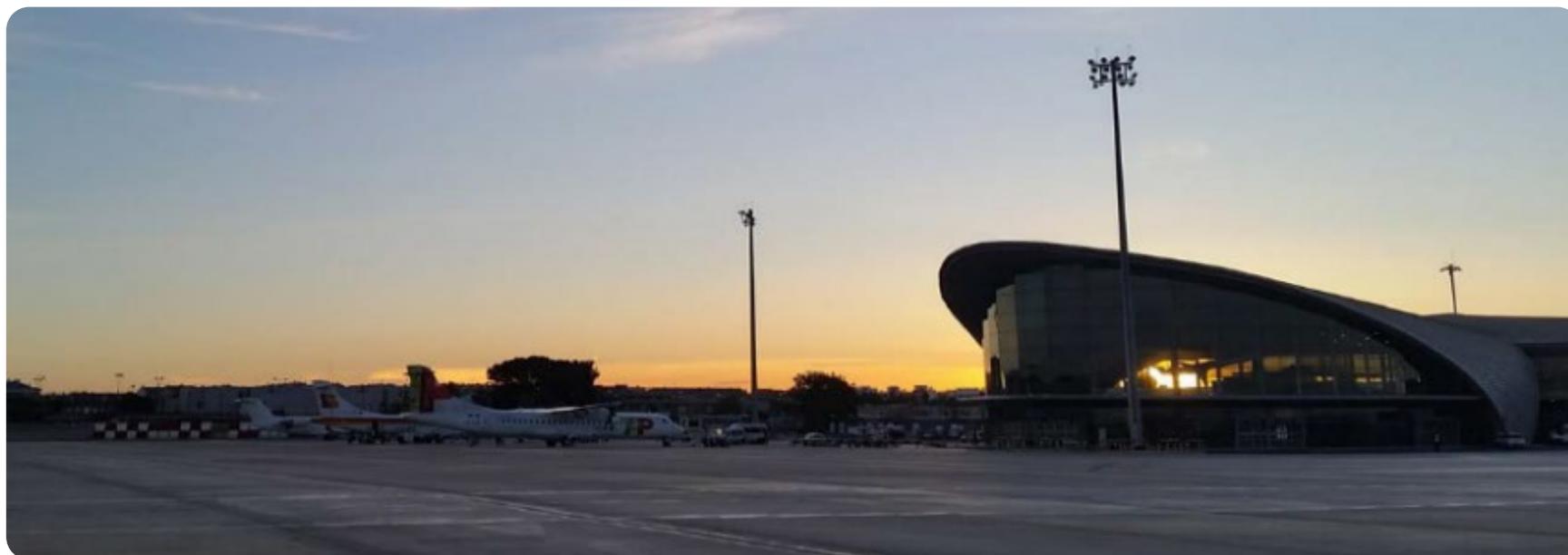


⁶⁹ Through the communication and dialogue mechanisms described in the 'Relationships with Stakeholders' section contained in the 'Document approach', Aena actively communicates with all of its stakeholders to deal with all matters that it considers relevant, including, where appropriate, those related to the Company's tax and fiscal practices.

(GRI 201-4; 207-4)

Tax jurisdictions where Aena has shares	Revenue from intragroup transactions with other tax jurisdictions 2021	Pre-tax profit 2021	Taxes withheld and paid on behalf of employees	Taxes collected from customers on behalf of a tax authority	Significant uncertain tax positions	Intra-company debt	Corporate tax paid (cash received basis) 2021	Tax on profits/losses for companies for fiscal year 2020 (exclude deferred tax on profits and provisions for uncertain tax positions)	Other taxes or payments to governments
SPAIN	8.6	-40.5	164.0	-56.7	-	16	-	-44.0	150.7
UNITED KINGDOM	-	-63.7	2.9	6.5	-	-	0.3	-3.4	6.4
BRAZIL	-	-92.7	4.0	6.2	-	-	0.6	-31.5	-

- All data relating to Aena's tax contribution have been included in the Annual Accounts, and are therefore verified by an external auditor.
- With respect to public grants received by Aena, the detail can be consulted in the Annual Accounts.



1.4. Sustainability: pillar of Aena's management

(GRI 102-14; 102-18; 102-19; 102-20; 102-23; 102-24; 102-26; 102-32; 102-43)

Aware more than ever of its role as an economic and social engine, and of the influence and impact that the Organisation can exercise in the areas in which it operates, in 2021 Aena presented its Sustainability Strategy 2021–2030⁷⁰.

A cross-divisional strategy across all areas of the Company, especially designed to meet the big challenges and mega trends of ESG, and aligned with the Sustainable Development Goals (SDGs) of the 2030 Agenda of the United Nations.

A Strategy through which Aena puts the necessary mechanisms and tools to face the greatest successes of its main risks, opportunities and ESG challenges.

To ensure its effectiveness and start-up, the Company develops and implements all the necessary tools and mechanisms and configures its governance model around this priority.

London Luton Airport has a Responsible Business Strategy, based on 6 key areas, whose progress is evaluated periodically. In addition, a sustainability committee was created in 2021.

1.4.1. Sustainability Policy

The Board of Directors has formalised its commitment to corporate responsibility and sustainability through the new Sustainability Policy, approved in 2021.

It thus becomes the internal framework of reference, with which Aena reaffirms the orientation of its activity towards the creation of long-term value for all its stakeholders, ensuring that its activity is developed in accordance with a set of values, principles, criteria and attitudes that promote sustainable social and environmental development, and promote the implementation and development of its ethical principles based on integrity and transparency.

To this end, the Policy defines and establishes the principles, commitments, objectives and strategies to be followed, as well as the supervision and control mechanisms.

1.4.2. Governance of Sustainability

(GRI 103-2; 102-31)

In addition to formalising the Organisation's commitment to sustainability at the highest level, the Board of Directors has among its powers to guide and control the strategy, objectives, risks and results in matters related to sustainability, as well as to carry out the monitoring and reporting of the Strategy.

In addition, and to ensure its correct materialisation and start-up, a specific Committee has been created, the Sustainability and Climate Action Committee to, among others, review and ensure compliance with it and support the Audit Committee in the supervision of risks in terms of sustainability⁷¹.

In addition, to coordinate the different cross-divisional areas in the deployment of the Strategy and support its implementation, an internal work group has been implemented. In this context, active and direct involvement of all areas and employees is essential.

Finally, Aena created the role of Chief Green Officer, with the aim of making sustainability a fundamental element in the company's decision-making and strengthening commitment in this area with all stakeholders.

Aena assumes the main international reference frameworks promoted by the United Nations for sustainable management. Thus, it maintains a firm commitment to the Ten Principles of the Global Compact, the Guiding Principles on Business and Human Rights and the Seventeen Sustainable Development Goals.

⁷⁰ The Aena Climate Action Plan is part of the Strategy.

⁷¹ London Luton Airport created a Sustainability Committee in November 2021.

SUSTAINABILITY STRATEGY 2021-2030

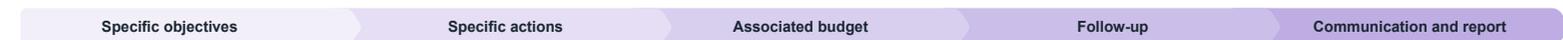
- Decarbonisation and reduction of pollution**
- Responsible management of resources (water, energy, promotion of the circular economy, etc.)**
- Impact on the natural environment (biodiversity, noise)**
- Commitment to the local community (noise, protection of human rights, most vulnerable groups)**
- Protection, care and management of internal talent**

SUSTAINABLE GOVERNANCE

 Approval	<p>Board of Directors</p> <ul style="list-style-type: none"> Approves, promotes and deploys the Sustainability Policy. Guidance and control of the strategy, objectives, risks and results in matters related to sustainability. Implementation of a remuneration model that includes the achievement of sustainability objectives. Provide support to the Audit Committee in the process of supervising the risk management system, ensuring the identification, management and communication of the main risks within the planned levels. Monitoring and reporting on the Sustainability Strategy. 	
 Monitoring and evaluation	<p>Sustainability and Climate Action Committee</p> <ul style="list-style-type: none"> Be informed of and drive, steer and monitor the objectives, action plans, practices and policies of the Company in environmental and social matters. Evaluate and verify the performance and compliance with the environmental and social strategy and practices. Support the Audit Committee in risk supervision in the field of sustainability. Support and supervise Aena's contribution to the achievement of the SDGs. Review, prior to its approval by the Board of Directors and subsequently, supervise compliance with the Climate Action Plan. Promote a coordinated strategy for social action, sponsorship and patronage consistent with the Company's policies. 	<p>Quarterly meeting to ensure periodic follow-up</p>
	<p>Chief Green Officer</p> <ul style="list-style-type: none"> Make sustainability a fundamental element in decision-making. Enhance commitment in this area with all stakeholders. 	
 Coordination and support	<p>Internal workgroup</p> <ul style="list-style-type: none"> Coordination of business areas for the deployment of the strategy. Support for the Sustainability and Climate Action Committee. 	<p>Periodic review of actions</p>
 Implementation	<p>Management of Innovation, Sustainability and Customer Experience</p> <p>General Corporate Secretariat</p> <p>Organisation and Human Resources Management</p> <p>All organisational areas and employees with direct and active involvement in the actions.</p>	<p>Commissioning and development</p>

EXPLICIT COMMITMENT TO SUSTAINABILITY

Sustainability Policy	Sustainability Strategy: 5 Strategic Programmes
<ul style="list-style-type: none"> Guarantee the quality and environmental management Fight against climate change; analysis and management of risks and opportunities Minimise environmental impacts Ensure the development of social policies (human rights, diversity, equality of opportunities) Respect and promote human rights and absolute opposition to modern slavery Provide a safe and healthy working environment 	<ul style="list-style-type: none"> Ensure equal opportunities and non-discrimination Provide value in the geographical areas in which it operates. Contribute to social well-being and to the improvement of quality of life Application of responsible tax principles and practices Promote innovation and continuous improvement Promote the principles of transparency, integrity and business ethics Establish channels of communication, participation and dialogue with stakeholders Guarantee accountability
<ul style="list-style-type: none"> Carbon neutrality Sustainable aviation Responsible use of resources Sustainable community and value chain Social commitment 	



1.4.3. Features of the Sustainability Strategy

The 2021–2030 Sustainability Strategy is composed of 5 strategic programmes with which to respond to some of the main ESG challenges identified. These programmes are developed in 16 lines of action, aligned with the SDGs, which in turn are deployed in projects and actions, and are specified in a series of goals.

To assess their evolution, specific quantitative objectives and KPIs have been determined that will be

reported periodically.

The Sustainability Strategy maximises collaboration with third parties through work groups and joint projects that allow minimising the impact of the Organisation on the environment

This new roadmap, whose associated investment, is close to €750 million⁷², provides consistency to the sustainable performance of the Organisation. The Strategy includes both its own actions and those that involve third parties in its development, positioning the

Organisation as a tractor of the industry in sustainability.

Gradual compliance with the Sustainability Strategy has an impact on the remuneration of the workforce. Likewise, the objectives set will be reviewed annually in order to promote and encourage the achievement of all the goals set.

The Company links the achievement of the Sustainability Strategy to the variable remuneration of employees

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

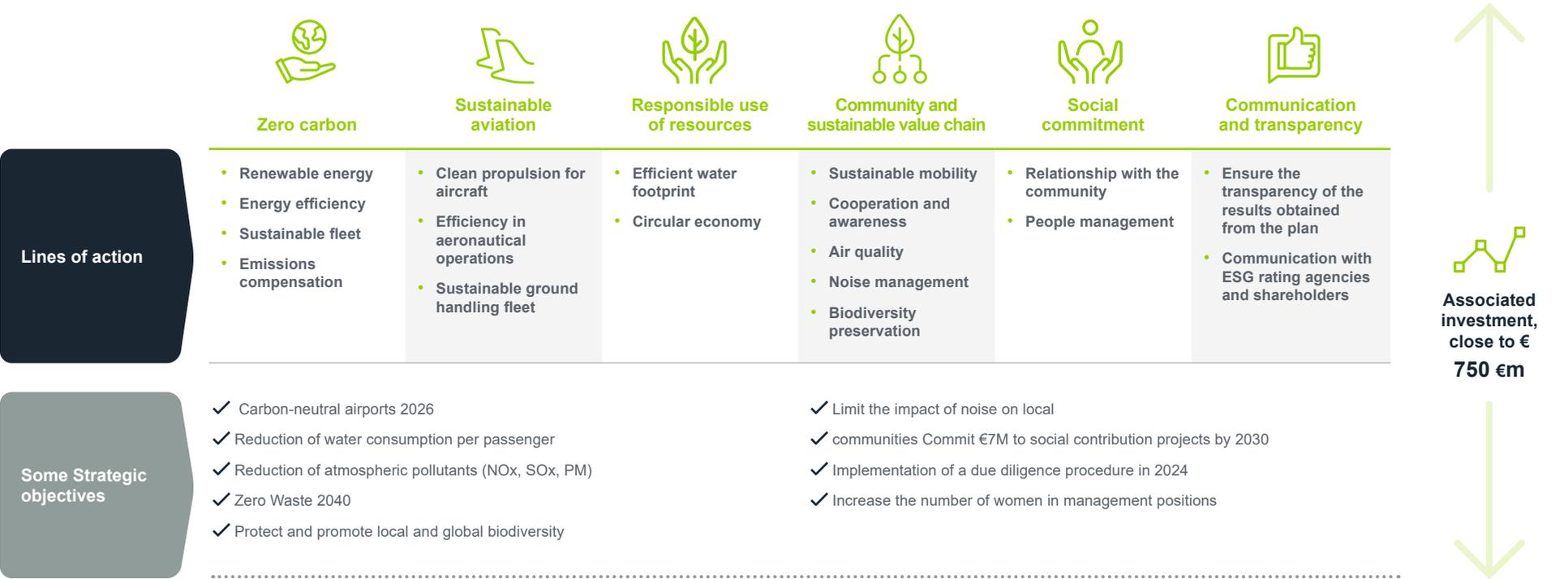
Being a responsible business makes us a better business

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



⁷²Total economic budget of the Strategy for the period 2021–2030.

STRATEGIC PROGRAMMES



Note: The details of the Sustainability Strategy 2021-2030 can be consulted on the Aena website. Likewise, the NFIS details and describes the different lines of action and the corresponding objectives (see Chapters 2, 3 and 5)

1.4.4. Contribution to the Sustainable Development Goals

Since its approval in 2015, the SDGs have been key elements for Aena, fundamental inputs for the identification of mega trends and ESG challenges.

In 2021, with the approval of the Sustainability Policy and the formulation of the new Strategy, these

objectives have strengthened, if possible, their prominence in the Organisation.

The SDGs constitute one more element of their business management, with their corresponding monitoring measures, capable of guaranteeing that the policies include the three dimensions of sustainable development—social, environmental and economic—and of providing evidence for an effective assessment of the advances of the contribution.

Aena takes them as a reference to formulate and align its framework for action, being more aware than ever of the importance that companies have in the achievement of these Objectives.

The Aena Board of Directors assumes the commitment of the Organisation to the SDGs

Objectives and strategic benefits	SDGs	Outstanding actions and achievements	Report section
<p>Decarbonisation and fight against climate change</p> <p>Evolve towards a more sustainable model by implementing specific actions such as the use of low-emission energy sources, the evolution towards clean means of displacement, the use of sustainable aviation fuels, among others, working collaboratively with stakeholders.</p> <ul style="list-style-type: none"> Reduce the Organisation's carbon footprint by contributing to the mitigation and adaptation to climate change. Following the TCFD guidelines, carry out the analysis of risks and opportunities for climate change and know the impact of climate change on the Organisation. Comply with decarbonisation commitments and act as a tractor of other agents in the aviation sector to accelerate the fight against climate change. 	   	<ul style="list-style-type: none"> Sustainability Strategy and Climate Action Plan. Purchase of 100% of renewable energy in 2020 and 2021. Level 3 of the ACA programme at Adolfo Suárez Madrid-Barajas Airport and Barcelona-El Prat Josep Tarradellas Airport Inclusion of quantified environmental criteria in procurement specifications. 66.2% reduction in own CO2e emissions in the Spanish network (base year 2019) 95,419 t of CO2e emissions avoided due to the Company's own renewable energy facilities and energy efficiency, as well as to the purchase of electrical energy from a renewable source New photovoltaic plants in self-supply at 3 Canary Island airports. ACA: Level 3 Adolfo Suárez Madrid-Barajas and Barcelona-El Prat Josep Tarradellas airports, Level 2 Málaga-Costa del Sol, César Manrique-Lanzarote and Palma de Mallorca airports and Level 1 Alicante-Elche, Santiago-Rosalía de Castro and Menorca airports. Promotion of the use of a sustainable vehicle to access airports through a 15% discount for passengers who park their vehicle with an environmental 'zero emissions' mark in the airport parking lots. 	<p>Commitment to the environment Social management of our value chain Innovation Responsible governance</p>
<p>Protecting the environment and efficient use of resources</p> <p>Minimise the environmental impact of operations and reduce their footprint through actions, objectives and goals aimed at reducing atmospheric pollution, water consumption and waste generated.</p> <p>Protect the biodiversity and natural wealth of the environment in which the Organisation operates.</p> <ul style="list-style-type: none"> Develop a water management that addresses the loss of water availability and quality and carry out an integrated management of water supply sources and risks derived from climate change. Reach Zero Waste by 2040. Comply with the emission reduction commitments of the European programme to reduce the negative impact on the health of air pollution through innovative solutions. Limit the impact of noise on local communities. Protect and promote local and global biodiversity. 		<ul style="list-style-type: none"> Sustainability Strategy. Strategic plan for water management. Calculation of water footprint. Promote the maximisation of recycling and minimise the volume of waste generated. Encourage collaboration and awareness in the circular economy. Air quality action line that covers emissions generated by own operations and by third parties. Implementation of three new Sound Insulation Plans at César Manrique-Lanzarote, Tenerife Sur and Vitoria airports. 25,711 isolated homes in the period 2000–2021 with an associated amount of €340,327,204. Approval of the Aeronautical Easements of César Manrique-Lanzarote Airport, Tenerife Norte-Ciudad de La Laguna Airport and Tenerife Sur airports. Initiatives at airports to protect local fauna. 	

Objectives and strategic benefits	SDGs	Outstanding actions and achievements	Report section
<p>Relationship with the community</p> <p>Promote and exchange cultural values, participation in the community and contribution to social welfare.</p> <p>Promoting a positive impact on the environment, in order to actively contribute to the creation of more inclusive and sustainable cities in the areas where Aena operates, and mitigate possible negative impacts.</p> <ul style="list-style-type: none"> Contribute to the development of the community in which the Organisation operates. Ensure respect for human rights throughout the Organisation and compliance with current regulations and best practices. 	  	<ul style="list-style-type: none"> Aena with music. Aena Project with Research. Agreements with universities. Inclusion of social clauses in procurement specifications. 'Aena with Autism' project. Updating the Human Rights Policy. €50,000 to help La Palma. 	<p>Safe, quality services Commitment to society and human rights Innovation</p>
<p>Innovative and safe infrastructures that promote diversity and social inclusion and sustainable use modalities</p> <p>Innovative, safe and quality services to ensure cohesion and connection throughout the territory and transport, ensuring the protection of all users and employees of airport facilities.</p> <ul style="list-style-type: none"> Encourage the use of air transport by providing a safe and quality service, ensuring accessibility for all. Ensure the security and protection of all users of the Organisation's facilities and services and minimise any type of risk arising from a failure. 		<ul style="list-style-type: none"> Almost 750,000 PRM assistances (Aena, AIRM, London Luton Airport and ANB). €14.8 million allocated to R&D&I. Use of electric vehicles on runways, and installing quick charging points. Implementation of Aena Maps at more airports. Approval and deployment of the Strategic Innovation Plan 2021–2025. Start-up of the first edition of Aena Ventures, the Aena Start-up acceleration programme. More than 11,050 ambulance flights. Facial recognition pilot tests at all steps of the airport process: enrolment (at home or at the airport), baggage check-in, access to the security filter and boarding access. 	
<p>Strengthen alliances to achieve common sustainable objectives</p> <p>Providing solutions to global challenges thanks to everyone's collaboration. Recognising the importance of alliances, communication and transparency as tools for raising awareness and achieving our goals. Contribute with these alliances to reduce inequality.</p> <ul style="list-style-type: none"> To jointly face the challenges facing the Company by sharing best practices with third parties. Improve dialogue and communication with all stakeholders. 	 	<ul style="list-style-type: none"> 100 agreements with associations in 2021 €3,032,521.6 in contributions to non-profit Foundations and entities and €212,851.6 in contributions by London Luton Airport Policy of Relationship with stakeholders Updates to the Anti-Corruption and Fraud Policy and Regulatory Compliance Continuous coordination and contact with the Ministry of Health, law enforcement bodies and security forces, and other agencies to offer the best service Landing pages and specific platforms to improve stakeholder relationships 	<p>Sustainable governance model Safe, quality services</p>

Objectives and strategic benefits	SDGs	Outstanding actions and achievements	Report section
<p>Economic and sustainable growth and people management</p> <p>Generate diverse, safe and attractive work environments, in which employee care, development and training are priority objectives.</p> <ul style="list-style-type: none"> • Encourage diversity, inclusion and non-discrimination. • Promote the retention and attraction of employees/talents. • Increase the motivation and <i>engagement</i> of employees. • Guarantee the health and safety of employees and improve accident rates. 	    	<ul style="list-style-type: none"> • Equality Plan. • 36.6% of the Company's employees in 2021 are women. • 44.2% of executive, middle management and graduate positions are occupied by women. • Employer Branding Project. • Promotion of work-life balance • Telecommuting policy – remote work. • Work Disconnection Policy. • 1.5% employees with functional diversity. • Call for integration into the labour market or job creation actions to be undertaken by social entities, foundations or associations: €100,000/year. • LGBTI Diversity and Inclusion Business Network. • Adaptation of workplaces to ensure hygiene, ventilation and social distancing measures. • Provision for each employee of personal protection kits – Perform diagnostic tests. • Psychological support. • Wage gap below 2% in Spain. 	<p>Staff and social issues Social management of our value chain Commitment to society and human rights</p>

1.5.- Sustainable financing. Taxonomy

In order to seek financing alternatives that provide added value to society and the environment, and incorporating ESG factors into its financing decisions,

Aena currently has several financing instruments linked to the Company's sustainable commitments⁷³.

	Start date (*)	Product characteristics	ESG Score Provider
Sustainable Syndicated Credit Line for the amount of €800 Million	2018	The economic conditions of this 'revolving' credit line, which acts as a contingency line, are linked, in addition to the credit rating, to the ESG adjustment, based on the evolution of sustainability parameters, linked to Aena's ESG performance, which is evaluated by an external ESG supplier.	
Loan agreement with Intesa Sanpaolo for the amount of €500 million	2021	The economic conditions of the loan are linked, in addition to the ordinary interest rate ⁷⁴ , to the ESG adjustment, based on the evolution of sustainability parameters, linked to Aena's ESG performance, which is evaluated by an external ESG provider	
Loan Agreement with ICO for the amount of €250 million	2021	The economic conditions of the loan are linked, in addition to the ordinary interest rate ⁷⁵ , to the ESG adjustment, based on the evolution of sustainability parameters, linked to Aena's ESG performance, which is evaluated by an external ESG provider	

(*) Effective as of the date of this report

⁷³ Information on the amounts drawn down and their costs in 2021 can be consulted in the Company's Annual Accounts.

⁷⁴ Or, if applicable, a main or a subsidiary substitute.

⁷⁵ Or, if applicable, a main or a subsidiary substitute.

Taxonomy of sustainable finances

In July 2020, *Regulation (EU) 2020/852* entered into force, also known as Regulation on Taxonomy. By virtue of this, specifically its article 8, any company required to publish non-financial information in accordance with *Directive 2014/95/EU (NFRD)* and its corresponding regulation of transposition into the Spanish national legislation of *Act 11/2018*, must include in their Non-Financial Information Statement (NFIS) information on the way and the extent to which the company's activities are associated with economic activities that are considered environmentally sustainable in accordance with the Taxonomy system that it establishes.

In order to develop and more precisely specify the reporting obligation regarding the taxonomy of article 8, in July 2021, the Commission adopted the *Delegated Act (EU) 2021/2178*, which in its article 10.1, imposes a reporting obligation in 2022 different to that for 2023 and future years.

Therefore, in accordance with the disclosure obligation set out in article 8 of *Regulation (EU) 2020/852* and in accordance with the specifications of *Delegated Act (EU) 2021/2178*, Aena will disclose, for the 2022 Taxonomy report (based on data from the 2021 fiscal year): *the proportion of eligible and ineligible economic activities according to the taxonomy⁷⁶ in its total turnover, its investments in fixed assets, its operating*

expenses and the qualitative information referred to in section 1.2 of Appendix I of the applicable Delegated Act (EU) 2021/2178.

Qualitative information corresponding to Section 1.2 of Appendix I of the Delegated Act (EU) 2021/2178

Accounting policy

Aena's accounting policy is detailed in note 2 of the consolidated report for the fiscal year 2021. Regarding this, the Group's consolidated annual accounts have been prepared in accordance with the International Financial Reporting Standards adopted by the European Union (IFRS-EU, hereinafter the 'IFRS') and the IFRIC interpretations in force at 31 December 2021, as well as the commercial legislation applicable to companies that prepare financial information in accordance with the IFRS to show fair presentation of the consolidated equity and consolidated financial position of the Group at 31 December 2021, the consolidated results from its operations, consolidated changes in equity and consolidated cash flows for the fiscal year ended on that date.

The figures contained in the documents comprising the consolidated annual accounts, the consolidated statement of financial position, the consolidated income statement, the consolidated statement of other comprehensive income, the consolidated statement of

changes in equity, the consolidated statement of cash flow and the notes, are expressed in thousands of euros, which is the functional and presentation currency of the Parent Company, unless otherwise indicated and rounded to the nearest thousand. The use of rounded figures may in certain cases lead to a negligible rounding difference in the totals or in the differences.

The preparation of annual accounts under the IFRS requires the use of certain critical accounting estimates. The management is also required to exercise its judgement in the process of applying the Group's accounting policies. Note 4 sets out the areas that involve a higher level of judgement or greater degree of complexity, or the areas where assumptions and estimates are significant for the consolidated annual accounts.

In this regard, the categories assigned to CAPEX and OPEX are:

- **Investments:** In Aena, a non-financial company that applies international financial reporting standards (IFRS) adopted by the European Union, investments will cover the costs that are accounted for according to:
 - a) IAS 16 Property, Plant and Equipment, paragraph 73, letter e), subsections i) and iii);
 - b) IAS 38 Intangible Assets, paragraph 118, letter e), subsection i);

⁷⁶ In accordance with the activities contained in Appendices I and II of the *Delegated Act (EU) 2021/2139* enacted to develop objectives 1 (mitigation of climate change) and 2 (adaptation to climate change) of Regulation (EU) 2020/852.

- c) IAS 40 Investment Property, paragraph 76, letters a) and b), (for the fair value model);
- d) IAS 40 Investment Property, paragraph 79, letter d), subsections i) and ii) (for the cost model)
- e) IFRS 16 Leases, paragraph 53, letter h).
- **Operating expenses:** Includes non-capitalised direct costs related to research and development, building renovation measures, short-term leases, maintenance and repairs, as well as other direct expenses related to the daily maintenance of assets of property, plant and equipment by the company or a third party to whom activities are subcontracted and which are necessary to ensure the continued and effective operation of such assets.

Information on the evaluation of compliance with Regulation (EU) 2020/852

Aena's main activity is airport management, which includes all services related to airport traffic and air transport, such as: real estate services related to hangars and workshops for aircraft, management and access to vehicle parking, passenger services and transport companies, etc., that is, all those necessary for airport management.

Both Appendix I (mitigation) and Appendix II (adaptation) of the *Climate Delegated Act* only include one activity related to Aena's main activity, which is number 6.17: *Low-carbon airport infrastructure* described as the "construction, modernisation, maintenance and operation of infrastructures necessary for operations with zero CO2 emissions

(exhaust emissions) of aircraft or for the operations of airports, as well as for the fixed supply of electricity and air conditioning on the ground to parked aircraft".

Given that Aena's main activity, which is airport management, is not completely aimed at reducing emissions, as required by the literal wording of section 6.17, it is understood that it cannot currently be categorised within this activity, and therefore is not reportable under the taxonomy.

This is why Aena's main activity, airport management, will not be taken into account for the calculation of turnover, CAPEX and OPEX. However, Aena purchases products/services linked to eligible economic activities according to taxonomy that do not generate turnover, but do involve representative investments and operating expenses.

To identify these economic activities, Aena's financial information has been analysed at the airports in Spain, Brazil and Luton included in its network, classifying each of the company's economic items into an eligible or, on the contrary, ineligible activity. In this way, the numerator of each economic indicator has been assigned those amounts corresponding to investment items/expenses related to assets or processes associated with a specific eligible activity of the Taxonomy.

As a result of this analysis and classification exercise, the following taxonomic activities have been identified as eligible for Aena:

CATEGORY: Forestry

1.4 Conservation forestry

Under this activity, all expense items for conservation forestry have been categorised, as they consist of forest management projects that aim to preserve one or more habitats or species.

CATEGORY: Energy

4.1. Generation of electricity using photovoltaic solar technology

Under this activity, all investment items or expenses for the operation and maintenance of photovoltaic solar plants at several Aena airports have been categorised, which allow for an energy self-supply fee using renewable energies. The operation includes the installation of infrastructure, supply of necessary material and management of legal/administrative procedures.

4.3 Generation of electricity from wind energy

Under this activity, all expenses for the operation and maintenance of wind turbines have been categorised, which allow for an energy self-supply fee using renewable energies at various airports. The operation includes the installation of infrastructure, supply of necessary material and management of legal/administrative procedures.

4.9. Transportation and distribution of electricity

Under this activity, all investment items or expenses destined for the operation of electrical power distribution systems have been categorised.

CATEGORY: Water supply, sanitation, waste treatment and decontamination

5.3. Construction, expansion and operation of wastewater collection and treatment systems

Under this activity, all investment items or expenses aimed at the operation of wastewater collection and treatment systems have been categorised. The treatment also includes all those activities necessary for the process (chemical supply, water quality analysis...), as well as those intended for the maintenance of the equipment (cleaners, purification plants, osmosis, ETS...) and infrastructures (water networks, pipes...).

5.5 Collection and transportation of non-hazardous waste in fractions segregated at origin

Under this activity, the expenses for the collection and transportation of waste (segregated) from several airports to clean points have been categorised, in order to be treated for future reuse or recycling.

CATEGORY: Transportation

6.3 Urban and suburban transportation, road passenger transportation

Under this activity, the expenses for internal passenger transportation at airports have been categorised.

6.5. Motorcycle, passenger car and light commercial vehicle transportation

Under this activity, the investment items and expenses destined to the rental of transportation elements (as they involve the rental of vehicles classified in the M1 category) and the supply of electric passenger cars for several airports (as they involve the purchase of vehicles classified in the M1 category) have been categorised.

CATEGORY: Building Construction and Real Estate Development Activities

7.1. Construction of buildings

Under this activity, the investment items intended for the construction of buildings, which are expected to be leased to companies other than Aena (handling companies, goods transportation companies, among others...) have been categorised.

Under this activity, the investments destined to the construction of buildings used by Aena and its personnel have not been categorised, as the definition of this activity established by the taxonomy forces the new building, after its construction, to be sold or leased.

7.2. Renovation of existing buildings

The following have been categorised under this activity:

- The investment items and expenses destined for construction or civil engineering works at the terminal buildings of Aena airports that result in a total or partial renovation thereof.

- The investment items and expenses related to technical assistance of construction projects, Technical Assistance Drafting Project (ATRP [Asistencia Técnica Redacción Proyecto]) and Technical Assistance Project Management Control and Monitoring (ATDOCV [Asistencia Técnica Dirección de Obra Control y Vigilancia]), because they may be included in the part of the definition made by the taxonomy of this activity entitled '... preparation of such works'.
- The investment items and expenses related to the signage activity (in the building area), as signage is an activity included in NACE F43 (which the taxonomy associates with activity 7.2 in its definition).
- The investment items and expenses intended to perform acoustic insulation actions, as the acoustic insulation works are an activity included in NACE F43 (which the taxonomy associates with activity 7.2 in its definition).
- The investment items and expenses related to construction/works in car parks (which are located outside or inside a building), as all parking has been considered as part of the terminal area.
- The investment items and expenses related to works in hangars, warehouses, industrial area, etc., as these infrastructures are considered buildings.
- The investment items and expenses destined to perform civil works (in buildings), as the taxonomy itself includes this type of work in the definition of this activity.

- The investment items and expenses destined to the expansion of infrastructure/buildings, as these expansions will involve works and their end result will entail a renovation of the building.
- The investment items and expenses destined to the renovation and installation of gateways or boarding bridges, as they require carrying out works and activities in NACE F43 (which taxonomy associates with activity 7.2 in its definition).
- The investment items and expenses intended to perform building waterproofing actions, as waterproofing works are an activity included in NACE F43 (which the taxonomy associates with activity 7.2 in its definition).
- The investment items and expenses intended to the plumbing and painting activities in infrastructures/buildings, as these works are an activity included in NACE F43 (which the taxonomy associates with activity 7.2 in its definition).
- The investment items and expenses destined to the repair of buildings, not specific equipment, as these will involve at least small works and the performance of activities included in NACE F43 (wiring, carpentry, painting...)

The following have not been categorised under this activity:

- The investment items and expenses destined for the supply/installation of equipment that does not involve work as, despite being able to imply adjustments/adaptations to the infrastructures in some cases, they do not meet the criteria of the

definition for representing construction/civil engineering works to the building.

- The investment items and expenses destined for the acquisition of inventory material and small works and installations, as, in addition to assuming a supply of undetermined material, small works and installations, despite being able to imply adjustments/adaptations to the infrastructures in some cases, do not meet the criteria of the definition for representing construction/civil engineering works to the building.

7.3. Installation, maintenance and repair of energy-efficient equipment

The following have been categorised under this activity:

- The investment items and expenses associated with it for the supply and/or installation of energy efficiency equipment of all kinds, including LED lights, air conditioners, heating, covers and blinds that decrease solar radiation, etc., as well as the maintenance and repair of all of them.
- The investment items intended for the installation or replacement of light fixtures, as these will be LED (only in Spain). In this way, the same rationale has been followed for those expenses related to the supply of lighting, as this will be the LED type (only in Spain). Following the same line, the expenses related to the installation of lighting beacons for signalling have also been categorised under this activity because their lights are the LED type (only in Spain). It should

be noted that the investment items/expenses related to lighting in Brazil and Luton have not followed this classification criterion, as they are not always LED lights (then they cannot be considered energy efficiency equipment and are excluded from the analysis).

- The investment items and expenses related to the climate control of buildings (air conditioning, heating, roofs and blinds that decrease solar radiation), as these are considered energy efficiency equipment.
- The investment items related to runway works/renovations/repairs that include the supply/replacement/installation of LED light marking equipment have not been categorised under this activity due to the impossibility to differentiate in such items which monetary amount is allocated to the runway works/renovations/repairs and which amount is allocated to the supply/replacement/installation of LED light marking equipment.

7.4. Installation, maintenance and repair of electric vehicle recharging stations in buildings (and in parking spaces attached to buildings)

Under this activity, the investment items related to the installation, maintenance and repair of recharging points have been categorised, as they are recharging points for electric vehicles in the car parks of various airports managed by Aena.

7.5. Installation, maintenance and repair of instruments and devices to measure, regulate and control the energy efficiency of buildings

Under this activity, the investment items and expenses related to the supply, installation, maintenance and repair of systems/devices that measure, control and regulate the energy efficiency of buildings (such as water meters, electricity, air conditioning, etc.) have been categorised.

Specification of the key results indicators

Once the classification exercise explained in the previous section has been carried out, the economic indicators reflected in this report have been calculated (*proportion of total fixed assets and proportion of operating expenses related to assets or processes associated with eligible economic activities according to the Taxonomy*) as the numerator divided by the denominator following the provisions of points 1.1.2.1. and 1.1.2.2 of Appendix I of *Delegated Act (EU) 2021/2178*.

In this way, the following methodology has been used:

CAPEX Indicator

Numerator: The numerator is equivalent to the part of the investments in fixed assets included in the denominator that is related to assets or processes that are associated with eligible economic activities according to the taxonomy (*those classified in one of the taxonomic activities listed above*).

Denominator: This will include additions to tangible and intangible assets of the fiscal year considered before depreciations, amortisations and possible new valuations, including those resulting from revaluations and impairments, corresponding to the relevant fiscal year, excluding changes in fair value. The denominator will also include additions to tangible and intangible assets resulting from business combinations.

In this regard, the data corresponding to the denominator includes the following items included in the 2021 annual accounts:

- Note 6 - Additions of property, plant and equipment: €771,146
- Note 7 - Additions of intangible fixed assets: €2,248
- Note 6.3 – Additions of real estate investments: €1,969

OPEX Indicator

Numerator: The numerator will include the part of the operating expenses included in the denominator that is related to assets or processes that are associated with economic activities that conform to the taxonomy (*those classified in one of the taxonomic activities listed above*).

Denominator: The denominator will include non-capitalised direct costs related to research and development, building renovation measures, short-term leases, maintenance and repairs, as well as other direct expenses related to the daily maintenance of assets of property, plant and equipment by the company or a third party to whom activities are subcontracted and which are necessary to ensure the continued and effective operation of such assets.

In this regard, the data relating to the denominator corresponds to the consolidated figure of the 2021 annual accounts of €876,517,000, relating to 'other operating expenses'.

Contribution to multiple objectives

To respond to section 1.2.2.2 of Appendix I of *Delegated Act 2021/2178*, it should be emphasised that all activities identified as eligible for Aena are included both in Appendix I (corresponding to the mitigation of climate change objective) and in Appendix II (corresponding to the adaptation to climate change objective) of *Delegated Act (EU) 2021/2139*. Therefore, the final economic indicators that are expressed in this report and indicate *the proportion of eligible economic activities in investments in the company's fixed assets and operating expenses*, refer to activities that may potentially contribute to both objective a) *mitigation of climate change* and b) *adaptation to climate change*, of Article 9 of Regulation 2020/852.

INFORMATION TABLES

Quantitative summary of the economic indicators for the 2022 Taxonomy report (based on 2021 data).⁷⁷

CAPEX Table:**CAPEX Table**

Eligible economic activities according to Taxonomy	Codes	Absolute CAPEX	CAPEX of the activity			Total CAPEX of the eligible activity	Proportion of CAPEX eligible according to Taxonomy	Mitigation of climate change	Adaptation to climate change	Category: facilitating activity	Category: transition activity
			AENA, AIRM, ADI (Spain)	Aena Brasil	London Luton Airport						
Generation of electricity using photovoltaic solar technology	4.1		3,182,450	-	-	3,182,450	0.38%	Eligible	Eligible	N/A	N/A
Transportation and distribution of electricity	4.9		523,281	-	75,330.69	598,611	0.07%	Eligible	Eligible	N/A	N/A
Construction, expansion and operation of water collection and treatment systems	5.3		1,002,136	252	104,798.55	1,107,187	0.13%	Eligible	Eligible	N/A	N/A
Motorcycle, passenger car and light commercial vehicle transportation	6.5		454,860	-	-	454,860	0.05%	Eligible	Eligible	N/A	It may be transitional (if an economic activity of this category does not meet the criteria relating to a substantial contribution specified in letter a) of its specific section, that activity is a transitional activity).
Construction of buildings	7.1	845,363,000.00	2,354,806	-	-	2,354,806	0.28%	Eligible	Eligible	N/A	N/A
Renovation of existing buildings	7.2		209,686,968.00	910,803	2,163,090	212,760,861	25.17%	Eligible	Eligible	N/A	N/A
Installation, maintenance and repair of energy-efficient equipment	7.3		31,750,084	87,023	270,906	32,108,013	3.80%	Eligible	Eligible	If it meets the technical criteria	N/A
Installation, maintenance and repair of electric vehicle recharging stations in buildings (and in parking spaces attached to buildings)	7.4		1,754,181.35	-	-	1,754,181	0.21%	Eligible	Eligible	If it meets the technical criteria	N/A
Installation, maintenance and repair of instruments and devices to measure, regulate and control the energy efficiency of buildings	7.5		476,893	29,924	45,263	552,079	0.07%	Eligible	Eligible	If it meets the technical criteria	N/A
CAPEX of eligible activities according to Taxonomy			254,873,048.26								
% of CAPEX eligible according to Taxonomy							30.1%				
% of CAPEX not eligible according to Taxonomy							70%				

OPEX Table

⁷⁷ These tables are based on the templates of Appendix II of *Delegated Act (EU) 2021/2178*, which are mandatory for the report for 2023 and coming years.

OPEX Table

Economic activities eligible according to Taxonomy	Codes	Absolute OPEX	OPEX of the activity			Total OPEX of the eligible activity	Proportion of eligible OPEX according to Taxonomy	Mitigation of climate change	Adaptation to climate change	Category: facilitating activity	Category: transition activity
			AENA, AIRM, ADI (Spain)	Aena Brasil	London Luton Airport						
Conservation forestry	1.4		120,384.85	-	-	120,384.85	0.01%	Eligible	Eligible	N/A	N/A
Generation of electricity using photovoltaic solar technology	4.1		68.68	-	-	68.68	0.00%	Eligible	Eligible	N/A	N/A
Generation of electricity from wind energy	4.3		14,874.68	-	-	14,874.68	0.00%	Eligible	Eligible	N/A	N/A
Transportation and distribution of electricity	4.9		1,780,018.63	-	-	1,780,018.63	0.20%	Eligible	Eligible	N/A	N/A
Construction, expansion and operation of water collection and treatment systems	5.3		1,065,307.41	38,882.06	40,848.22	1,145,037.69	0.13%	Eligible	Eligible	N/A	N/A
Collection and transportation of non-hazardous waste in fractions segregated at origin	5.5	876,517,000.00	530.20	-	-	530.20	0.00%	Eligible	Eligible	N/A	N/A
Urban and suburban transportation, road passenger transportation	6.3		-	-	218,268.96	218,268.96	0.02%	Eligible	Eligible	N/A	It may be transitional (if an economic activity of this category does not meet the criteria relating to a substantial contribution specified in letter a) of its specific section, that activity is a transitional activity).
Motorcycle, passenger car and light commercial vehicle transportation	6.5		271,692.53	-	-	271,692.53	0.03%	Eligible	Eligible	N/A	It may be transitional (if an economic activity of this category does not meet the criteria relating to a substantial contribution specified in letter a) of its specific section, that activity is a transitional activity).
Renovation of existing buildings	7.2		4,699,247.55	6,338.82	-	4,705,586.37	0.54%	Eligible	Eligible	N/A	N/A
Installation, maintenance and repair of energy-efficient equipment	7.3		10,379,971.95	608,248.01	-	10,988,219.96	1.25%	Eligible	Eligible	If it meets the technical criteria	N/A
Installation, maintenance and repair of instruments and devices to measure, regulate and control the energy efficiency of buildings	7.5		1,053.44	-	-	1,053.44	0.00%	Eligible	Eligible	If it meets the technical criteria	N/A
OPEX of activities eligible according to Taxonomy			19,245,736.00								
% of OPEX eligible according to Taxonomy			2.20%								
% of OPEX not eligible according to Taxonomy			97.80%								

2

Commitment to the environment

2021

100% of the activity of Aena and the London Luton Airport is certified according to ISO 14001

Environmental risks included in the Aena risk management system

100% of the electricity consumption from renewable sources in the Spanish network

66.2% reduction in own CO₂ emissions in the Spanish network (base year 2019)

Aena and the climate emergency

- Climate Action Plan, approved at the General Shareholders' Meeting
- Supervision and monitoring mechanisms
- Three lines of action: Carbon neutrality, sustainable aviation, community and sustainable value chain
- Commitment to the setting of science-based target initiatives (SBTI)
- TCFD recommendations
- Analysis of risks and opportunities for climate change
- Effective actions and measures to achieve decarbonisation objectives
- Metrics and Carbon footprint
- Efficiency in the use of renewable energies

Objectives:

- Achieve carbon neutrality by 2026 and be Net Zero Carbon by 2040 (2050 at ANB)

Waste management and circular economy

- Measurement and monitoring of waste
- Reducing generated waste
- Use of sustainable materials
- Encouragement to segregation and recycling
- Energy recovery and composting
- Collaboration & Awareness

Objectives:

- Zero Waste in 2040 in Spain
- Reduce waste (excluding aircraft waste) to 0.12 kg/passenger at London Luton Airport
- Improve the methodology of separation of waste—including tenants in 2022 at ANB

Noise

- Limit the impact associated with noise: community programme and sustainable value chain of the Sustainability Strategy
- Measurement, reduction and control
 - Sound Insulation Plans
 - Communication

Some objectives:

- Maintenance and expansion of noise monitoring systems.
- Plans to increase the volume of isolated housing by 36%, reaching 33,000 isolated housing by 2030 (2050 at ANB)

+ of 27,000 homes isolated in the 2020-2021 period (Spain and United Kingdom)

Protecting biodiversity

- Protection of natural areas
- Study on the fauna of the environment and control services
- Vegetation control inside and outside airports
- Initiatives linked to combating wild species trafficking
- Actions included in the Sustainability Strategy 2021-2030



Air pollution

- Air Quality Action Line
- Strategic projects for reducing contaminants linked to air quality (NOx, SOx, PM10)
- Characterisation, control, monitoring and correction of emissions through air quality monitoring networks

Reduction objective:

In Spain, by 2030:

- 22% of NOx emissions per passenger with respect to 2019
- 36% of SOx emissions per passenger with respect to 2019
- 15% of PM emissions per passenger compared to 2019

In 2022:

- Model the air quality and develop an air quality strategy at London Luton Airport
- Carry out the inventory of atmospheric pollutant levels at ANB

Strategic Plan for Water Management

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

Objectives:

- Decrease in water consumption by 10% per passenger in 2030 compared to 2019 (5% reduction in 2026)
- Increase in the use of alternative water sources per passenger by 150% in 2030 compared to 2019 (50% increase in 2026)
- Reduction of total water consumption to 6.98 litres/passenger in 2023 at the London Luton Airport

Commitment to SDGs

- SDG 6**

Clean water and sanitation
- SDG 7**

Affordable and non-polluting energy
- SDG 9**

Industry, innovation and infrastructure
- SDG 11**

Sustainable cities and communities
- SDG 12**

Responsible production and consumption
- SDG 13**

Climate action
- SDG 15**

Life on land
- SDG 16**

Peace, justice and solid institutions
- SDG 17**

Alliances to achieve objectives

2.1. Sustainable environmental management model (GRI 102-11)

Current Scenario

Today, Spain has a robust network of airports that ensures the connectivity of our citizens, territorial cohesion and that has the strength necessary to face a solid recovery process. Despite the significant difficulties that the COVID-19 crisis is posing for all actors in our economy, the airport network has shown high resilience and a capacity to provide airport services in terms of security, quality and continuity.

Nonetheless, the air transportation sector must recover from what has been the biggest crisis in its history, but this recovery must be framed within the context of sustainability, taking advantage of those technologies and practices that guarantee environmentally sustainable air travel.

Thus, in the immediate future, important challenges such as the recovery of air traffic in relation to the environmental challenge must be faced. To provide the best possible response to these challenges, the DORA 2022-2026 establishes various strategic pillars—including environmental sustainability—on the basis of which Aena will perform its activity during the next five-year period.

To this end, Aena is committed to being an active agent in the fight against climate change, minimising the use of natural resources, reducing atmospheric pollution, protecting biodiversity, etc. This reinforces its action strategy for caring for the environment, managing natural capital and minimising the environmental impact of its activity.

In this regard, the 2022-2026 DORA is committed to strengthening sustainability as a key strategic focus, setting the conditions for the sustainable development of the Aena airport network and establishing the necessary environmental standards to carry out a green recovery of the sector.

Environmental objectives (GRI 102-11)

As the clearest example of this commitment, the Company has approved its roadmap, which is recorded in the Sustainability Strategy and the Climate Action Plan¹, which set the Company's future actions on the matter over the next nine years, and focus on the following areas of environmental management:

- Climate change, energy efficiency and renewable energy
- Water footprint and efficient water management
- Circular economy
- Air quality
- Noise management
- Preservation of biodiversity

This chapter provides detailed information on the environmental performance, the management mechanisms that have been developed as well as the objectives and progress achieved in the different environmental areas.

Environmental governance

The Board of Directors of Aena considers sustainability and the fight against climate change to be priorities when managing the company. Consequently, it has decided to take a pioneering step in terms of the responsibility and commitment of the company towards environmental matters. It has proposed a solid action plan to fight climate change, which pays special attention to promoting transparency and the participation of its shareholders in the development of said plan.

Thus, Aena has become the first Spanish company, and one of the first in the world, to render accounts to its shareholders every year on its Climate Action Plan. This Plan was submitted to an advisory vote at the Company's General Shareholders' Meeting of April 2021, and in subsequent years, the follow-up of the Plan's execution will be presented annually.

The powers of the Board of Directors include:

- Approval of the Climate Action Plan.
- Guidance and control of the strategy, objectives, risks and results in matters related to sustainability.
- Implementation of a remuneration model linked to sustainability objectives.

¹ The Climate Action Plan has been integrated into the Sustainability Strategy.

- Provide support to the Audit Committee in the process of supervising the risk management system, ensuring the identification, management and communication of the main risks within the planned levels.
- Monitoring and reporting of the Sustainability Strategy/Climate Action Plan (including actions and associated risks).

The Board of Directors has created a Sustainability and Climate Action Committee whose mission is to review

and supervise the Sustainability Strategy/Climate Action Plan and the fulfilment of its objectives. In addition, an internal work group has been created to coordinate the business areas in the deployment and review of the Sustainability Strategy and the Climate Action Plan.

The Company has also created the role of Chief Green Officer as an additional position to the Director of Innovation, Sustainability and Customer Experience, in order to make sustainability a fundamental element in

the Company's decision-making process and strengthen its commitment in this area with all the stakeholders.

Likewise, London Luton Airport, in line with its carbon reduction plan, has created a Sustainability Board Committee to promote its implementation and monitoring.



2.1.1. Natural capital management model (GRI 102-11)



Policies and strategies



Strategic objectives

	Policies and strategies	Strategic objectives	
AENA	<ul style="list-style-type: none"> Sustainability Policy. Defines and establishes the principles, commitments, objectives and strategy to be followed by the Company to carry out its activity, optimising the contribution to sustainable development, creating long-term value, maximising positive impacts and minimising negative impacts on society and the environment throughout its value chain, using ethical and transparent behaviour. Its general principles of action include the integration of sustainability in all business areas and organisational levels of the Company, extending this culture to employees, customers, suppliers, value chain, partners and other stakeholders while ensuring that providers and contractors, within the scope of the work they perform for Aena, engage in sustainable management and are in line with the social and environmental sustainability objectives. It also refers to minimising environmental impacts by promoting a transition towards a circular economy that includes all processes. Integrated Quality, Environmental and Energy Efficiency Management Policy. It includes the guiding principles and reference framework for the Company's activity with respect to environmental issues, combined with quality standards. The Policy refers to the continuous improvement of management and services, as well as the proper management of resources and waste. Sustainability Strategy. Sets the Organisation's roadmap for 2021–2030, placing a special focus on the commitment towards and performance of environmental issues related to the fight against climate change, air quality, noise management, water management. 	<p>biodiversity and circular economy. It establishes a series of sustainability measures and indicators based on the Company's strategy, policies, current regulations and the UN's Sustainable Development Goals.</p> <ul style="list-style-type: none"> 2021–2030 Climate Action Plan: Zero emissions route. It reflects Aena's commitment to protecting the environment, decarbonisation and the climate emergency as key issues in its management. <p>Its objectives include achieving Net Zero Carbon by 2040 and achieving carbon neutrality by 2026, in line with the national and international regulatory framework (Paris Agreement, the objectives and commitments set out in the declaration of the Government of Spain in the face of the climate and environmental emergency, the 2021–2030 National Integrated Energy and Climate Plan, and the SDGs and recommendations of the TCFD).</p> <ul style="list-style-type: none"> Strategic Plan for water management. Includes the diagnostic survey of the water management situation at Aena's airports, as well as the various improvement objectives, along with their corresponding actions and indicators. Thus, the plan will contribute to achieving the objective of ensuring that water management is adapted to the requirements of use, consumption and purification posed by the different stakeholders at the airports, as well as the SDGs to which Aena has committed. Environmental monitoring of suppliers (ISO 14001). Environmental assessment of the property portfolio and tenant operations. 	<ul style="list-style-type: none"> Make the management of airports compatible with respect for the environment where they are located. Become a carbon-neutral airport operator (2026) and lay the foundations for achieving Net Zero Carbon (2040). Reach level 3+ (neutral) of the Airport Carbon Accreditation of ACI EU in the seven main airports. Act as a driving force for other agents in the aviation sector to accelerate their decarbonisation. Improve the sustainability of the environment by collaborating with suppliers, tenants, transportation agents and the community. Develop water management that addresses the loss of freshwater availability and quality associated with climate variability. Perform an integrated management of water supply sources and risks derived from climate change. Reach Zero Waste by 2040. Contribute to improving air quality. Limit the impact of noise on local communities. Protect and promote local and global biodiversity.
LONDON LUTON AIRPORT	<ul style="list-style-type: none"> London Luton Airport Energy Policy, aligned with the ISO 50001 standard. It shows the airport's commitment to improving energy management and performance. London Luton Airport Environmental Policy. Recognises and accepts the airport's responsibility in minimising its environmental impact, and undertakes to continuously review its performance. London Luton Airport's Responsible Business Strategy, published in 2020, contains six lines of action, the first of which is focused on guaranteeing the care of the environment with responsibility and efficiency, and minimising the environmental impact of the airport, through a series of specific annual objectives. 	<ul style="list-style-type: none"> Action Plans regarding noise pollution: Noise Action Plan at London Luton Airport 2019–2023. London Luton Airport Aircraft Noise Inquiry and Complaint Policy. London Luton Airport Access Strategy. London Luton Airport is the fifth most transited passenger airport in the United Kingdom, with excellent transport connections that connect it to London, the southeast, the east of England and the South Midlands. Carbon Reduction Plan. 	<ul style="list-style-type: none"> Reduction of greenhouse gas emissions, increasing the use of renewable energy, climate risk analysis achieving carbon neutrality by 2026 and Net Zero Carbon 2040. Minimisation of water consumption per passenger. Reduction of waste and increased recycling. Preparation of the air quality strategy. Encouraging the use of sustainable mobility. Collaboration with airlines to reduce aircraft noise and with the community to improve noise management. Reduction of the number and severity of spills in the operations area that occur at the airport. Collaboration in the elimination of single-use plastics, and in avoiding their use.
BRAZIL	<ul style="list-style-type: none"> Aeroportos do Nordeste do Brasil Sustainability Policy. Aeroportos do Nordeste do Brasil's Integrated Quality, Environmental and Energy Efficiency Management Policy. Principles of Action against Climate Change and governance in environmental matters. Strategic Sustainability Plan. 	<ul style="list-style-type: none"> Specific plan for acoustic Zoning at Aeroportos do Nordeste do Brasil airports. Establishment of the Fauna Risk Management Committee and the Aeronautical Noise Management Committee. 	<ul style="list-style-type: none"> Reach level 3+ of the Airport Carbon Accreditation programme of ACI EUROPE by 2030. Commitment to ACI EU's Net Zero, to have zero net emissions by 2050. Reduction of carbon emissions through mapping of GHG inventory and initiatives related to work on infrastructures that will enable the achievement of the reduction objectives as well as foster the updating of more efficient and sustainable equipment. Air quality management. Protect and promote local biodiversity. Encourage the rational use and reuse of water through efficient equipment, minimising consumption. Reduction of waste and increased recycling. Migration of all consumed electricity to the deregulated energy market that allows the purchase of green energy for airports of ANB. Aeroportos do Nordeste do Brasil Photovoltaic Plan until they reach 70% energy self-consumption from solar energy in the network's airports by 2030. Noise control and implementation of noise zoning action plans.

2.1.2. Environmental certifications

(GRI 102-11)

Aena develops its commitments towards environmental matters through the Integrated Management System for Quality, Environment and Energy Efficiency (IMS). This system, integrated since 2014, facilitates

legal assurance, the assessment of environmental aspects, the minimisation of negative impacts, the identification of risks, communication with interested parties and the environmental monitoring of suppliers. During 2021, the certificates of the Integrated Quality and Environmental Management System and the Energy Management System of all Aena's units and centres have been renewed.

Aena's entire activity in Spain and at the London Luton Airport is certified according to ISO 14001 and all Central Service units and Aena Spain centres are certified according to ISO 9001. Aeroportos do Nordeste do Brasil plans to obtain certification under with ISO 14001 in 2022.

	MANAGEMENT INSTRUMENTS	CERTIFICATIONS
Aena's Integrated Quality and Environment System certified according to ISO 14001 standard →	It addresses the most significant environmental aspects linked to airport activity, including noise emissions, atmospheric pollution, greenhouse gas emissions, water consumption, energy consumption, hazardous and non-hazardous waste, spills, soil pollution and supplier environmental control. This certification covers 100% of Aena's activity. The Company guarantees the continuous improvement of its environmental performance, by applying the policy and conducting regular audits of samples at its sites.	<ul style="list-style-type: none"> Renewed the certifications in 2021 for all Central Services units and Aena Spain centres. London Luton Airport certification renewed in 2021. The network in Brazil has implemented Aena's Environmental Management System for the network's airports and is in the process of being certified.
Quality (ISO 9001) →	An international standard based on the management and the control requirements of processes, aimed at improving them, focusing on the detection and determination of the organisation's processes as a decisive activity for effective operations. Within the framework of the system, and by means of audits that are periodically conducted at the centres, the Company guarantees the continuous improvement of the quality of its processes, satisfying the needs and expectations of its customers. This certification covers 100% of Aena's activity.	<ul style="list-style-type: none"> All Central Services units and Aena centres have been certified.
EMAS Regulation →	It defines an environmental management scheme and audits based on the ISO 14001 standard, and proposes an effective systematic approach to help organisations manage and continuously improve their environmental performance. EMAS contains its own requirements that make it a model of excellence for environmental management.	<ul style="list-style-type: none"> Menorca Airport Tenerife Sur Airport
EFQM →	Shows the logical connection between the purpose and strategy of an organisation and how it is used to help create sustainable value for its key stakeholders and to generate outstanding results.	<ul style="list-style-type: none"> Adolfo Suárez Madrid-Barajas Airport
Carbon footprint (ISO 14064) →	Determination of the quantity of greenhouse gas emissions that are released into the atmosphere as a result of carrying out any activity to identify the sources of the emissions and establish effective reduction measures based on this knowledge.	<ul style="list-style-type: none"> Málaga-Costa del Sol Airport Palma de Mallorca Airport Barcelona-EI Prat Josep Tarradellas Airport Adolfo Suárez Madrid-Barajas Airport César Manrique-Lanzarote Airport Menorca Airport Alicante-Elche Airport Santiago-Rosalía de Castro Airport London Luton Airport
Energy efficiency (ISO 50001) →	An international standard for energy management systems that provides a tool to systematically optimise energy performance and promote more efficient energy management.	<ul style="list-style-type: none"> Reus Airport Valladolid Airport External Thermal Insulation System (SATE) Adolfo Suárez Madrid-Barajas Airport Zaragoza Airport London Luton Airport
ISO 20906 Standard →	Specific standard to monitor the sound conditions by using the Noise Monitoring and Flight Path Systems of the airports. Obtaining this accreditation is another step towards ensuring the quality of the noise data that Aena offers publicly.	<ul style="list-style-type: none"> Aena has been the first global operator to have noise data accredited in accordance with the ISO 20906 standard at six of its most relevant airports: <ul style="list-style-type: none"> Adolfo Suárez Madrid-Barajas Airport Barcelona-EI Prat Josep Tarradellas Airport Palma de Mallorca Airport Valencia Airport Alicante-Elche Airport Málaga-Costa del Sol Airport

2.1.3. Management of environmental risks and impacts (GRI 103-2)

In environmental matters, the Company is particularly exposed to risks arising from:

- Noncompliance with environmental regulations that may affect its operations and projects.
- Other risks inherent to its business, such as those resulting from climate change² or noise pollution.

For monitoring purposes, Aena includes in its environmental management system the identification of legal requirements that apply to all its airports.

Furthermore, Aena has implemented a risk management system. The risk map, in which all areas of the company collaborate, includes environmental and sustainability risks and establishes mechanisms to manage them (see Chapter '2021: A Year for Recovery').

In addition, the Company uses the Environmental Impact Assessments of the Master Plans and Projects to facilitate the integration of the environmental variable into the decision-making process of those projects that are expected to have a significant impact on the environment or to preserve natural resources, minimising the possible risks or environmental impacts derived

from the expansion of its infrastructures (more information in section 'Protection of the biodiversity' of this Chapter).

In 2021, ANB started an environmental risks control and management process, during which seven environmental risks were defined, including the number of disputes due to environmental matters, the consumption of water resources and the management of environmental licences and compliance with environmental restrictions (environmental sanctions)

In this regard, during 2021, ANB has prepared an Environmental Report and a Neighbourhood Impact Study at Recife Airport, to anticipate the possible environmental impacts/risks.



² See section '2.2.3. Risks and opportunities related to climate change'.

Some indicators related to environmental management and the resources dedicated to the improvement of environmental management and the prevention of environmental risks (GRI 103-2)

	AENA S.M.E., AIRM, ADI	London Luton Airport ³	Aeroportos do Nordeste do Brasil
Number of people assigned to environmental management	Central Services: 55 (Aena+AT) and 57 (airports, some of which are partially dedicated to environmental management)	6	2
Investment allocated to the protection and improvement of the environment (€)	€59,467,000	€203,583.10	€1,754,242
Expense allocated to the protection and improvement of the environment (€)	€16,039,000	634.798	€1.447.554
Investment in R&D&I to reduce the impacts generated by pollution, generation of waste or the use of resources (€)	€329,470	€449,046.1	N/A
Investment allocated to R&D&I activities in environmental and climate change matters (€)	€937,090	N/A	N/A
Costs associated with impacts generated by pollution, generation of waste or the use of resources (€)	€5,249,301 (corresponding to waste management)	€449,046.1	N/A
Noncompliance with environmental legislation and regulations, including those related to water consumption	No.	0	0
	€	0	0
Return on environmental investments	CAPEX	See section 'Taxonomy of Sustainable Finances'.	
	OPEX		
Environmental risk provisions and guarantees	See 2021 Consolidated Annual Accounts and Management Report		

³ Exchange rates as of 31/12/2021 used for Balance Sheet accounts: EUR vs GBP = 0.85960 EUR vs BRL= 6.3779

2.1.4. Environmental inquiries⁴

Aena's environmental consultation channel allows the Company to centralise the information requests, complaints and suggestions concerning the environment, enabling the Company to respond swiftly, consistently and effectively.

London Luton Airport has a Policy for inquiries and complaints about aircraft noise and a website from which to make the inquiries.

In the case of ANB, they also have an inquiry system. In 2021, two environmental complaints were received and answered.

Main data:

- 2,712 complaints received in Aena regarding environmental matters.
- 99.7% of noise-related complaints in Aena.
- 100% of all complaints were answered.

Indicators of environmental complaints			
	Aena	London Luton Airport	Aeroportos do Nordeste do Brasil
Environmental complaints	2,712	12,433	2
Noise related complaints	2,705	12,431	0



⁴ See section "About this report - Links of interest".

2.1.5. Sustainability and value chain

Green leases

Aena transfers the concept of Green Lease and, therefore, the commitments adopted to minimise the environmental impact (reduction of energy consumption, generation of waste, emissions, etc.) to the management of all its real estate activity (retail).

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

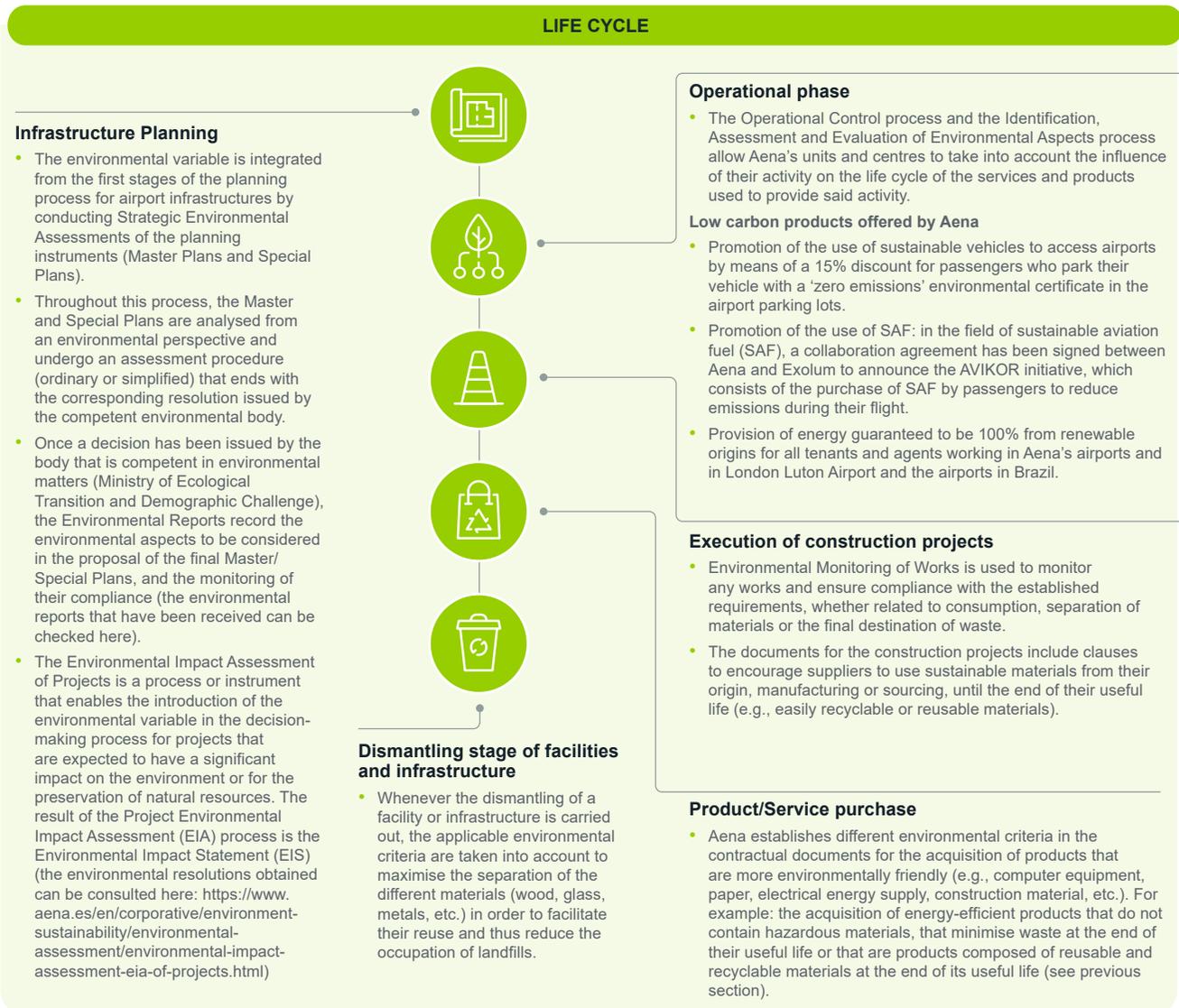
Sustainability Policy	Integrated Quality, Environmental and Energy Efficiency Management Policy	Real Estate Development White Books	Environmental clauses in procurement specifications
<p>Its principle of action is to integrate sustainability (climate change, air quality, noise management, water management, impact on biodiversity and waste management, as well as social aspects) in all business areas, transferring this culture to the entire value chain.</p>	<p>Addresses issues derived from tenant operations, covering environmental issues in general (preventing pollution, making efficient use of resources and managing waste adequately) and shows the commitment to communicate this policy to all companies that carry out their activity in Aena.</p>	<p>They incorporate sustainability criteria into the urban and architectural design of future real estate developments in the main airports (Adolfo Suárez Madrid-Barajas Airport and Barcelona-El Prat Josep Tarradellas Airport). These documents will supplement the tender documents for the construction projects of future Real Estate Plans, ensuring that the environmental sustainability component is incorporated into the general design criteria and in matters related to urbanisation and landscaping.</p>	<p>The tender documents include, among other environmental requirements, the need to obtain certifications, such as ISO 14001.</p> <p>The environmental clauses included in the technical conditions’ documents for handling agent contracts, establish the need to create an equipment replacement plan in order to reduce their emissions. In the latest tender documents, handling⁵ agents are required to make 44% of their vehicles and equipment sustainable by 2026 and this percentage will increase to 66% by 2029.</p> <p>During 2021, Aena began the preliminary work of a pilot project for the Implementation of Telemetry in Handling Vehicles at Palma de Mallorca airport to improve efficiency in consumption.</p>
<p>Supervision of environmental behaviour</p> <p>The conditions allow for the supervision by Aena of the environmental behaviour of the companies (contracted and lessees), and the support of the development of environmental management improvement initiatives, paying special attention to those contracts associated with activities with a potentially significant impact on the environment. In these cases, periodic follow-ups, visits to facilities and the review of aspects related to the Environmental Monitoring Plans are carried out, in order to:</p> <ul style="list-style-type: none"> • Establish the rules and actions that the contracted companies and those third parties that carry out their activities at Aena’s facilities must respect. • Identify and control the environmental aspects of the activities carried out in the facilities, sites and premises owned by Aena. • Verify the proper provision of the service. 	<p>Technical conditions for the leasing of commercial premises</p> <p>They include the need for potential tenants, when making their offers, to incorporate measures of an environmental nature (for example, measures for the proper management of waste, storage of hazardous substances, air quality, discharges, etc.) and to take care of their supervision and strict monitoring (see Chapter 3).</p>	<p>Third-party awareness mechanisms and creation of a collaboration forum for sustainability</p> <p>During 2021, the foundations were laid to establish new third-party awareness mechanisms and create a collaboration forum for sustainability. The start of its activity is planned for 2022.</p>	<p>In line with the Sustainability Strategy and within its Sustainable Value Chain programme, in 2021, a guide is being prepared for the technical assessment of supplier files, incorporating scores based on quantitative sustainability requirements (in the field of water, circular economy, water, energy consumption, etc.). The environmental clauses have also been updated.</p> <p>It has progressively included into the new food and beverage contracts, a specific clause that seeks to reduce the volume of plastic waste generated, avoiding the use of single-use plastics and promoting the use of disposable products (biodegradable or recyclable materials).</p>

⁵ The handling agents provide assistance services on the airside of the airports. They are one of the main fuel consumers inside airports after airlines.

Sustainable purchases

Aena promotes the acquisition of new technologies to foster and provide the Company with a more agile, efficient and transparent supply chain, which in turn allows it to gradually incorporate criteria that are more environmentally friendly.

- Worth noting is the acquisition of electric vehicles or green cars in the new tender contracts for cars belonging to the Aena fleet in order to reach 100% sustainable vehicles by 2026.
- Purchase of renewable electrical energy: since 2020, the company has purchased 100% of its electrical energy with a renewable origin guarantee. This green energy is supplied to all the tenants through the network, which covers all the companies that work in the airports.



2.2. Aena and the climate emergency

2.2.1. Climate Action Plan

(GRI 103-2; 201-2; 302-3; 305-5)

In 2021, Aena's Board of Directors approved the Climate Action Plan (CAP)⁶, which was submitted to an advisory vote at the General Shareholders' Meeting (*Say on climate*)⁷, becoming the first Spanish company and one of the few listed companies in the world to provide information on its decarbonisation plan to its shareholders.

The main objectives of this Plan, included in Aena's Sustainability Strategy, are to achieve carbon neutrality by 2026, obtain a 94% reduction by 2030 of emissions per passenger associated with Aena's own operations and be Net Zero Carbon (0 net emissions) by 2040. Likewise, the CAP establishes actions that involve Aena acting as a driving force in the sector, promoting reductions in emissions associated with its stakeholders, with special attention to airlines (Scope 3 emissions).

The new Climate Action Plan is in line with the Sustainable Development Goals and the recommendations of the TCFD.

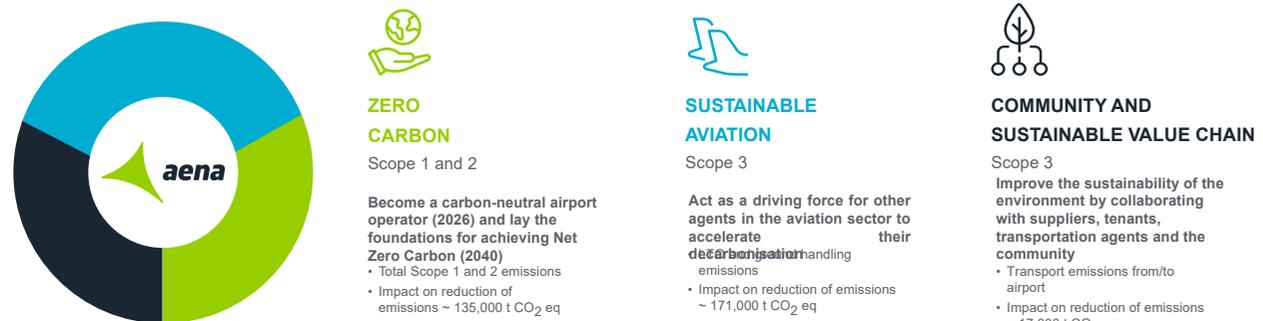
In 2021, Aena made a commitment to set science-based reduction objectives, by signing and sending the commitment to the Science-based Targets initiative (SBTi)

The Plan is structured into 3 strategic programmes: Carbon Neutrality, Sustainable Aviation and Community and Sustainable Value Chain. In order to achieve these objectives, a set of effective actions and measures will be developed, focused on energy efficiency, the use of renewable energies, sustainable mobility, the reduction of third-party emissions and the

decarbonisation of processes and activities. For this, nearly €550 million will be allocated in the 2021 and 2030 period⁸.

Its objectives are in line with the commitment acquired in 2019 to be part of the ACI (Airports Council International) Europe NetZero initiative, currently signed by more than 200 European airports and which marks a significant milestone in the actions that airports are taking to fight climate change⁹.

AENA'S CLIMATE ACTION PLAN: STRATEGIC PROGRAMMES



⁶ In 2021, London Luton Airport updated its Carbon Reduction Plan, in line with Aena's Plan, which commits to achieve carbon neutrality by 2026 and to reach Net Zero by 2040 in all direct operations (Scope 1 and 2), as well as to work with partners to support carbon reduction in areas outside the direct scope of the airport (Scope 3). To support this commitment, London Luton Airport has implemented measures that offer a reduction in its operating emissions and has identified new reductions in its Responsible Business Strategy 2020–2025. The Carbon Reduction Plan includes measures for the short, medium and long term, covering the period until 2050. See section "About this report – Links of interest".

In Aeroportos do Nordeste do Brasil, work has begun on the implementation of climate change mitigation and adaptation measures. These measures, which are also in line with those developed by Aena, include the adoption of a Strategy and of the Action Principles against Climate Change, responsibility with the integrated management policy and energy efficiency and carbon footprint mapping for the subsequent reduction action plan.

⁷ The result of the vote for the Plan at the General Shareholders' Meeting was 95.65% of votes in favour.

⁸ All actions, objectives and associated indicators for the monitoring of the PAC. See section "About this report – Links of interest".

⁹ Mr. Javier Marín, Managing Director of Aena Airports and executive member of the Board of Directors of Aena, has been elected Chairman of ACI EU in 2021.

Specific decarbonisation objectives

(GRI 103-2; 302-3; 305-5)

The CAP establishes a roadmap, set by the Company, with annual strategic objectives, aimed at reducing its

own emissions, producing renewable energy in self-consumption, purchasing renewable energy, increasing energy efficiency, distributing SAF in the airports, reducing emissions from handling agents, increasing the percentage of electric fleet recharge

points and consuming sustainable fuel in the handling equipment and vehicles, promoting sustainable mobility to and from the airport, and proactively collaborating with the supply chain and community to drive sustainability.

	Aena	London Luton Airport	Aeroportos do Nordeste do Brasil
Short-term	<p>2022:</p> <ul style="list-style-type: none"> Reduction of absolute GHG emissions 60% scope 1 and 2 (base year 2019). <p>2025:</p> <ul style="list-style-type: none"> 32% production and self-supply of renewable energy in own facilities. Increase to 3,100 electrical charging points in the parking lots for passengers and employees, as well as for the airside. <p>2026:</p> <ul style="list-style-type: none"> Reduction of absolute GHG emissions 82% scope 1 and 2 (2019 base year) and compensation of 18% of remaining emissions. Electrification of 26% of the Aena vehicle fleet (cars and vans). Purchase of electricity, 100% with renewable origin guarantee (ongoing objective since 2020). Promotion of the use of geothermal energy, to provide cold and heat to the terminals of the three main airports. 100% self-supply of renewable energy in Aena's airport network based on Aena's Photovoltaic Plan. ACI EU level 4+ Airport Carbon Accreditation at Adolfo Suárez Madrid-Barajas Airport and Barcelona-EI Prat Josep Tarradellas Airport and level 3+ neutrality at the main airports. Corporate carbon-neutral accreditation for all Aena network airports 44% sustainable Handling fleet (electrical equipment and sustainable fuel). Implementation of new collaborative measures and improvements that improve the efficiency of airport operations, as well as the congestion of European airspace, reducing waiting and flight times. Fleet of shuttles between terminals in Madrid and Barcelona 100% electric. <p>2026: Achievement of carbon neutrality.</p>	<p>2022:</p> <ul style="list-style-type: none"> Entry into operation of the Sustainability Committee. Development of a roadmap to achieve carbon neutrality and net zero, establishing actions, processes, deadlines and financing strategy. Launch of the Sustainable Supply Chain Charter. Commissioning of DART (Direct Air-Rail Transit). Have more than 28% of employees and 36% of passengers use sustainable means of transportation. Low carbon fleet plan. <p>2023:</p> <ul style="list-style-type: none"> Reduction of the demand for operating electricity (excluding vehicles) to less than 2.0 kWh/passenger. <p>2026</p> <ul style="list-style-type: none"> 25% energy supply from renewable energies in own facilities. 	<p>2022:</p> <ul style="list-style-type: none"> Purchase of clean energy from the Deregulated Energy Market (since 2021). Preparation of the Carbon Management Plan linked to ACA level 2 Semi-annual monitoring of GHG emissions. Study and analysis of large-scale self-consumption facilities for photovoltaic renewable energy equipment (Photovoltaic Plan).
Medium/long	<p>2030:</p> <ul style="list-style-type: none"> Reduction of absolute GHG emissions 93% scope 1 and 2 (2019 base year) and compensation of 7% of remaining emissions. 78% sustainable Handling fleet (electrical equipment and sustainable fuel). 4.6% of SAF distributed in the airport network. Installation of hydrogen generators in the five main airports. <p>2040: ACI EU's Net Zero Commitment, to have zero net emissions at all airports of the Aena network.</p>	<p>2030:</p> <ul style="list-style-type: none"> 25% energy supply from renewable energies in own facilities. 	<p>2030:</p> <ul style="list-style-type: none"> Reach level 3+ of the <i>Airport Carbon Accreditation</i> of ACI EU in the main airports. Implementation of the Photovoltaic Plan to reach 70% of self-consumed energy from solar energy in the airports. <p>2050: commitment to ACI EU's Net Zero, to have zero net emissions.</p>

Development and progress of established decarbonisation goals¹⁰

Aena	London Luton Airport	Aeroportos do Nordeste do Brasil
<ul style="list-style-type: none"> • 66.2% reduction in own CO₂e emissions in the Spanish network (base year 2019)¹¹ • Purchase of electricity with a 100% renewable origin guarantee. • ACA: Level 3 Adolfo Suárez Madrid-Barajas and Barcelona-El Prat Josep Tarradellas airports, Level 2 Málaga-Costa del Sol, César Manrique-Lanzarote and Palma de Mallorca airports and Level 1 Alicante-Elche, Santiago-Rosalía de Castro and Menorca airports. • 210 recharge points in airport parking lots. • Promotion of the use of sustainable vehicles to access airports via a 15% discount for passengers who park their vehicle with a 'zero emissions' environmental certificate in the airport carparks, and who are members of <i>AENA Customer Club</i>. • Launch of the sustainable cargo collaboration forum. 	<ul style="list-style-type: none"> • Purchase of electricity with 100% renewable origin guarantee (since April 2021, which constitutes 76% of the year). • ACA Level 3. • 85% LED lighting. • Identification of the risks associated with climate change and development of a resilience plan, integrating commercial risks into the assessment. 	<ul style="list-style-type: none"> • Purchase of clean energy from the Deregulated Energy Market. • Creation of the sustainability area • Publication of the Sustainability Strategy 2022–2027.



¹⁰ Specific details of the set objectives can be seen in the Climate Action Plan and in the Carbon Reduction Plan of London Luton Airport.

¹¹ Aena's emission reduction target (S1 and S2) for 2021: 60% compared to 2019

2021 MITIGATION ACTIONS AND MEASURES TO ACHIEVE THE DECARBONISATION OBJECTIVES (GRI 103-2)

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



- The electricity consumed at Aena's centres in Spain and London Luton Airport comes from sources with a 100% renewable origin guarantee. For their part, at ANB they have migrated all consumed electricity to the deregulated energy market that allows the purchase of green energy for their facilities.
- During 2021, Aena, as part of its goal of reaching 100% self-supply by 2026, has conducted the work required prior to the implementation of the Photovoltaic Plan and has installed two new self-consumption photovoltaic plants:
 - At César Manrique-Lanzarote Airport, whose facility will provide 850 kilowatts (kW) of self-consumption power and will generate 1.4 GWh/year—equivalent to energy savings corresponding to the annual consumption of 412 homes.
 - At Tenerife Sur Airport, with 1 MW of self-consumption power and a production of 1.6 GWh/year, which is equivalent to the annual consumption of around 500 homes.
- The energy efficiency measures include those linked to improving and maintaining the lighting, boilers, etc. At London Luton Airport, 85% of the existing lighting has been replaced by LED lighting, and at Aena's airports in Spain, LED lighting continues to be implemented in their facilities with the aim of achieving 100% by 2026.

Airport carbon accreditation



- Over 91% of carbon emissions are accredited by the Airport Carbon Accreditation (ACA) programme:
 - Adolfo Suárez Madrid-Barajas Airport, Barcelona-El Prat Josep Tarradellas Airport and London Luton Airport have risen from Level 2 to 3 'Optimisation'
 - The César Manrique-Lanzarote Airport, Málaga-Costa del Sol Airport and Palma de Mallorca Airport have renewed the Airport Carbon Accreditation Level 2 'Reduction' certification.
 - Alicante-Elche, Menorca and Santiago-Rosalía de Castro airports have renewed Level 1 'Inventory'.
- As a goal for 2026, Adolfo Suárez Madrid-Barajas Airport and Barcelona-El Prat Josep Tarradellas Airport will reach the 4+ level of ACA. Likewise, for that year, another five Aena airports and London Luton Airport will be certified in level 3+ (carbon neutral). In addition, all of the network's airports in Spain will be included in Aena's 2026 emission neutrality programme.
- As an objective for 2026, Aena's main airports and the London Luton Airport will be certified level 3+ (carbon neutral) and all the network's airports in Spain will be included in Aena's emissions neutrality programme.
- For their part, Aeroportos do Nordeste do Brasil is working on joining the programme, with its objective being to achieve level 3+ of the Airport Carbon Accreditation programme of ACI EUROPE by 2030.

Sustainable fleet



- Replacement of Aena's fleet of cars with cleaner and more efficient vehicles and expansion of the recharge point network for electric or hybrid vehicles reaching 21.2% of electric vehicles of the fleet of cars and vans in 2021 and 210 recharge points in the airports. Aena's objective is to have 100% sustainable vehicles and more than 3,000 recharge points on the airside and landside by 2026.
- London Luton Airport is committed to acquiring low-emission vehicles in 2021 as part of its Responsible Business Strategy.

Collaborations with third parties



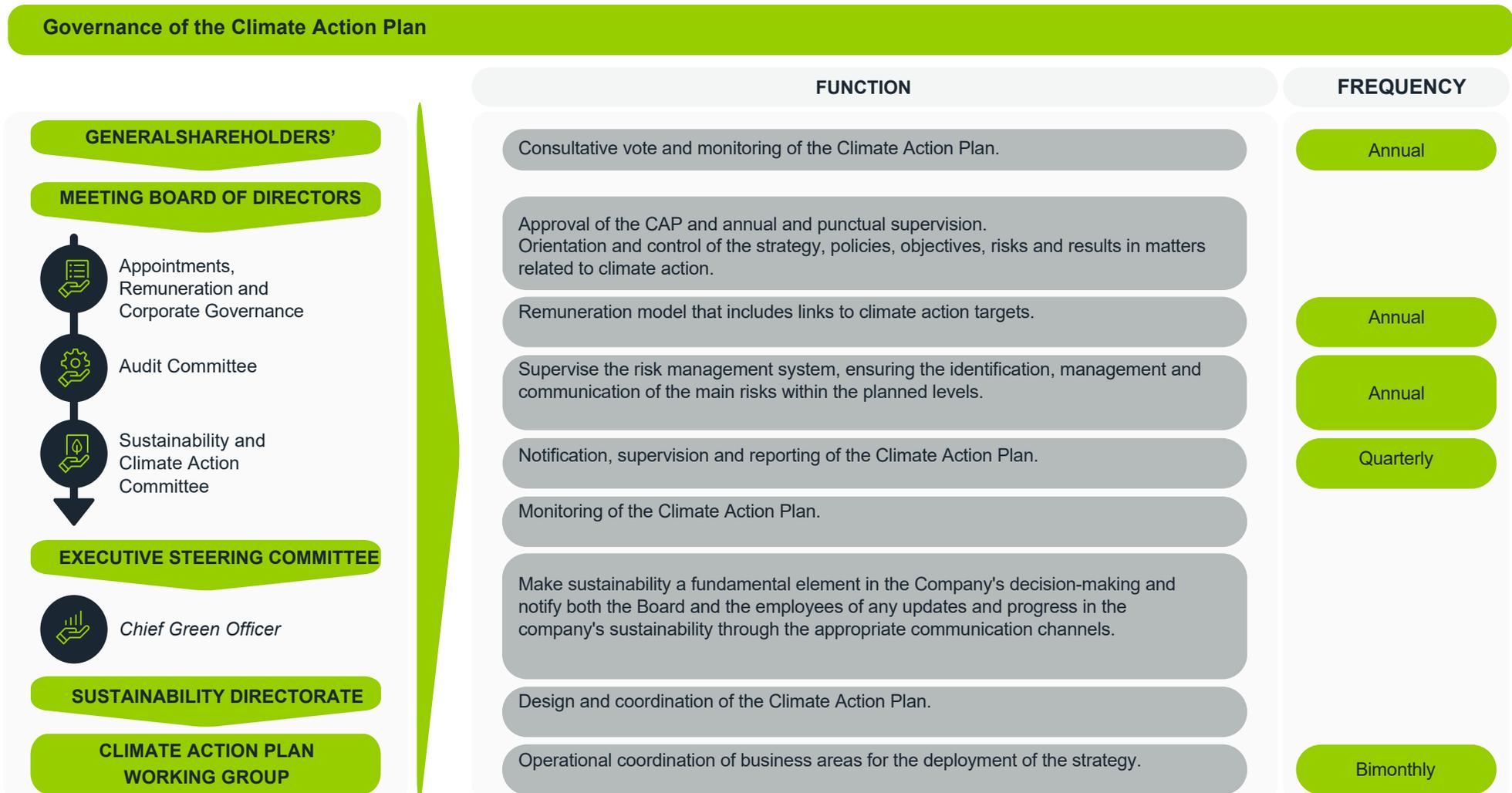
- Fostering the use of sustainable aviation fuel: active collaboration with bio-kerosene producers, airlines and other interested agents to increase the use of sustainable aviation fuel and promote production. For its part, London Luton Airport, in 2021, has promoted support for research projects financed by the government of the United Kingdom, such as the analysis of the impact caused to infrastructure by the use of hydrogen in different processes (refuelling, costs, processes), and the challenges of the transition to other new technologies (SAF, electric aircraft and their simultaneous use).
- Reduction of LTO and APU cycle emissions: implementation of A-CDM or CDM (Airport Collaborative Decision Making or Collaborative Decision Making) aimed at improving the overall efficiency of airport operations, reducing taxiway time and therefore, fuel consumption and emissions through the shared use of updated information of an operational nature. It has been implemented in Adolfo Suárez Madrid-Barajas, Barcelona-El Prat Josep Tarradellas and Palma de Mallorca airports. Likewise, Aena has Advanced Towers in 12 of its airports.
- In relation to ENAIRE, Aena has participated in the development of the sustainability criteria of the new contract for the provision of air navigation services, establishing the conditions necessary to ensure they are in line with Aena in terms of sustainability. As an integral part of the documentation to be submitted in the offer, ENAIRE will present a Sustainability Plan, which will include follow-up objectives, measures and KPIs, in line and compatible with the achievement of the Company's objectives.
- Supply of renewable electrical energy to aircraft: 100% of the gangway parking spaces have a 400 Hz electricity supply system. In 2021, progress has been made in the implementation of new outlets, replacement and substitution of old equipment and work is also being done to implement these electrical supply systems in the aircraft apron stations. In addition, the electrical energy supplied by Aena to these aircraft has a 100% renewable origin guarantee.
- Sustainable Handling Fleet: Incorporation of new sustainability criteria and objectives in the new Handling conditions documents in order to reach 78% sustainable ground handling vehicles by 2030: sustainable fleet of 44% by 2026 and 66% by 2029 (electric vehicles and use of sustainable fuel).

Communication and reporting



- Commitment to the Science Based Target initiative (Net-zero science-based emissions reduction targets).
- Participation in the Carbon Disclosure Project (CDP), the main reporting framework for climate change, in which it obtained a 'B' rating in 2021.
- Adherence to various initiatives in the fight against climate change:
 - Manifesto for a Sustainable Recovery
 - Community for the climate
 - Forética Climate Change Cluster
 - European Climate Pact
 - The Clean Skies for Tomorrow Coalition
 - European Clean Hydrogen Alliance
- During COP26, London Luton Airport has promoted a sustainability awareness campaign through messages published on the terminal's digital screens and the availability of a stand to promote specific actions among passengers, such as recycling, among others.

2.2.2. Supervision and monitoring of the Climate Action Plan



The variable remuneration related to climate change applies to all Aena employees, including the Chairman, members of the Management Committee, and the rest of Senior Management linked through the performance management system, with one of the objectives being the 'Preparation, proposal and approval by the Board and the General Shareholders' Meeting of the Climate Action Plan and the execution corresponding to 2021'.

2.2.3. Risks and opportunities related to climate change (GRI 201-2)

The Company's risk map expressly includes those associated with Climate Change, and incorporates the corresponding management, supervision and control mechanisms¹², including indicators and measures linked to compliance with the CAP.

When analysing risks and opportunities, Aena follows the recommendations of the Task Force on Climate-Related Financial Disclosures (TCFD), considering three climate scenarios¹³. During 2022, the plan is to update and extend the risk study that was completed between 2020 and 2021.

- **Physical risks.** In the medium/long term, the identified risks show that an increase in temperatures, more frequent heat waves, extreme rainfall or a rise in sea level may have a direct impact on infrastructures or the management of transport services due to adverse weather conditions. These risks can lead to an increase in HVAC expenses (OPEX), to the need to incur investments to prolong runways in some airports to avoid operational restrictions or the need to make investments to protect the facilities against extreme

rainfall or the increase in sea level (CAPEX), among others.

- **Transition risks.** Includes the short-, medium- and long-term analysis of market risks (possible changes in consumer behaviour), regulatory risks (arising from the approval of regulations on climate change and decarbonisation) and reputational risks (derived from the current greater interest of investors and society for responsible investments and activity), which may entail additional expenses and costs.
- **Opportunities.** Aena's study includes the detection of opportunities related to the weather such as:
 - Implementation and generation of renewable energy that promotes a new energy consumption model, reducing energy dependence.
 - Promotion of the production of SAF fostering a sustainable aviation fuel market.
 - Development of low emissions services such as electric vehicle recharge points in the parking lots of the airport network.

- Improvement in positioning in capital markets, participating in sustainability indices and climate-related certifications.

London Luton Airport has updated the climate change adaptation report (prepared for the first time in 2011), which identifies some of the physical risks associated with climate change and provides an assessment of their impact on the assets, operations and strategic functions¹⁴. The environmental risk identification, monitoring and management process was initiated in 2021 at ANB.

Based on this analysis, the Company proposes climate change mitigation and adaptation measures:

- **Mitigation measures:** specific actions to reduce the negative environmental impacts associated with airport activity and develop clean means of transport, promoting collaboration actions with airlines and other stakeholders¹⁵.
- **Adaptation measures:** during the Strategic Environmental Assessment of its Master Plans, Aena evaluates and assesses the foreseeable evolution of climate variables, the possible impacts of climate change and the possible effects on airport

¹² As this has been incorporated into the Company's risk map, it is supervised and reviewed by the Board of Directors, through the Audit Committee. Aena's Management Committee updates the risk map annually based on the monthly information provided by the different corporate management departments.

¹³ When analysing physical risks, in line with the recommendations of the TCFD, the following climate scenarios have been considered:

- RCP 8.5 Scenario (Business as Usual scenario): corresponds to a trajectory in which emissions continue to rise at the same rate as they do today, assuming global warming that will probably not exceed 4°C.
- RCP 2.6 Scenario (most aggressive emission mitigation scenario): corresponds to a trajectory in which emissions have been halved by 2050, assuming global warming below 2°C.

When analysing the transition risks related to air traffic demand, the climate scenarios of the International Energy Agency have been used, as they provide information, data, and projections relating to air traffic in various time horizons. The study has focused on the following climate scenarios:

- Beyond 2 Degrees Scenario (B2DS Scenario): this is a scenario in which by the year 2100 the overall average temperature difference is around 1.75°C with respect to pre-industrial records.
- 2 Degrees Scenario (2DS Scenario): this is a scenario that foresees that the temperature gradient will be limited to 2°C.
- Reference Technology Scenario (RTS Scenario): this is a less restrictive scenario, with environmental policies and agreements that are at the same level as current ones (Paris Agreement, Green Deal, etc.), but that have not resulted in a massive deployment of green technology as would occur in the previous scenarios.

¹⁴ The risks and opportunities have been identified and assessed using a standardised risk assessment framework that considers the impact thresholds, the probability of events and the severity of the impacts. The reference framework has been expanded to include a high-level assessment of transition risks at London Luton Airport to reflect current best practices by progressively introducing the TCFD guidelines.

¹⁵ For more details, see the Aena and London Luton Airport Climate Action Plan and Carbon Reduction Plan.

infrastructures and operations, establishing specific measures for adapting the airports. This analysis is performed on the Master Plans that are under review and covers the intermediate time horizons up to the foreseeable development horizon¹⁶.

As regards Aena Emergency situations and their corresponding Action Plans¹⁷ involving aircraft and/or facilities, linked, for example, to weather or geological events, such as the Filomena snowfall or the eruption of the La Palma volcano, which may have repercussions in the airports, there are procedures in place to minimise their impact on operations. Thus, each airport has the corresponding procedures to respond to adverse weather situations. In addition, as an example, in the case of airports close to areas at risk of volcanic eruptions, there are procedures for removing ash.

London Luton Airport has emergency plans in the event of any climate events relating to:

- Action plans for extreme climate events.
- Winter action plans (elimination of ice).
- Greater maintenance frequency and intensity to reduce the risk associated with the impacts of climate change.

- Management plans for adapting to climate change in the long term, including ongoing monitoring and reviews.

AENA CLIMATE RISKS AND OPPORTUNITIES ANALYSIS

 <p>Physical risks</p> <ul style="list-style-type: none"> • Temperature increase. • Peak heat. • Extreme rainfall. • Increased sea level. 	 <p>Transition risks</p> <p>Regulatory and legal</p> <ul style="list-style-type: none"> • Changes in regulations that may result in an increase in the price of carbon and/or the tightening of carbon markets. • Imposition of a use percentage of SAF. • Possible imposition of a new ecotax on the price of tickets. <p>Market</p> <ul style="list-style-type: none"> • Changes in consumer behaviour (demand). • Disincentivise/restrict of domestic flights on routes where there is a high-speed train alternative. <p>Reputation</p> <ul style="list-style-type: none"> • Changes in consumer preferences. • Stigmatisation of the sector.
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 **Opportunities**

- Implementation of renewable energies in airports.
- Revenue from the sale of electricity at electric vehicle charging points.
- Promote a market for sustainable aviation fuels.
- Reduce energy dependence.
- Promote industrial alliances and public-private partnership agreements.
- Promote and increase ACA, CDP and other climatic certifications, which provide a great reputational benefit to the Company.

LONDON LUTON AIRPORT CLIMATE RISKS AND OPPORTUNITIES ANALYSIS

 <p>Physical risks</p> <ul style="list-style-type: none"> • Visibility reduction (fog, cloud cover etc.) • Extreme winds • Floods • Extreme/snowy temperatures • Heat peaks 	 <p>Transition risks</p> <p>Policies</p> <ul style="list-style-type: none"> • Policies to restrict or mitigate actions that contribute to the adverse effects of climate change • Policies that seek to promote adaptation to climate change <p>Technological</p> <ul style="list-style-type: none"> • Competitiveness of the airport <p>Market</p> <ul style="list-style-type: none"> • Changes in demand • Changes in market segments • Competing on the part of carbon options <p>Reputational</p> <ul style="list-style-type: none"> • Change in customer or community perception of the contribution to the transition to a low carbon economy
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 **Opportunities**

- Extension of the summer season in some destinations.
- Capitalisation of efficiencies and improvements derived from supporting technological changes in the aviation sector.
- Capture market share of competitors by achieving future expansions of the airport that could be limited to airports with low carbon emissions intensities and greater infrastructure for new technologies.
- Capture passengers driven by sustainable tourism.

¹⁶ Specifically, in Aeroportos do Nordeste do Brasil, as a result of the climate change risk analysis that was carried out, a series of adaptation measures have been concluded which will be implemented in the airports to minimise the detected risks and their possible impacts, related to adapting the airports' Master Plans in a coordinated manner, and including them in the construction work planned during the next time horizon.

¹⁷ As there are specific emergency plans available for each airport, the local team is responsible for this. The procedures that develop the corresponding emergency plan are specific to each Airport, supported by Central Services, and are certified and inspected by AESA. For more information see Chapter 6

2.2.4. Metrics. Carbon footprint

(GRI 103-2; 302-3; 305-1; 305-2; 305-4; 305-5)

Aena monitors its carbon footprint to evaluate the effectiveness of the measures applied, which has reduced its carbon footprint (scope 1 and 2) compared to 2019 by 66.2% (objective 2021: 60%).

The reductions in Scope 1 with respect to the 2019 base year are due to the implementation of mitigation and efficiency measures and the reduction of activity caused by COVID-19. The reduction of Scope 2 emissions occurs mainly by the purchase of electricity with renewable origin guarantee. The reduction of the Scope 3 footprint compared to 2019

is mainly due to the reduction of traffic, as well as the collaborative initiatives with third parties implemented during 2021.

Evolution of GHG emissions (equivalent tonnes of CO₂)¹⁸

Intensity of GHG emissions, kg CO₂e/ATU (scopes 1 and 2)¹⁹

	Aena	LLA	Aeroportos do Nordeste do Brasil
2019	0.26	0.30	-
2020	0.22	0.61	-
2021	0.16	0.32	0.13

Carbon footprint²⁰

	2019		2020		2021		Aeroportos do Nordeste do Brasil
	Aena	LLA	Aena	LLA	Aena	LLA	
Direct emissions (scope 1) ²¹	22,769.6	2,966	17,112.5	2,326	14,313.6	2,032.2	558.6
Indirect emissions (scope 2) ²²	113,860.9	4,981.3	26,199.3	3,418	31,870.9	1,244	2,246.4
Scope of emissions 3 ²³	3,866,448.1	278,268	1,870,884.6	109,092	2,242,058	N/A ²⁴	N/A

¹⁸ The commercial areas leased by Aena to other entities (concessionaires) are accounted for as part of Aena's total consumption and the generated emissions are considered its own. In any case, Aena provides 100% renewable electricity to its tenants, which means that their emissions associated with their electricity consumption, taking into account market-based criteria, are zero in Scope 2. In the case of the London-Luton Airport, CO₂ emissions linked to the electricity consumption of tenants reached 856.25 tCO₂ in scope 2 (April-December period with 100% renewable energy purchase) and in Brazil, 733.92 tCO₂ in scope 2 in 2021.

¹⁸ Given the start date of its activities, the carbon footprint for Aeroportos do Nordeste do Brasil has been calculated from 2021.

¹⁹ The calculation of Scope 2 emissions has been made according to market-based criteria except for the 2019 and 2020 emissions from London-Luton Airport (location-based).

²⁰ The 2020 NFIS collected estimates calculated with the best information available at the date of publication. In this document, the 2020 data have been adjusted once the consolidated information has been made available. Likewise, the emission factors of 2021 have been used to calculate the current emissions, these being updated each year.

The calculation methodology is based on the GHG Protocol (WRI and WBCSD) and the scope categories 1 and 2 are based on the Airport Carbon Accreditation programme.

²¹ Direct emissions or scope 1. Direct emissions from sources or processes and activities controlled by Aena at airports. The sources of GHG emissions are:

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

²² Indirect GHG emissions of scope 2. Indirect emissions that are produced by the generation of electricity or thermal energy acquired and consumed at our airports. Their source is:

- Consumption of electricity or thermal energy. Emissions associated with the electrical or thermal energy consumption in the activities carried out by airports for air conditioning, lighting and operation of various facilities.

²³ Indirect GHG emissions of scope 3. Indirect third-party emissions produced by the LTO cycle (Landing and Take-Off of aircraft from airlines operating in airports), APUs (Auxiliary Power Units that supply energy to aircraft when they are on the ground), vehicles and machinery that provide Handling services and others (ground access, employee travel, etc.). Indirect scope 3 Aena emissions according to categories established in the CDP (Carbon Disclosure Project) and London-Luton Airport according to Airport Carbon Accreditation categories.

²⁴ Data in preparation and calculation. Pending publication.

Direct GHG emissions (Scope 1)

	2019				2020				2021			
	CO ₂	CH ₄	N ₂ O	CO ₂ e	CO ₂	CH ₄	N ₂ O	CO ₂ e	CO ₂	CH ₄	N ₂ O	CO ₂ e
Aena												
Diesel	12,985.1	0.3	0.3	13,088.3	9,321.4	0.2	0.2	9,396.5	7,950.0	0.2	0.2	8,015.9
Petrol	159.2	0.05	0.01	163.4	129.2	0.04	0.01	132.8	138.5	0.04	0.01	142.2
Natural gas	9,213.7	0.2	0.2	9,266.5	7,394.5	0.1	0.1	7,436.8	5,933.8	0.1	0.1	5,967.8
Propane	54.1	0.001	0.003	55.2	35.1	0.0005	0.002	35.7%	35.5	0.0005	0.002	36.2
Kerosene	194.2	0.005	0.006	196.3	109.6	0.003	0.004	110.7	149.9	0.004	0.005	151.5
TOTAL	22,606.4	0.5	0.5	22,769.6	16,989.8	0.4	0.4	17,112.5	14,207.7	0.4	0.3	14,313.6
London Luton Airport												
Diesel Fuel	1,317.6	1.0	15.8	1,334.5	656.6	0.5	7.9	665.1	629	0.2	8	637.2
Natural gas	1,558.8	2.0	0.8	1,561.7	1,346.5	1.8	0.7	1,349.0	1,386	2	1	1,389
Propane	8.1	0	0	8.1	2.3	0	0	2.3	6	0.005	0.004	6
TOTAL	2,884.5	3.1	16.7	2,904.3	2,005.3	2.3	8.7	2,016.4	2,021	2.2	9	2,032.2
Aeroportos do Nordeste do Brasil												
Diesel	-	-	-	-	-	-	-	-	526.19	0.01	0.01	526.2
Petrol	-	-	-	-	-	-	-	-	32.42	0.01	0.002	32.4
TOTAL	-	-	-	-	-	-	-	-	558.64	0.02	0.012	558.64

The 2020 NFIS collected estimates calculated with the best information available at the date of publication. In this document, the 2020 data have been adjusted once the consolidated information has been made available. Likewise, the emission factors of 2021 have been used to calculate the current emissions, these being updated each year.

The calculation methodology is based mainly on the *GHG Protocol (WRI and WBCSD)* as it is the most commonly accepted at the international level.

The global warming potentials of the Fourth IPCC Evaluation Report (EU Regulation 517/2014) have been used to calculate the tonnes of CO₂e.

Indirect GHG emissions (Scope 2)

	2019				2020				2021			
	Aena											
	CO ₂	CH ₄	N ₂ O	CO ₂ e	CO ₂	CH ₄	N ₂ O	CO ₂ e	CO ₂	CH ₄	N ₂ O	CO ₂ e
Electric power	83,789.64	0	0	83,789.64	0	0	0	0	0	0	0	0
Heating and cooling energy	30,071.26	0	0	30,071.26	26,199.27	0	0	26,199.27	31,870.85	0	0	31,870.85
TOTAL	113,860.90	0	0	113,860.90	26,199.27	0	0	26,199.27	31,870.85	0	0	31,870.85
London Luton Airport												
Electric power	4,941.89	12.67	26.70	4,981.25	3,364.99	10.49	20.10	3,395.57	1,244.00	N/A	N/A	1,244.00
Heating and cooling energy	0	0	0	0	0	0	0	0	0	0	0	0
TOTAL	4,941.89	12.67	26.70	4,981.25	3,364.99	10.49	20.10	3,395.57	1,244.00	N/A	N/A	1,244.00
Aeropertos do Nordeste do Brasil												
Electric power	-	-	-	-	-	-	-	-	2,246.37	0	0	2,246.37
Heating and cooling energy	-	-	-	-	-	-	-	-	0	0	0	0
TOTAL	-	-	-	-	-	-	-	-	2,246.37	0	0	2,246.37

Source of emission factors: MITECO, EMEP/EEA (Corinair), US EPA, US FAA and UK Government (LLA).

Note: Data calculated with market-based criteria, except for the emissions of 2019 and 2020 from London-Luton Airport (location-based). Taking into account the residual electricity mix for non-renewable electric energy in those countries where it is available, and the conversion factor of electricity from renewable sources with certificate of origin is zero.

The 2020 NFIS collected estimates calculated with the best information available at the date of publication. In this document, the 2020 data have been adjusted once the consolidated information has been made available

2.2.5. Efficiency in the use of energy and use of renewable energy (GRI 103-2)

Additionally, the Company's Photovoltaic Plan, consolidated in 2019, will allow 100%²⁵ energy self-supply from solar energy and a production of 950 GWh/year to be reached by 2026.

Likewise, since 2020, all the airports and their tenants consume electricity with a 100% renewable origin guarantee.

This is expected to prevent the emission of 159,200 tons of CO₂ into the atmosphere each year, equivalent to the consumption of about 280,000 homes throughout the year. The renewable energy itself will be distributed to both Aena's own buildings and its tenants.

The photovoltaic plan will turn the Company into a leader in the production of renewable energy for self-consumption.

In 2021, progress has been made towards achieving the plan, by conducting actions linked to the drafting of projects, permit requests, and the depositing of the necessary guarantees, as well as the commissioning

of two new photovoltaic plants in the César Manrique-Lanzarote and Tenerife Sur airports in the Canary Islands, which now join Fuerteventura Airport, where the work was completed by the end of 2020.

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

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

Finally, in 2021, Aena conducted energy audits at 20 of its main airports. The objective of these energy

audits is to develop an action plan based on the study of buildings and other airport facilities to obtain information on the energy consumed by its facilities, especially that which is consumed by electromagnetic lighting and HVAC.²⁶

The actions carried out at London Luton Airport in terms of energy efficiency include the project to change the lighting to low energy consumption LED technology. In 2021, 85% of the lighting had been replaced with LEDs.

All of these initiatives will help reduce the carbon footprint and operating costs.



²⁵ Initially planned 70%.

²⁶ An audit includes the assessment of both technical and economic aspects that influence the energy consumption of all facilities and any other energy-consuming equipment and its main objective is to understand how such consumption is managed, detect weaknesses and propose improvement measures that reduce consumption and improve energy efficiency.

ENERGY EFFICIENCY IN 2021 (GRI 163-2, 302-4)

Some relevant related actions



Climate control



Lighting



Energy saving to improve energy efficiency

Airport	Action	Description	Milestone
Adolfo Suárez Madrid-Barajas Airport	●	Replacement of HVAC equipment for the metro square and p2, t2 and t3 corridors	●
Adolfo Suárez Madrid-Barajas Airport	●	Improved energy efficiency in singular buildings	●
Adolfo Suárez Madrid-Barajas Airport	●	Installation of a new HVAC system in the mechanical rooms of the 6th floor of the south tower	●
Alicante-Elche Airport	●	Installation of blinds on the facade of the terminal dock	●
Alicante-Elche Airport	●	Replacement of HVAC production technology	●
Barcelona-El Prat Josep Tarradellas Airport	●	Renewal of HVAC equipment in terminal t2	●
Barcelona-El Prat Josep Tarradellas Airport	●	Renewal of HVAC equipment in transformation centres	●
Fuerteventura Airport	●	HVAC actions in terminal building	●
Girona-Costa Brava Airport	●	Renewal of air handling units (AHU) in the terminal building	●
Menorca Airport	●	Replacement of heat pumps and coolers phase 1	●
Menorca Airport	●	Replacement of rooftop catwalks	●
Seve Ballesteros-Santander Airport	●	HVAC equipment on the 1st floor east zone	●
Tenerife Sur Airport	●	Replacement of air conditioning equipment in different locations of Tenerife Sur Airport	●
Adolfo Suárez Madrid-Barajas Airport	●	Change of lighting to LED technology	●
Madrid - Cuatro Vientos Airport	●	Change of lighting to LED technology	●
Fuerteventura Airport	●	Change of lighting to LED technology	●
Gran Canaria Airport	●	Change of lighting to LED technology	●
César Manrique-Lanzarote Airport	●	Change of lighting to LED technology	●
Palma de Mallorca Airport	●	Change of lighting to LED technology	●
Salamanca Airport	●	Change of lighting to LED technology	●
Tenerife Norte-Ciudad de La Laguna Airport	●	Change of lighting to LED technology	●
Tenerife Sur Airport	●	Change of lighting to LED technology	●

Emission reduction thanks to renewable energy and energy efficiency facilities²⁷

(GRI 103-2; 302-3; 302-4; 305-5)

In 2021, the amount of emissions avoided due to the Company's renewable energy facilities and energy efficiency, as well as to the purchase of electricity from a renewable source (100% in 2021) has increased to 95,419²⁸ tonnes of CO₂. The increase in reduced emissions achieved thanks to these initiatives is due,

among others, to the commissioning of the photovoltaic plants at César Manrique-Lanzarote and Tenerife Sur airports in 2021 and Fuerteventura Airport at the end of 2020. Additionally, in the case of energy efficiency, the energy savings achieved at Aena thanks to efficient lighting installations were 11,077,075 Kwh.

In this area, the initiative carried out by the Alicante-Elche Airport, which was implemented in 2021, consists of a new intelligent energy savings system in

the Automated Baggage Handling System (ABHS). The installation of a new software with more advanced technology and greater features will allow savings that could reach one million Kwh per year, equivalent to the average energy consumption of 293 households. Updating the IT and programming technology used by the ABHS minimises system start-ups and optimises the time it takes for baggage to travel through.

The amount of emissions avoided due to the Company's own renewable energy facilities and energy efficiency, as well as to the purchase of electrical energy from a renewable source (tonnes of CO₂e)

	2019	2020	2021
Tonnes of CO ₂ e	144,661	101,317	95,419

NOTE: The CO₂ calculation is obtained from the relationship established between the electricity generated by the indicated facilities and the estimated CO₂ emission factor applicable each year.

Source of the electrical factor: REE

In 2019 and 2020, the 'market-based' emission factor was applied and in 2021, the location-based emission factor (LB) was applied according to the real guarantee of origin (GoO) percentage.

²⁷ To date, London Luton Airport and Aeroportos do Nordeste do Brasil have not developed any measure for the implementation of renewable energy for self-consumption.

²⁸ Data calculated with market-based criteria.

Reduction in GHG emissions (SCOPE 1)

Aena Installation	2019		2020		2021	
	kWh generated	tCO ₂ e avoided	kWh generated	tCO ₂ e avoided	kWh generated	tCO ₂ e avoided
²⁹ Cogeneration plant at Bilbao Airport (thermal energy)	18,732	3	153,845	19	482,015	57
Reus Airport geothermal power plant	41,224	7	61,488	8	59,407	7
Total (scope 1)	59,956	10	215,333	26	541,422	64

Reduction in GHG emissions (SCOPE 2)

Aena Installation	2019		2020		2021	
	kWh generated	tCO ₂ e avoided	kWh generated	tCO ₂ e avoided	kWh generated	tCO ₂ e avoided
Wind turbines at La Palma Airport	2,493,058	411	1,904,174	234	2,109,511	249
Photovoltaic modules at Menorca Airport	75,777	13	72,862	9	64,591	8
Photovoltaic modules at Ibiza Airport	72,184	12	83,849	10	78,725	9
Photovoltaic modules at Alicante-Elche Airport	18,771	3	17,814	2	38,635	5
Photovoltaic modules at Adolfo Suárez Madrid-Barajas Airport	88,780	15	48,964	6	15,465	2
Photovoltaic modules at Madrid-Cuatro Vientos Airport	25,627	4	81,101	10	20,323	2
Photovoltaic modules at La Palma Airport	38,301	6	53,279	7	30,535	4
Photovoltaic modules at Valencia Airport	34,720	6	33,532	4	31,800	4
Photovoltaic modules at Vigo Airport	19,167	3	13,815	2	11,195	1
Self-consumption photovoltaic plant at Tenerife Sur Airport	N/A	0	N/A	0	1,752,063	207
Self-consumption photovoltaic plant at César Manrique-Lanzarote Airport	N/A	0	N/A	0	555,160	66
Self-consumption photovoltaic plant at Fuerteventura Airport	N/A	0	N/A	0	1,823,289	215
Cogeneration plant at Bilbao Airport (electricity)	10,513	2	128,860	16	342,368	40
Total (scope 2)	2,876,898	475	2,438,250	300	6,873,659	811

²⁹ As an improvement in the reporting process this year, the production of energy from the 'Cogeneration Plant at Bilbao Airport' has been broken down into the following: in Scope 1 the thermal energy produced and in Scope 2 the electric energy in the 2019 and 2020 period. Likewise, the data from previous years have been adjusted once the consolidated information has been made available.

Main indicators of energy consumption (GRI 302-1; 302-3)

The electricity consumption made by the leasing companies of the Spanish network of Aena (data corresponding to 98% of the centres) reached a total of 385,057 GJ in 2021, which constitutes 13.3% of the global consumption of Aena. The consolidated

percentage, including the London Luton and ANB Airports, is 13.7%.

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

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



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

(**) The data relating to the Aeroportos do Nordeste do Brasil correspond only to 2020, the year from which these airports began their activity as part of Aena. The increase in energy intensity compared to 2019 data is mainly due to the decrease in airport operations caused by COVID-19.

Consumption of non-renewable fuels (GJ)

	2019		2020			2021		
	Aena	London Luton Airport	Aena	London Luton Airport	Aeroportos do Nordeste do Brasil	Aena	London Luton Airport	Aeroportos do Nordeste do Brasil
Diesel Fuel	175,238	19,001	128,154	9,528	1,871	109,872	9,162	7,578
Petrol	2,297	-	1,907	-	-	2,044	-	487
Natural Gas	164,590	30,580	132,092	26,413	-	105,999	29,329	-
Propane	851	138	551	38	-	558	102	-
Kerosene	2,661	-	1,501	-	-	2,054	-	-
Subtotal	345,637	49,719	264,205	35,978	1,871	220,526	38,593	8,065

Non-renewable energy consumption (GJ)

	2019		2020			2021		
	Aena	London Luton Airport	Aena	London Luton Airport	Aeroportos do Nordeste do Brasil	Aena	London Luton Airport	Aeroportos do Nordeste do Brasil
Electricity	1,374,982	70,158	-	52,432	88,535	-	14,158	21,079
Heating	201,131	30,580	179,520	26,413	-	212,700	27,301	-
Cooling	421,865	-	343,021	-	-	392,902	-	-
Subtotal	1,997,978	100,739	522,541	78,845	88,535	605,602	41,459	21,079

Renewable energy consumption (GJ)

	2019		2020			2021		
	Aena	London Luton Airport	Aena	London Luton Airport	Aeroportos do Nordeste do Brasil	Aena	London Luton Airport	Aeroportos do Nordeste do Brasil
Electricity	2,072,169	-	2,591,629	-	-	2,907,279	44,832	111,492
Heating/Cooling	148	-	221	-	-	214	0	0
Subtotal	2,072,317	-	2,591,850	-	-	2,907,493	44,832	111,492

The data relating to Aeroportos do Nordeste do Brasil correspond only to 2020 and 2021, the years from which these airports began their activity as part of Aena.

The Aena data on energy consumption includes the consumption by the concession companies. The data for the London Luton Airport and ANB on electricity consumption does not include the consumption by concession companies. This report has improved the calculation of the 2019 and 2020 indicators, unifying their units and using the latest consolidated data in the case of 2020.

2.2.6. Renewable energies (GRI 302-1)

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

As previously indicated, in 2021, the photovoltaic plants at César Manrique-Lanzarote, Tenerife Sur and Fuerteventura airports came into service.

% Electricity with renewable source guarantee

	Aena	London Luton Airport	Aeroportos do Nordeste do Brasil
2019	60%	0%	0%
2020	100%	0%	0%
2021	100%	100% ³⁰	84.1%

Renewable energy facilities at Aena ³¹

		2019	2020	2021
Energy generated from renewable sources (GJ)	Wind power	8,975	6,855	7,594
	Solar power/photovoltaics	1,344	1,459	15,918
	Solar thermal energy	0	0	0
	Geothermal	148	221	213.86
	Subtotal	10,467	8,535	23,726
Energy consumed from renewable sources (GJ)	Wind power	8,453	6,353	7,067
	Solar power/photovoltaics	1,244	1,361	15,824
	Solar thermal energy	0	0	0
	Geothermal	148	221	214
	Subtotal	9,845	7,936	23,105
Energy sold from renewable sources (GJ)	Wind power	522	502	527
	Solar power/photovoltaics	100	97	94
	Solar thermal energy	0	0	0
	Geothermal	0	0	0
	Subtotal	622	599	621

³⁰ Purchase of renewable energy with guarantee of origin in Luton since April 2021, which constitutes 76% of the year

³¹ The actual energy consumed and generated through renewable sources at London Luton Airport and at Aeroportos do Nordeste do Brasil is zero. The increase in Spain is due to the new facilities: plants at César Manrique-Lanzarote, Fuerteventura and Tenerife Sur airports.

2.3. Contamination (GRI 103-2)

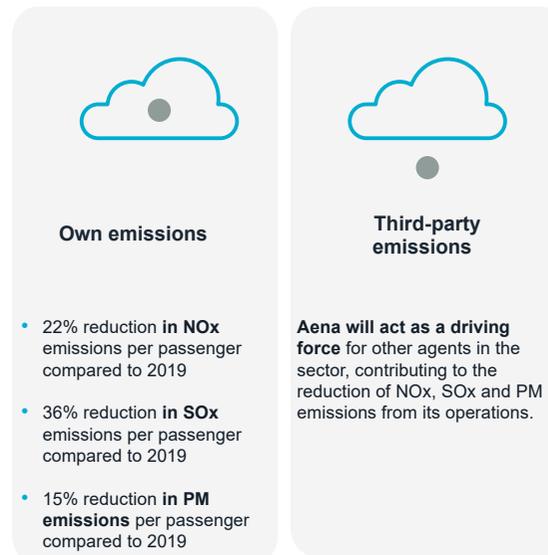
2.3.1. Air pollution³²

The Air Quality Action line, which is framed within the Sustainability Strategy, goes hand in hand with the development of the Climate Action Plan, in which strategic projects are defined that aim both to reduce CO₂ emissions and to reduce contaminants linked to air quality (e.g., NO_x, SO_x, PM₁₀). In order to achieve these objectives, Aena includes the start of a set of effective actions and measures, focused on energy efficiency, the use of renewable energies, sustainable mobility and the reduction of third-party emissions.

In accordance with the principles of Aena's Integrated Quality and Environmental Policy, they carry out Air Quality Control and Monitoring Programmes in the vicinity of the airports. Thus, to date, the air quality monitoring networks located in several airports characterise, control, monitor and correct the atmospheric emissions generated by the activity. These measure the concentration levels of the main substances such as sulphur dioxide (SO₂), nitrogen oxides (NO_x) and particulate matter (PM). These substances come from

both Aena's own activities, as well as other sources of emission in the surrounding area. This enables continuous and automatic control of air quality in the area of influence of a number of airports.

These networks are implemented in the airports of Adolfo Suárez Madrid-Barajas, Barcelona-El Prat Josep Tarradellas, Palma de Mallorca, Alicante-Elche and Málaga-Costa del Sol³³. In certain cases, measurement stations are integrated and form part of the municipal and/or autonomous community air quality surveillance networks. Aena's strategic objectives for 2030 in relation to air quality are:



For its part, London Luton Airport, thanks to the installation of air quality monitors, has identified the areas with the most emissions and, as a result, has implemented new actions (for example, the introduction of a specific policy for buses and coaches, in order to improve air quality in front of the terminal). To date, 19 different locations have been monitored to ensure NO₂ measurements in the areas of greater use and impact; the concentration levels of particulate matter (PM) are measured in one location. The data obtained by this Airport have been shared with the surrounding local authorities and are also published monthly.

By 2022, London Luton Airport has set itself the goal of modelling air quality at the airport and developing an air quality strategy to improve it.

As for ANB, they plan to carry out an atmospheric pollutant levels inventory, among other measures, starting in 2022. In addition, in the medium term, they intend to update the electrical equipment and replace fossil fuels with biofuels, as well as acquire electric car charging points.

³² Data not available for ANB because the air quality monitoring system is in the implementation phase.

³³ It can be consulted the reports from the surveillance network of Adolfo Suárez Madrid-Barajas Airport, as well as the data from the stations around Barcelona-El Prat Josep Tarradellas Airport that are attached to the Catalan Government network. See section "About this report – Links of interest".

Atmospheric pollution indicators (GRI 305-7)

Nitrogen oxides (NOx), sulphur oxides (SOx) and other significant air emissions

	NOx(t)		SOx(t)		CO(t)		NMVOC(t)		PM10(t)		PM2.5(t)	
	Aena	LLA	Aena	LLA	Aena	LLA	Aena	LLA	Aena	LLA	Aena	LLA
2019												
Diesel	69.8684	N/A	6.3357	N/A	22.0498	N/A	5.2221	N/A	4.4890	N/A	4.1596	N/A
Petrol	0.7597	N/A	0.0005	N/A	6.0814	N/A	0.6717	N/A	0.0018	N/A	0.0018	N/A
Natural Gas	12.1797	N/A	0.1103	N/A	4.7731	N/A	3.7856	N/A	0.1284	N/A	0.1284	N/A
Propane	0.0587	N/A	0.0005	N/A	0.0394	N/A	0.0334	N/A	0.0601	N/A	0.0601	N/A
Kerosene	0.3094	N/A	0.0626	N/A	41.3201	N/A	1.2432	N/A	9.3378	N/A	9.3378	N/A
Total 2019	83.1759	N/A	6.5096	N/A	74.2640	N/A	10.9560	N/A	14.0171	N/A	13.6877	N/A
2020												
Diesel	50.7476	2.9627	4.5093	0.0849	16.0715	1.1549	3.7550	0.2228	3.2463	0.2422	3.0121	0.2368
Petrol	0.6328	0	0.0004	0	4.8804	0	0.5563	0	0.0015	0	0.0015	0
Natural Gas	9.7748	1.9071	0.0885	0.0173	3.8307	0.7474	3.0381	0.5928	0.1030	0.0201	0.1030	0.0201
Propane	0.0381	0	0.0003	0	0.0252	0	0.0213	0	0.0375	0	0.0375	0
Kerosene	0.1745	0	0.0353	0	23.3022	0	0.7011	0	5.2660	0	5.2660	0
Total 2020	61.3679	4.8698	4.6338	0.1022	48.1100	1.9023	8.0719	0.8156	8.6543	0.2623	8.4201	0.2569
2021												
Diesel	45.6732	4.6450	3.5274	0.1251	14.6282	1.3590	3.4370	0.3210	2.8784	0.2336	2.7122	0.2296
Petrol	0.6694	0.0000	0.0005	0.0000	5.9875	0.0000	0.6030	0.0000	0.0017	0.0000	0.0017	0.0000
Natural Gas	7.8439	1.9091	0.0710	0.0173	3.0740	0.7481	2.4380	0.5934	0.0827	0.0201	0.0827	0.0201
Propane	0.0393	0.0030	0.0003	0.0000	0.0230	0.0163	0.0192	0.0149	0.0278	0.0548	0.0278	0.0548
Kerosene	0.2388	0.0000	0.0483	0.0000	31.8897	0.0000	0.9595	0.0000	7.2066	0.0000	7.2066	0.0000
Total 2021	54.4646	6.5570	3.6476	0.1424	55.6023	2.1234	7.4567	0.9293	10.1972	0.3085	10.0310	0.3046

As an improvement to the report, the 2020 data have been updated once the consolidated information has been available.

Specific objectives regarding atmospheric pollution

	Aena	London Luton Airport	Aeroportos do Nordeste do Brasil
Short-term	<ul style="list-style-type: none"> Act as a driving force for other agents in the sector, contributing to the reduction of NOx, SOx and PM emissions from its operations. Start-up of pilot projects to absorb and reduce air pollutants through innovative solutions. 	<ul style="list-style-type: none"> Presentation of a formal strategy to improve air quality before the end of 2022, with specific objectives. 	<ul style="list-style-type: none"> Inventory of atmospheric pollutant levels.
Medium/long	2030: <ul style="list-style-type: none"> 22% reduction in NOx emissions per passenger compared to 2019. 36% reduction in SOx emissions per passenger compared to 2019. 15% reduction in PM emissions per passenger compared to 2019. 		<ul style="list-style-type: none"> Updating of electrical equipment and replacement of fossil fuels with biofuels, as well as acquiring electric car charging points.

2.3.2. Light pollution

The exterior lighting of the airports of Aena, Aeroportos do Nordeste do Brasil and London Luton Airport is subject to current regulations on operational safety.



2.3.3. Noise

Noise pollution is one of the main environmental aspects generated by airport activity.

One of Aena's priorities is to reduce noise levels to a minimum and protect the quality of life of the surrounding populations.

That is why noise management is part of another of the lines of action of the Sustainability Strategy 2021–2030. As part of the community programme and sustainable value chain, limiting the impact of noise on local communities becomes a strategic objective for the Organisation.

During 2021, air traffic has been recovering its activity, thus increasing the impact of sound on the

environment. In order to facilitate a traffic recovery that is respectful and sustainable with the environment, Aena has continued to work to improve the measurement, control and minimisation of noise, as well as to ensure active and bidirectional communication with all stakeholders involved.

Specific objectives in reducing noise levels

	Aena	London Luton Airport	Aeroportos do Nordeste do Brasil
Short-term	<ul style="list-style-type: none"> Maintenance and expansion of noise monitoring systems in relevant noise situations, in order to share information with passengers in the future, improving transparency and communication with its surroundings. Collaboration with ENAIRE to improve air navigation procedures. 	<ul style="list-style-type: none"> Maintain a track performance of no less than 99%. 	<ul style="list-style-type: none"> Monitoring and tracking of noise in 2022.
Medium/long	<ul style="list-style-type: none"> Continuation of the Sound Insulation Plans, with a forecast of increasing the volume of insulated homes by 36%, reaching 33,000 insulated homes by 2030. 	<ul style="list-style-type: none"> Modernise LLA airspace to ensure operator efficiency and reduce ground noise. 	<ul style="list-style-type: none"> Carry out noise mitigation measures with the surrounding community.

Evolution and progress of the objectives set in terms of reducing noise levels

Aena	London Luton Airport
<p>2021:</p> <ul style="list-style-type: none"> Insulated homes: 1,185 Next amount allocated: €7.6 million Implementation of three new Sound Insulation Plans at César Manrique-Lanzarote, Tenerife Sur and Vitoria airports. Noise monitoring system at Seville Airport Approval of the Aeronautical Easements of César Manrique-Lanzarote, Tenerife Norte-Ciudad de La Laguna and Tenerife Sur airports, adding up to 12 approved Acoustic Easements, as well as their corresponding Action Plans. <p>2000-2021:</p> <ul style="list-style-type: none"> Total homes insulated in the period: 25,711. Amount: €340,327,204 	<p>2015-2021:</p> <ul style="list-style-type: none"> Total homes insulated in the period: 139. Amount: €445,912.10³⁴

³⁴ Exchange rates as of 31/12/2020 used for Balance Sheet accounts EUR vs GBP = 0.85960.

Measurement, reduction and control

(GRI -A07)

According to legislation, Strategic Noise Maps (SNMs) must be made for airport infrastructures with more than

50,000 operations annually. These maps are the starting point for diagnosing global exposure to noise in the vicinity of airports during a full year. This way, the noise levels in the vicinity are controlled, applying measures to reduce or improve the impact of sound

and, in any case, always meet the levels required by law.

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

SNM PHASE I:

Noise levels	Gran Canaria Airport	César Manrique-Lanzarote Airport (*)	Tenerife Sur Airport	Tenerife Norte-Ciudad de La Laguna Airport	Alicante-Elche Airport	Bilbao Airport	Barcelona-El Prat Josep Tarradellas Airport	Ibiza Airport (*)	Adolfo Suárez Madrid-Barajas Airport	Málaga-Costa del Sol Airport	Palma de Mallorca Airport	Valencia Airport	Sevilla Airport (*)
Lday 65 dB (A)	191	-	0	1,049	84	24	11	-	2,058	299	90	10	-
Levening 65 dB (A)	66	-	0	825	90	23	19	-	1,957	314	98	8	-
Lnight 55 dB (A)	614	-	120	0	172	23	24	-	708	605	336	52	-

SNM PHASE II:

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

SNM PHASE III:

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

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

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

Evolution of the number of people exposed to noise at London Luton Airport

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

Associated legislation:

- Defra Action Plan Guidance For Airport Operators (pdf).
- Civil Aviation Act.
- EU Environmental Noise Directive 2002/49.

In 2021, in compliance with the procedures for notifying the European Commission of the data of the Strategic Noise Maps and Action Plans to be prepared in the fourth phase of application of Directive 2002/49/EC, the General Directorate of Civil Aviation has been informed of the large airports in Aena's network that, according to the data corresponding to the year 2019, exceed the amount of 50,000 annual operations.

The level of noise incidence in the territory is defined by the Acoustic Easements (AEs). To this end, the acoustic impact generated in the airports is evaluated and its evolution is predicted.

In 2021, the AEs for César Manrique-Lanzarote, Tenerife Norte-Ciudad de La Laguna and Tenerife Sur airports were approved. The Joint Committee on Easements has also granted its approval for the AEs of the A Coruña and Fuerteventura airports and for the review of the AEs of the Bilbao and Sevilla airports.

In total, Aena currently has 12 approved AEs, as well as their corresponding Action Plans.

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

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

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

Palma de Mallorca, Sevilla, Tenerife Norte-Ciudad de La Laguna, Tenerife Sur and Valencia.

Sound Insulation Plans

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

During 2021, a total of 19 meetings have been held by Committees associated with the Sound Insulation Plans, which Aena is carrying out in the vicinity of its airports, significantly exceeding the number of meetings held in 2020, which was characterised by the

state of emergency caused by the COVID-19 pandemic.

In this situation, during 2021, the execution and investment values of previous years have been recovered, and even exceeded. In particular, 1,185 homes have been insulated this year and an amount close to €7.6 million has been executed.

In addition, during this year, three new Sound Insulation Plans have been implemented, belonging to César Manrique-Lanzarote, Tenerife Sur and Vitoria airports. The census of the Sound Insulation Plan at Seville Airport has been updated this year, as a result of which the number of homes included in this plan has doubled. This set of actions has allowed for the inclusion in these plans of an approximate amount of 3,500 new homes and sensitive use buildings.

In addition, the approval in 2021 of the acoustic easement of the Tenerife Norte-Ciudad de La Laguna Airport will cause the expansion of the census of this plan.

Likewise, the meetings held by the Mixed Committees of the airports of A Coruña, Bilbao, Fuerteventura and Seville have made it possible for these Committees to issue favourable reports on their Acoustic Easement proposals, or their reviews, with the foreseeable extension of the censuses of their respective Sound Insulation Plans.

In order to ensure the proper execution of the technical and administrative actions associated with these Sound Insulation Plans, their Management Office has continued to provide information to the interested parties, processing the corresponding sound insulation files and controlling the proper execution of the construction work carried out. It has also provided advice to individuals and various institutions on all aspects related to this activity, when required. At London-Luton Airport, the cumulative investments made from the start date of the actions until 31 December 2021 amount to €445,912.10³⁵, with a total of 139 households benefiting.

Communication

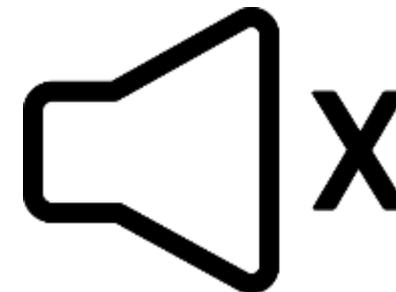
Different tools are available to report the noise management actions at Aena:

- Interactive Noise Maps (*WebTrak*), implemented in 12 airports in the network³⁶.
- Publication of monthly Noise Reports on the public website. These reports analyse the dispersion of the trajectories in the municipalities that surround the airport, the monthly evolution in the use of the southern configuration, the incidences and the distribution of aeronautical operations through the published nominal routes.
- Annual follow-up reports on the Action Plans pertaining to noise pollution.
- Environmental Monitoring Commissions of the SIPs and Joint Commissions created to establish the Acoustic Easements and their associated Action Plans.
- Specific Management Office for the information, execution, control and management of the SIPs.
- In the case of London Luton Airport, follow-up reports are issued quarterly with details on aircraft movements, as well as the follow-up of the noise and complaints generated by the activity itself.

³⁵ Exchange rates as of 31/12/2020 used for Balance Sheet accounts EUR vs GBP = 0.85960.

³⁶ See section "About this report – Links of interest".

Airport	No. of soundproofed buildings	Amount invested €M (2000–2021)
A Coruña Airport	783	6,842,340
Alicante-Elche Airport	2,998	41,293,831
Barcelona-El Prat Josep Tarradellas Airport	50	2,966,717
Bilbao Airport	1,580	21,323,170
César Manrique-Lanzarote Airport	0	791
Girona-Costa Brava Airport (*)	0	50,902
Gran Canaria Airport	616	9,984,565
Ibiza Airport	611	6,443,377
La Palma Airport	22	402,329
Adolfo Suárez Madrid-Barajas Airport	12,919	170,345,671
Málaga-Costa del Sol Airport	814	16,319,098
Melilla Airport	0	0
Menorca Airport	10	214,971
Palma de Mallorca Airport	1,031	17,525,671
Pamplona Airport	43	1,224,084
Sabadell Airport	0	13,633
Santiago-Rosalía de Castro Airport	15	296,570
Sevilla Airport	128	520,463
Tenerife Norte-Ciudad de La Laguna Airport	1,093	25,657,503
Tenerife Sur Airport	0	1,212
Valencia Airport	2,758	15,367,002
Vigo Airport	240	3,530,149
London Luton	139	445,912.10
Total 2020-2021 (Aena and London Luton)	25,850	340,769,961.10



2.4. Sustainable use of resources: water

2.4.1. Water management

Water is the main natural resource that is consumed in Aena's facilities (mostly for human consumption, irrigation of green areas, cleaning, fire service and execution of construction work). Aena rigorously controls its use to ensure the efficient supply of water to employees, passengers and the rest of the users who move through the facilities daily. In recent years, a series of internal measures have been implemented, focused on improving water efficiency, including, among others, the replacement of all of taps with others with automatic sensors, to make the output flow more efficient and promote lower consumption.

Aena's Sustainability Strategy includes, among its lines of action, the implementation of a Strategic Water Management Plan, applicable to all centres, focused on achieving the following strategic objectives:

- Manage water in a manner that addresses the loss of freshwater availability and quality associated with climate variability, decreasing water consumption by 10% per passenger by 2030 compared to 2019 (5% reduction in 2026).
- Manage the water supply sources and risks derived from climate change in an integrated manner, increasing the use of alternative water sources per passenger by 150% by 2030 with respect to 2019 (50% increase in 2026).

In 2021, Aena calculated the water footprint of all Aena's centres and the Action Plans for the 46 airports have been prepared.

Aena has completed the calculation of its water footprint in all its centres in Spain. The calculation year selected was 2019 and both the calculation and the assessment of their sustainability, have been based on the methodology of the Water Footprint Network (WFN).

For its part, London Luton Airport has implemented measures and systems to achieve a more efficient use of water, as part of the maintenance and improvement of the airport base. The Responsible Business Strategy includes among its objectives: the reduction of water consumption per passenger (to less than 6.98 litres/passenger, which implies a 10% reduction with respect to the baseline year) and the use of reclaimed water.

Aeroportos do Nordeste do Brasil plans to review projects for the applicability of water reuse and supply control in 2023. In the medium/long term, the Company foresees the use of quantification using telemetry, which allows for more efficient management and facilitates monitoring of the reduction of consumption.

Water management objectives

	Aena	London Luton Airport	Aeroportos do Nordeste do Brasil
Reduction of consumption	2026: <ul style="list-style-type: none"> • Reduction of water consumption by 5% per passenger compared to 2019. • Increase in the use of alternative water sources per passenger by 50% compared to 2019. 2030: <ul style="list-style-type: none"> • Reduction of water consumption by 10% per passenger compared to 2019. • Increase in the use of alternative water sources per passenger by 150% compared to 2019. 	2023: <ul style="list-style-type: none"> • Reduction of total water consumption to 6.98 litres/passenger compared to 2018. 	2023: <ul style="list-style-type: none"> • Review of sustainability projects that involve water consumption that will be applied after the construction extensions in. • Quantification of consumption reduction using telemetry. • Following the implementation of projects aimed at promoting the reuse of water in 2022, the use of water by hydroelectric sources will be reduced to 50%. • A significant reduction is expected in 2023 following the implementation of projects aimed at promoting the reuse of water by 2022.

2.4.2. Initiatives for responsible water consumption

Some of the network's airports, such as Menorca, have a complete system of flow meters with low consumption wireless transmission, thanks to which they have improved the measurement of water flow at various points of the supply network, the control of consumption and the detection of leaks. This in turn has allowed them to achieve a more efficient management of water resources.

In several airports located in territories in which this resource is scarce, such as islands, wastewater is reused, after passing through a purification system based on the application of a disinfection treatment and additional filtering. This purified water is used to water green areas and avoid the extra consumption of mains water.

Alicante-Elche Airport takes advantage of the rejected water from various processes to give it a second use.

This innovative strategy implemented in 2020 has involved the installation of a separate network for the collection of water from the terminal's sinks and the condensed water produced by the HVAC equipment. Once collected, the water is incorporated into a tank so it can be used a second time, thus preventing it from being discarded, and it is treated to enable it to be used in the toilets that are distributed in the different WCs of the airport complex.

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

Finally, with the aim of reducing water consumption in the airport's facilities, Aena has established a directive to eliminate the water salutes that were carried out by the fire department to welcome aircraft from new routes or other celebrations.

Adolfo Suárez Madrid-Barajas Airport has been the winner of the Innova Awards for 'best sustainable idea'. By including improvements in one of the main runway maintenance tasks: cleaning the rubber remains left by the aircraft that land in the contact zones of the runways. These rubber deposits must be removed so that the surface is not slippery and the friction and texture parameters set out in national and international regulations are met.

These rubber cleaning campaigns use trucks that use an injection-aspiration system with high-pressure water. The award-winning idea uses machinery with a special technique that separates the rubber residue from the water, allowing for the water to be reused and reducing consumption by around 80% without the need for chemical agents.

In addition, as already mentioned, Aena has developed two white books that incorporate sustainability criteria into the urban and architectural design of future real estate developments in the main airports of Adolfo Suárez Madrid-Barajas and Barcelona-El Prat Josep Tarradellas, related to the sustainable consumption of resources, as well as the reuse of water. The criteria

developed for this purpose include the collection of storm waters from the roofs of the buildings and their use, the implementation of separation networks and the promotion of sustainable urban drainage.

Taking into account the circumstances of the environment, in some island airports, such as Fuerteventura, Ibiza and César Manrique-Lanzarote, the Company uses seawater from desalination plants. In this regard, Aena collaborates with institutions to promote some of these initiatives aimed at reducing water consumption at our facilities.

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

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

For its part, London Luton Airport monitors water consumption in each area of the business monthly to identify demand peaks to encourage drops in the future. Additionally, it works in coordination with the supply

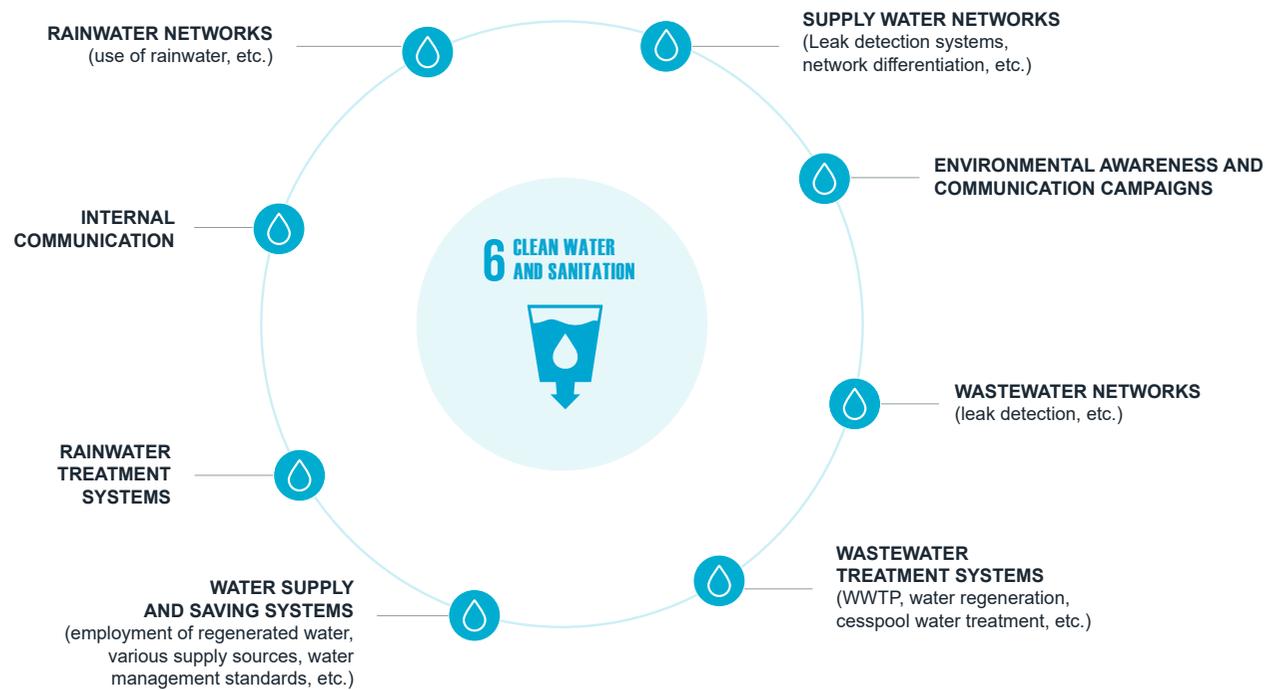
company to identify areas with high water consumption in order to implement reduction measures. Once identified, they foster coordination with the partners and

third parties that have high water consumption (terminal services, tenant catering facilities, etc.).

WATER MANAGEMENT INITIATIVES AT AENA



Initiatives aimed at reducing water consumption in the network's airports and minimising the generated spills to preserve nearby ecosystems.



Water consumption indicators (GRI 303-5)

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

Water extraction/consumption

Thousands of m ³	Aena			LLA			Aeroportos do Nordeste do Brasil	
	2019	2020	2021	2019	2020	2021	2020	2021
Desalination water/Sea water	185.1	154.93	202.18	n/a	n/a	n/a	n/a	n/a
Water from wells/Underground water	1,771.8	1,324.47	1,399.14	n/a	n/a	n/a	63.3	65.06
Drinking water from the network	3,463.6	2,181.9	2,689.73	133.3	52.7	48.20	70.6	161.88
Consumption of regenerated water purchased from third parties and from a regenerated water network/Municipal water supply or from other water companies	42.0	91.9	110.93	n/a	n/a	n/a	n/a	n/a
Total water consumption	5,462.50	3,753.20	4,401.98	133.30	52.70	48.20	133.9	226.94
Reused water/Rainwater collected directly and stored/Purified wastewater	133.90	282.1	297.12	n/a	n/a	n/a	n/a	n/a

The differences with the data published in previous years are due to an improvement in the quality of the report based on consolidated data.

Regions with water stress

	2019	2020	2021
Water consumption (thousands of m ³)	3,385.64	2,205.99	2,820.75
% Water consumption in regions with water stress over total ³⁷	62%	59%	64%

The differences with the data published in previous years are due to an improvement in the quality of the report based on consolidated data.

³⁷ The regions considered to have water scarcity have been obtained from the WRI Aqueduct, which are those that are 40% (extreme and high level) above the stress threshold, corresponding to the location of 33 airports of Aena's network.

The percentage of water consumption by the Aena tenant companies (Spanish network ³⁸) corresponds to 29.4% of the global consumption of Aena in 2021.

Total wastewater discharges (Thousands of m3)

	Final destination	2019	2020	2021
Aena	Surface waters (prior to WWTP step)	309.89	269.92	371.68
	Subsoil/wells	31.26	40.59	47.83
	Sanitation network-Municipal WWTP	2,643.85	1,720.45	2,433.53
Aeropertos do Nordeste do Brasil	Sanitation network-Municipal WWTP	N/A	118.5	120

The differences with the data published in previous years are due to an improvement in the quality of the report based on consolidated data.
Data not available for London Luton Airport.



³⁸ Data corresponding to 92% of the centres of the Spanish network of Aena

2.5. Protecting biodiversity

2.5.1. Biodiversity management and protection model (GRI 103-2; 304-1)

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

This is why Aena integrates the protection and promotion of local and global biodiversity as an objective in its Sustainability Strategy, through actions such as the protection of natural areas, the study of the environment's fauna and control services, the control of vegetation inside and outside the airports or through the implementation of initiatives linked to combating the trafficking of wild species.

Given the different locations of the airports in the Aena network, the diversity and types of ecosystems that can be found overall, vary greatly. Therefore, each airport can house different habitats that have been preserved and maintained over time.

2.5.2. Protected spaces (GRI 103-2; 304-1)

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

natural environments as a consequence of the airport activity.

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

The Company's website³⁹ contains the resolutions obtained in relation to these studies, which establish information on the nature of the direct and indirect significant impacts on biodiversity in terms of pollution, species reduction, or habitat transformation.

Likewise, these environmental impact studies, for both master plans and projects, also analyse the direct and indirect significant positive and negative impacts related to the following:

- the affected species;
- the extent of the impacted areas;
- the duration of the impacts;
- the reversibility or irreversibility of the impacts.

In Brazil, the Fauna Risk Management Committee (FRMC) has been established in 2021. The objective is to ensure the improvement of biodiversity management in the airports and their surroundings.

2.5.3. Studies on the fauna in the vicinity and control services (GRI 304-2)

Within the framework of operational safety, wildlife management is carried out at all Aena airports, in a manner that protects natural heritage and maintains the safety and quality standards inherent to aeronautical operations. In this context, in Spain, in compliance with those established by the EASA, ICAO and National regulations, the Fauna and Habitats Study is periodically prepared for each airport, validating the results with the collaboration of local and autonomous entities, and the State Air Security Agency (AESA).

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

Likewise, Aena has innovation as a tool for the control and protection of fauna, highlighting 2 projects:

³⁹ See section "About this report – Links of interest".

- **Halcodrón:** The project will confirm the functionality of unmanned aircraft or RPAS (Remotely Piloted Aircraft) to control wildlife in essential areas at heliports and airports. The objective is to study, in situ, the true effectiveness of the drones camouflaged as birds of prey in order to scare away surrounding birds and, thus, minimise the risk of impacts with aircraft. It is an addition to the wildlife control service, which is usually carried out with birds of prey. The flight is carried out in compliance with all security requirements, and with the coordination required with all the necessary bodies (Major Air Status, Local Authorities, etc.). During 2021, a pilot test was carried out in the Ceuta heliport with a RPA in the form of a goshawk. By means of tagging and tracking flights, with standardised data taken on operating conditions and their effect on the birds that are to be expelled from the heliport, in order to test their degree of effectiveness with the yellow-legged gull (*Larus michahellis*), a species that generates greater risk in the aforementioned heliport.
- **Radar Aviar:** this project, which is scheduled to be launched in 2022, consists of a system based on radar technology for the detection of movements of birds in the airport surroundings, compatible with the equipment and systems of the airport. The use of this technology in an airport environment is part of the improvement of operational safety, as well as the improvement of information on the ethology of fauna, as it is a tool that could help identify and characterise patterns of bird movements, as well as the identification of foci of attractions. In this regard, it is expected that the information obtained will allow for mitigating measures to be defined that are more adapted to the associated risk of each species, in order to evaluate the efficacy of the

measures already implemented and to provide additional information on events with fauna in the vicinity of the airport.

2.5.4. Control of vegetation in the environment of the airports

Aena monitors the impact of the environment's habitats on the airport's operational areas, encouraging coordination with the entities responsible for their management and also monitors the vegetation that exists in the surroundings of the airport enclosures through the implementation of specific measures, ensuring Operational Safety while promoting care and respect for the environment. In addition, within the framework of collaborations with third parties, the Company establishes agreements with farmers, companies and cooperatives that promote the agricultural exploitation of the land and ensure the maintenance of the vegetation.

The participation of La Palma Airport in the LIFE IP Azores Natura Europe project, together with the World Biosphere Reserve of the Canary Islands Foundation and the Government of Azores. This project seeks the maximum possible participation and consensus of all stakeholders (scientific community, political-institutional environment, ports, airports, and citizens in general), with the aim of creating an operational framework for prevention, early warning and rapid response against species of invasive exotic flora on the island of La Palma.

In Brazil, the Identification of Fauna Hazards (IPF [Identificación de Peligros de Fauna]), as well as the Fauna Risk Management Programme (PGRF [Programa de Gestión de Riesgos de Fauna]), together

with its corresponding Aerodrome Fauna Management Plan (PMFA [Plan de Gestión de Fauna de Aeródromo]), are the main tools for managing fauna risks.



2.6. Waste management and circular economy in airport facilities

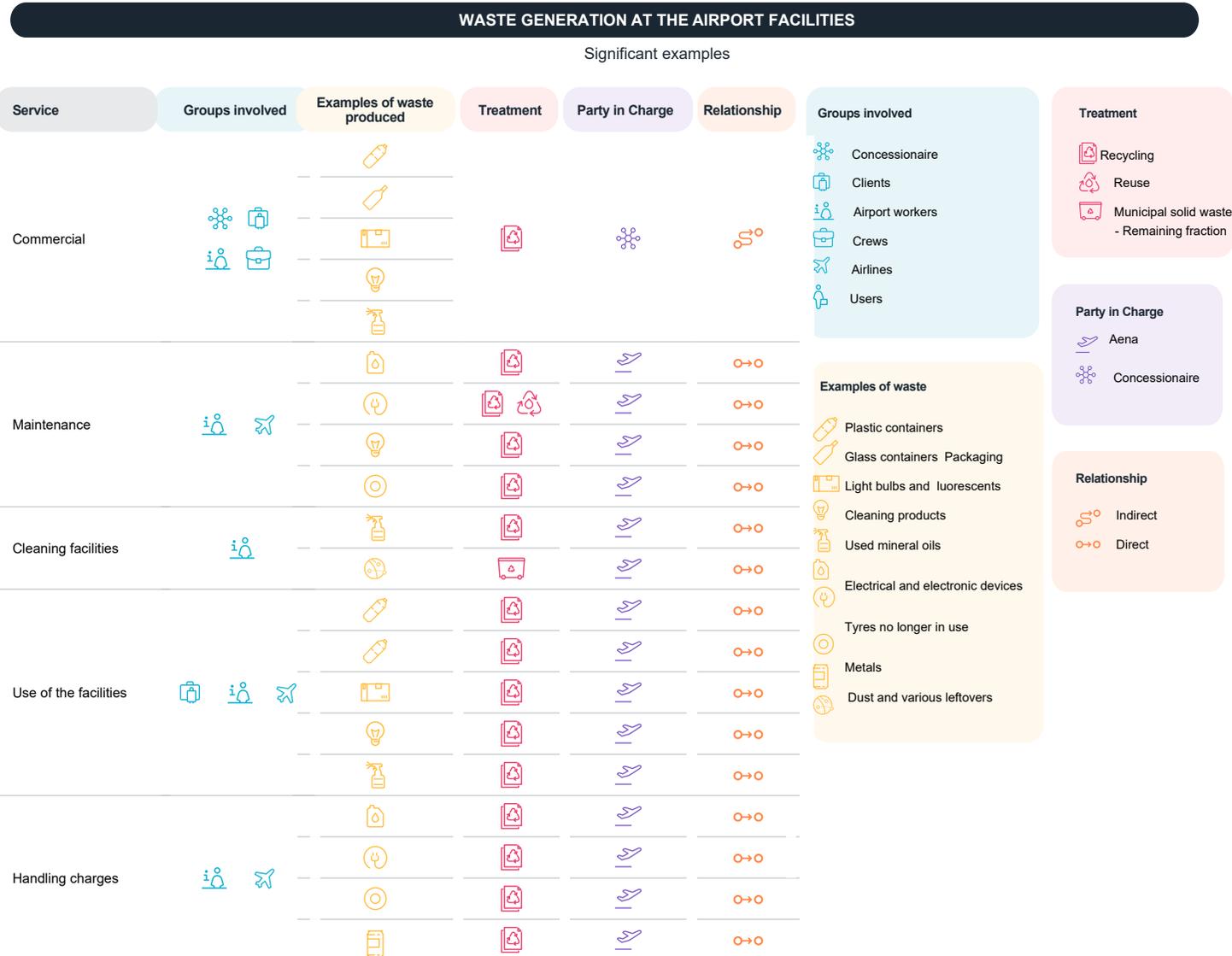
2.6.1. Waste management and circular economy model

(GRI 103-2; 306-1 (2020); 306-2 (2020))

Aena is committed to the development of a Circular Economy that promotes maximising recycling and minimising the volume of waste generated. It has therefore developed a strategy that will allow it to take steps towards improving future waste management.

Waste generation at the airport facilities

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



2.6.2. Zero Waste Objective by 2040

Aena is committed to the development of a Circular Economy that promotes maximising recycling and minimising the volume of waste generated. Which is why, the Sustainability Strategy has developed a specific line of action that will allow it to take steps towards an improvement in waste management until it reaches *zero waste* by 2040⁴⁰. The actions linked to this objective are framed in the following fields of action:

- Measurement and monitoring of waste;
- Reduction of waste generated;
- Use of sustainable materials;

- Impulse given to segregation and recycling;
- Energy recovery and composting;
- Collaboration & Awareness

For its part, London Luton Airport’s Responsible Business Strategy includes among its priorities regarding waste management and circular economy an increase in the percentage of recycled waste and preventing it from being sent to landfills. Specifically, the following lines of action are proposed:

- Through the waste contractor, provide additional waste classification and segregation, and expand the collection of new types of recyclable materials (e.g., coffee cups and residue).

- Involve the airport’s concessionaires to improve recycling, providing easily accessible separation containers and on-site assistance from the waste contractor.
- Set a recycling rate target to reduce waste and increase recycling.
- Operate a segregated waste flow throughout the airport, with a contractor specialised in waste to ensure that they are handled in accordance with the law.

In Aeroportos do Nordeste do Brasil, the cooperation period with recycling cooperatives to increase the amount of recycled waste began in 2021.

Objectives for waste management and promotion of the circular economy

	Aena	London Luton Airport	Aeroportos do Nordeste do Brasil
Short/medium/long term	2030: <ul style="list-style-type: none"> • 72% increase in fully recycled waste 2040: <ul style="list-style-type: none"> • Zero Waste 	2022: <ul style="list-style-type: none"> • Obtain the Carbon Trust Standard – Zero waste to landfills • Recycle at least 70% of non-hazardous waste (excluding airplane waste). 2023: <ul style="list-style-type: none"> • Reduce waste (excluding airplane waste) to 0.12 kg/passenger 	2022 <ul style="list-style-type: none"> • Improve the methodology for separating waste—including tenants.

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

Proper management of waste generated at the network’s airports is essential for the preservation of natural resources. Aena promotes initiatives and collaboration with stakeholders for the transition to a circular economy, generally developing initiatives at its airports. In addition, taking into account their specific

characteristics, some centres put more specific actions in place.

In line with the actions implemented since the beginning of the pandemic, the Company has installed specific signage in its terminal buildings and technical blocks, with the aim of raising awareness about the importance of properly discarding the used gloves and

⁴⁰ Objective focused on recurrent non-hazardous waste, excluding construction waste and hazardous waste

masks in the appropriate containers and promoting better segregation of this waste.

Waste treatment and recycling

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

The environmental departments of the airports carry out extensive control of all waste generated from its origin and storage until its removal and transfer to an authorised manager for external treatment. Verification of the correct management of the waste generated by Aena is carried out through periodic monitoring of our activities by the Operational Control department. In the case of waste generated by contracting and tenant companies, verification is carried out through periodic monitoring of the Environmental Monitoring Plan of these companies⁴¹.

For its part, London Luton Airport works closely with tenants to separate waste. As part of the corresponding waste contract, an additional task has been introduced, in order to facilitate an additional waste classification step in specific areas. Likewise, to ensure the proper treatment of hazardous waste, the training of

workers on this matter is guaranteed and contractors are monitored.

Reuse of waste

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

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

Removal of single-use plastics

The new food and beverage contracts have progressively included a specific clause that seeks to reduce the volume of plastic waste generated, avoiding the use of single-use plastics and promoting the use of products produced with biodegradable or recyclable materials⁴².

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

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

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

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

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

⁴¹ See section 2.1.5. Sustainability and value chain and 'Chapter 4.

⁴² See sections 2.1.2 and 2.1.5.

Waste management indicators (GRI 306-3; 306-4)

(2020))

Main waste indicators

	2019		2020			2021		
	Aena	LLA	Aena	LLA	Aeroportos do Nordeste do Brasil	Aena	LLA	Aeroportos do Nordeste do Brasil
Generated (t)	79,917	12,492	59,957*	872	531	22,071	600	1,309
Hazardous (t)	938	21	301*	12	42	440	13	82
Non-hazardous (t)	78,979	2,471	59,656	860	489	21,631	587	1,227
Recycled hazardous waste (t)	443	17	162	10	-	332	12	0
Non-Hazardous recycled waste (t)	58,409	1,476	51,882	415	-	13,858	358	57
% hazardous recycled	47%	79	54	89	-	76%	92%	0%
% non-hazardous recycled	74%	60	87	45	-	64%	61%	5%

* In the Non-Financial Information Statement 2020 of Aena, it was reported that the figures for waste generated increased in 2020. Within the report improvement process, this year they have been recalculated, detecting an error in the 2020 report, these being updated with the total waste generated of 59,957 tonnes. In 2021, Aena has improved the internal information methodology with a new information procedure in order to detect and correct deviations in KPIs in a timely manner in the future.

3

Commitment to society and human rights



Line of action *Community relations included in the Sustainability Strategy*

Principles that drive social sustainability

- Contribute to and be a direct participant in the socioeconomic development of communities
- Anticipate social trends focused on the protection of human rights and disadvantaged groups.
- Create shared value
- Collaborate with local and national entities and actively participate in the social development of the immediate context



€5 million: minimum annual budget associated with the plan of action Relationship with the community

Aena's commitment to Human Rights

- Human rights policy
- Implementation of the process of due diligence of human rights
- Corporate culture
- Human rights in the value chain
- Prevention of risks of human rights violations
- Opposition to child labour and forced labour

Three main areas of action

- Human rights
- Social protection and action
- Education and research

Includes a set of proposals, goals, and specific indicators aligned with business objectives



Main areas and initiatives of social action in 2021

- Aena with La Palma Payslip Solidarity
- Collaboration with the food bank
- Aena with music
- Aena with autism
- National Alliance for Zero Child Poverty of the High Commissioner against Child Poverty
- Donations and aid to entities
- Commitment to social concerns: Assignments of spaces
- Guided tours and familiarisation sessions
- Social environmental actions
- Healthy life and support for charitable causes
- COVID-19 volunteers at London Luton Airport
- Donations to the community (Community trust fund)
- Charitable partners at London Luton Airport – Corporate solidarity
- Customer donations

Areas that support social action

Synergies

- Social innovation
- Transparency
- Training and employment
- Healthy life
- Support for social causes
- Research and innovation
- Emergency flights
- Environmental commitment
- Good practices
- Inclusion
- Labour integration
- Equality and accessibility
- Zero violence
- Human rights
- Art, music and culture
- Diversity
- Value chain
- Voluntary

Specific line on involvement in the community included in the Responsible Business Strategy at London Luton Airport.

€3,245,373 contributed to non-profit foundations and entities in 2021

Impact of the activity on society and the environment

- Generation of employment
- Improvement of social integration
- Promotion of the local business network
- Economic value generated and distributed
- Tax contribution



Commitment to SDGs



SDG 2
Zero hunger



SDG 3
Health and well-being



SDG 7
Affordable and non-polluting energy



SDG 8
Decent work and economic growth



SDG 9
Industry, innovation and infrastructure



SDG 13
Climate action



SDG 16
Peace, justice and solid institutions



SDG 17
Alliances to achieve objectives

3.1 Commitments to sustainable development and to society (GRI 102-43; 413-1; 413-2)

The Sustainability Strategy 2021–2030 defines the social roadmap for the coming years, focusing action on ensuring the creation of shared value and fostering the socio-economic recovery of the countries in which Aena operates.

To this end, the Company draws on a set of inspiring principles included in the sustainability policy.

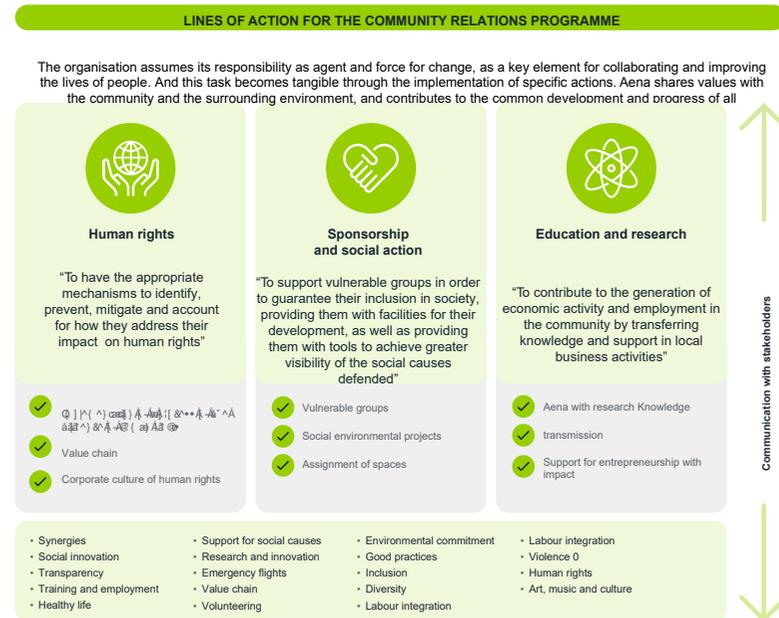
On this basis, the Strategy includes the **plan of action Relationship with the Community¹** based on a series of key elements that focus on the promotion and respect of human rights, local development, support for vulnerable groups, culture, research and education and the development of environmental projects of a social nature. To do this, it includes a set of actions, goals, indicators and specific budgets that are in turn aligned with the business objectives.

Thus, within the scope of the Sustainability Strategy, the Company regularly monitors the progress and status of the proposed social sustainability objectives.



The London Luton Airport includes a specific line in the Responsible Business Strategy about involvement in the community focused on creating opportunities for young people, supporting social causes and community welfare projects, contributions to local organisations for the implementation of local projects and volunteering for employees, among others.

The minimum annual budget associated with the plan of action Relationship with the Community is €5 million



¹ The applicable mechanisms of control, monitoring, supervision and governance are those defined in the Sustainability Strategy (see Chapter 1).

3.1.1. Social action: Contributions to foundations and non-profit entities (GRI 201-1; 413-1)

The Company promotes social actions in collaboration with different public and private institutions to promote socio-economic development and regional cohesion and social inclusion, and to respond to the requirements of stakeholders (lessees, business partners, local community, passengers, employees, etc.)².

This need to determine and detect the critical needs of the environment has served as the basis for redirecting the social actions to be considered in the formulation of the social sustainability strategy carried out in 2021 (see infographic on the previous page).

In 2021, the impact of COVID-19 on airport activity has reinforced the promotion of actions seeking to protect public health and safety, while continuing to pay special attention to social issues included in the social action plans for corporate responsibility prior to 2020. These include special attention to employees, the promotion of R&D, the protection of local companies, the support of organisations and agencies that protect children and vulnerable groups, and the integration of disadvantaged people.

- The improvement of the health situation and the gradual return to normal has allowed for the resumption of traditional social actions that took

place at airports and which had to be suspended due to the pandemic, such as reserving spaces for the charitable causes of social entities, organising exhibitions, etc.

The situation has allowed for the framework of collaboration and partnerships and the exchange of experiences and good practices to be maintained with relevant organisations in terms of sustainability: United Nations Global Compact, Forética, Fundación Seres, Businesses for a Society Free from Gender-Based Violence Initiative, Community for Climate. In 2021, Aena joined the Declaration for a sustainable recovery.

The London Luton Airport has continued to focus its social action activities in 2021 on promoting the community trust fund to cater for the needs of communities located near the airport; supporting social organisations through the 'Charity partners at London Luton Airport' project; employee participation in volunteering activities; and donations from customers³.

The amount of Aena's contributions to non-profit foundations and entities in 2021 increased to €3,032,521.64 in Spain and £247,617 at London Luton Airport⁴.

On the corporate website, you can see all the agreements concluded between Aena and a range of entities in detail⁵.

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

Humanitarian flights

In 2021, more than 11,050⁶ ambulance flights were carried out in Spain. Aena's airports are always available to respond to emergency situations and to transfer organs from medical teams



² Aena has mechanisms and tools for communicating with stakeholders which allow for new needs to be detected and the Organisation's social contribution to be adapted (see the section 'Relationship with stakeholders' in this report).

³ The Airport also develops programmes to improve the training of young people. However, in 2021, due to COVID-19, they were postponed.

⁴ Exchange rates as of 31/12/2021 used for Balance Sheet accounts: EURvsGBP= 0.85960 / EURvsMXN= 23.9852 / EURvsCOP= 4,431.90 / EURvsBRL= 6.3779

⁵ See section "About this report - Links of interest".

⁶ Provisional data as of the closing date of this report.

Main areas and initiatives of social action in 2021 in Spain

Aena with La Palma

The personnel of the Fire and Rescue Service at La Palma Airport work together in supporting and helping the people affected by the eruption of the Old Cumbre volcano. Adolfo Suárez Madrid-Barajas Airport and Central Services send protection equipment (PPE) to facilitate these tasks.



Payslip solidarity

Aena and its employees donate €50,000 to World Central Kitchen to prepare Christmas menus for those affected by the eruption of Cumbre Vieja.



Collaboration with the Food Bank

Aena donates €50,000 to the Food Bank Federation to help families with needs and in a vulnerable situation. Of the total, more than €11,000 were collected thanks to employee contributions in the month of December 2020.



Aena with music

This project encompasses a strategy of patronage and collaboration that supports the training and musical talent of young artists and groups at risk of exclusion, and brings music to airport users.

Aena with autism

We continue to work on improving accessibility by paying special attention to the most vulnerable groups, such as people with Autism Spectrum Disorder (ASD) in collaboration with the Spanish Autism Confederation.

National Alliance for Zero Childhood Poverty of the High Commissioner against Childhood Poverty

Aena joins this initiative, which aims to change the situation of child poverty in Spain by fostering joint participation with administrations, companies and foundations and the third sector to achieve a country that provides equal opportunities to all citizens and breaks the circle of child poverty.

Donations and assistance to entities

During 2021, several initiatives of this type have been carried out. Among others:

- The workers of the Alicante-Elche Airport, through the 'My contribution' Foundation, contributed financially to the launch of the Rehoboth project, a centre that serves homeless people.
- The Albacete Airport donated children's books to hospitalised children.

- Fuerteventura Airport participated in the collection of toys at Christmas with the Red Cross.
- Aena donates €50,000 to the Food Bank Federation to help families with needs and in a vulnerable situation. Of the total, more than €11,000 were collected thanks to employee contributions in the month of December 2020.

Commitment to social concerns: Assignments of spaces

- Participation in the lighting of facilities and buildings in the commemoration of International days: Rare Diseases, Women's, Autism, Dyslexia, Breast Cancer or Elimination of Violence Against Women, Earth Hour, etc.
- Exposures and assignments of joint spaces to social entities.

Guided tours and familiarisation days

Resuming the visit schedule by interested groups who want to get to know the airport facilities up close (e.g. Fuerteventura Airport).

Healthy life and support for beneficial causes

Aena combines sport and charitable causes supporting sports and events for social purposes.

Environmental actions of a social nature

F.G.L. Granada-Jaén Airport joins the 'green footprint' initiative sponsored by the Provincial Federation of Hospitality and Tourism of Granada to raise awareness of climate change and promote measures that compensate for the carbon footprint. Through this project, the Airport has welcomed 20 replanted specimens of the Lucio olive tree.



London-Luton Airport

- Volunteers in London against COVID-19: More than 100 workers enrolled or as volunteers to assist the NHS in the rollout of a historical mass vaccination programme.
- Donations to the community (Community trust fund).
- Economic collaboration with foundations in projects related to mental health, poverty and the promotion of equality.
- Contribution of £213,345 (of which, £63,345 funds extended due to COVID-19) and €15,000 from noise fines.
- Charitable partners of London Luton – Corporate solidarity

- The airport promotes collaboration with social entities and the promotion of good causes thanks to the participation and solidarity of employees, who participate directly in the organisation of solidarity and passenger events.
- For the period from 2021 to 2023, collaboration has been formalised with the 'Air ambulance of this Anglian' and the Luton food bank. In 2021, £10,622 was raised.
- Customer donations, thanks to customer contributions (foreign currencies), thanks to which we have managed to donate £5000.



3.2. Impact of the activity on society and the environment.

3.2.1 Creating social value

Aena is aware of the social and economic impact (qualitative and quantitative) that its activity generates in the countries in which it operates, and of its key role in terms of cohesion and territorial connection.

The Company contributes to the economic and social development of the communities in which it is present, generating direct and indirect employment (local and otherwise), by hiring specialised companies and making spaces available for the development of economic activities that generate employment, tax contributions⁸, the improvement of social integration and the promotion of social innovation initiatives.

Generation of resources in the community (Social Cash Flow) (GRI 102-13; 201-1; 413-1; 413-2)

Creating jobs	Improving social integration	Promoting local businesses	Economic value generated and distributed	Tax paid
+ than 8,800 employees + than 43.8 million jobs worldwide generated by the air transport sector ⁷ 23 agreements with academic institutions and 60 bachelor's or master's degree students have completed curricular or extracurricular internships in 2021 in Spain	1.5% of people with functional diversity in the workforce Call for integration into the labour market or job creation actions to be undertaken by social entities, foundations or associations: €100,000/year Collaboration with third sector organisations to promote the integration of people with special needs (Spanish Autism Confederation, CERMI, etc.) PRM service at airports (almost 750,000 people assisted in 2021)	Aena venture: programme for accelerating ideas for financing and implementing pilot projects. Contracting local suppliers (local employment): <ul style="list-style-type: none"> 98.72% in Spain 35% in the United Kingdom 100% in Brazil 	€2,393.3 million in economic value generated (revenue) (+6.7% compared to 2020) €2,514.9 million in purchases and contracts (-5.1 % compared to 2020) 459.8 Staff costs	This has amounted to €285 million. <ul style="list-style-type: none"> €258 million in Spain (90.5%) €16.1 million of taxes paid in the United Kingdom (5.7% of the total) 10.8 in Brazil (3.8%). Taxes borne: €267.3 million The taxes associated with the property totalled €139.8 million.
		2021 (millions of €)	Notes	
A. Direct economic value generated (revenue)		2393.3		
B. Economic value distributed		-2,545.0		
Operating costs		-2,055.1	Total expenses, except staff costs	
Wages and employee benefits		-459.8	Staff costs	
Payments to capital providers		-39.4	Financial results and payment of dividends	
Government payments (by country)		-285	Tax paid	
Investments in the community		-3.0	Contributions to foundations and non-profit organisations	
C. Economic value retained		-121.7	C=A-B	

⁷ Of which 30,000 were generated by airport management.

Source: ATAG. COVID-19 analysis fact sheet, ed. Sept. 2021. See section "About this report - Links of interest".

⁸ See section "Tax strategy" in Chapter 1. Business Model.

3.2.2. Impact on local populations and on the territory

(GRI 102-13; 201-1; 413-1)

Aena provides an essential service in terms of territorial mobility, cohesion and structuring.

- **Promoting sustainable mobility.** Aena supports more sustainable and intermodal transport alternatives, which contribute to reducing travel and waiting times, resulting in energy savings and reduced emissions.

In collaboration with other organisations, the airports promote the integration of infrastructures with other modes of transport, improving access, urban planning and connection with other infrastructures. As a result, in recent years, there has been an increase in the use of public transport at the expense of using private cars, although this trend has changed as a consequence of the pandemic (from 30.5% in 2010 to 30.9% in 2021⁹).

London Luton Airport has put an 'Airport Surface Access Strategy for 2018–22' into place, with the aim of improving and promoting the use of sustainable transport for passengers and personnel.

- **Studies and Mobility Plans** for the improvement and integration of access and transport infrastructures in cities and the airport itself. In this regard, the Barcelona-El Prat Josep Tarradellas

Airport has a Business Deployment Plan (BDP) across the facilities with the purpose of detailing mechanisms to promote the use of transport alternatives to the private vehicle in order to access the workstation or, if not possible, to rationalise its use. During 2021, the airport completed the link between the cycle lane and the lane network in the Barcelona metropolitan area and has public parking spaces especially designed for bicycles¹⁰.

- **Periodic air mobility surveys (known by their Spanish acronym EMMA** [Encuestas de Movilidad en Modo Aéreo]) are carried out at various airports in order to identify passenger profiles, their modes of access and origin.
- **Application of insularity criteria** in airport charges in the Canary Islands and the Balearic Islands.
- **Setting up new subsidised routes and developing hub airports**, which serve to strengthen the aviation sector as a tool for connectivity and connection between the world's main cities.
- **Directive programmes and environmental evaluation studies**¹¹, which include a specific analysis on the impact that the infrastructures and the airport activity itself may have on an environmental and social level, while at all times prioritising respect and care for the environment.

Likewise, specific measures are valued and proposed to guarantee sustainable coexistence with society and the environment, including, where appropriate, proposals for urban regeneration, with the objective of avoiding any impact during the execution of work on new projects or once it has been carried out (see *environmental resolutions from the Environmental Directive Plans*¹² for an example).

- **Collaboration with third parties to improve the airport environment.** For example, London Luton Airport helps local charities, non-profit organisations and community groups to lead projects with direct benefits at a local level¹³. In this way, it supports the well-being and sustainable development of the local environment.

In the development of infrastructures and services, it considers a responsible management approach and listens to stakeholders.

- **In Real Estate Developments: SmartCities & SmartAirports** involves the collaboration of various town councils with the aim of:

⁹ The data from surveys correspond to 2019, which have been weighted with the passenger traffic data for 2021.

¹⁰ See the link to the Barcelona cyclable network in the "Annex – Links of interest" of this document.

¹¹ The directive programmes are airport planning documents that define the major guidelines for airport management and development and describe the actions that should be carried out to ensure they adapt to the demand expected in the short, medium and long term, while at the same time maintaining an adequate level of service to customers and users in general.

¹² See section "About this report – Links of interest"

¹³ See section "About this report – Links of interest".

- Improving the traveller's experience by exchanging information between the airport and the city.
- Using synergies to achieve the goal of the smart airport and the smart city through their information systems.
- The coordinated action of the airport with its surroundings—city or adjoining cities—improving sustainable development actions.

Adolfo Suárez Madrid-Barajas Airport was presented in 2021¹⁴.

Operations with significant negative impacts

One of the most significant impacts of airport activity is the noise produced by aircraft, which affects all areas around airports.

To mitigate this impact, Aena develops a series of mechanisms and allocates a set of resources, including Sound Insulation Plans (SIP) (*for more on this, see Chapter 2*).

The chapter on risk management in this report details other possible potential negative impacts associated with airport management, as well as the mechanisms developed for minimising them.

Preservation of archaeological heritage

As part of the adaptation and modernisation work at Ibiza Airport, since 2019 Aena and the Spanish Ministry of Culture and Sport have collaborated in the execution of the cultural heritage research project.

This archaeological project is intended to reveal the customs and lifestyles of the human groups that previously occupied the areas of the airport's general system, as well as their relationship with the environment.

During 2021, the team of experts concentrated their activity on the parking area, where findings show that the area was formerly used as an agricultural production field.

International Cooperation Programme

Aena's International Cooperation Programme is composed of a set of training activities aimed at aeronautical professionals, mainly from the Ibero-American public sector, focused on improving the training of participants in aeronautical matters, and thus enhancing the development of their countries.

All the activities carried out in the framework of this programme are conducted in collaboration with national and international organisations, and institutions of renowned prestige, such as the Spanish Agency for International Development Cooperation (AECID), a body affiliated with the Ministry of Foreign Affairs, European Union and Cooperation, the Technical Cooperation Bureau of the International Civil Aviation Organisation (ICAO), and the School of Aeronautical and Space Engineering at the Technical

University of Madrid (UPM), as well as other institutions.

In this way, the programme also contributes to consolidating the reputation of Spanish industry and its hallmark of excellence, as well as showcasing Aena's best practices abroad.

In 2021, given the restrictions on the international mobility of people as a result of the pandemic, and with the aim of facilitating and guaranteeing the correct development of the programme's activities, the virtual format of all the training activities carried out (specific training courses and seminars) has been upheld.

In this way, more than 212 professionals from the Ibero-American air transport sector have participated, and a total amount of more than €76,800 has been allocated to the programme.

Impact of the International Cooperation Programme in the last five years:

- 918 aeronautical professionals.
- 21 different countries.
- €670,000 expenditure.

¹⁴ See section "About this report – Links of interest".

3. Human Rights

3.3.1. Aena's Human Rights Policy and Strategy

(GRI 102-12; 102-16)

The protection of human rights is an integral part of Aena's corporate values and a pillar of its business activity.

The Human Rights Policy, approved by the Board of Directors, formalises this commitment at the highest level and deploys it across the Company through a series of standards and tools¹⁵. These notably include the Code of Conduct and the Sustainability Policy, which are based on the following, among others: the Principles expressed in the United Nations Global Compact; the Guiding Principles on Business and Human Rights: Implementing the United Nations 'Protect, Respect and Remedy' Framework; the OECD Guidelines for Multinational

Enterprises; the Tripartite Declaration of Principles concerning Multinational Enterprises; the Social Policy of the International Labour Organization; the Children's Rights and Business Principles; the United Nations Sustainable Development Goals (SDGs); and the Modern Slavery Act in the United Kingdom.

The Human Rights Policy establishes specific principles of action, in addition to laying the foundations for their development, supervision, control and review.



Aena's commitment to fundamental conventions regarding human rights

- Universal Declaration of Human Rights of the United Nations
- Declaration of the International Labour Organization (ILO)
- Children's Rights and Business Principles
- Adhesion to the Principles of the United Nations Global Compact
- United Nations Guiding Principles on Business and Human Rights
- OECD Principles of Corporate Governance
- National and international laws and regulations in force in the countries where it operates
- Law on Public Sector Contracts

Main impacts of Aena's activity on Human Rights and Labour Rights	Principles of the UN Global Compact
Occupational health and safety of people	1, 2
Equality and non-discrimination	1, 2, 6
Decent work	3, 4, 5, 6
Child labour*	5
Protection of the environment	7, 8, 9
Commitment to customer/suppliers	8, 1
Freedom of association	3

Main management instruments and control mechanisms

 Strategic Plan

 Code of Conduct

 Internal Procurement Manual

 Forced Labour Policy at London Luton Airport Sustainability

 Human Rights Policy

 Collective Agreement

 Sustainability Policy

 Strategy 2021-2030

Aena's other principles and commitment to Human Rights



Aena principles and commitments to Human Rights established in the Corporate Policy on Human Rights

- Eradicate child labour
- Avoid discriminatory practices
- Promote people's development
- Facilitate freedom of association and collective bargaining
- Promote adequate working conditions and protect people's health
- Promote a respectful and decent work environment
- Commitment to customers
- Commitment to people linked to suppliers, contractors and collaborating companies and business partners
- Respect the rights of communities
- Promotion and awareness of Human Rights



The **Sustainability Policy** includes among its principles that of respecting and promoting internationally recognised fundamental human rights (union freedom, right of association and collective bargaining, nonexistence of child labour, elimination of forced or mandatory labour, etc.), declaring the absolute opposition of the Company to modern slavery and human trafficking, and any other practice that may imply a violation of individual or collective dignity.



London Luton Airport has a Policy that rejects any form of slavery or forced labour, a Policy of Ethics in Business and a Code of Conduct that includes, among its basic principles, respect for the human rights of all company employees.

It also works to renew its Ethical Business Policy, in line with expanding its operations.



Aena's Policy on Human Rights, approved in January 2020, is applicable to those companies in which Aena has a majority stake.



ANB has its own code of conduct, which includes the principle of action in accordance with respect of human rights.

¹⁵ These rules are binding and are applicable to the entire Group, including employees, companies with a majority stake, and in all the territories where the Group operates. Both the London Luton Airport and Aeroportos do Nordeste do Brasil have corresponding regulations that incorporate values aligned with those of Aena.

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Within the line of action 'Relationship with the Community', the Sustainability Strategy 2021–2030 includes a specific programme on the subject of human rights that aims to prepare the appropriate mechanisms to identify, prevent, mitigate and remedy its impact through the implementation of a due diligence process. This process is based on the need to involve stakeholders (employees, suppliers, social groups and specialised organisations, etc.).

The social Sustainability Strategy proposes the implementation of a due diligence process throughout the Organisation in 2024

To achieve this, a series of actions are established aimed at guaranteeing respect for human rights in all activities and throughout the value chain, maintaining a relationship of the highest respect in the communities in which Aena carries out its operations.

Implementation of the human rights due diligence process

(GRI 102-16; 102-17; 103-2)

The Organisation's priority is to develop a human rights due diligence process that reinforces the current tools used in the regulatory compliance or risk management system, for example, in order to reduce the company's exposure to possible violations (child labour, forced labour, discriminatory practices, etc.) and to allow us to incorporate new solutions to mitigate and/or correct potential negative effects, as well as to monitor them and report on the matter.

During 2021, Aena has laid the foundations for developing this process, by beginning to identify elements that could

be subject to risk of human rights violation and the associated impact.

Corporate culture

Through its Human Rights Policy, Aena is committed to promoting a culture of respect for human rights among its professionals and across all the areas in which it operates, especially in those where there is a higher risk of violating these rights.

To this end, the Sustainability Strategy provides for training and raising awareness among its employees and fosters partnerships with third parties, which help reinforce the implementation of the process.

During 2021, specific communication and internal awareness actions have likewise taken place on the importance of the Organisation's compliance system and regulatory framework, which are reflected in the protection and prevention of possible human rights violations (see *Chapter: Overview of the document*). This training was given to employees in Spain and Luton, and it is also starting in Brazil. In addition, the London Luton Airport will provide compulsory training on equality and diversity starting in 2022.

Aena collaborates with the ONUART Foundation to promote human rights.

Human rights in the value chain

Aena's commitment to human rights is transmitted across the value chain, from suppliers to airport users, and to the communities located in the area in which they carry out their operations, including indigenous peoples, through different tools:

- The human rights policy considers the possibility that suppliers may use it as their own by assuming the principles established therein. Along this same line, the Sustainability Strategy reinforces the importance of transmitting the company's social objectives through the value chain.
- Aena's Code of Conduct establishes the ethical principles and values, integrity, legality and transparency that must guide the conduct of all people who are included within its scope of application. Not only between each other, but also in their relations with customers, shareholders, suppliers and, in general, with all people and entities, whether public or private, with which they may come into contact while carrying out their professional duties. At the same time, it also seeks to promote effective compliance with the standards that apply to all those activities, guided by the principle of zero tolerance for any kind of illegal behaviour.
- Inclusion of social clauses in related procurement specifications, among others, with respect to human rights. The Internal Hiring Manual provides mechanisms for following up on the degree of compliance and penalty measures (see *Chapter 4*). The Sustainability Strategy reinforces this action, including among its actions the inclusion of human rights clauses in agreements with suppliers

to ensure joint responsibility between Aena and its ecosystem.

- London Luton Airport follows a zero tolerance policy on human trafficking and slavery, which extends to all its contractual relationships. The criteria of sustainability and human rights are key both in the evaluation of suppliers and in the renewal of contracts (assessing aspects such as zero tolerance to slavery and making express reference to compliance with the declaration against modern slavery in the ‘Modern Slavery Act¹⁶).

Since 2018, environmental and sustainability considerations have been included in acquisition processes. The documentation associated with tender processes has a clear scoring system that is used in order to evaluate not only suppliers, but also established social and environmental standards. Likewise, the sustainability and human rights criteria continue to be key when renewing contracts (ethical treatment, zero tolerance to slavery, equality and diversity, health and safety, climate change resilience, standards for waste and natural resource management, etc.).

Aeroportos do Nordeste do Brasil has tools to control the procurement process by requesting documentation, recording working hours, etc., which contribute to mitigating the risk of violation (e.g. forced or mandatory labour). (see Chapter 4). Given the characteristics of the supply chain, the risk of child labour is not considered significant.

Beyond the Group’s ecosystem, Aena collaborates with non-governmental organisations and other institutions to develop its established principles of action. Aena seeks to contribute to the development of projects with social repercussions and the deployment of environmental policies, taking into account the right of everyone to a clean environment.

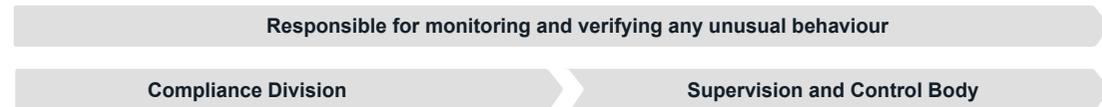


Aena’s commitment to Human Rights

After formalising its commitment to human rights, Aena is evaluating and assessing any possible noncompliance, and seeking solutions to eradicate it.



Commitments transferred to the value chain



¹⁶ See section “About this report - Links of interest”.

3.3.2. Prevention of risks that violate Human Rights (GRI 102-16; 102-17)

Aena has a series of tools that allow for a continuous assessment of the level of risk of human rights violation, identification of possible impacts and social concerns and, in general, safeguarding compliance with applicable laws and regulations (external and internal).

The main tool that provides the protection required for this assessment process is the Regulatory Compliance System, which establishes the principles, mechanisms, procedures and controls aimed at preventing, identifying and resolving situations in which unethical or unlawful practices or regulatory breaches occur in the development of the activity.

This system—together with Risk Control and Management, the Collective Bargaining Agreement, the Internal Hiring Regulations and the Code of Conduct—constitute the tools necessary to prevent, control and monitor actions that may be related to human rights violations.

Likewise, Aena has a series of (general and specific) mechanisms aimed at the prevention, detection and response to possible violations of the commitments included in corporate policies. These mechanisms are the following:

- Prevention control: responsibility of ensuring compliance by all members of the Organisation with the Company's internal policies and regulations, as well as identifying areas of improvement that allow

for the implementation or correction of procedures as deemed appropriate.

- Action control: obligation to report any event that could constitute a possible criminal offense, legal breach or irregularity of which it becomes aware by means of the channels established for such purpose, including the Complaints Channel.
- Supervision control: with this task being carried out by the Compliance Supervision and Control Body and the Internal Audit Division.

London Luton Airport and Aeroportos do Nordeste do Brasil include the principles for human rights protection in their respective Codes of Conduct, guaranteeing that the corporate policies take into account their compliance and protection when applicable.

Opposition to child labour and forced labour

(GRI 102-12; 102-17; 408-1; 409-1)

Aena rejects any form of child labour and forced labour, and commits to rigorous compliance with international standards, such as the United Nations Global Compact, with the aim of promoting a work environment that respects human rights.

The regulatory compliance system offers the available prevention, action and monitoring mechanisms that allow the Company to ensure compliance with current legislation and international standards, such as the ILO principles.

Reports of human rights violations

(GRI 103-2; 406-1)

The Aena Complaints Channel (see Chapter 1 for more information) allows Group and external employees to make inquiries or report possible risks or breaches in various matters, including those referring to the violation of human rights, except those related to workplace harassment, which have their own protocol.

During 2021, no complaints referring to human rights violations were recorded¹⁷.

Accessibility in the provision of services

In 2021, Aena continues working to improve service for persons with reduced mobility by implementing the necessary measures to minimise the health risks and offer the best facilities.

¹⁷ Within the framework of the human rights due diligence procedure, the classification of complaints is expected to be analysed and updated.

4 Social management in the value chain

Sustainable acquisition and purchasing process

Risk assessment

- Code of Conduct
- Sustainability Policy
- Anti-Corruption and Fraud Policy
- Human Rights Policy
- Integrated Management Policy for Quality, Environment and Energy Efficiency
- Policy for Occupational Risk Prevention
- Operational Safety Policy
- Inclusion of ESG issues in bidding processes and in the execution
- Inclusion of ESG issues in processes

Continuous improvement: actions and results

- 1** Acquisition planning
- 2** Internal approval
Inclusion in the purchasing policy of social issues, gender and environmental equality and consideration in relations with suppliers and subcontractors of their social and environmental responsibility
- 3** Tendering and publication in the contracting portal
- 4** Receipt of offers and evaluation
- 5** Selection of the successful bidder and signing of the contract
- 6** Supply of the goods or service
- 7** Systematic consideration of environmental and social matters throughout the bidding process:
 - Compliance with current legislation
 - Purpose of the contract
 - Economic and financial solvency
 - Technical or professional solvency
 - Exclusion criteria
 - Technical evaluation.
 - Civil liability policy and accident insurance, Social Security, Tax Agency, Civil Registry payments, etc.
 - Inclusion of tiebreaker clauses, if required
 - Definitive guarantee
- 8** Payment of the invoice

The value chain at Aena

- Necessary infrastructure
- Operations
- Customer services
- Marketing, communication and relationships with the environment
- Cross-sectional and support activities

Internal and external framework

- Legislation of each country
- Regulations and internal codes
- Assessment and improvement tools
- Ethical culture
- Sustainability Strategy of Aena
- Responsible business strategy of London Luton Airport

Transparency and dialogue with suppliers

Sustainable value chain management

98.72% of suppliers in Spain are local, 35% at the London Luton Airport and 100% at Aeroportos do Nordeste do Brasil



Commitment to SDGs

- SDG 8** Decent work and economic growth
- SDG 9** Industry, innovation and infrastructure
- SDG 11** Sustainable cities and communities
- SDG 16** Peace, justice and solid institutions
- SDG 17** Alliances to achieve objectives

Contracting undertaken by Aena is subject to the legislation that is applicable in each of the countries in which it operates, and to its own internal regulatory framework.

In Spain, the contracting of Aena’s suppliers is governed by that provided for in a set of standards (applicable for both the parent company and the Spanish subsidiaries) that are contemplated in the clauses on social and environmental matters included in the bidding documents and other contractual documentation that are compulsory after signing. Specifically, these are as follows:

- Royal Decree-Law 3/2020, of 4 February, on urgent measures incorporating various European Union directives into the Spanish legal system regarding public procurement in certain sectors; on private insurance; on pension plans and funds; on taxes and tax litigation (hereafter, RDL 3/2020).
- Act 9/2017, of 8 November, on Public Sector Contracts, which transposes into the Spanish legal system the Directives 2014/23/EU and 2014/24/EU of the European Parliament and of the Council of 26 February 2014, on procurement processes (hereafter, Act 9/2017).
- The ‘Commercial Procurement Regulation’ regulates the tender procedures for commercial spaces in network airports, with full respect for the principles and values of transparency, competition, efficiency, legality, publicity, confidentiality and sustainability.
- Internal Procurement Guidelines, applicable for the Concession Company of AIRM and ADI.



In the United Kingdom, the Utilities Contracts Regulations of 2016, as well as the Contractors Code of Practice (CCoP), regulate public procurement.

In the case of Brazil, the 2019 Procurement Regulation is applicable. In addition, in 2021 the Code of Conduct for suppliers was approved; in line with the Organisation's Code of Conduct and the rest of the applicable regulations—it addresses the values and behaviours that govern its relationship with third parties, considering it a priority to establish relationships with all of them based on respect, transparency and trust in order to obtain a mutual benefit.

4.1 Criteria applicable to procurement at Aena

In accordance with the applicable regulations, for all of its procurement processes, the Company demands, both of its suppliers and agents, **efficiency and respect for the principles of equal treatment, non-discrimination, transparency, proportionality, competition, publicity, confidentiality and integrity**, with the aim of ensuring that contracts are awarded to the bidder who submits the best bid.

Aena has a set of tools that allows it to transmit its social and environmental commitments across the value chain and which have their highest exponent in the incorporation of these clauses in the bidding documents, which must be complied with after adjudication and, consequently, during the provision of the services until the end of the contractual relationship.

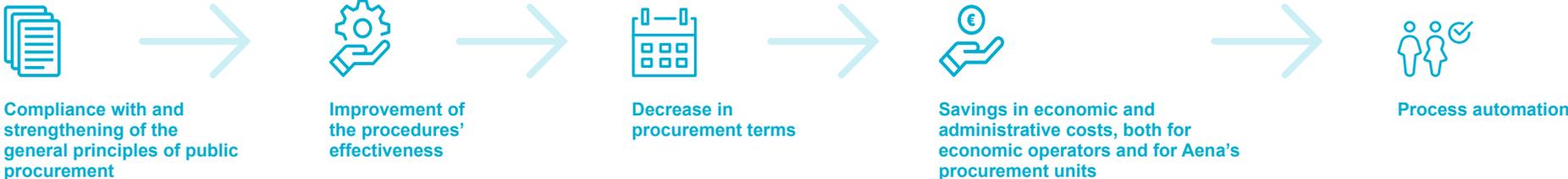
Efficiency, transparency, legality and respect for external and internal regulations are the pillars on which Aena lays the foundations of its relations with its value chain



PROCUREMENT OBJECTIVES

Aena extends its commitments and best practices in environmental and social sustainability to its entire value chain.

To respond to regulatory demands and promote continuous improvement across the supply chain, Aena launches a set of initiatives with which it aims to achieve:



		Oversight	Specific objective
<p>Aena's Sustainability Strategy includes specific procurement objectives</p>	<p>Establishment of selection criteria and environmental requirements, as well as their monitoring and penalties, in the relevant field.</p>	<p>Sustainability Committee and Climate Action Plan</p> <hr/> <p>Procurement Division</p>	<ul style="list-style-type: none"> • Definition and implementation of quantified sustainability requirements as of 2022. • Inclusion of human rights clauses in the bidding documents. • Provision of special execution conditions through the inclusion of clauses of an environmental, labour or social nature that may give rise to penalties in the event of non-compliance or may be considered essential, so that their non-compliance may give rise to the resolution of the contract.
	<p>Strengthening of environmental requirements for suppliers and measuring the percentage of contracts that include environmental clauses with quantitative objectives.</p>		
	<p>Inclusion of clauses related to the protection of human rights to ensure joint responsibility between Aena and its ecosystem.</p>		
<p>Responsible Business Strategy for London Luton Airport</p>	<p>One of its six lines of action is precisely the promotion of a sustainable value chain, with the aim of extending good social and environmental management practices to suppliers.</p>	<p>Specific governance structure for the supervision of the Strategy</p>	<ul style="list-style-type: none"> • Preparation and implementation of a Code of Conduct for suppliers: in 2022. • Start of work to identify strategic suppliers and assessment of climate change risks: review of the impacts of climate change, Supply chain charter. • Developing a climate change resilience plan for suppliers: In 2021, a start was made on work that will culminate in the development of a specific climate change resilience plan. • Favouring hiring local suppliers. • Carrying out events to develop suppliers' capacities: paused in 2021 as a result of COVID-19.

4.1.1. Main procurement milestones in 2021

During 2021, Aena has worked on a Guide for the technical evaluation of suppliers' tender files, which aims to serve the various Aena proposing units in terms of selecting criteria for the technical evaluation of files of any nature. With objective criteria for technical evaluation, reference is made to both exclusionary criteria and technical evaluation criteria of bids from a dual point of view: to set a minimum threshold whose breach would lead to exclusion and, at the same time, to quantify the score of that criterion to assess what the bidders offer above the established minimum requirement.

In addition to including practical guidelines and parameters, the guide aims to strengthen the evaluation of suppliers based on ESG criteria (environmental, social and governance) for which special attention is paid to the inclusion of these criteria in the process, incorporating examples of objective criteria to be used in the technical evaluation into the tender document models.

For its part, London Luton Airport has worked along the same lines in 2021 to incorporate more ESG issues into the supplier selection criteria, as well as encourage the procurement of local suppliers.

In the case of Aeroportos do Nordeste do Brasil (ANB), it is worth mentioning the approval of the Code of Conduct for suppliers.

Training

To ensure its implementation and proper use, from the Technical Evaluation of Offers Division, in collaboration with the training department of the Organisation and Human Resources Management, the objective of developing specific training courses aimed at the preparers of the tender specifications has been established, which contributes, at the same time, to promoting the proper incorporation of the social and environmental criteria across the value chain.

Following the line of training reinforcement, the Procurement Division, together with Organisation and Human Resources Management, has developed a general training course on Public Procurement with special emphasis on Aena's situation. A specific course on the use of the SIGA application has also been developed.

At London Luton Airport, 10 training sessions have been held for employees focused on promoting and incorporating good sustainability practices in procurement.



4.1.2. Description of the supply chain

Contracting local suppliers to carry out the activity continues to be a characteristic element of Aena's procurement, as reflected in the data.

In addition, as a reflection of the Company's commitment to procuring local suppliers for performing its activities, the percentages reached in 2021 were 98.72% in Spain (98.31% in 2020), 32% in the United Kingdom (30% in 2020), and 100% in Brazil (the same as in 2020).

In this way, the Company can maximise its financial contribution to the communities where it operates, thus strengthening their business network and social development through the creation of indirect jobs.

	AENA		UNITED KINGDOM *		BRAZIL	
	2020	2021	2020	2021	2020	2021
Suppliers (No.)	2,734	2,604	3,679	3,732	341	633
New (No.)	1,108	931	106	53	-	292
Local (No.)	-	911	-	423	341	633
Tenders managed (No.)	1,281**	1,390	73	83	318	261
Amount awarded to tenders (€m)	1,077.8	1,694.3	31.02	51.7	19.04	201.78
Corresponding to services and works (%)	89.2%	84.1%	52%	98%	-	97.54%
Corresponding to materials and equipment (%)	10.8%	15.9%	48%	2%	-	2.42%
Centralised volume of procurement (€m)	982.1	1,560.5	22.95	51.5	19.04	201.72
Decentralised volume of procurement (€m)	95.7	133.8	1.98	0.1	0.000021	0.06
Total volume of procurement allotted associated with leases for commercial activity (€m)	32.4 ***	38.3	0.91	0.0	-	10.53
Allotment of minor contracts (€m)	15.7	16.2	6.2	0.1	0.000021	0.06

* Exchange rates as at 31/12/2021 used for Balance Sheet accounts: EUR vs GBP = 0.8596; EUR vs BRL = 6.3779

** 438 centralised and 952 decentralised tenders awarded

*** 158 tenders awarded

4.2. Sustainable value chain management

SUSTAINABLE ACQUISITION AND PURCHASING PROCESS

Transparency, competition, efficiency, legality, advertising, confidentiality, sustainability and respect for external and internal regulations.



4.2.1. General aspects

Transparency and dialogue¹

The information related to the procurement processes is published on Aena’s website and the bidding documents and other associated documentation are made available to the bidders. This information is updated on an ongoing basis and adapts to the digitisation requirements². Practically all of the procedures for contracting suppliers are processed electronically.

To facilitate communication with suppliers and lessees, and to provide them with support and technical assistance when handling this electronic media, helpful tools such as the user manual, support centre or mailbox for real-time inquiries are available to them.

- In Spain, there is an information page—the Procurement Portal—and two specific management landing pages (Aena Suppliers and Aena Companies³, which redirect users to the Public Sector Procurement Platform), as well as two specific mailboxes for:
 - Information about the bidding process: portalcontratacion@aena.es.
 - Tenders: contact addresses for the units responsible for the tenders.

In accordance with the requirements of the National Scheme for Interoperability, to which Aena must adapt, for the coming fiscal years, the Company plans to complete the implementation of the system for tenders and electronic notifications. Additionally, the development of a new internal digital communications system has been completed and it is expected to come into operation during the first half of 2022 depending on its compatibility with iNotifica.

Moreover, Aena’s website has a specific section through which all information about procurement is available.

- AIRM has a specific contracting portal. For any queries related to customers and invoicing, suppliers can contact rmufacturacion@aena.es.
- London Luton Airport has its own electronic procurement portal called *In-tend*, which links to the new Find a Tender Service (FTS)⁴. It also organises events on a regular basis to help suppliers in the procurement process and respond to issues raised by local companies and SMEs to the questions and doubts that may arise in this regard.

Due to having recently started its activity, ANB, as of the date of this report, does not have any platform specifically enabled for the publication of procurement documents. To date, all communications with suppliers have been made by direct invitation.



¹ See section ‘About this report – Links of interest’.

² In Spain, they are derived from the stipulations in Act 9/2017, of 8 November, on Public Sector Contracts.

³ In addition, in accordance with Act 19/2013, of 9 December, on transparency, access to public information and good governance, the Public Sector Procurement Platform publishes all information related to the procurement of suppliers, minor contracts awarded and statistical data for awarded contracts.

⁴ New operational service after Brexit.

Continuous value chain risk assessment

The risks associated with procurement are incorporated through the Organisation’s risk management and control model. They may derive from the procurement process itself (bidding and awarding) or from supply chain activities during the execution of the contract⁵.

Main risks associated with the supply chain related to:	Tools for their control, monitoring	Main mitigation and control
<p>Environment</p> <p>Occupational health and safety</p> <p>Work conditions</p> <p>Human rights</p> <p>Ethics, any fraudulent practice or corruption</p> <p>Regulatory breach</p>	<p>Code of Conduct</p> <ul style="list-style-type: none"> This includes the principles that guide the actions of persons subject to the Code in their relationship with third parties. It expressly includes the 'relationship with customers, suppliers and collaborating companies' in order to avoid any kind of interference that may affect their impartiality or objectivity, avoiding any conflict of their personal interests with those of Aena. <p>Sustainability policy</p> <ul style="list-style-type: none"> Its objectives include integrating sustainability in all areas of business and organisational levels, transferring this culture to suppliers and the value chain and ensuring its incorporation in the scope of the work they perform for Aena. <p>Anti-corruption and fraud policy</p> <ul style="list-style-type: none"> In the context of the business activity carried out for Aena or on its behalf, this policy establishes that suppliers must not directly or indirectly offer or grant to public officials, third parties or any employee of the company, gifts, presents or other advantages that are not authorised in the Code of Conduct, with the purpose of obtaining favourable treatment in the granting or conservation of contracts or benefits of a personal nature or for the supplier company. To prevent corruption, it is expressly indicated that the Company must choose its consultants, partners, suppliers, customers and representatives with due diligence, establishing relationships whenever possible with recognised and top-level entities in its respective market. If this is not possible, due diligence procedures will be adopted in accordance with the regulatory framework to which the Company is subject. <p>Human rights policy</p> <ul style="list-style-type: none"> Aena's commitments with suppliers and contractors include disseminating its responsibility with human rights by promoting that they formalise their commitment to human rights and that, in the event that they do not have their own policy, they subscribe to that of Aena. <p>Integrated Quality, Environmental and Energy Efficiency Management Policy</p> <ul style="list-style-type: none"> One of the principles is communicating the policy to all employees and companies that carry out their activity in the Company and making it available to interested parties. <p>Occupational Risk Prevention Policy</p> <ul style="list-style-type: none"> This policy assumes the commitment to comply, among other things, with the objective of coordinating preventive activities with third parties, including concessionaires, contractors and air operators, and taking care of their health and safety. <p>Operational Safety Policy</p> <ul style="list-style-type: none"> Its principles include obtaining sufficient guarantees with respect to the functions of external suppliers, provided that they may significantly affect Operational Safety. <p>Inclusion of ESG issues in the bidding procedures and in their execution</p> <ul style="list-style-type: none"> This includes the obligation of the parties to act within the most demanding levels of safety, occupational risk prevention and environmental respect. It specifies the rejection of any fraudulent practice or corruption. Specific clauses are incorporated on the corporate responsibility of suppliers, contractors and lessees, as well as social, environmental and governmental performance and respect for human rights. Includes specific requirements, in social, environmental and governmental matters, required in the execution of the contract, whose breach may result in the imposition of penalties or contractual termination. 	<ul style="list-style-type: none"> Verification of the qualification and integrity of each supplier and customer. Before initiating binding commercial relations, suppliers and customers are required to have, to the extent possible, anti-corruption protocols and controls and to sign an anti-corruption clause (unless the proposing unit considers it unnecessary due to the nature of the relationship or other circumstances). It is mandatory to comply with clauses 39, 40, 41 and 42 included in the procurement specifications about the prevention of occupational risks, environmental protection, operational and airport safety, and other social and labour conditions and obligations. Certified for the implementation of environmental management and quality assurance systems (ISO 14001 and ISO 9001 or similar), guarantee of compliance with the fundamental Conventions of the International Labour Organization, as well as technical solvency criteria. Exchange of good environmental practices to promote the continuous improvement of the products/services provided and contribute to sustainable development. Supplier evaluation system: evaluation of environmental and social programmes implemented by bidders in the technical assessment process. Civil liability policy and accident insurance, be up to date with Social Security, Tax Agency, Civil Registry payments, etc. Adoption of Aena's Human Rights Policy in the event that it does not have its own policy (and, therefore, the Principles of the Global Compact—the initiative of which Aena is a part and whose observance is expressly contained therein), as well as specific commitments related to: <ul style="list-style-type: none"> Eradicate child labour. Avoid discriminatory practices. Promote the development of people. Facilitate freedom of association and collective bargaining. Promote adequate working conditions (remuneration, working hours, etc.) and protect the health and safety of workers. Promote a respectful and decent work environment. Commitment to customers. Respect for community rights. Promotion and awareness of human rights. The control of human rights in the supply chain is carried out through the inclusion of specific clauses in the procurement specifications. Supplier monitoring during the term of the contract and verification of compliance with the special conditions of execution. Monitoring of indicators on health and safety. At Aeroportos do Nordeste do Brasil, control and supervision is carried out by means of external audits (documentation, record of working hours, etc.), contributing to mitigating the risk of forced or mandatory labour. Due to the nature of its supply chain, the risk of child labour is considered insignificant. The legal framework applicable to the geographical areas where Aena operates makes it less likely for significant risks to be identified regarding violations of the rights of freedom of association and collective bargaining.

⁵ The Airport also has several tools to ensure the control, supervision and mitigation of risks associated with the value chain. For example, a specific record of key risks and mitigation actions, risk monitoring services or a risk matrix to determine the appropriate value of insurance in tenders. Likewise, all bidding documents include specific questions for assessing possible associated risks.

Other risks associated with the value chain:

- Personnel privacy: Aena has a privacy policy for employees of collaborating companies that informs them of the personal data processing performed by companies in the Aena Group and by the Aena Group’s service providers, where appropriate, in accordance with current legislation⁶ (for more information, see Chapter 1).
- Protection of suppliers’ health and safety: the bidding specifications include specific clauses through which the successful bidder undertakes to comply with the obligations imposed by law⁷, other standards and applicable regulations (see Chapter 5). In addition, an Operational and Airport Safety Clause is included, whose main objective is to establish the requirements that apply to these third parties to comply with the Operational Safety Management System and the current Airport Safety regulations, and determine the actions that govern the relations between the airport and the external suppliers in this matter (see Chapter 6).

With regard to London Luton Airport, the bidding documentation that is evaluated incorporates a series of issues related to health and safety, insurance, prohibition/rejection of slavery, the environment, financial stability and technical capacity.

During the effective period of the contract, the service areas monitor and supervise potential risks arising from its performance.

At Aeroportos do Nordeste do Brasil, an external company is responsible for verifying compliance with labour requirements and obligations (related to health, safety and worker training), as well as the correct delivery of PPE and safety equipment to workers based on the associated risk. With regard to environmental aspects, audits are planned and will be comprehensively carried out during the next fiscal year.

Main results in 2021

The Company has not identified any incident in any procurement agreement with suppliers related to the rights of freedom of association, collective bargaining, use of child labour, or forced or nonconsensual labour, nor have any complaints been received for the aforementioned reasons. No suppliers with a significant negative social impact have been detected, nor have incidents been registered through the channels enabled for this purpose, which would lead to the cancellation of orders or contracts with suppliers of the group due to their negative social impact.



⁶Regulation (EU) 2016/679 of the European Parliament and of the Council, of 27 April 2016, on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (GDPR) and Organic Act 3/2018, on Personal Data Protection and Guarantee of Digital Rights.

⁷ Act 31/1995, of 8 November, on Occupational Risk Prevention.

4.2.2. The acquisition and purchasing process (GRI 102-9; 103-2; 308-4; 414-2)

The supplier management model transmits the objectives in environmental and social matters—including respect for human rights—and in innovation

and Aena’s development throughout the procurement process. As indicated in the beginning of this chapter, these aspects have been reinforced in 2021 with the approval of the guide for the technical evaluation of suppliers’ tender files, incorporating best practices in sustainability into supply chain management and

ensuring the good environmental performance of all suppliers.

Sustainable acquisition and purchasing process

Compliance with current legislation	Purpose of the contract	Definitive guarantee	Economic and financial solvency	Technical or professional solvency	Exclusion criteria	Technical evaluation	Civil liability policy and accident insurance, Social Security, Tax Agency, Civil Registry payments, etc.
Respect the regulations in force in all of the countries in which the Company operates.	With special consideration to those agreements in which technological, social or environmental innovations can be incorporated	Possibility of exempting the successful bidder from the obligation to create a definitive guarantee.	As a measure to ensure the ability to meet the commitments made.	In addition to the mandatory compliance criteria, additional technical solvency criteria may be included, at the discretion of the proposing unit, such as the 'Certificate of Implementation of the Environmental Management System (ISO 14001 or similar)', the 'Certificate of Implementation of the Quality Management System (ISO 9001 or similar)', or the guarantee of compliance with the fundamental Conventions of the International Labour Organization.	Essential and necessary for the proper execution of the contract.	Through technical assessment criteria with which the technical evaluation of the bids will be carried out, which must be formulated objectively, with full respect to the principles of equality, non-discrimination, transparency and proportionality, also including environmental and social criteria.	Necessary in certain contract awards that provide an adequate response to the circumstances.



Inclusion of social and environmental issues in tendering processes (GRI 102-9; 103-2; 308-4; 414-2)

- **Determination of the purpose of the contract**

Spanish legislation⁸ establishes the obligation that the purpose of the contract be defined in view of the specific needs or functionalities that are intended to be met—without being limited to a single solution.

This implies the need to take into account the technological, social or environmental innovations that can be incorporated when preparing the specifications to improve the efficiency and sustainability of the goods, works or services that are being contracted.

This includes, among others, the incorporation of criteria related to improving accessibility for people with disabilities, universal design or environmental protection, for example.

On this basis, in 2021, work has been done to define and implement quantified sustainability requirements that allow Aena’s⁹ commitment to sustainability to be transmitted through the value chain by including these objectives in 100% of the specifications from 2022¹⁰.

Using the Sustainability Strategy as a reference, Aena has worked to define and implement quantified sustainability requirements in environmental matters (decarbonisation, waste management, etc.) that can be included in 100% of the specifications as of 2022, so that

it will entail the mandatory achievement of certain environmental goals by contractors, for example:

- Use 100% of the vehicles (passenger vans and cargo vans) with the ECO environmental label or ‘zero emissions’ for executing work from the time of signing the contract or the use of the most efficient technology available to implement 100% of the necessary lighting.
- The contractual objective that handling agents operating in airports reduce their emissions by at least 74% by 2030, based on 2019 emissions (see Chapter 2).

On the other hand, in order to facilitate the integration of workers with disabilities in the labour market, in the file initiation reports, the file director must state the possibility of reserving a contract for special employment centres and insertion companies, as regulated by Act 44/2007, of 13 December.

London Luton Airport also incorporates sustainability standards when preparing the purpose of the contract.

- **Technical or professional solvency criteria**

The Guide for the technical evaluation of tender files from Aena’s suppliers, applicable in Spain, establishes a methodology to ensure the correct incorporation and application of the technical solvency criteria of bidders who take part in Aena’s procurement processes, depending on the nature of each contract.

The power to apply these criteria corresponds to the proposing unit and depends on the nature and type of contract (work, service, supply or commercial contract). Once the proposing unit has included them as a criterion for solvency, the companies must comply in order to be able to tender for the contract.

Examples of technical solvency criteria:

- **Environmental scope:** Depending on the type of contract, the following can be requested: ISO 14001, ISO 9001 or similar certifications issued by an accredited entity (for works, supplies or services tenders); certificates issued by officially recognised institutes or services responsible for quality control that accredit the conformity of products to certain specifications or technical standards (these may be requested in the case of supply tenders), etc.
- **Social issues:** These may generally be related to the guarantee of compliance with the fundamental Conventions of the International Labour Organization through a statement committing to the application of supply chain management systems.

⁸ RDL 3/2020 and Act 9/2017 and articles 3 and 4 of Royal Legislative Decree 1/2016, of 16 December, via which the consolidated text of the Integrated Pollution Prevention and Control Directive is approved.
⁹ These requirements are aligned with the Company’s environmental objectives (decarbonisation, waste management, etc.), and will entail the mandatory achievement of certain environmental goals by contractors.
¹⁰ As detailed in chapter 2, the specifications for contracting handling services already include decarbonisation objectives.

These types of practices are also carried out by London Luton Airport and Aeroportos do Nordeste do Brasil as part of their selection processes:

- London Luton Airport incorporates a set of technical requirements relating to accreditations, experience, references and methodologies in social and/or environmental matters, which are subject to analysis and evaluation (guaranteed in some cases by external certifications like ISO 14001/EMAS). 100% of the procurement specifications incorporate technical solvency criteria of an environmental and social nature and must prove that their systems are certified in accordance with ISO 14001 and 9001.
- Aeroportos do Nordeste do Brasil carries out the so-called ‘*authorisation*’ process, which consists of performing a background check of the supplier’s previous practices and records. This analyses whether the supplier has been sued for corruption, slavery practices or noncompliance with labour obligations (resulting in a high number of procedures and convictions), etc. Subsequently, the so-called ‘*mobilisation*’ process is carried out, which verifies whether the working relationships between the employer and the employee are lawful and compliant with current legislation.

At ANB, all bidding companies must present a management model in their proposals that details, among others, aspects related to sustainability, health and safety, risks, environmental issues, etc.

• **Technical evaluation of offers**

As in the evaluation of the technical solvency of the bidders who take part in the procurement processes, the ESG criteria are decisive in carrying out the technical evaluation of the bids submitted. This type of criteria is intended, among other aspects, to assess the availability of proven systems and methodologies in the application of various aspects in addition to those traditionally used as technical solvency criteria (certificates of environmental management and quality assurance systems).

The applicability of these criteria and their weighting in the overall score depends on the need, nature and type of contract (work, service, supply or commercial contract).

With the approval of the ‘Guide for technical evaluation’, since 2021, criteria has been introduced that take into account social, innovation and sustainability aspects in line with the guidelines of the current regulations. In order to meet the strategic objectives established by Aena in the field of sustainability, the possibility of selecting this type of criteria to align the interests and obligations of suppliers with those of the Company is envisaged¹¹.

- Environmental criteria. The guide includes standard clauses related to decarbonisation, sustainable water management and the use of resources.

- Social criteria: specific criteria may be included, such as having an SA 8000 Social Responsibility Management certificate or an AENOR gender/retributive equality certificate.

In this way, Aena aims to ensure that contracts are awarded based on the best price-quality relationship (financial and qualitative criteria¹²).

The commercial procurement specifications also include ESG conditions:

- The specific bidding conditions include:
 - Environmental requirements related to the operation and maintenance of the spaces.
 - The obligation to include in the project specifications an Environmental Monitoring Plan duly completed by the lessee.
 - In assessing the technical offer, consider having a plan for reducing single-use plastics and for promoting the energy efficiency of the facilities.
- The legal specifications include:
 - The commitment to comply with health and airport and environmental safety regulations—including those related to, among others, the use of single-use plastics, emissions, waste management, waste, usage, machinery, etc.
 - The obligation to present, prior to the start of the activity, an Environmental Control Programme agreed upon with Aena, which details the way in which the potential impacts of the activity on the environment will be managed and controlled, identifying the organisational structure in charge

¹¹ Special attention must be paid to the impact that the selected criteria may have on competition, especially if it is mandatory compliance criteria.

¹² If required, the request for quality certifications (ISO 9000 or similar) and environmental certificates (ISO 14001 or equivalent) by the company that called the tender in order to demonstrate technical solvency cannot be assessed in the evaluation criteria.

of management, planning activities, responsibilities, practices, procedures, processes and resources dedicated to eliminating or reducing potential impacts (see more information in Chapter 2).

- Aena may periodically monitor compliance with the agreed Environmental Control Programme or any other aspect of the company that could affect the Company's Integrated Management System (IMS).

Both the specific bidding conditions and legal specifications¹³ include penalising and sanctioning mechanisms in the event of noncompliance with the applicable obligations on environmental, public health and epidemics, social and labour matters, as well as the infractions that may arise from them.

London Luton Airport also includes a set of requirements on sustainability and environmental matters in its procurement specifications. Likewise, suppliers are also evaluated and scored on their compliance with key performance specifications and objectives.

Inclusion of tiebreaker clauses

In Spain, when two or more offers obtain the same score (with a similar economic offer), Article 147 of Act 9/2017 and Article 66.11 of RDL 3/2020 foresee tiebreaker clauses, giving advantages to companies that ensure the implementation of sustainable and responsible practices in their everyday performances and management. These types of clauses are also incorporated into the procurement specifications of London Luton Airport

Exemption from providing a definitive guarantee

In accordance with current legislation in Spain, in certain cases, the Company's Procurement Body can exempt the successful bidder from the obligation of providing a definitive guarantee. This especially affects supplies of consumable goods whose delivery and receipt must be made before payment of the price, and contracts whose purpose is the provision of social services or the social or labour inclusion of persons belonging to groups at risk of social exclusion.



¹³ The Director of the Aena Centre in which the activity performed by the lessee is carried out will notify the company in writing of the infraction committed and the penalty that it would entail, granting it a period of ten calendar days to submit as many arguments and evidence as it deems pertinent. In view of the same, the Director of the Aena Centre will proceed to impose the penalty that may be applicable or to close the proceedings and, in the event that he or she is not competent according to this contract, he or she will make a proposal to impose the penalty to the competent Aena body.

4.2.3. Contract execution processes GRI 102-9; 103-2; 308-4; 414-2)

Formalisation of the contract

By signing the contract, the successful bidder (contractor and/or lessee) undertakes to accept specific provisions on social matters (prevention of occupational risks, physical and operational safety) and environmental protection¹⁴ contained in the specifications, to which the promotion of good practices is added, whereby, although not contractual, they do contribute to promoting the sustainability of the products and the provision of services.

The clauses contained in the contracts are mandatory for 100% of the successful bidders, and their non-compliance may result in penalties.

Environmental Protection: to comply with environmental legislation, as well as the conditions established in the specifications regarding, for example, the proper management of waste, the storage of hazardous materials and substances, the conditions of use of vehicles/machinery and atmospheric emissions or waste.

Labour and social obligations: among which, the contractors agree to have minimum percentages of fixed workers on the workforce and employees with functional diversity, and to comply with the wage conditions of workers as per their applicable sectoral collective bargaining agreement and with the legislation on labour matters.

Occupational risk prevention: compliance with current legislation on prevention¹⁵ aimed at ensuring that suppliers carry out high-quality and sustainable works, supplies and services, ensuring the protection of their health and safety.

Airport and operational security¹⁶: comply with all current legislation on security, as well as abide by the orders and instructions issued by the airport authority aimed at ensuring the security of activity.

At the London Luton Airport, all suppliers must comply with current regulations in the United Kingdom on labour (slavery, minimum wage, equality, etc.) and environmental matters.

At Aeroportos do Nordeste do Brasil, the contractual specifications and/or documents stipulate the obligations and requirements concerning labour and environmental matters, and expressly establish, in the case of a breach by the supplier, the possibility of suspending and/or retaining payments until the compliance with the contract is once again achieved.



¹⁴ In general, these are set out in clauses 39, 40, 41 and 42 of the procurement specifications, corresponding to RDL 3/2020, and clauses 42, 43, 44 and 45 of the provisions of Act 9/2017.

¹⁵ Act 31/1995, of 8 November, on the Prevention of Occupational Risks, and other standards and regulations applicable within the scope of this Prevention.

¹⁶ See Chapter 6: Safe, quality services.

Special conditions of contract execution

In the bidding procedures in Spain, Aena incorporates special execution conditions related to social, labour, ethical and environmental conditions, with which suppliers must comply. These conditions, which must be stated both in the tender announcement and in the specific terms and conditions of bids (PCP [pliego de cláusulas particulares]) cannot be directly or indirectly discriminatory and must be compatible with European law.

Procurement regulations stipulate the monitoring to be carried out in relation to compliance with the conditions of public contracts and include the possibility of establishing, in case of a breach, economic penalties that could even result in the termination of the contract.

This is one of the mechanisms used by the Company to ensure compliance with both environmental and social standards included in the procurement specifications.

100% of Aena's procurement agreements include, among the special conditions of contract execution, clauses related to the environment, labour and social issues that may give rise to penalties in the event of a breach. These clauses could also be of essential nature, meaning their breach could give rise to the termination of the contract.

The proposing unit is responsible for supervising the proper execution of the tender in accordance with the provisions of the special execution conditions.

SPECIAL CONDITIONS OF CONTRACT PERFORMANCE

These include aspects such as: a minimum percent of fixed staff in the company or of staff with disability or social exclusion; timely payment of wages to staff; reduction, reuse and recycling of waste products; sustainable water management; environmental vigilance system; or being up-to-date in payments to subcontractors and suppliers

 <p>Labour and social obligations</p> <p>They include issues such as: enforcing the rights recognised in the United Nations Convention on the Rights of Persons with Disabilities, to a higher percentage than that required by national legislation; promoting the employment of persons with special difficulties of insertion in the labour market, in particular people with disabilities or in a situation or risk of social exclusion; eliminating inequalities between men and women in that market.</p>	 <p>Occupational risk prevention obligations</p> <p>Compliance with mandatory aspects in the prevention of occupational risks in accordance with current legislation, in order to ensure safety and health at work and compliance with sector agreements, as well as the implementation of measures to prevent workplace accidents.</p>	 <p>Environmental obligations</p> <p>They include aspects related to the reduction of greenhouse gas emissions; the maintenance or improvement of environmental values that may be affected by the execution of the contract; more sustainable water management; the promotion of the use of reusable containers; the promotion of product recycling.</p>
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Some examples of special execution conditions that appear in the tender documents

- | | | |
|---|---|--|
| <ul style="list-style-type: none"> • Employ a percentage of fixed workers equal to or greater than 20% in the execution of the contract. • Employ in the execution of the contract a percentage of workers who, on the total of new jobs that are performed, is equal to or greater than the national average in the construction sector, provided that the availability of the construction labour market allows it. • Employ in the execution of the contract a percentage of workers with disabilities, or in a situation or at risk of social exclusion greater than 1%, provided that the availability of the construction market allows it. • Prompt payment of wages to personnel and compliance with the applicable wage conditions derived from the collective agreement. • Employ in the execution of the contract a percentage of workers who, across all new jobs that are carried out, are equal to or higher than the national average in X's sector (engineering and technical study offices, etc.). • The contractor must be up-to-date with the payment of subcontractors or suppliers participating in the contracts. | <ul style="list-style-type: none"> • Perform the work in strict compliance with the legislation on occupational risk prevention. • Provide workers who perform the work with adequate information and training on the risks of the activity they are carrying out, with preventive measures and personal protective equipment or other means of protection necessary for their execution. | <ul style="list-style-type: none"> • Promoting the reduction, reuse and recycling of waste. • Establishing an environmental monitoring system that guarantees compliance with the indications and protective and corrective measures, related to the purpose of the contract. The contractor will establish a series of indicators that provide a way to estimate the performance of these measures and their results. • Recycling of products and the use of reusable containers. • Sustainable water management. |
|---|---|--|

Monitoring and evaluation of suppliers

(GRI 102-9; 308-2; 414-2)

Valuation of the quality of services

In Spain, the procurement specifications determine the mechanisms for monitoring compliance with the clauses of the contracts, as well as the penalties to be applied in the event of a breach.

The File Director, responsible for monitoring the execution of the contract, must monitor, supervise and verify that the requirements—including the social and environmental criteria—and quality levels defined in the tender file’s technical specifications are met. In addition, where required, he or she issues the corresponding certification of execution compliance with the frequency established in the contract.

At Aeroportos do Nordeste do Brasil, the execution of tender work is supervised monthly. To this end, the contractor digitally sends proof of compliance with the obligations stipulated in the contract and of being up-to-date with tax payments. In the event of a breach, the contract provides for the possibility of withholding payments.

In the case of London Luton Airport, supplier performance is supervised through agreements regarding the level of services provided or key performance indicators. This supervision is carried out by the *Services Areas*, which, at the end of the contract, must report on the supplier’s performance. This report also includes the valuation of the quality of the services, supplies and works performed during the year.

Negative supply chain impacts

The Company’s evaluation system allows it to identify suppliers that can or do cause significant negative impacts at the environmental or social level, and to act accordingly. In accordance with the provisions of the contracts, it implements measures to mitigate these impacts, which can range from an improvement agreement with the supplier until the termination of its contract.

Supplier and customer satisfaction study

Aena has a procedure for evaluating customer satisfaction that includes analysing the degree of satisfaction of lessees and contractors. This procedure describes the systematic process followed in the Company’s units/sites. The main tool used for this evaluation is the completion of surveys, which are evaluated. Then, the corresponding improvement actions are determined and implemented.

In addition, other tools and channels are used to understand the needs and expectations of the following:

- Suppliers: meetings with contractors, working parties for information exchange and service improvement, meetings, user committees, monitoring and management of complaints, suggestions and compliments, DORA indicators, etc. Based on these channels, it has been possible to detect, among other expectations, the need to improve contractual requirements, including clear, achievable and stable objectives; improvement of transparency; promotion of equal treatment; and streamlined processing.

- Partners providing services to clients of Aena and other lessees: working parties for information exchange and service improvement; analysis of results of the service provided (commercial attributions of ASQ surveys and monitoring the management of complaints, suggestions and compliments); VIP Lounge surveys; parking and commercial services; meetings with lessees; and meetings with handling agents. The expectations identified include the implementation of standards of conduct, acceptable requirements and stability.

London Luton Airport has developed a system to continuously improve its processes, which is accredited by the Chartered Institute of Procurement and Supply (CIPS). Although, during 2021, due to the impact of the pandemic, the associated budget has been significantly reduced.



5

Staff and social issues



Priorities

- Job stability and professional development
- Working conditions and fair remuneration model
- Work/life balance and motivation
- Diversity and inclusion
- Attraction and retention of talent
- Continuous education and training
- Two-way and ongoing communication
- Comprehensive work well-being and flexibility
- Health and safety
- New technologies and collaborative tools

Health and well-being

- Occupational health and safety model, promoted to the highest level of the Organisation
- Proactive approach to maintain the highest levels of safety and minimise exposure to risk
- Health and safety objectives
- Reduction in the number of accidents
- Conciliation measures and promotion of health and well-being for 100% of employees

Stable and quality employment

- Aena is committed to employability and professional development:
- 8,811 employees
 - 489 new employees
 - 93% fixed
 - 96% perform their work full-time

Remuneration system

Promotes equal treatment for employees, with no gender or personal differences of any other kind.

1.7% pay gap in 2021 (Spain)

Organisation of work time and disconnection

- Telecommuting policy
- Digital disconnection policy

Promotion of Diversity and Inclusion

Gender diversity

- Women represent:
- 37%** of the workforce
 - 26,67%** Board of Directors

Generational diversity

- Encouragement of training and employment of training among the youngest through participation in employment fairs, agreements with universities, etc.

Equality Plan II

Promotion and development of talent, skills and knowledge

- Employer branding strategy
- Business strategy manager for London-Luton Airport
- Promotion of employment in the local environment

Development programmes

- 'Mentoring: Leaders Developing Leaders'
- 'Reciprocal Coaching' programme
- Coaching programme
- Digital and Cultural Transformation programme

100% of Spain's workforce participates in the Performance Management system



€2,165,474 investment in training programmes

100% of employees have received training

41.4 hours of training per year per employee



Commitment to SDGs



SDG 3
Health and well-being



SDG 4
Quality education



SDG 5
Gender equality



SDG 8
Decent work and economic growth



SDG 16
Peace, justice and solid institutions



SDG 17
Partnerships for the goals

With the emergence of COVID-19, Aena implemented multiple measures aimed at minimising the impacts on its professionals, reinforcing aspects of health and well-being and promoting the use of new technologies and the cultural transformation of workers. Talent management has also been a priority and is a basic pillar for the Company's management and performance.

In 2021, with the objective of adapting to new trends, Aena has adopted a proactive approach that reinforces

existing management tools and culminates in the Sustainability Strategy 2021–2030, which—through a medium- to long-term action framework—focuses on diversity and inclusion, talent management, professional career development, work-life balance and motivation, and the development of a sustainable culture.

This approach provides the Organisation with sufficient strength to cope with the dynamic environment,

responding to the needs of an increasingly changing and demanding work environment.

During 2021, Aena's professionals have exceedingly shown their ability to excel and adapt to new environments.



Aena's Organisation and Human Resources Management is the unit in charge of matters related to people management and of promoting a quality work environment with the objective of maintaining the highest levels of motivation and commitment, attracting and retaining talent, and taking on the Company's new challenges.

Aena's status as a state-owned public company implies certain restrictions on the hiring of personnel and talent development, and this is reflected on the Company's risk map. These risks are assessed annually through the monitoring of Key Risk Indicators (KRIs) defined for this purpose. Specifically, no significant impact occurred in this fiscal year.

The measures adopted to mitigate these risks include the Successions Plan and participation in Remuneration Studies, Potential Detection Programmes and Employer Branding, aimed at promoting access to the Organisation for the best talent and providing them with the tools and knowledge necessary to adapt to this changing environment. This is what is included, among other things, in the Sustainability Strategy.



5.1. Stable and quality employment¹

5.1.1. Main workforce details

Since the emergence of COVID-19 in 2020, Aena has maintained its commitment to providing a quality work environment, guaranteeing the stability and working conditions of its employees.

At the end of 2021, Aena's workforce amounted to 8,811 people, 0.5% more than the previous year, of which 37% were women.

The majority of employees are based in Spain (90%) (Madrid, Canary Islands, Catalonia, Andalusia and Balearic Islands) and in the United Kingdom (7%) (London).

Aena offers stable and quality employment, a commitment to employability and professional development:

- 93% are permanent,
- 7% are temporary
- 96% work full-time

Total number and distribution of employment contract types (as of 31 December)* (GRI 102-8)

	2020					2021					
	Total workforce	Permanent		Temporary		Total workforce	Permanent		Temporary		
		Part-time	Full-time	Part-time	Full-time		Part-time	Full-time	Part-time	Full-time	
Aena S.M.E., S.A. (Spain)	7,690	165	7,031	51	443	7,787	194	6,953	59	581	
Aena Sociedad Concesionaria del AIRM S.M.E., S.A. (Spain)	79	0	76	0	3	79	0	75	0	4	
ADI, S.M.E., S.A. (Spain)	24	1	21	0	2	26	1	23	0	2	
London Luton Airport (United Kingdom)	706	123	583	0	0	628	100	528	0	0	
Aena Brasil	272	0	270	0	2	291	0	288	0	3	
Total	No.	8,771	289	7,981	51	450	8,811	295	7,867	59	590
	%	100%	3.3%	91.0%	0.6%	5.1%	100.0%	3.3%	89.3%	0.7%	6.7%

(*) All workers—except those who have reduced working hours—have full-time contracts.

¹All the data presented corresponds to the end of the fiscal year, 31 December 2021, except in those cases in which another date is expressly specified. Likewise, in those cases in which its consolidation has not been possible, its scope is specifically indicated.

Total number and distribution of employees by gender, age, country and professional category (as of 31 December) (GRI 102-8)

2021

	Aena S.M.E., S.A. (Spain)						Aena Sociedad Concesionaria del AIRM S.M.E., S.A. (Spain)						ADI, S.M.E., S.A. (Spain)						TOTAL SPAIN					
	< 25 years old		Between 25 and 45 years old		> 45 years old		< 25 years old		Between 25 and 45 years old		> 45 years old		< 25 years old		Between 25 and 45 years old		> 45 years old		< 25 years old		Between 25 and 45 years old		> 45 years old	
	W	M	W	M	W	M	W	M	W	M	W	M	W	M	W	M	W	M	W	M	W	M	W	M
Senior Management	0	0	1	1	4	5	0	0	0	0	0	1	0	0	0	0	0	0	0	0	1	1	4	6
Executives and Graduates	0	0	372	450	499	610	0	0	2	4	3	9	0	0	1	3	5	9	0	0	375	457	507	628
Coordinators	0	0	62	145	305	692	0	0	0	1	0	6	0	0	0	0	0	0	0	0	62	146	305	698
Technicians	0	1	395	1,104	988	1,720	0	0	8	18	4	19	0	0	0	0	0	0	1	403	1,122	992	1,739	
Support staff	0	0	88	71	141	133	0	0	1	1	0	2	0	0	3	0	4	1	0	0	92	72	145	136
Total	0	1	918	1,771	1,937	3,160	0	0	11	24	7	37	0	0	4	3	9	10	0	1	933	1,798	1,953	3,207

	London Luton Airport						Aena Brasil						TOTAL (gender – age)						TOTAL (by gender)		
	< 25 years old		Between 25 and 45 years old		> 45 years old		< 25 years old		Between 25 and 45 years old		> 45 years old		< 25 years old		Between 25 and 45 years old		> 45 years old				
	W	M	W	M	W	M	W	M	W	M	W	M	W	M	W	M	W	M	W	M	
Senior Management	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1	4	6	5	7
Executives and Graduates	0	0	11	24	7	19	0	0	7	12	2	6	0	0	393	493	516	653	909	1,146	
Coordinators	0	0	6	14	9	16	0	0	12	32	0	1	0	0	80	192	314	715	394	907	
Technicians	0	1	2	34	3	26	1	0	20	84	0	4	1	2	425	1,240	995	1,769	1,421	3,011	
Support staff	10	3	121	157	71	94	3	1	52	46	0	8	13	4	265	275	216	238	494	517	
Total	10	4	140	229	90	155	4	1	91	174	2	19	14	6	1,164	2,201	2,045	3,381	3,223	5,588	

Annual average of contracts according to their type* by gender, age and professional category in 2021 (consolidated) (GRI 102-8)

	2020						2021					
	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
Men	5,239	122	320	20	5,559	142	5,158	100	316	15	5,474	115
Women	2,782	235	199	45	2,981	280	2,783	187	165	38	2,948	225
Total by gender	8,021	356	519	65	8,540	421	7,941	287	481	53	8,422	340
Senior Management	12	0	0	0	12	0	12	0	0	0	12	0
Other executives and graduates	1,897	32	41	0	1,938	32	1,948	25	37	0	1,985	25
Coordinators	1,236	19	1	0	1,237	19	1,246	19	2	0	1,248	19
Technicians	3,953	118	416	48	4,369	166	3,883	111	391	41	4,274	152
Support Staff	923	188	61	17	984	205	852	132	51	12	903	144
Total by professional category	8,021	356	519	65	8,540	421	7,941	287	481	53	8,422	340
Over 45 years old	4,658	165	174	23	4,832	188	4,898	147	182	22	5,080	169
25–45 years old	3,330	174	344	42	3,674	216	3,021	132	299	31	3,320	163
Under 25 years old	33	17	1	0	34	17	22	8	0	0	22	8
Total by age	8,021	356	519	65	8,540	421	7,941	287	481	53	8,422	340

(*) Note: Aggregated data of the total consolidated workforce.

Hirings by gender, age, professional category and region (*) (GRI 405-1)

2021																								
Aena S.M.E., S.A. (Spain)						AIRM. (Spain)						ADI, S.M.E., S.A. (Spain)						TOTAL SPAIN						
< 25 years old		Between 25 and 45 years old		> 45 years old		< 25 years old		Between 25 and 45 years old		> 45 years old		< 25 years old		Between 25 and 45 years old		> 45 years old		< 25 years old		Between 25 and 45 years old		> 45 years old		
W	M	W	M	W	M	W	M	W	M	W	M	W	M	W	M	W	M	W	M	W	M	W	M	
Senior Management	0	0	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	54	35	18	11	0	0	1	0	0	0	0	0	0	0	0	2	0	0	55	35	18	13
Coordinators	0	0	1	0	2	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	2	3
Technicians	1	0	104	49	55	39	0	0	3	0	1	0	0	0	0	0	0	0	1	0	107	49	56	39
Support staff	0	0	7	10	8	12	0	0	0	1	0	0	0	0	0	0	0	0	0	0	7	11	8	12
Total	1	0	166	94	83	65	0	0	4	1	1	0	0	0	0	0	2	1	0	170	95	84	67	

LONDON LUTON AIRPORT						AENA BRASIL						TOTAL CONSOLIDATED							
< 25 years old		Between 25 and 45 years old		> 45 years old		< 25 years old		Between 25 and 45 years old		> 45 years old		< 25 years old		Between 25 and 45 years old		> 45 years old			
W	M	W	M	W	M	W	M	W	M	W	M	W	M	W	M	W	M		
Senior Management	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
Executives and Graduates	4	0	0	0	4	1	0	0	1	3	0	0	4	0	56	38	22	14	
Coordinators	0	0	0	0	0	0	0	0	0	2	1	0	1	0	0	3	1	2	4
Technicians	0	0	0	0	1	0	0	1	6	7	0	1	1	1	113	56	57	40	
Support staff	2	4	0	0	0	3	1	1	8	20	0	0	3	5	15	31	8	15	
Total	6	4	0	0	5	4	1	2	17	31	0	2	8	6	187	126	89	73	

In 2021, 205 women and 284 men were hired, a total of 489 people (549 in 2020).

Layoffs² (GRI 103-2; 401-1)

In 2021, the number of dismissals amounted to 23 (39 and 10 dismissals in 2020 and 2019, respectively). Of the total number of dismissals, the number of women

whose employment contract was terminated for this reason was 12, i.e., 52% (12 women and 30.1% in 2020 and 2 women and 20% in 2019), compared to 11 men, 48% (27 men and 60.9% in 2020 and 8 men and

80% in 2019). With regard to dismissals by professional classification and age, 57% are concentrated in support staff positions (69.2% and 40% in 2020 and 2019, respectively.)

Dismissals by gender, age, professional category and region

2021

	Aena S.M.E., S.A.						AIRM						ADI						London Luton Airport (United Kingdom)						Aena Brasil, S.A. (Brazil)						TOTAL					
	< 25 years old		Between 25 and 45 years old		> 45 years old		< 25 years old		Between 25 and 45 years old		> 45 years old		< 25 years old		Between 25 and 45 years old		> 45 years old		< 25 years old		Between 25 and 45 years old		> 45 years old		< 25 years old		Between 25 and 45 years old		> 45 years old							
	M	W	M	W	M	W	M	W	M	W	M	W	M	W	M	W	M	W	M	W	M	W	M	W	M	W	M	W	M	W						
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	0	0	0	0	0	0						
Executives and Graduates	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1	1	0	1	0	0	1	1						
Coordinators	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1	0	1	0	0	1	1						
Technicians	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	1	0	1	0	0	1	1						
Support staff	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	1	2	2	4	1	0	0	0	1	0	1	0	1						
Total	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	1	3	2	5	1	0	0	2	4	0	4	0	1	5	6	6	5	

² Labour force adjustment plans: In 2021, no dismissals were made under the Labour Force Adjustment Plan (ERE [Expediente de Regulación de Empleo]), neither permanent nor temporary dismissals, which reinforces the Company's willingness to maintain working conditions and stability in employment.

Rotation rate (GRI 103-2; 401-1)

Low turnover rates, a 3.3% turnover rate (1.9% of which corresponded to a voluntary turnover rate) and the recognitions received by Aena in the area of personnel management reflect the commitments made by the Company in the area of human capital management, as well as the excellent deployment and implementation of specific actions and plans.

Turnover rate* of staff by age, gender and region

2021

Turnover rate (%)	Aena S.M.E., S.A.			SCAIRM			ADI			LLA			Aena Brasil			TOTAL		
	W	M	Total	W	M	Total	W	M	Total	W	M	Total	W	M	Total	W	M	Total
Over 45	1.01%	3.16%	2.35%	22.22%	2.78%	6.67%	0%	0%	0%	10.11%	10.32%	10.25%	25.00%	17.39%	18.52%	1.58%	3.59%	2.84%
25-45	1.01%	2.38%	1.92%	0.00%	8.33%	5.88%	0%	0%	0%	14.55%	10.34%	11.97%	13.70%	5.95%	8.30%	3.54%	3.56%	3.55%
Under 25	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0%	0%	0%	40.00%	50.00%	44.44%	33.33%	100.00%	50.00%	39.13%	52.94%	45.00%
Total	1.01%	2.85%	2.18%	10.53%	5.00%	6.33%	0%	0%	0%	14.96%	11.81%	13.03%	15.00%	7.81	9.93%	2.62%	3.73	3.33%

(*) Turnover: Number of employees who leave the organisation voluntarily or due to dismissal, retirement or death while having an active status.

Voluntary turnover rate* of staff by age, gender and region

2021

Turnover rate (%)	Aena S.M.E., S.A.			SCAIRM			ADI			LLA			Aena Brasil			TOTAL		
	W	M	Total	W	M	Total	W	M	Total	W	M	Total	W	M	Total	W	M	Total
Over 45	0.11%	0.23%	0.19%	0.00%	0.00%	0.00%	0%	0%	0%	8.99%	7.74%	8.20%	25.00%	4.35%	7.41%	0.58%	0.62%	0.61%
25-45	0.91%	2.33%	1.85%	0.00%	8.33%	5.88%	0%	0%	0%	13.94%	9.20%	11.03%	8.22%	4.76%	5.81%	3.05%	3.31%	3.22%
Under 25	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0%	0%	0%	35.00%	50.00%	41.67%	33.33%	100.00%	50.00%	34.78%	52.94%	42.50%
Total	0.40%	1.06%	0.82%	0.00%	3.33%	2.53%	0%	0%	0%	13.87%	10.19%	11.61%	10.00%	5.21%	6.62%	1.80%	1.93%	1.88%

(*) Voluntary turnover rate: Number of employees who leave the organisation voluntarily.

5.1.2. Remuneration model (GRI 405-2;

102-35; 102-36)

The remuneration model is based on the principles of pay transparency, equality and non-discrimination—understood in its broadest sense (gender, age, nationality, etc.)—in the applicable legal standards, and incorporates the standards and principles of national and international best practices on the matter.

For Aena S.M.E., S.A., SCAIRM, ADI and Aena Brasil employees, this model is adjusted according to the level of responsibility and the achievement of previously set objectives, combining:

- Fixed salary³, established according to professional level, occupation, function and level of individual responsibility. Other applicable supplements (occupation, night shifts, working hours, etc.) are added to this salary.
- Variable remuneration: Amount set based on a certain percentage of the fixed salary, which varies depending on the professional category, linked to the results of the performance evaluation and the employees' achievements.

At the same time, the Company offers its professionals products such as health insurance, life insurance, pension plan, and restaurant vouchers, among others.

In 2021, Aena and SCAIRM allocated a total of €1.4 million to social support benefits for employees aimed at covering educational support expenses, child education support, childcare (children's camps and schools), health, births, exceptional disability, etc.

In relation to London Luton Airport, different occupations are included within each category. Each of them has a basic salary that is equal for men and women and different age ranges. Once two years of service are reached, an extra bonus is given, regardless of the occupation. In 2021, there has been no salary increase with respect to 2020.

Supervision and control mechanisms:

- Within the framework of exercising the prevention of money laundering, the Auditors of Accounts carry out a review of contracts, payrolls, social security contributions and transfers, among others.
- Likewise, in compliance with articles 5 and 7 of Royal Decree 902/2020, of 13 October, on equal pay between women and men, the Company prepares a Pay Register and a Pay Audit.
- The purpose of the pay audit is to obtain the necessary information to verify whether the company's remuneration system complies with the effective application of the principle of equality between women and men in terms of remuneration in a cross-divisional and complete manner. It includes a diagnosis of the company's remuneration situation, with a position assessment that guarantees the principle of equal remuneration for positions of equal value, as well as the analysis of other relevant factors and the establishment of an action plan to correct possible inequalities.

Through its system of remuneration, the Company promotes equal treatment for employees, with no gender or personal differences of any other kind.

Thus, Aena's remuneration model guarantees:



A decent remuneration and the realisation of social contributions



Transparency and communication, when setting and reviewing the



remuneration Individual results and achievements

³ The remuneration per professional category at Aena S.M.E., S.A., and SCAIRM is public and can be consulted in Annex II, of the 1st collective agreement of Aena, See section 'About this report – Links of interest'. In the case of ADI, it is also public and can be consulted in the salary tables contained in the Collective Agreement for Offices and Bureaus of the Community of Madrid. Similar to the previous case, other applicable supplements (activity, availability, etc.) are added to this salary published in Annex I of the Collective Agreement. For ANB, the 1st Collective Agreement, signed on 23 July 2020, is applicable. As concerns London Luton Airport, each category includes different occupations, which have a basic salary assigned without distinction based on gender or age.

Average remuneration and pay gap⁴

The Company incorporates specific measures to enforce the right to equal treatment and non-discrimination between women and men in remuneration, develops the necessary mechanisms to identify and correct discrimination in this area and promotes the necessary conditions for its effectiveness. Accordingly, in Spain under Royal Decree 902/2020, of October 13, on equality between women and men, and to ensure equality in compensation as well as the transparency and monitoring of said compensation system, Aena has prepared the Pay Register, using the tools and user guides published by the Institute of Women, an agency under the Ministry of Equality, the use of which is not compulsory, but does allow for standardisation of data analysis and for comparisons with other companies, regardless of their size, sector, etc.

For the analysis of the remuneration model, the total remuneration has been analysed; this includes all remuneration items, such as base salary, occupation salary, seniority, variable remuneration, shift dynamics, night shift, medical insurance, life and accident insurance, pension plan, transportation, housing, food, allowances and locomotion, among others.

Based on this remuneration, the average remuneration has been calculated as the arithmetic mean so that they are effectively comparable. For this purpose, the 'Standardised Remuneration' has been taken, which is

defined as that which, considering all concepts of the remuneration model, the person would obtain if they had been contracted full-time throughout the entire fiscal year.

Based on the average remuneration, the **pay gap** has been calculated as an indicator to analyse the salary differences based on gender, using the following formula:

Wage gap = (Average men's remuneration – Average women's remuneration)/Average men's remuneration.

From the analysis carried out, it is concluded that there is a salary parity between men and women because, in Spain, in 2020, the difference between men and women represented only 1.2%, with women representing 36% of the workforce. In 2021, this difference stands at 1.7%, with women representing 37% of the workforce.

This salary difference occurs mainly due to the weight of the remunerations received by groups (such as the Firefighting Service, Maintenance and Information Systems) in which there is female underrepresentation, having a high percentage of representation in the global workforce, and in whose selection processes they do not present themselves as candidates.

The increase from 1.2% in 2020 to 1.7% in 2021 is mainly due to the increase in spending on overtime in 2021, mainly motivated by the increase in absenteeism due to COVID-19, as well as exceptional circumstances, such as adverse weather phenomena, in female underrepresentation groups. If the level of

expenditure on overtime for 2020 had been maintained, leaving the rest of the values for 2021 constant, the pay gap would drop to 0.8%.

With regard to London Luton Airport, the British government requires companies to report on the gap between the salaries of men and women. A remuneration difference of 22% is extracted from the table of average remuneration by gender, age and professional category. Although the quantitative data on average salary shows the existence of this remuneration difference, there is no wage discrimination based on gender or age.

As for Brazil, the difference in remuneration, deduced from the figures of average remunerations for men and women, is 8.3%.

⁴ The salary differences have been calculated using the equation: Wage gap = (Average men's remuneration – Average women's remuneration)/Average men's remuneration. The British government requires companies to report on the pay gap between men and women. This can be viewed on the UK government webpage and on the London Luton Airport page. See section 'About this report – Links of interest'. The total annual compensation ratio (Spain) is set at 4.7, calculated as the ratio of the total annual compensation of the Organization's best-paid person versus the median total annual compensation of all employees (excluding the best-paid person).

Average remuneration and its evolution disaggregated by sex, age and professional categories or equal value (fixed + variable salary)(*) (**) (GRI 102-35; 102-36; 102-38; 405-2)

		2020								2021 (*)							
		< 25 years old		Between 25 and 45 years old		> 45 years old		Average remuneration		< 25 years old		Between 25 and 45 years old		> 45 years old		Average remuneration	
		W	M	W	M	W	M	W	M	W	M	W	M	W	M	W	M
TOTAL SPAIN (***)	Executives and Graduates	0	0	48,644	50,151	55,960	58,562	52,951	55,248	0	0	46,780	48,288	54,203	56,426	51,442	53,390
	Coordinators	0	0	39,008	39,997	42,028	43,246	41,550	42,715	0	0	37,493	39,433	40,964	42,745	40,502	42,298
	Technicians	(*)	0	32,687	34,193	35,347	36,970	34,548	35,863	0	(*)	32,402	34,397	35,004	36,941	34,330	36,061
	Support staff	0	0	29,915	29,741	30,544	31,983	30,294	31,203	0	0	29,690	29,879	30,269	31,368	30,058	30,917
	Total	(*)	0	38,550	38,004	41,148	42,356	40,304	40,804	0	(*)	38,039	38,088	40,740	41,827	39,967	40,650
LONDON LUTON AIRPORT	Executives and Graduates	0	0	86,424	73,983	68,246	93,151	78,471	82,139	0	0	66,248	73,356	90,102	128,980	75,525	97,934
	Coordinators	0	0	45,756	50,815	41,624	52,225	43,001	51,489	0	0	43,647	50,886	44,140	60,800	43,943	56,173
	Technicians	0	0	45,035	46,650	30,559	53,050	37,797	49,594	0	(*)	58,685	49,820	40,341	55,237	47,679	51,884
	Support	16,873	19,276	23,499	30,497	27,219	29,238	24,002	29,514	21,857	24,495	29,102	31,734	32,175	32,735	29,824	32,019
	Total	16,873	19,276	28,385	37,601	32,003	42,650	28,720	38,734	21,857	27,096	33,067	39,952	38,149	51,204	34,506	44,315
BRAZIL	Executives and Graduates	0	0	60,054	54,431	37,308	63,374	51,524	56,219	-	-	62,504	53,715	39,431	90,296	57,377	65,909
	Coordinators	0	0	22,980	23,329	0	21,582	22,980	23,229	-	-	22,988	24,422	-	21,027	22,988	24,319
	Technicians	0	0	4,480	4,480	0	4,480	4,480	4,480	(*)	-	4,223	4,307	-	(*)	4,223	4,303
	Support staff	6,432	7,929	8,276	10,096	6,273	12,467	8,027	10,416	4,963	(*)	8,414	9,524	-	11,741	8,226	9,810
	Total	6,432	7,929	13,345	14,114	29,549	23,461	13,723	14,926	4,778	(*)	13,576	12,793	39,431	35,454	13,746	14,985

Euro/Pound exchange rate in 2021: EURvsGBP= 0.8596 / Euro/Brazilian Real exchange rate in 2021: EURvsBRL= 6.3779

(*) In those cases in which there is only one person in the group, the remuneration is not shown, to avoid their identification, although it has been taken into account for the purposes of calculating the total average remuneration.

(**) The remuneration of Senior Management is included in the Corporate Governance chapter. This has been taken into account for the purposes of calculating the total average remuneration.

(***). The 0.9% salary review included in Act 11/2020, of 30 December, on General Budgets, for 2021, is pending application.

In the fiscal year of 2021, no payment has been made for the Productivity supplement (non-consolidating)

Pay gap (*) (GRI 405-2)

		2020	2021
SPAIN	Executives and Graduates	4.2%	3.6%
	Coordinators	2.7%	4.2%
	Technicians	3.7%	4.8%
	Support staff	2.9%	2.8%
	Total	1.2%	1.7%
LLA	Executives and Graduates	4.5%	22.9%
	Coordinators	16.5%	21.8%
	Technicians	23.8%	8.1%
	Support staff	18.7%	6.9%
	Total	25.9%	22.1%
BRAZIL	Executives and Graduates	8.4%	12.9%
	Coordinators	1.1%	5.5%
	Technicians	0.0%	1.8%
	Support staff	22.9%	16.1%
	Total	8.1%	8.3%

(*) Pay gap = (Average men's remuneration – Average women's remuneration)/Average men's remuneration.

Comparison with the inter-professional minimum wage⁵ (GRI 405-2)

The salary remuneration of the standard initial category is established by level and nature of the function to be performed and does not distinguish by gender. Currently, Aena's minimum wage is higher than the minimum wage in all countries in which the group operates:

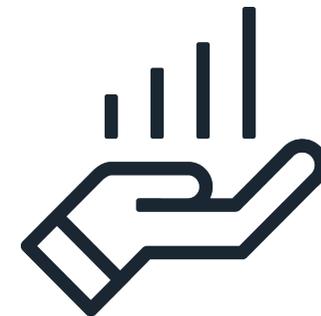
- In Spain, Royal Decree 817/2021, of 28 September, establishes a minimum salary of €13,510/year (which is equivalent to €965/month).
- In this regard, the lowest salary received at the companies of the group in Spain has been €22,238.61, which represents 65% of the Minimum Inter-professional Wage. London Luton Airport complies with all minimum and living wage requirements established by the UK government, which in 2021 is:

£4.62/hour for those under 18 years of age;
 £6.56/hour for those between 18 and 20 years old;
 £8.36/hour for those between 21 and 22 years; and
 £8.91/hour for those over 23 years of age.

The average hourly wage at London Luton Airport is £29.76.

The Airport is currently working to expand this commitment to its value chain and ensure its compliance, and it has committed to obtaining the voluntary accreditation awarded by the Real Living Wage Foundation to improve the salary of the lowest-paid employees.

- In 2021, the lowest salary at Aena Brasil was R\$1,981.00 per month, which, therefore, exceeds the legal minimum (established at R\$1,100.00) and reaches a ratio of the standard starting salary against the local minimum salary of 55.5%.



⁵ Note: Except for best paid person.

Note: Euro/Pound exchange rate in 2021: EURvsGBP= 0.8596 / Euro/Brazilian Real exchange rate in 2021: EURvsBRL= 6.3779

Locations that have significant operations are all those countries in which Aena is present, that is, those in which all the companies in which Aena has a stake and over which it exerts management control are located.

5.1.3. Work time organisation and disconnection (GRI 103-2; 401-2)

Working day

- At Aena S.M.E., S.A., and Aena SCAIRM, S.M.E., S.A., the organisation of work time is regulated in accordance with current employment legislation and the provisions of the 1st Collective Agreement of Aena. For example, a daily working day of 7 hours and 30 minutes is established for personnel with normal working days, with the right to 30 minutes of rest, which is calculated as effective work time, as well as flexibility in the start time of the normal daily working day. Likewise, for personnel who provide services under the shift system, annual working hours are set at 1,711 hours. (Article 57 of the 1st Collective Agreement of Aena).
- ADI: the organisation of working time is regulated in the Collective Agreement for Offices and Bureaus of the Community of Madrid⁶, which establishes an effective maximum working year of 1,765 hours (article 28).
- London Luton Airport complies with all legislation related to working hours, including the Working Time Regulations of 1998. This allows employees to limit their working time to 48 hours per week. Employees can apply for flexible work through family-friendly policies, which may include reducing working hours. In some operational departments,

including Security and Cargo, the option of minimum hour contracts that support greater work flexibility around family commitments is allowed.

- Aena Brasil: The provisions of Brazilian legislation and the 1st Collective Agreement, signed on 23 July 2020, apply, where a working week of 44 hours is established.

With the approval of the teleworking and digital disconnection policies, Aena progresses in its commitment to achieve the necessary balance between the proper planning and organisation of the work and the work-life balance and well-being of the workers.

The supervision of the fulfilment of the workday is carried out from the units of the Organisation and Human Resources Management Unit in charge of it.

Digital Disconnection

In 2021, Aena and SCAIRM approved the Digital Disconnection Policy⁷ in order to ensure respect for breaks, leave and holidays, as well as personal privacy outside of the workers' working time, and to strengthen the right to work-life balance.

The internal policy establishes guidelines and recommendations on digital disconnection, including:

- Encouragement of practices that contribute to improving the work-life balance through recognition of the right to digital disconnection.
- Establishment of calls and attendance at work meetings, both in person and online, within the limits of the working day and working hours.
- Avoid sending communications outside working hours, unless there are reasons that justify it.
- Promotion of the rational use of digital tools.
- Workers will be guaranteed the right to digital disconnection during holidays and other non-working days.
- The exercise of the right to digital disconnection will not negatively affect the possibilities of promotion, nor may it be cause for the imposition of disciplinary sanctions.
- The implementation of training activities and information on the protection and respect of the right to digital disconnection.

As established in the Digital Disconnection Policy itself, for the purposes of monitoring and supervising the provisions thereof, a joint monitoring committee will be established, made up of representatives of the workers and of the company.

⁶ About this report – Links of interest.

⁷ This is also applicable to ADI.

Aena has established a system for recording working days, prior to the approval of Royal Decree-Law 8/2019, of 8 March, on urgent measures for social protection and the fight against instability in the working day⁸.

This system is available both in the physical offices and on the corporate intranet, and allows workers to consult the daily movements, as well as extract the history. To make the link to the portal more accessible, they have been given several clarifying documents and a direct link.

As indicated in the previous section, at the London Luton Airport in accordance with current legislation, the working time of its workers is limited to 48 hours per week.

Teleworking policy

Approval of the Teleworking Policy reinforces the implementation of tools for modernising the organisation of work, which provides greater autonomy to the working people in the planning and fulfilment of their professional activities and objectives while contributing to the balance of work, personal and family life.

This policy includes the requirements necessary to access teleworking, mainly related to the position/occupation, and the technical requirements, material means and workplace, as well as the conditions for the provision of services through this modality. Since its start-up, approximately 80% of the people who, due to their position/occupation, can telework have joined the teleworking system, thus reflecting the success of its implementation.

In order to ensure the prevention of occupational risks, all workers have been provided with the information and training necessary to carry out their work activity in healthy and safe conditions. 100% of the people who have embraced the teleworking modality have received the relevant training.

The London Luton Airport has recently launched a guide on hybrid working, which allows staff, when appropriate, to work remotely and includes related aspects such as health and safety repercussions, expected working time in the office and possible changes that may be implemented in relation to the guide.

5.2. Diversity and inclusion

(GRI 103-2)

Aena has a set of rules and tools that constitute the framework for action in matters of equality, diversity and non-discrimination, which guide its management model.

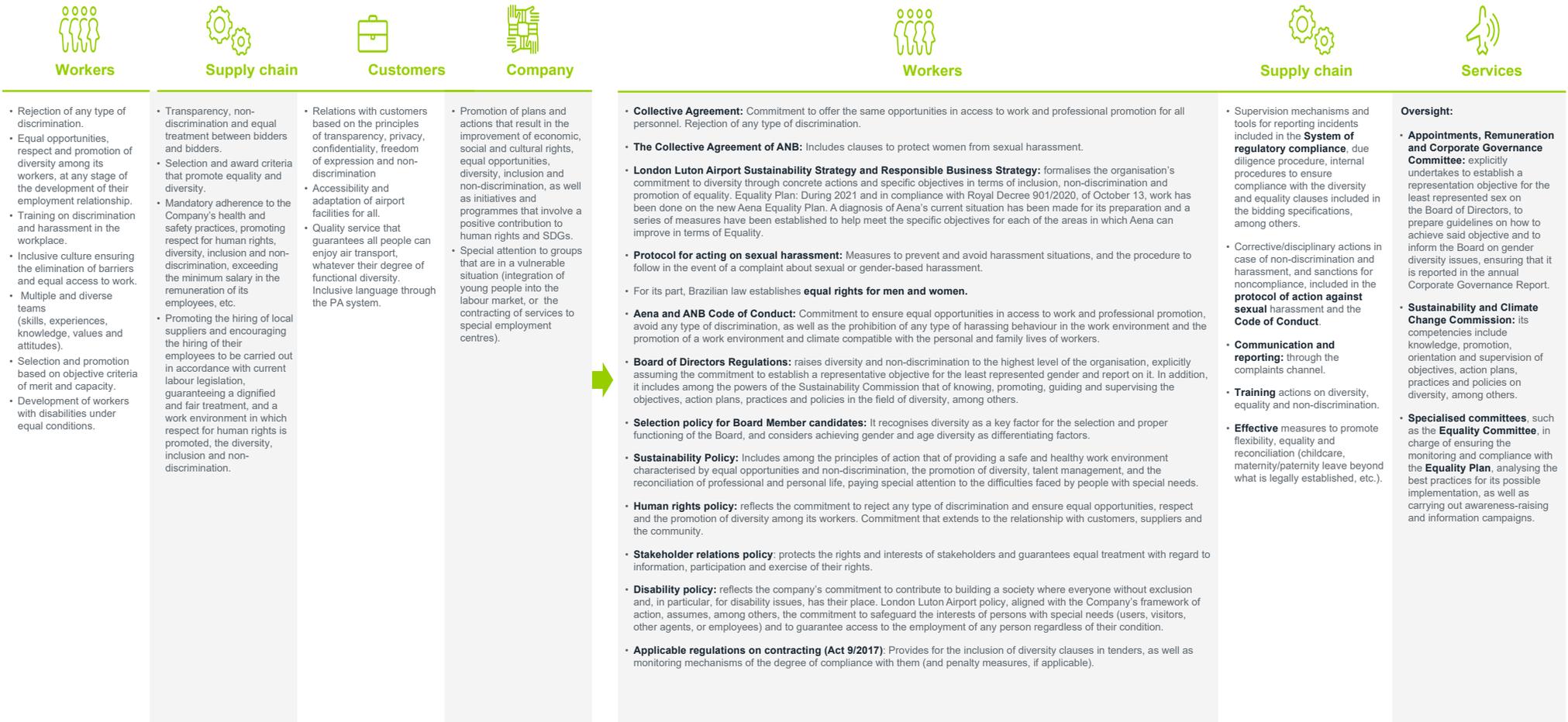
- The Company's Sustainability Strategy 2021–2030 includes a specific line of action on diversity and inclusion, the purpose of which is to make the relevance of equality visible through the development of policies and proactive participation in specific programmes.
- The United Nations Principles (Global Compact).
- The Human Rights Policy: Aena formally undertakes to apply, among others, the content of the fundamental Conventions of the International Labour Organization (ILO) on the subject.

⁸ Article 10 of Royal Decree-Law 8/2019, of 8 March, on urgent measures of social protection and the fight against instability in the working day. See section 'About this report – Links of interest'.

Aena conceives diversity in its broadest and most plural sense (race, nationality, age, social origin, gender, marital status, sexual orientation, religion, political ideology, disability or any other personal, physical or social condition)

A firm commitment to equal opportunities and non-discrimination extended throughout the value chain

That it is made effective through a set of standards and tools



5.2.1. Gender diversity

(GRI 103-2; 413-1)

The Equality Plan, included in the Collective Agreement, guarantees equal opportunities for men and women and, together with the rest of the tools referenced, sets up the company's action framework to promote effective equality, fairness, merit, personal progress, joint responsibility and balancing the work and personal life of all professionals.

In line with the Company's Sustainability Strategy 2021–2030, in December 2021, Aena's new Equality Plan was approved within the framework of the Negotiating Committee, and it was subsequently registered on 4 January 2022. This Plan constitutes an organised set of objectives and measures aimed at achieving equal treatment and opportunities between women and men in the company, eliminating any discrimination based on gender which may exist and improving communication and awareness in this area.

During 2021, the current Plan has been revised, a diagnosis of Aena's situation has been made and up to 40 measures have been designed and incorporated into the new Equality Plan. The specific objectives of the measures under the new Plan are aimed at improving different indicators, among others, in the following areas: improving the underrepresentation of women, promoting women's career development, promoting and fostering the balance of personal and family life to improve levels of joint responsibility, implementing communication measures to disseminate current media and improve internal

procedures, increasing training on the subject of equality and prevention of sexual and/or gender-based harassment.

The process has been carried out in different phases and the corporate and business parties have participated in all of them. This plan is valid for 4 years (up to 2025). The actions derived from the measures put forward in the Plan will be implemented starting in 2022.

Aena's main equality objectives

- Aena's Sustainability Strategy. Reach 45% of female managers of central services and 25% of female managers at airports by 2026.
- Develop specific actions to promote programmes aimed at women and promote and participate in campaigns and events related to equality.
- The London Luton Airport Responsible Business Strategy, although it does not currently have specific goals or actions established, it is being reviewed in line with the new corporate strategy for 2022.

Gender diversity in the company's organisational structures

Women account for 37% of the Group's workforce, hold 26.7% of positions on the Board, and 44% of director, middle management or graduate positions. Additionally, women occupy 34% of organisational

positions regarded as STEM and 37% of positions that directly contribute to revenue generation.

Reports of harassment

During 2021, five harassment complaints were received through the relevant channel (*see Chapter 1 on the complaints channel*) accessible to all employees in Spain; zero complaints were received in the United Kingdom and Brazil.

Equality training

- During 2021, 135 workers had access to training programmes on content related to equality between women and men. Over the last five years, 100% of the workforce, including staff in management and positions of responsibility, has participated in this type of training.
- Every year in March, coinciding with International Women's Day, training on "equal opportunities for women and men" is held for people who have joined Aena and Aena SCAIRM and still have not had the opportunity to do this training.

At London Luton Airport, a training programme on equality and inclusion for managers was completed during the course of 2021. This programme is expected to be mandatory for all staff in 2022.

Percentage of women/men in the workforce (as of 31 December) (GRI 405-1.i (gender))

2020

	Aena S.M.E., S.A. (Spain)		Aena Sociedad Concesionaria del AIRM S.M.E., S.A. (Spain)		ADI, S.M.E., S.A. (Spain)		London Luton Airport (United Kingdom)		Aena Brasil		TOTAL	
	Employees	% total workforce	Employees	% total workforce	Employees	% total workforce	Employees	% total workforce	Employees	% total workforce	Employees	% total workforce
Men	4,909	63.8%	60	76%	13	54%	432	61%	192	71%	5,606	63.9%
Women	2,781	36.2%	19	24%	11	46%	274	39%	80	29.4%	3,165	36.1%
Total	7,690	100%	79	100%	24	100%	706	100%	272	100%	8,771	100%

2021

	Aena S.M.E., S.A. (Spain)		Aena Sociedad Concesionaria del AIRM S.M.E., S.A. (Spain)		ADI, S.M.E., S.A. (Spain)		London Luton Airport (United Kingdom)		Aena Brasil		TOTAL	
	Employees	% total workforce	Employees	% total workforce	Employees	% total workforce	Employees	% total workforce	Employees	% total workforce	Employees	% total workforce
Men	4,932	63.3%	61	77.2%	13	50.0%	388	61.8%	194	66.7%	5,588	63.4%
Women	2,855	36.7%	18	22.8%	13	50.0%	240	38.2%	97	33.3%	3,223	36.6%
Total	7,787	100%	79	100%	26	100%	628	100%	291	100%	8,811	100%

Women (as of 31 December)

	2020	2021
Women in the workforce (%)	36.1	36.6%
Women on the Board (%)	33	26.6% Target of 40% in 2022
Women in positions of management, middle managers or graduates (%)	43.9	44.2%
Women in organisational positions regarded as STEM (%)	34	33.7%
Women in positions that directly contribute to revenue generation (%)	36.1	36.6%

(*) Over the total number of men and women in each group



Most relevant actions carried out in the area of gender diversity in 2021

- 'Leaders creating leaders' Mentoring Programme, in which 92 women participated, representing 41% of the total number of participants, among which 42% took on the role of mentors. In the edition that started in 2021, 36 people participated, of which 17 were women (47% of participants) and 56% were mentors.
- Highly specialised training programmes, mainly focused on positions of responsibility and taught by prestigious business schools such as IESE, ESADE, IE, CUNEF and at different Universities. In 2021, five female managers participated in this type of programme, where they have been trained in matters of Finance, Public Procurement and Competition Law, among others.
- Proactive and direct collaboration in initiatives related to gender equality and diversity carried out by public and private institutions (International Women's Day, Women and Girls in Science Day), specialised forums for the promotion of equality (Barcelona Woman Acceleration Week [BWAW]), 'Companies for a gender-free society' initiative of the Government Office against Gender-Based Violence.
- Participation in the forum 'Women in motion: Women's Leadership in Transport and Sustainability', promoted by Metro Madrid.
- Article on women in airports, published in the journal of the Ministry of Transport, Mobility and Urban Agenda (MITMA).
- Article in the magazine Aena 360° about women in underrepresented groups, such as the Firefighting Service, Maintenance and Operations, through several interviews to give visibility to our professionals and recognise their work publicly.
- Virtual meeting between the Organisation and Human Resources Management and the women participating in this article to better understand their employment situation and their challenges and generate a communications network.
 - Aena has joined the IBEX Gender Equality Index to promote gender equality, which Bolsas y Mercados Españoles (BME) has launched. To be included in the index, companies must have a female presence of between 25% and 75% on their Board of Directors and between 15% and 85% in Senior Management.
- Celebration of Women's Day at Aena by participating in forums, MITMA initiatives such as the video 'They changed the course' and purple lighting at various airport facilities.
- The Madrid Bar Association (ICAM [Ilustre Colegio de Abogados de Madrid]), within the framework of the IX Summit of Women Jurists, has granted Aena's legal team the Seal of Good Practices for Equality between men and women in the exercise of the legal profession granted by the Delegated Equality Committee.
- At Aena Brasil, they have specific actions for gender diversity.

Aena is committed to creating alliances that aim to highlight the role of working women and the promotion of equality, mainly in the aeronautical sector.



5.2.2. Universal accessibility to employment for people with disabilities (GRI 103-2; 405-1)

People with different abilities are part of Aena’s workforce.

In matters of employment, the organisation makes the necessary adaptations to ensure and favour their optimal participation in job offers and selection tests, and promotes the development of concrete measures for training and raising awareness about disability in its multiple forms.

At the end of 2021, the company had 1.48% of employees with functional diversity, to which must be added its equivalence through alternative measures ⁽⁹⁾, thus complying with article 42 of Royal Legislative Decree 1/2013, of 29 November, which approves the Consolidated Text of the General Act on the rights of persons with disabilities and their social inclusion, in which it refers to the reserve quota for people with a disabilities.

Every three years in Spain, the Company publishes a call for applications addressed to social organisations, foundations or associations that carry out actions for employment integration or job creation for a maximum amount of €100,000/year (in 2021, six organisations benefited from these grants, with a total amount of €90,000).

Employees with disabilities (*) (GRI 405-1)

	Manpower (**)		Total workforce		% of total workforce	
	2020	2021	2020	2021	2020	2021
Aena S.M.E., S.A.	108	108	7,690	7,787	1.40%	1.39%
SCAIRM S.M.E., S.A.	7	6	79	79	8.86%	7.59%
ADI, S.M.E., S.A.	0	0	24	26	0.00%	0.00%
Aena Brasil, S.A.	8	7	272	291	2.94%	2.41%
TOTAL	123	121	8,065	8,183	1.53%	1.48%

(*) Currently, London Luton Airport (United Kingdom) does not record disability; the United Kingdom government does not require it, so its workforce is excluded and the data published in the NFIS 2020 has been reviewed and corrected. The total workforce at Luton at the end of the 2021 fiscal year amounted to 628 (in 2020:706); therefore, the exclusion of its workforce with respect to what was published in the NFIS 2020 assumes that the % over the total workforce went from 1.40% to 1.53%.
 (**) See footnote.

5.2.3. Accessibility of the services (GRI 103-2)

Aena’s facilities and work centres are adapted to facilitate and enhance access for employees, customers, suppliers and users, including adaptations in the work environment that are objectively necessary and having a specific service in the airports for persons with reduced mobility (PRM).

Aena collaborates with the main Spanish organisations in the sector such as CERMI or the Spanish Autism Confederation and other specific organisations in the United Kingdom.

For its part, London Luton Airport works closely with its Occupational Health providers to manage each case

and ensure that, when necessary, reasonable adjustments are made for those employees who require them.



⁹ Data corresponding to the actual number of employees with disabilities in the workforce as of 31 December, without considering the equivalent number resulting from compensatory measures. According to current legislation, the percentage of employees with disabilities is calculated based on the actual number of people with disabilities in the workforce as of 31 December, and the equivalent number of people resulting from the compensatory measures approved by the Resolution of the General Directorate of the Public Service of State Employment (SEPE) on the Declaration of exceptionality and adoption of alternative measures for the fulfilment of the reserve quota in favour of workers with disabilities. The actual number of employees with disabilities in Spain, as of 31 December 2020, is 115 and in 2021, it was 114 (1.44%). However, as of the date of publication of this report, the Resolution from the competent body regarding the Declaration of exceptionality corresponding to the 2020 fiscal year that allows the corresponding total percentage of employees with disabilities to be included is not available, nor is it available for 2021.

5.2.4. Diverse and inclusive work environment

Aena is part of the Business Network for LGBTI Diversity and Inclusion (REDI), which is formed by the public companies of the MITMA group¹⁰. This Network, as established in the protocol signed by its constituents, seeks to promote the **diversity and inclusion of the LGBTI group in the Public Sector** and promote awareness and the appropriate environment to carry out specific initiatives.

Having established the basis of the protocol, the following steps to follow are aimed at achieving progress in the normalisation and visibility of the LGBTI group, eradicating discrimination and intolerance and favouring integration in an appropriate work environment within companies such as Aena. At Aena Brasil, they have specific actions for the inclusion of the LGBTI community.

Aena reaffirms its commitment against discrimination and promotes awareness and the appropriate environment for the effective

inclusion of the LGBTI group in the work environment.

Cultural diversity in governing bodies and employees

Aena is aware of the value that the confluence of different cultures and nationalities brings to the organisation. Therefore, it seeks the maximum diversity of the team. The company has a total of 18 different nationalities.

Distribution of employees in the workforce by nationality (*)

	% of the workforce		% in managerial and director positions	
	2020	2021	2020	2021
Spanish	96.13%	95.98%	98.34%	98.35%
Brazilian	3.31%	3.50%	1.25%	1.15%
Italian	0.14%	0.12%	0.16%	0.15%
French	0.06%	0.06%	0.05%	0.05%
German	0.07%	0.06%	-	-
Venezuelan	0.04%	0.05%	0.10%	0.15%
British	0.04%	0.04%	-	-
Swedish	0.04%	0.04%	-	-
Other	0.17%	0.16%	0.10%	0.15%
TOTAL	100%	100%	100%	100%

(*) London Luton Airport (United Kingdom) does not record the nationality of its employees. Its employees and nationalities are not included in the table.

¹⁰ Adif, Adif-AV, ENAIRE, INECO, Puertos del Estado and Renfe Operadora.

Generational diversity, age management and the promotion of the integration of young people in the workplace (GRI 103-2; 413-1)

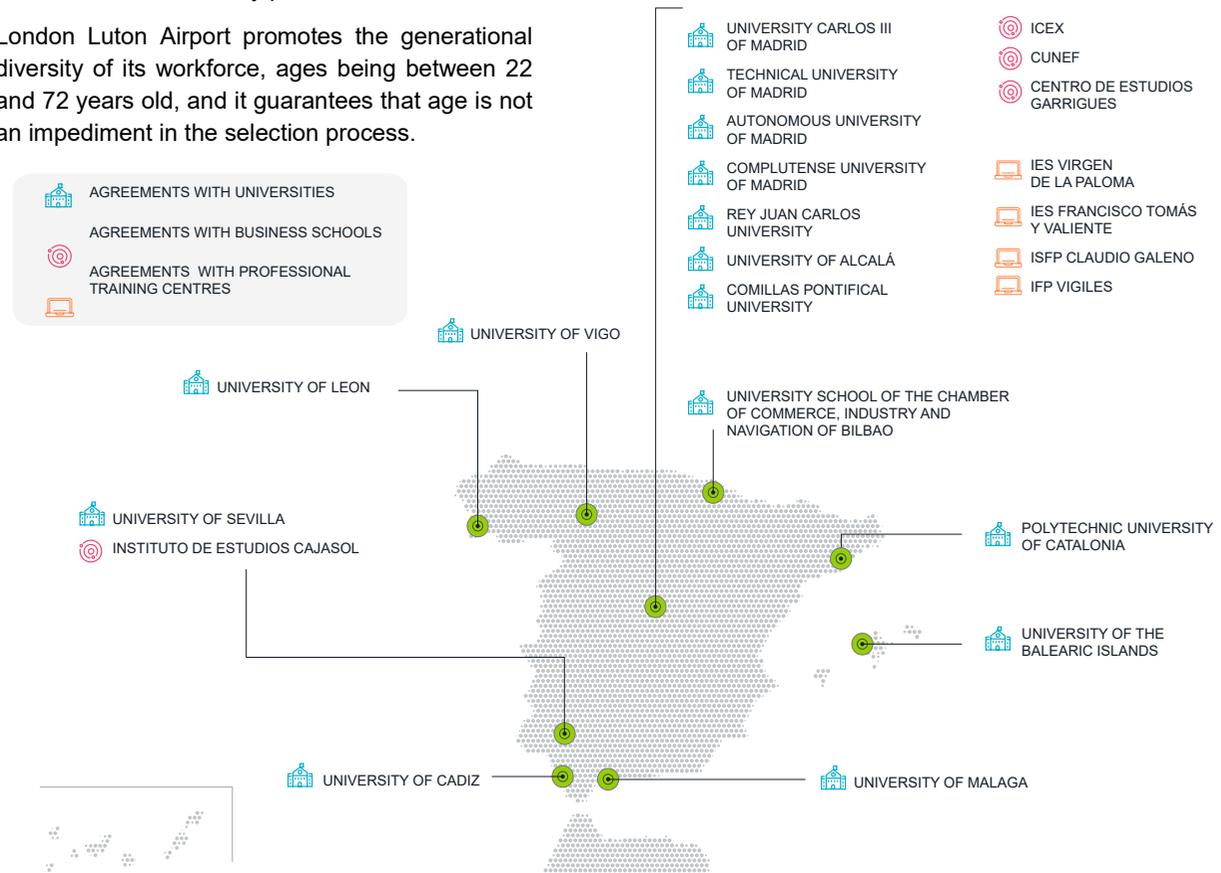
Aena aims to promote employment and training among young people.

- The average age of the workforce in 2021 was 47.7 years¹¹, this being the same for both men and women.
- The Sustainability Strategy has among its specific objectives to promote the hiring of graduates doing work experience and to evaluate opportunities to develop new approaches in the mentoring programme.
- In 2021, various initiatives have continued to be developed to promote the integration of young people in the workplace.
- Currently, Aena has signed agreements with 15 universities (public and private), 4 business schools, 4 vocational training centres and other teaching centres, allowing 60 students from undergraduate degrees, master's degrees and vocational training to complete curricular or extracurricular internships in 2021 in Spain.
- Participation in 2021 in the Virtual Employment Fair of the University of A Coruña, in the II Virtual Employment Fair of the Community of Madrid and in the XVII Virtual Employment Fair of the UPM, as well as in various university forums.

- As part of the initiatives under the 'Employer Branding' strategy, the Company aim is to promote the creation of a network of brand and diversity ambassadors who will seek to highlight the Company's heterogeneity, among other matters.
- Likewise, the Company will work on career plans and conduct an annual appraisal of the Successions Plan for key positions.
- London Luton Airport promotes the generational diversity of its workforce, ages being between 22 and 72 years old, and it guarantees that age is not an impediment in the selection process.

Distribution of the workforce by age ranges (%) (Consolidated)

	2020	2021
< 30 years old (%)	3.6	2.75
30-50 years old (%)	58.9	57.38
> 50 years old (%)	37.5	39.87



¹¹ Consolidated data.

5.3. Promotion and development of talent, skills and knowledge

'Professional Career Development' is one of the priorities of the 'People Management' line included in the Sustainability Strategy, which focuses on attracting talent and training workers with the aim of detecting and promoting high performance, motivation and the commitment to retaining talent while improving the image of the Aena brand.

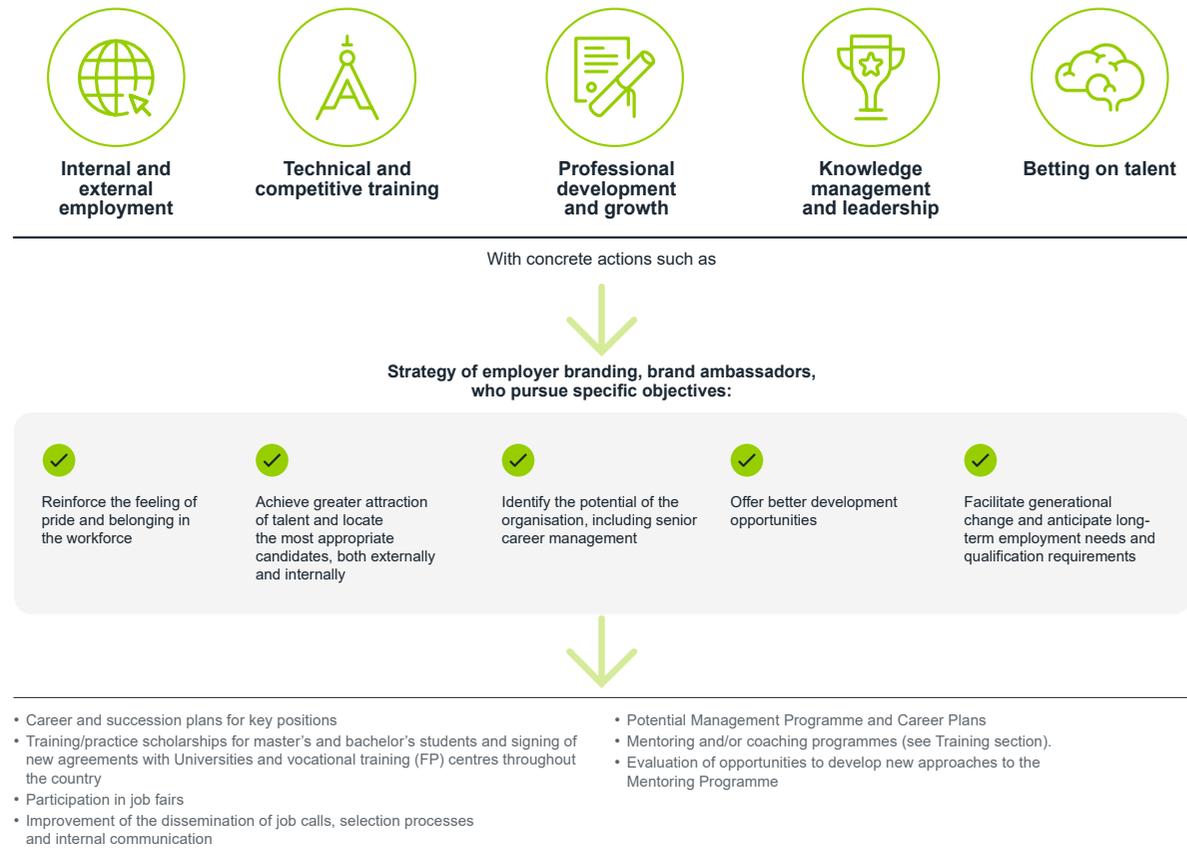
5.3.1. Attracting, developing and retaining talent

- Employer Branding Strategy. Focused on fostering the feeling and pride of belonging, attracting and retaining the best talent and, above all, getting the best candidates to be part of Aena and help to take on the company's future challenges.
- Brand ambassadors. This is intended to give greater visibility to the company's strengths, to improve the Organisation's attractiveness in the development of professional careers, making employees direct participants of the initiative.
- Responsible Business Strategy of the London Luton Airport, which is aligned with the Sustainability Strategy, includes, among other objectives, attracting and recruiting talent and guaranteeing the professional development of employees, as well as contributing to the *Luton*

Council's training academy and expanding the learning programme.

In 2022, the London Luton Airport, in collaboration with local partners, will work to advance its commitment to promoting employment in the local environment.

Aena promotes the attraction and retention of talent, promotion of employability and professional career development



Opportunities for internal mobility

With the aim of promoting professional growth, Aena makes it easier for employees to choose a temporary change of occupation and thus undertake roles of higher levels. Likewise, processes for internal recruitment are regularly promoted, which enable professional promotion and career development within the company.

These internal recruitment processes are regulated under the Collective Agreement (Articles 18, 19, 20 and 21), with a Joint Committee for Promotions and Selection (formed by representatives of the company and representatives of the trade union), in order to ensure the adequate control, quality and homogeneity of the processes, as well as compliance with employment legislation and the principles of equal opportunities, merit, capacity and publicity in these processes.

To guarantee all employees access to these new opportunities, the Company sends communications via email informing all employees in the network and has a specific section on the corporate intranet, accessible to all, with detailed information about internal recruitment vacancies existing at any given time, the number and details of the vacant positions, as well as all the requirements and issues related to each process.

The latest internal recruitment process, convened in October 2021, made available to employees more than 260 job offers in various work centres in order to foster opportunities for professional promotions.

London Luton Airport guarantees that all employees have access to all internal vacancies, which are sent by email and are communicated in the weekly briefing sessions and more recently in the internal communications system.

With regard to Aena Brasil, all open vacancies are mainly covered internally. Vacancies are announced and employees apply and participate in the selection process.

Assessment of internal talent: Aena's foundation

The periodic performance evaluation of Aena's professionals has the main objective of understanding the internal talent in depth and effectively guiding their training and career development.

The performance management system identifies the degree of achievement of the objectives set annually, the skills and behaviours of the professionals, as well as the strengths and areas of development of the professionals in exercising their activity. The results of these evaluations, in addition to being linked to remuneration, allow for guiding the performance of workers and complementing their development by identifying possible training courses.

Performance management in the Aena Group is the method by which the actions of all participating workers are improved, by means of the appraisal of the results obtained, in order to achieve the Company's

objectives. 100% of Spain's workforce participates in the Performance Management system.

The performance of professionals is measured through three types of objectives: company, team and personal goals (position, training and values). The Strategic Plan and the Operational Plans of the different units are used to set the company and team objectives. Team objectives must be aligned with company objectives.

The three types of objectives (company, team and personal) will have a different weighting, which will be determined annually by the Management Committee, based on the strategic priorities of each fiscal year. The objectives assigned and their weighting will also depend on the organisational level of the professional, as this will determine their ability to influence their achievement.

The objectives will be tracked throughout the year through the different indices and statistics. In the case of company and team objectives, these must be carried out through the Operational Plans.

With regard to the London Luton Airport, managers are responsible for reviewing the professional performance of their team members. A formal approach to performance management is planned to be developed in 2022.

Other tools to improve internal management

The Organisation is aware of the usefulness of Big Data in Human Resources to facilitate the identification of the needs, risks and opportunities of workers, as well as facilitate the making of well-founded, objective and reliable decisions.

Aena is advancing in this aspect, in order to progressively implement use cases in the areas of selection, training, development, talent and planning. This year, the implementation of the **SuccessFactors People Analytics** module has begun, which will allow greater autonomy and self-service of the information, with the advantage of being within an integrated system such as SAP.

5.3.2. Training (GRI 130-2; 404-2)

The training and career development of the workers is included in the Agreement as a strategic instrument to improve the employee's performance, develop the appropriate levels of specialisation and employability, facilitate orientation towards professional promotion, and constantly adapt to the technological and operational developments.

The Training Policy and the Sustainability Strategy include specific actions aimed at attracting and retaining talent, contributing to the transformation of the organisational culture, increasing the motivation, commitment and involvement of employees and the development of their professional skills.

Although the London Luton Airport does not have a training policy, all employees are required to take mandatory or regulatory training within their roles, and many also participate in career development actions and technical training as required for their role, such as higher education programmes.

Training policy

- Develop the technical, professional and human skills of workers in order to promote and ensure the correct performance of their job.
- Facilitate updating workers' knowledge based on the regulatory, technological and organisational changes that occur.
- Increase the productivity, efficacy and efficiency levels.
- Contribute to projecting an excellent image of Aena through its professionals.

The Collective Agreement also includes the need to have a Training Plan, aimed at individual improvement and the professional training of workers. The Plan is drawn up, developed and supervised by the Joint Training Committee

Sustainability Strategy: training, development and professional career (GRI

130-2; 404-2)

- First steps towards the development of its own Training Centre (Aena Campus).

- Development of its own fire practice simulators in various network centres to improve the training of the Firefighting and Rescue Service (SSEI [Servicio Salvamento y Extinción de Incendios]) group, as well as to improve training centres in Madrid and Barcelona for maintenance technicians.
- Technology eLearning platform for updating and improving IT talent.
- Specialised training aimed at the cultural and digital transformation of Aena.
- Supporting the Strategic Information Systems Plan (PESI [Plan Estratégico de Sistemas de la Información]) with the objective of turning Aena into a company that develops its projects with Agile methodologies.
- Customer Centricity and Excellence Programme to raise awareness of the importance of excellence in customer service.
- At Aena, training is provided to certify Security Managers and those responsible for airport security at the airports.

English programmes—and, in particular, the That's English programme—allow employees to acquire knowledge to perform their job and to take official exams to obtain certification of their level.

In Brazil, outstanding AVSEC professionals participate in AVSEC training for Airfield Operators, as a way to develop future managers in this area, as the course is mandatory for this position.

Significant training actions in 2021¹²

Aena promotes employee participation in its training plan. To do this, it conducts an annual survey of 'training needs' for all its workers. In 2021, due to the special circumstances arising from the pandemic, it was decided to extend the detection of current needs in order to comply in 2022 with the training needs that could not be covered in the previous year. In 2021, a significant effort has been made to restart much of the training that had been suspended in 2020 due to the health situation caused by the pandemic. In March 2020, all face-to-face training was suspended, although in the last quarter of 2020, certain more

critical face-to-face actions could be resumed. It has not been until the beginning of 2021 that a certain normality in face-to-face training has been able to return.

Taking into account that much of this training is regulatory in nature (to comply with the AESA and EASA regulations), a significant effort has been made in 2021 to resume the delayed training and comply with regulations.

This year, employees have been provided with a virtual training platform that allows them to take courses focused on subjects related to the core strategic areas (innovation, digital transformation and sustainability) at

any time. On a monthly basis, they are invited to take courses on emotional well-being.

In 2021, there were 6,145 active users on this platform, 8,809 hours of study and 2,098 courses have been completed.

For its part, at London Luton Airport, in 2021, focus was placed on maintaining all the required mandatory and regulatory training, as well as a training programme for people in the area of Discipline and Complaints, Absence Management and Code of Conduct. Some of the staff also completed training on Equality and Diversity, which will be mandatory in 2022.

Main training data * (GRI 404-1)

2021

		Aena S.M.E., S.A.	ADI	SCAIRM	LL ⁽⁴⁾	Aena Brasil	Total
Investment in employee training and education programmes (€)			1,846,332 ⁽³⁾		210,223	108,919	2,165,474
Investment in training per employee (€)			233.9		334.8	374.3	245.8
Employees who have received training (%) ⁽¹⁾	Women	100%	92%	100%	-	100%	100%
	Men	100%	100%	100%	-	100%	100%
	Total	100%	96%	100%	-	100%	100%
Average training per year per employee (hours) ⁽²⁾	Women	26.6	24.5	42.1	-	32.0	26.8
	Men	50.0	47.5	67.2	-	36.9	49.7
	Total	41.4	36.0	61.5	-	35.3	41.4

¹ Calculated based on the total workforce in Spain and Brazil (Luton does not record training hours).

² Calculated based on the total workforce in Spain and Brazil (Luton does not record training hours).

Average hours of training per woman = Total number of hours of training provided to female employees/Total number of female employees

Average hours of training per man = Total number of hours of training provided to male employees/Total number of male employees

Average hours of training per employee = Total number of hours of training provided to employees/Total number of employees

³ Total Expenditure on Training in Spain.

⁴ London Luton Airport does not record training hours.

(*) Access to the Aena 2020 Non-Financial Information Statement, see About this report - Links of interest.

¹² Throughout the document, the training courses provided in different subject areas (compliance, equality, quality of services, environment, security, data protection, etc.) are described in detail.

Training hours by gender, professional category and region^(*) (GRI 404-1)

2021															
Training hours	Aena S.M.E., S.A.			SCAIRM			ADI			Aena Brasil			TOTAL		
	Online training	On-site training	Total	Online training	On-site training	Total	Online training	On-site training	Total	Online training	On-site training	Total	Online training	On-site training	Total
Men	143,971.89	102,617.08	246,588.97	2,650.00	1,449.52	4,099.52	59.00	558.00	617.00	6,141.5	1,026	7,167.5	152,822.39	105,650.60	258,472.99
Women	48,380.44	27,494.23	75,874.67	620.00	137.75	757.75	66.00	252.50	318.50	2,723.5	380.5	3,104	51,789.94	28,264.98	80,054.92
Total by gender	192,352.33	130,111.31	322,463.64	3,270.00	1,587.27	4,857.27	125.00	810.50	935.50	8,865.00	1,406.50	10,271.50	204,612.33	133,915.58	338,527.91
Senior Management	2.00	819.00	821.00	10.00	2.00	12.00	-	-	-	-	-	0	12.00	821.00	833.00
Executives and Graduates	30,300.35	28,434.27	58,734.62	435.00	278.77	713.77	80.00	749.00	829.00	1,018.50	122.50	1,141	31,833.85	29,584.54	61,418.39
Coordinators	27,417.61	16,116.67	43,534.28	331.00	231.50	562.50	-	-	-	1,411.00	163.50	1,574.5	29,159.61	16,511.67	45,671.28
Technicians	128,157.62	82,216.09	210,373.71	2,392.00	1,050.50	3,442.50	-	-	-	4,645.50	675.00	5,320.5	135,195.12	83,941.59	219,136.71
Support Staff	6,474.75	2,525.28	9,000.03	102.00	24.50	126.50	45.00	61.50	106.50	1,790.00	445.50	2,235.5	8,411.75	3,056.78	11,468.53
Total by professional category	192,352.33	130,111.31	322,463.64	3,270.00	1,587.27	4,857.27	125.00	810.50	935.50	8,865.00	1,406.50	10,271.50	204,612.33	133,915.58	338,527.91

(*) See section 'About this report – Links of interest'.

In 2021, Aena allocated a total of €2,165,474 to investment in employee training and education programmes (€1,359,225 in 2020). In 2021, a significant effort has been made to restart much of the training that had been suspended in 2020 due to the health situation caused by the pandemic.



Other development programmes¹³

PROGRAMME: 'LEADERS CREATING LEADERS' MENTORING PROGRAMME

PROGRAMME DESCRIPTION	DESCRIPTION OF PROGRAMME OBJECTIVES AND BUSINESS BENEFITS	QUANTITATIVE IMPACTS
<p>Development programme that is incorporated at Aena as a strategy of: Knowledge management, Cultural Transformation and Organisational Networking that generates support networks.</p> <p>It is a development programme in which a professional with more experience and prestige in their field accompanies another in their professional development, sharing their experience, their knowledge of the business and their strategic vision, promoting the career development of the mentee, the knowledge of the informal culture and the increase of skills that are considered critical in the organisation.</p> <p>The Programme has been evolving and expanding its field of action. It began as a Programme aimed at promoting the incorporation and career development of airport directors and has been introduced in successive editions across all areas and organisational levels of Aena.</p>	<p>Efficiently manage the knowledge accumulated in the company, promoting the dissemination of experience and know-how.</p> <p>Encourage interconnection, collaboration and mutual understanding between people, centres and functional areas of the company.</p> <p>Develop the talent identified.</p> <p>Facilitate adaptation in transitions to positions of greater responsibility.</p> <p>Develop mentees' critical skills.</p>	<p><u>Satisfaction ratios:</u> 4.5 (scale of 1 to 5) Satisfaction expressed by mentees in questionnaires after each mentoring session, cumulative average from Editions 1 to 7. The editions started in 2019 and 2021 have not yet concluded.</p> <p><u>Level of learning development achieved:</u> 3.64 on a scale of 1 to 4 (Average rating by mentees in each process).</p> <p><u>Overall evaluation of the utility for each process:</u> 3.78 on a scale of 1 to 4 (Average rating by mentees in each process).</p> <p><u>Overall evaluation of the programme:</u> 3.84 on a scale of 1 to 4 (Average rating by mentees from the first 7 editions).</p> <p><u>Development of talent/career:</u> 27% vertical promotion and 22% horizontal promotion of mentees from editions 1 to 7 (difference placed from the beginning of the process to December 2021).</p> <p><u>Development of critical skills:</u> Percentage of processes in which work has been done specifically according to the evaluation questionnaire: Leadership: 78% participants; Communication: 87%; Negotiation and conflict management: 84%; Flexibility and Change Management 61%.</p> <p>Interrelationship collaboration percentage of couples formed by Mentor/mentee from different work centres or areas of activity: 100%</p>
NUMBER OF PARTICIPANTS	228 in total over the course of the programme.	

PROGRAMME: RECIPROCAL MENTORING

PROGRAMME DESCRIPTION	Description of programme objectives and business benefits	Quantitative impacts
<p>The programme pairs together managers who have recently joined the company with long-standing managers in the company.</p> <p>They are pairs in which the mentor roles are simultaneous: both are mentor or mentee depending on what subject they are dealing with.</p> <p>The one who has recently joined shares knowledge of their specific area of activity and the culture of the external organisation. Then, the one from Aena shares their knowledge of the airport business and Aena's culture.</p> <p>It is designed with five sessions on a monthly basis. Preferably in person.</p> <p>The members of each pair are from different areas of activity, although they may be related.</p>	<p>Dissemination of business knowledge, structure and informal culture to promote the integration of newly incorporated individuals.</p> <p>Broaden the vision of internals.</p> <p>Promote the development of a corporate culture of collaboration and mutual support.</p> <p>Promote synergies between areas of activity</p>	<p>Ratio of completed processes to the total of those initiated.</p> <p>Degree of utility perceived by the participants (in questionnaire).</p> <p>Number of sessions/activities that have been carried out with other centres or areas of activity other than those of the components of each pair.</p> <p>Number of sessions/activities performed in groups by two or more pairs from the edition.</p> <p>** There is no data yet due to the programme having started in December 2021</p>
NUMBER OF PARTICIPANTS	14 people	

¹³ At the London Luton Airport, as of the date of this report, there is no formal programme, but several employees have undergone professional coaching when the need for it was identified. In 2022, there are plans to work on a development programme for high-potential employees through leadership and coaching development plans as needed.

PROGRAMME: COACHING

PROGRAMME DESCRIPTION	Description of programme objectives and business benefits	Quantitative impacts
<p>Coaching is incorporated into the company as a development strategy with a personalised methodology adapted to each participant, which aims to release and develop the potential of behavioural competencies.</p> <p>It is an individual/team professional relationship, in which a coach accompanies others in a process of professional transformation. It is based on the customer's own knowledge through dialogue, through questions asked by the coach, so that the customer explores, broadens their perspective by observing reality, strengthens their creative ability and discovers new solutions as they put them into practice.</p> <p>This strategy has been evolving and expanding its scope. It began in 2007 and was aimed at directors through external coaches.</p> <p>Since 2011, internal coaches have been incorporated, using a common methodology and procedures, and the scope of the programme has been expanded to other levels of the company.</p>	<p>Improve the achievement of professional objectives and performance.</p> <p>Improve the behavioural competencies of social interaction (communication and impact, conflict management, negotiation and teamwork), leadership (team and people management) and personal self-management mainly.</p> <p>Improve self-confidence and self-motivation.</p> <p>Promote the development of the potential to adapt to new challenges and positions of greater responsibility.</p>	<p>Satisfaction ratios: Scale from 0 to 8. Annual weighted average: 7.81</p>
Number of Participants	119 people have participated in coaching processes since 2007.	

PROGRAMME: DIGITAL AND CULTURAL TRANSFORMATION

PROGRAMME DESCRIPTION	Description of programme objectives and business benefits	Quantitative impacts
<p>Four training programmes have been launched aimed at achieving a more agile company and working according to more collaborative and horizontal models, through these courses: <i>Inspirational Sessions, Agile coach, Tech and Data Experts, Design thinking and Lean.</i></p>	<p>Advanced programmes mainly aimed at the teams from the Information Technology and Communications Division (DTIC [Dirección de Tecnologías de la Información y Comunicaciones]), Innovation, Sales and people related to digital transformation.</p> <p>Aimed at deepening digital knowledge to help improve the customer experience with new technologies.</p> <p>Train experts in agile methodologies that can develop and transmit these methodologies to different groups.</p> <p>Learn about innovation using innovation, change the way of working, process participants' information and use agile methodologies as part of their daily work.</p>	<p>Satisfaction questionnaire (scale from 0 to 4).</p> <p><i>Inspirational Sessions: 3.47</i></p> <p><i>Tech Data Expert: 3.36</i></p> <p><i>Design Thinking and Lean: 3.60</i></p> <p><i>Agile Coach: 3.55</i></p>
Number of Participants	In 2021, 528 people participated in this training.	

In 2021, at Aena Brasil, various programmes were carried out:

- 'Leadership Journey' programme for three levels of managers: 1. Supervisors and Coordinators; 2. Managers and 3. Directors (16 hours per participant), with the aim of aligning Aena's leader profile, self-management and team management.
- Media training course for Directors with a total of 12 hours for each participant, which allowed them to position themselves in the different communication channels.
- Meetings between Directors to build the organisational culture platform with 10 hours of meetings, in order to establish strategic pillars for Aena Brasil.

5.4. Labour Relations (GRI 102-41)

Aena guarantees its employees the rights of freedom of association, unionisation and collective bargaining within the framework of current labour regulations and the collective agreement that is applicable.

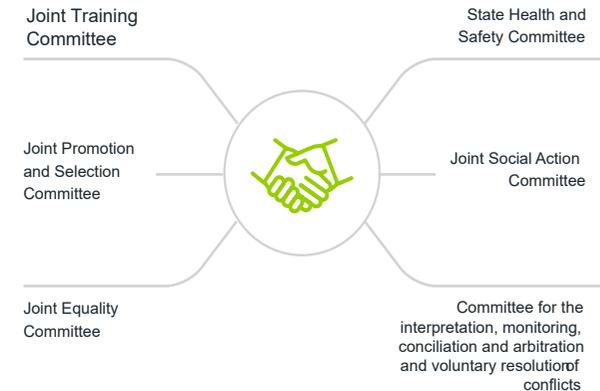
5.4.1. State Trade Union Coordinator

The State Trade Union Coordinator (CSE [Coordinadora Sindical Estatal]) is a body representing the workers and is composed of 12 members appointed by the union organisations that obtain a minimum of 10% of the total number of delegates of personnel and/or members of the centre's Committee in the corresponding elections of Aena and Aena SCAIRM.

Together with the CSE, there are different Joint Committees composed of representatives of the company and members of the trade unions present at the CSE and responsible for developing and dealing with specific matters that affect employees, as well as for carrying out and guaranteeing the application and monitoring of the agreements adopted within the framework of the Collective Agreement.



The collective agreement includes the existence of joint committees



Site committees and/or staff delegates: They guarantee the participation of workers in the management of the company.

Corporate commitment to the right of freedom of association and collective bargaining of workers endorsed in Aena's Human Rights Policy, which takes as a reference, among others, the Declaration of the ILO relating to fundamental principles and rights at work, and is applicable to all the companies of the group.

5.4.2. Communication with employees

Aena has several specific communication channels with employees to facilitate dialogue, share objectives and promote their involvement, as well as to disseminate corporate policies and regulations, including those related to employment matters (Collective Agreement, etc.).

- The employee portal, SAP SuccessFactors, is accessible from any internet browser and mobile device. It promotes communication and interaction between workers by facilitating access to their personal information and focusing on promoting communication and interaction between workers.
- The intranet has more than 30 themed portals. One of them is current affairs, where employees are offered all the most relevant information about company and human resources news.
- Email is another way of communicating with the entire workforce. Through email, specific campaigns that affect all working people are reported.
- Aena 360° is a weekly magazine that contains all the news about the company and the people who comprise it. It is also distributed to the workforce of Aena Brasil. The publication is open-minded and includes a mailbox to receive requests, concerns and suggestions from employees.
- Publications from other workplaces. Following in the wake of Aena 360°, several airports have their own publications through which they disseminate their local information.

- Meetings with management. For the second consecutive year, the company’s management has made themselves available to the staff in a virtual meeting with the aim of facilitating communication.

This spirit also extends to physical spaces, such as those of the Organisation’s headquarters, designed to promote teamwork methodologies, as well as to encourage and promote creativity and innovation.

London Luton Airport has its own internal communication channels. For example, ‘Engage Co: Lab’ is an internal working group that aims to collaborate, debate and find effective solutions for improving bidirectional communication, fostering a sense of pride in belonging and regular employee participation.

Aena Brasil has Aena Brasil Comunica, Estamos Conectados and the monthly newspaper Aena Brasil 360 as internal communication tools.

5.4.3. Satisfaction and motivation of Aena’s professionals

In Spain, with the aim of improving the well-being of workers, promoting their satisfaction with regard to work and increasing their motivation, a periodic appraisal of psychosocial risks is carried out, aiming to identify, evaluate and assess the psychosocial risks present in work centres to understand areas of improvement and implement action plans to improve the engagement and commitment of employees.

These appraisals are carried out by the occupational health and safety service through anonymous surveys

(some online), following the F-PSICO 4.0 method of the National Institute of Health and Safety at Work (INSST), part of the Ministry of Labour and Social Economy. The factors evaluated in these surveys include workload, autonomy, psychological demands and social support and relationships, among others.



Internal communication

- Intranet
- SAP SuccessFactors Intranet
- Internal publications - Aena 360°
- Conecta2 programme
- Bienestar360
- Suggestion box
- State union coordinator
- Mixed commissions
- Dialogue with managers
- Mailboxes and emails
- Complaints channel
- Work groups

Currently, the engagement index is updated, calculated on the basis of the percentage of workers classified at the moderate risk level and in an appropriate situation for the psychosocial factors of 'Variety/work content' and 'Interest in work/reward'.

	2019	2020	2021
Engagement index (%) (*)	80.49	90.14	82.43
% of Workforce covered	6.41	28.51	36.78

(*) This index is calculated by taking the average of two psychosocial factors from all psychosocial evaluations that have been performed that year: Variety/Work Content (VC [Variedad/Contenido del trabajo]) and Interest in Work/Reward (ITC [Interés por el Trabajo/Compensación]).

On the other hand, one of the objectives of the Sustainability Strategy (2021-2030) is the implementation of a system for measuring the work environment through surveys. The survey model is currently being developed, which will be sent to all working people online and in which employees will be asked periodically about issues related to their satisfaction with the company, their job, their co-workers and their managers, as well as with other areas of the organisation (such as internal communications and leadership).

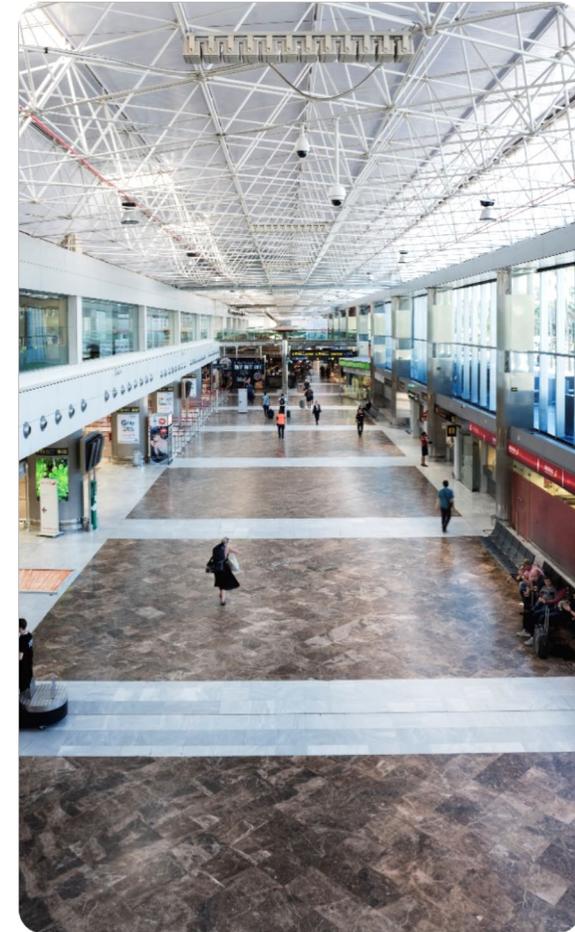
The London Luton Airport plans to conduct this type of survey in the first quarter of 2022.

5.4.4. Restructuring

With regard to substantial amendments to the employment contract, both individual and collective, these are made in accordance with what is set out in the Workers' Statute.

Aena has not carried out any restructuring in recent years.

In Brazil, the work change procedure is guaranteed in the Consolidation of Brazilian Labour Laws (CLT, as it is known by its Portuguese acronym).



5.5. Health and safety in employment (GRI 403-1; 403-2; 403-3; 403-4; 403-5; 403-6; 403-7; 403-8)

COMMITMENT AT ALL LEVELS OF THE ORGANISATION, WITH:



Protection of physical and emotional health and safety



Preventive culture



Reduction of accident rate

It is set out in the **Occupational Risk Prevention Policy**, which includes the general guidelines and objectives of the organisation related to the prevention of occupational risks, such as:

- Prevention of damage and impairment of health, and promotion of well-being and continuous improvement, through the establishment of annual quantitative objectives.
- Compliance with the requirements signed by the organisation, beyond those legally applicable and evaluation of progress in the objectives set.
- Establishment of adequate information channels to communicate matters affecting the prevention of occupational risks to the interested parties (internal and external to the company).
- To guarantee the training of workers in health and safety, and their participation and information, especially in the Policy, through the establishment of appropriate information channels.
- To disseminate, explain and keep the Policy updated.
- To coordinate preventive activities with third parties, including concessionaires, contractors and airline operators.

For which the following is available:

They cover 100% of the workers.

Continuous review and improvement to minimise and/or eradicate possible risks, incidents and fatalities

Occupational Risk Prevention Plan

Occupation Risk Management System

And specific actions are carried out:

-
- Training
 - Follow-up and external audits periodically (every 5 years) by health and safety experts
 - Risk assessment
 - Active and bidirectional communication regularly among the different areas involved (committees, human resources, etc.).
 - Quarterly, meetings of the Health and Safety committees, both State and Local in the different centres

5.5.1. Aena Health and Safety Model

(GRI 103-2; 403-1; 403-2; 403-3; 403-4; 403-5; 403-6; 403-7; 403-8)

Aena promotes best practices in the safety, health—physical and emotional—and well-being of its workers and the users of its facilities. The Occupational Risk Prevention Policy formalises this commitment and includes a set of specific objectives and actions which cover 100% of the workers and which are conducted through the Occupational Risk Management System¹⁴ and the Occupational Risk Prevention Plan. The system is audited externally every five years. After the last audit, conducted in 2019, a high level of compliance was obtained in regard to Occupational Risk Prevention, good integration of the preventive activity in the company and good efficacy to prevent, identify, evaluate, correct and control occupational hazards in all phases of the company's activity.

The prevention of occupational risks and the promotion of the health and safety of workers affect all areas of the organisation without distinction, being a cross-divisional function present across the entire activity of the Company.

Since 2020, work has been carried out on the system review, and on the assessment of opting for the

ISO 45001 certification. In 2021, the analysis of the system documentation was carried out, starting the work of updating it. For its part, Aena's Occupational Risk Prevention Plan normalises and establishes the Risk Prevention Policy, and contains the organisation and means of risk prevention regarding Aena's activities that affect not only the exploitation of existing infrastructure, but also the aspects of the construction of new infrastructures, and in which emergency situations and third-party activities are also taken into account (contractors, concessionaires, etc.).

The London Luton Airport Occupational Health and Safety Management System is based on the applicable¹⁵ regulations and commitments undertaken in the Health and Safety Policy¹⁶, which includes the adoption of a proactive approach to its safety culture, open and transparent reporting practices and the intention to focus on achieving continuous improvement in its performance. This System, certified in accordance with ISO 45001¹⁷, provides a solid structure to ensure effective management of health and safety throughout the Airport with regard to the following:

- Strong leadership and management.
- Identification of risks, threats and opportunities.
- Monitoring, measurement, analysis and improvement of performance.

- Compliance evaluation.
- Opportunity for ongoing improvement.
- Performance analysis and evaluation.
- Inspections.

The Health and Safety objectives, defined in the 2020-2025 London Luton Airport Responsible Business Strategy, include the review and improvement of operations to address problems proactively, focusing not only on employees, but also on customers and suppliers. The purpose is clear: incorporate an excellent culture of safety and risk management throughout the airport.

The system is subject to an external audit system every three years by the British Standards Institution (BSI) and to monitoring audits twice a year, verifying its continuous improvement. In the last audit of November 2021, no nonconformities were recorded, which demonstrates the robustness of the continuous improvement process, the good integration of preventive actions and its efficiency to prevent, identify, evaluate, correct and control occupational risks in all phases of activity.

The London Luton Airport's Responsible Business Strategy 2020–2025 defines specific objectives in the matter, aimed at incorporating an excellent culture of safety and risk management throughout the airport (employees, customers and suppliers).

¹⁴ The Occupational Risk Management System is based on the applicable regulations (Act 31/1995, of 8 November, on Occupational Risk Prevention and Royal Decree 39/1997, of 17 January, which approves the Risk Prevention Services Regulation).

¹⁵ Health and Safety at Work etc. Act 1974 and Management of Safety at Work Regulations 1999.

¹⁶ See About this report - Links of interest.

¹⁷ In 2019, London Luton Airport obtained the ISO 45001 certificate, receiving an excellent assessment from the evaluator regarding senior management's commitment to ensuring and improving the Health and Safety strategy, the resources allocated and the exemplary reporting practices.

OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT BODIES

Spain	Board of Directors	<ul style="list-style-type: none"> Approves, promotes and deploys the Occupational Risk Prevention Policy that guarantees a safe and healthy work environment.
	General management	<ul style="list-style-type: none"> Highest responsible for the functioning and management of Occupational Health and Safety issues and the approval of the Health and Safety Policy.
	Management and workplaces	<ul style="list-style-type: none"> Responsible for establishing the appropriate means and organisation to comply with the Occupational Health and Safety Policy.
	Joint Prevention Service	<ul style="list-style-type: none"> Responsible for monitoring the health of employees in relation to occupational risks and carrying out the investigation of occupational accidents and preparing accident statistics. Support and advice in the design, implementation and monitoring of risk prevention and health protection plans and programmes.
	Risk prevention delegates	<ul style="list-style-type: none"> They represent workers in the field of occupational risk prevention.
	Health and Safety Committees (State Health and Safety Committee (CESS); Local Health and Safety Committees (CLSS) of the workplaces).	<ul style="list-style-type: none"> Joint and group participating bodies and consensus, intended for regular and periodic consultation of the actions in the company in matters of occupational risk prevention, formed by representatives of the workers and of the Company. Development, implementation and evaluation of risk prevention plans and programmes; promotion of initiatives for the effective prevention of risks and improvement proposals.
	Workers	<ul style="list-style-type: none"> To ensure their own safety and health at work and that of other people who may be affected by their professional activity.
London Luton Airport	Board	<ul style="list-style-type: none"> Advises and assists the CEO on health and safety.
	CEO	<ul style="list-style-type: none"> Ultimate responsibility in terms of health and safety.
	Other senior managers, managers and supervisors	<ul style="list-style-type: none"> They advise and assist the CEO with regard to health and safety.
	Head of Health, Safety and Environment at the airport	<ul style="list-style-type: none"> Guarantees effective and direct lines of communication with all those involved in Occupational Health and Safety aspects, and with other areas of the airport.
	Workers	<ul style="list-style-type: none"> To ensure their own safety and health at work and that of other people who may be affected by their professional activity.
Aeroportos do Nordeste do Brasil	Committee	<ul style="list-style-type: none"> Established through company representatives and employee representatives. Those that are elected and appointed are duly trained in matters related to the prevention of occupational risks.

Supervision and review of risks associated with health and safety (GRI 403-1; 403-

2; 403-3; 403-4; 403-5; 403-6; 403-7; 403-8)

To ensure the prevention of third-party occupational risks, specific programmes and initiatives are carried out in collaboration with Public Administration bodies to promote health and safety in the work environment.

At London Luton Airport, the management and identification of health and safety risks is based on a clearly defined governance structure (capable of providing an adequate framework for management), and designed to ensure the effective implementation of Health and Safety policies, the Safety Management System (SMS) and the Environmental/Energy Management Systems (EMS/ENMS). Workers at all levels and roles are involved in the development, planning, execution, and evaluation of the performance and opportunities for improving this system. The corresponding procedure establishes the responsibilities at all levels, guaranteeing the involvement of employees and continuous improvement.

Communication, dialogue and employee participation in occupational safety

(GRI 103-2; 403-1; 403-4)

The consultation and participation of workers in health and safety is guaranteed through the following:

- *Representative bodies:* In Spain, the Health and Safety Committees (both state and local at the various centres) are joint and associated participating bodies aimed at regular and periodic consultation of the company's health and safety activities, through which the consultation and participation of workers in health and safety is guaranteed. Their actions include the following:

They are composed of representatives appointed by the organisation's management and by the representatives of the workers. Their functions include the following:

- Identification of hazards, risk evaluation and determination of checks.
- Accident investigation.
- Development and review of policies and objectives in the field of ORP.
- Consultation when there is any change affecting ORP.
- Representation in ORP-related issues.

The Health and Safety Committees meet every three months to discuss previously agreed matters. The conclusions and agreements adopted are published on the intranet available to all employees. It is through these committees, with the advice of the members of the health and safety service, where the Management reports, debates and allows workers to participate and consult through their representatives.

100% of Aena's workers are represented by the corresponding health and safety committees, or the risk prevention delegates at the sites where, due to having a number of workers less than 50, no committee is constituted.

- *Communication tools:* To report incidents, accidents or possible threats related to occupational safety, specific tools and mailboxes are available (such as the Employee Portal →HR →ORP →Accident/Incident Notifications or the mailbox sprlae@aena.es). At the same time, tools such as the online human resources portal, the newsletter, informational notes or mailboxes for the occupational risk prevention service in each geographical area help ensure active and bidirectional communication among employees, as well as raise awareness of the importance of complying with the risk prevention policy and detect any employee concerns regarding health and safety issues.

The London Luton Airport has its own internal and external communication procedure regarding its management and performance systems, in terms of health and safety, environment and energy:

- Internally, through training courses and the distribution of procedures.
- Externally: via the internet, and by organising meetings with interested parties.

Aena Brasil also has committees that act as representatives of the company and the employees. Communication takes place through the dissemination of newsletters on health and safety information to all employees.

Identification of hazards, risk assessment, accident investigation and corrective actions: Occupational Risk Prevention System

In Spain, Aena has a System for the prevention of occupational risks in whose Management Manual describes the processes for identifying, preventing and minimising risks associated with the work activity according to a dynamic process of continuous review.

To this end, it establishes mechanisms for identification, registration and monitoring of regulatory requirements, the analysis, identification, assessment and estimation of risk (type and severity), the adoption of preventive measures to detect potential harm to the health of employees (for example, due to changes arising from the implementation of new technologies, work methods, organisation, working conditions, etc.), as well as the establishment of urgent control measures that are necessary to minimise the possible consequences arising from them. Aena's Joint Prevention Service (SPMA [Servicio de Prevención Mancomunado de Aena]) is the body responsible for the prevention of occupational risks.

The ORP Management System includes the evaluation procedure agreed with the worker representation within the State Health and Safety Committee and is available

on Aena's intranet for consultation by all employees. In 2021, 60 general evaluations, 118 specific evaluations and 144 occupational risk studies were performed, and 1,752 measures were carried out, representing 36% of the total. 62% of the risks evaluated are considered tolerable, focusing the main preventive measures on the risks deemed to be important (12%).

Aena follows a proactive approach to maintain the highest levels of security and minimise risk exposure.

At the London Luton Airport, the risk assessment is carried out on an ongoing basis, both at the general level (by reviewing the documentation associated with strategic risk management and its recording and review), as well as at the local level.

At the local level, before undertaking a new task or work activity for the first time (or if any new equipment or substance is used or stored for the first time), department heads and members of the Local Health and Safety team perform monthly evaluations of local risks, as well as after any accident, injury or quasi-major accident. These evaluations are also performed when there are changes required by law, due to the modification of a role, process or location of personnel for a specific task.

Aena Brasil has implemented a series of programmes aligned with those of the rest of the Organisation and the requirements of Brazilian legislation to identify occupational hazards and assess risks, including the Environmental Risk Prevention and Occupational

Medical Control Programmes, while internal Accident Prevention Committees have also been established.

Notification, registration and investigation of accidents (GRI 403-3; 403-9)

Any employee of Aena can report accidents through different channels: either in person or by email to the Joint Prevention Service of Aena (SPMA) and/or Human Resources through the Employee Portal or through the Risk Prevention Delegates. The confidentiality of the data and of the person notifying the incident is guaranteed with any of these channels. In the event that a person wishes to communicate deficiencies or improvements, they must communicate this to the corresponding manager and/or to the Aena Joint Prevention Service (SPMA).

Likewise, Aena, in compliance with current regulations on ORP, considers that workers shall have the right to interrupt their activity and leave the workplace, if necessary, when they consider that such activity entails a serious and imminent risk to their lives or health (with serious and imminent risks being understood as those that are reasonably likely to occur in the immediate future and could pose serious damage to the health of the workers).

Aena has a defined system for reporting accidents and notifying health injuries, which is available to all employees. Thus, in the event of a workplace accident, whether mild or serious, they can notify the Human Resources department (SPMA through the Employee Portal or on paper), so that it is registered in the system

through the corresponding application and proceed to investigate the accident, identify the causes and prevent possible future similar situations. As a result of the process, corrective and/or preventive actions to be adopted are proposed.

For the internal monitoring of accident rates, periodic Reports of Accident Rates are drawn up with the list of accidents/incidents that have occurred. The labour and health authorities are also informed.

In Spain, 99 occupational accidents were reported during 2021, 1% less than in 2020, all mild, of which 43 involved medical leave and 56 did not involve medical leave. The causes were investigated in all of them and preventive actions and/or recommendations to the worker were put in place.

Although the accident rate at Aena is low, it has been detected that cases of accidents on the way to and from the workplace represent a high percentage of the accident rate, so an informative campaign is being prepared by the occupational risk prevention service to improve safety in travel to or from the workplace.

At London Luton Airport, all incidents (injuries, near accidents and hazards) are reported through the management system using the corresponding platform and an investigation is initiated. All employees are responsible for reporting any incident to their supervisor and to the incident management system.

This should be done as soon as reasonably possible without being exposed to any additional risk.

In Brazil, any occupational accident must be reported by the workers to the supervisory body through the corresponding system.

On a consolidated level, in 2021, a total of 134 accidents were recorded by workers, 57 with medical leave; and all were investigated according to the corresponding procedure.

Health and safety emergency preparedness procedures

The Aena work centres have the proper action protocols in case of an emergency. These are available to the employees of that centre either on the intranet or on the Employee Portal. Many airports work with the collaboration from other areas (security, operations, etc.), and thereby achieve greater involvement and commitments.

Objectives and monitoring of the objectives set in terms of health and safety

Aena's commitment to reducing accident rates and developing a risk-preventive culture is realised through a series of quantitative objectives in the field of

accidents, reviewed and updated annually according to best practices in the sector and/or the latest trends. These goals are set according to a continuous improvement process based on historical data, taking into account industry data. In 2021, the following objectives were established:

- Number of accidents: 60
- Incidence rate¹⁸: 7.71

The table below shows the goals established and results obtained between 2018 and 2021 with respect to the Incidence Rate and the number of accidents.

		2018	2019	2020	2021
Incidence rate of accidents	Goal	8.35	8.35	8.35	7.71
	Results	6.77	7.24	5.27	5.58
Number of accidents	Goal	60	60	62	60
	Results	51	56	41	43

All the objectives set by the Company in terms of health and safety have been successfully achieved.

By 2022, the goal set has been to maintain the same goal for the accident rate with respect to 2021 and reduce the goal number of accidents by 8.3%.

¹⁸ Incidence rate of occupational accidents = (Number of accidents x 10³)/Average accumulated workforce

Accident (Own Personnel) (GRI 403-3; 403-9)

	Aena S.M.E., S.A.			SCAIRM			ADI			London Luton Airport ¹			Aena Brasil ²			TOTAL consolidated
	2019	2020	2021	2019	2020	2021	2019	2020	2021	2019	2020	2021	2019	2020	2021	2021
Accidents (no.)	151	100	99	2	0	0	0	0	0	55	33	24	0	3	11	134
Men	85	60	75	2	0	0	0	0	0	-	-	14	-	3	10	99
Women	66	40	24	0	0	0	0	0	0	-	-	10	-	0	1	35
With medical leave	56	41	43	0	0	0	0	0	0	-	-	8	0	0	6	57
Men	45	30	35	0	0	0	0	0	0	-	-	5	-	0	6	46
Women	11	11	8	0	0	0	0	0	0	-	-	3	-	0	0	11
Without medical leave	95	59	56	2	0	0	0	0	0	-	-	16	0	3	5	77
Men	40	30	40	2	0	0	0	0	0	-	-	9	-	3	4	53
Women	55	29	16	0	0	0	0	0	0	-	-	7	-	0	1	24
With death	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Men	0	0	0	0	0	0	0	0	0	0	0	0	-	0	0	0
Women	0	0	0	0	0	0	0	0	0	0	0	0	-	0	0	0
Mild	150	98	99	2	0	0	0	0	0	0	0	17	0	3	11	127
Men	84	58	75	2	0	0	0	0	0	0	0	9	-	3	10	94
Women	66	40	24	0	0	0	0	0	0	0	0	8	-	0	1	33
Serious³	1	2	0	0	0	0	0	0	0	0	0	7	0	0	0	7
Men	1	2	0	0	0	0	0	0	0	0	0	5	-	0	0	5
Women	0	0	0	0	0	0	0	0	0	0	0	2	-	0	0	2
Rate of occupational accident injuries with major consequences⁴	0.08	0.15	0	-	-	-	0	0	0	0	0	24.00	0	0	0.00	0.50
Injury rate per recordable occupational accident⁵	4.23	3.08	3.26	-	-	-	0	0	0	0	0	27.43	0	0	12.48	4.03
Death rate⁶	0	0	0	-	-	-	0	0	0	0	0	0	0	0	0	0

(1) Until 2021, London Luton Airport did not report accidents broken down by gender, degree of severity or with/without medical leave.

(2) Aena was awarded the concession of Aena Brasil in March 2019.

(3) Any accidents that have had major consequences, not including deaths, are considered serious.

(4) Rate of occupational accident injuries with major consequences = (Number of occupational accident injuries with major consequences (not including death)*106)/Number of hours worked⁶

(5) Recordable occupational accident injury rate = (Number of accidents with medical leave x 10⁶)/(Total number of hours actually worked). Its calculation is equal to the Frequency Index.

(6) Death rate = (Number of deaths resulting from an occupational accident injury x 10⁶)/Number of hours worked

Accidents (own staff) (GRI 403-3; 403-9)

	Aena S.M.E., S.A.			SCAIRM ⁽¹⁾			ADI ⁽²⁾			London Luton Airport ⁽³⁾			Aena Brasil ⁽⁴⁾			Consolidated
	2019	2020	2021	2019	2020	2021	2019	2020	2021	2019	2020	2021	2019	2020	2021	2021
No. of days lost	2,162	1,620	896	-	-	0	-	-	0	-	84	174.7	0	0	54.00	1,124.7
Men	1,506	1,215	674	-	-	-	-	-	-	-	-	160	0	0	47.00	881
Women	656	405	222	-	-	-	-	-	-	-	-	14.7	0	0	7.00	243.7
Rate of days lost (*)	163.4	121.7	68.0	-	-	0	-	-	0	-	-	598.98	0	-	127.21	79.57
Men	178.2	143.5	80.3	-	-	-	-	-	-	-	-	854.80	-	-	166.18	97.46
Women	137.4	83.6	46.4	-	-	-	-	-	-	-	-	140.69	-	-	49.41	47.83
Incidence rate of occupational accidents (**)	7.24	5.27	5.58	-	-	0	-	-	0	28.07	-	11.92	0	0	20.91	6.51
Men	9.11	6.06	7.14	-	-	-	-	-	-	-	-	12.05	0	0	30.61	8.23
Women	3.94	3.89	2.86	-	-	-	-	-	-	-	-	11.72	0	0.00	0.00	3.47
Frequency rate (***)	4.23	3.08	3.26	-	-	0	-	-	0	17.01	23.90	27.43	0	0	12.48	4.03
Men	5.32	3.54	4.17	-	-	-	-	-	-	-	-	26.71	0	0	17.89	5.09
Women	2.3	2.27	1.67	-	-	-	-	-	-	-	-	28.71	0	0	0.00	2.16
Severity rate (****)	0.16	0.12	0.07	-	-	0	-	-	0	-	0.06	0.60	0	0	0.66	0.08
Men	0.18	0.14	0.08	-	-	-	-	-	-	-	-	0.85	0	0	0.84	0.10
Women	0.14	0.08	0.05	-	-	-	-	-	-	-	-	0.14	0	0	0.00	0.05

NOTE:

(1) In 2019, SCAIRM had two accidents without sick leave.

(2) In 2019, 2020 and 2021, ADI had no recorded accidents.

(3) London Luton Airport: until 2021, London Luton Airport did not report accidents broken down by gender, degree of severity or with/without medical leave.

(4) Aena Brasil. Aena was awarded the concession of Aeroportos do Nordeste do Brasil in March 2019. With regard to 2020, ANB recorded three accidents without medical leave, so as a result of this, the severity rate is 0.

(*) Rate of days lost = (Total number of cases of days lost by own personnel x 10⁶)/Total hours worked(**) Incidence rate of occupational accidents = (Number of accidents with medical leave x 10³)/Average accumulated workforce.(***) Frequency rate = (Number of accidents with medical leave x 10⁶)/(Total number of hours actually worked), where: Total number of hours actually worked: see section on 'Organisation of working time'. For London Luton Airport and ANB, the Frequency Rate has been calculated taking into account the total number of accidents. In Aeroportos do Nordeste do Brasil, the 2020 data has been recalculated to consider the number of accidents with medical leave.(****) Severity rate = (No. of working days not worked due to an occupational accident with medical leave x 10³)/(No. of hours actually worked)

Absenteeism (own staff) (GRI 403-9; 403: 2018)

	Aena S.M.E., S.A.				Aena Desarrollo Internacional				SCAIRM				London Luton Airport ²				Aena Brasil ⁽³⁾			
	2019	2020	2021	Δ 21/20	2019	2020	2021	Δ 21/20	2019	2020	2021	Δ 21/20	2019	2020	2021	Δ 21/20	2020	2021	Δ 21/20	
No. of hours lost due to absenteeism¹	754,854.41	789,310.64	834,364.17	6%	1,727.00	539.15	338.93	-37%	8,231.35	4,964.10	6,296.20	27%	87,582.31	59,413.97	57,130.22	-4%	4,335.00	3,572.00	-18%	
Men	431,243.29	454,667.04	470,055.73	3%	1,618.00	491.00	250.00	-49%	3,270.10	3,833.80	5,183.20	35%	51,798.00	23,884.02	39,338.15	65%	2,250.00	2,445.75	9%	
Women	323,611.12	334,643.60	364,308.44	9%	109.00	48.15	88.93	85%	4,961.25	1,130.30	1,113.00	-2%	35,784.31	35,529.95	17,792.07	-50%	2,085.00	1,126.25	-46%	
Absenteeism rate	6.59	7.14	7.31	2%	4.83	1.59	1.09	-31%	6.77	4.65	5.59	20%	5.51	3.84	4.36	14%	-	0.84	-	
Men	5.94	6.55	6.53	0%	8.44	2.71	1.72	-36%	3.71	4.91	6.15	25%	5.00	3.57	4.66	31%	-	0.86	-	
Women	7.72	8.14	8.63	6%	0.66	0.30	0.54	76%	14.87	3.94	3.92	0%	6.45	4.31	3.82	-11%	-	0.79	-	

¹ Number of hours lost due to absenteeism = the number of accumulated hours of absenteeism in the year due to sick leave and similar situations, unjustified absences, justified absences that are not recoverable and absences pending justification for each scheduled hour of work.

² Absenteeism rate = (Total number of absenteeism hours/Total number of hours worked) x 100
Total number of hours actually worked: see section on 'Organisation of working time'.

³ In 2019, Aeroportos do Nordeste do Brasil, S.A. did not calculate the absenteeism rate



Occupational health and safety training

Training, communication and awareness in health and safety are essential to ensure compliance with current regulations, and to reaffirm the commitment that the entire workforce needs to achieve this purpose.

In Spain, as well as in the United Kingdom and Brazil, Aena guarantees that each worker receives theoretical and practical training that is sufficient and adequate in preventive matters, both at the time of their hiring and during the course of their employment, regardless of the type or duration of their contract, the role that they undertake or any organisational or work team changes that may take place, as well as when any new technologies are introduced.

In order to adapt the training to the position held by each worker, health and safety training needs are identified on a regular basis when the risk evaluation reviews of each worker’s tasks are conducted.

These courses, which are mandatory and are counted for the purposes of the annual variable remuneration, take place during the working day.

Worker training on occupational health and safety

	2021				
	AENA S.M.E.	SCAIRM	ADI	ANB	Total
Training activities (no.)	1,181	20	6	2	1,209
Employees (no.)	7,640	79	27	70	7,816
Training hours	43,195	296	60	80	43,631

NOTE: London Luton Airport does not record training hours.

5.5.2. Promoting the health and well-being of workers

Aena develops risk prevention and health promotion activities for its workers aimed at improving their conditions, as well as early and individual detection of hazards and impairment factors that may affect their health (medical examinations, preventive programmes, the dissemination of the healthcare culture, the monitoring of occupational diseases, etc.). These actions, prepared by specialised technicians, are submitted for consultation and participation in the State Health and Safety Committee prior to their approval.

During 2021, many of these measures have been related to protection against COVID-19 in workplaces (distributing of FFP2 masks and sanitising materials, conducting diagnostic tests, teleworking policy, greater flexibility in hours, etc.).

The 360° Well-being project was one of the actions carried out in 2021. A project where the SPMA, together with various professionals from HR management, collaborates in this space where health, care and well-being are promoted from three cross-divisional axes:

- preventive culture and promotion of health;
- emotional well-being; and
- work-life balance and social benefits.

The objective is to provide practical resources and tools that can help them in their professional and personal environment. All employees have access to this material through the weekly newsletter distributed by email and on Aena’s intranet.

Measures to reduce stress

The Company has a procedure for identifying and evaluating psychosocial factors and risks that may represent a risk to the health and well-being of workers, including stress. It has also implemented a series of actions and resources to help improve the emotional state of employees and stress management, including:

- Awareness actions, through internal newsletters in the 360° Well-being section and webinars.
- Stress support instruments, such as that offered through the Aena Employee Assistance Program (PAE [Programa de Atención al Empleado]) and the 360° Well-being team.
- Training about stress for employees through the new online platform (*How to combat burnout, eustress yourself!*).

- Ergonomic design of the workstations, which contributes to the well-being of the workers in their work environment and adaptation of the furniture to people with special needs (lumbar cushions, footrests, etc.).
- As a result of the new teleworking policy, recommendations have been made to adapt teleworking positions to ergonomic criteria in order to reduce possible musculoskeletal injuries and improve the health and safety of people who have adhered to this new work modality.
- Evaluation of psychosocial factors through anonymous surveys, following the procedure approved within the State Health and Safety Committee, analysis of results and proposal of preventive measures in different workplaces.
- Identification of the sources of stress, based on these nine psychosocial factors: work time, workload, autonomy, psychological demands, variety and content of work, participation and supervision, employee interest and reward, role performance and relationships and social support.

London Luton Airport has its own strategies for promoting well-being, supported by its occupational health providers. All personnel must contribute to the support, identification and evaluation of risks associated with stressful situations, as well as to taking the necessary measures to identify their symptoms and provide the necessary support.

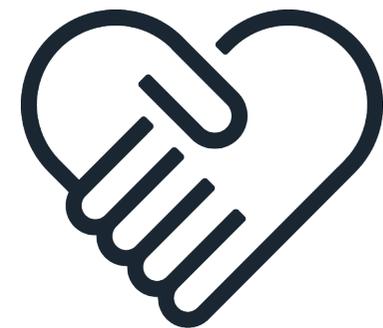
Balance and promotion of the health and well-being of workers. (GRI 401-2; 401-3)

The 'People Management' line of action included in Aena's Sustainability Strategy proposes, among its objectives, promoting work-life balance and the motivation of its workers, improving employee satisfaction through the work welfare programme and greater flexibility to balance employment with private life. Among its actions, it includes the following:

- the development of a flexible remuneration programme;
- an integration and coordination plan, providing well-being and prevention resources for employees; and

- the implementation of the Teleworking and Digital Disconnection policies.

To achieve the commitment to equality, facilitate the work-life balance, encourage both parents to carry out their corresponding duties and seek a balance between professional and personal life, the Company puts in place specific work-life balance measures in the different countries in which it operates. These actions have been defined by current regulations and agreed with the workers' legal representatives¹⁹.



¹⁹ In Spain, these can be consulted in the Company's Collective Agreement. See section 'About this report – Links of interest'.



Workday



Balance of family life and leaves



Paternity and maternity



Gender-based violence



Employee aid

AENA

<ul style="list-style-type: none"> • Flexi-time: <ul style="list-style-type: none"> • Flexible schedule of clock-in and -out times. • Two hours of daily flexibility for working people with children with disabilities. • Shortened workday during summer (3 months). Possibility of service changes for staff between shifts. • Teleworking policy that allows employees to work remotely • Digital Disconnection Policy that promotes respect for the employees' work schedule and their leisure time. • Workdays defined and set in the short and long term. • Schedule control. 	<ul style="list-style-type: none"> • Reduction of working hours for the care of children under twelve years of age, and sick and/or disabled family members. • Leave of absence to care for children or family members. • Paid leave for private matters (own matters). • Seniority leave (after 20 years of service, one additional day for every 5 years). • Paid leave on 24 and 31 December. 	<ul style="list-style-type: none"> • Rest in the event of childbirth, adoption or foster care. • Possibility of distribution of the rest period per birth of child. 	<ul style="list-style-type: none"> • Possibility of a reduction in working hours with a proportional decrease in salary or in the rearrangement of work time. • Suspension of the employment contract for those cases of job abandonment by the worker as a result of being a victim of gender-based violence. 	<ul style="list-style-type: none"> • Flexible compensation (restaurant tickets). • Medical insurance. Life and accident insurance. • Medical examinations. • Financial aid for studies, health, disability, camps, nurseries, reimbursable advances. • Aena's Employee Services Programme (PAE [Programa de Atención al Empleado]). A set of counselling, facilitation and emotional support services for events that take place in the life of employees, offering services and advice in all aspects derived from certain situations (legal, fiscal, social, administrative, etc.). • Pension Plan contributions.
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LLA

<ul style="list-style-type: none"> • Possibility of requesting flexible work, which may include part-time work, working from home or with modified start and end times. 	<ul style="list-style-type: none"> • Annual holidays that include 5 days above the minimum established by the government. 	<ul style="list-style-type: none"> • Paid maternity, paternity or adoption leave. • Paid parental leave of up to 5 days, plus compliance with the parental leave required by the government. 		<ul style="list-style-type: none"> • Benefits include private health insurance for the whole family. • Integration and coordination plan, providing well-being and prevention resources for employees. • Assistance programme available to all employees and their families: confidential service that includes personal advice and legal assistance if necessary.
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AEROPORTOS DO NORDESTE DO BRASIL

<ul style="list-style-type: none"> • Work-life balance measures provided for in the Collective Agreement. They highlight: maternity leave, paternity leave, leave to accompany children, etc.
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Against the backdrop of the COVID-19 pandemic, the Action Protocols against COVID-19 in Aena workplaces were certified by AENOR. These certificates were the result of the work carried out in implementing all the measures and protocols of each work centre, their alignment with the Ministry of Health's recommendations

and their effectiveness. A certificate that corroborates Aena's efforts to adapt the workplaces to the new circumstances and that endorses all the work done to create a safe work environment for employees.

Main data for 2021:

82% Rate of return to work of employees who took parental leave by gender (87% in 2020).

Employees who are on maternity/paternity or adoption/fostering leave (GRI 401-2)

	Aena S.M.E., S.A.				SCAIRM				ADI				LLA				Aena Brasil				TOTAL	
	2020		2021		2020		2021		2020		2021		2020		2021		2020		2021		2020	2021
	M	W	M	W	M	W	M	W	M	W	M	W	M	W	M	W	M	W	M	W		
Maternity	0	34	0	36	0	0	0	0	0	0	0	0	0	15	0	18	0	1	0	4	50	58
Paternity	133	0	139	0	1	0	2	0	0	0	0	0	11	0	15	0	10	0	8	0	155	164
Adoption/Foster care	0	0	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2
Parental Leave	5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	5	0
Total	138	34	139	38	1	0	2	0	0	0	0	0	11	15	15	18	10	1	8	4	210	224

Employees that returned to work after parental leave ended or adoption/fostering leave (GRI 401-2)

	Aena S.M.E., S.A.				SCAIRM				ADI				LLA				Aena Brasil				TOTAL	
	2020		2021		2020		2021		2020		2021		2020		2021		2020		2021		2020	2021
	M	W	M	W	M	W	M	W	M	W	M	W	M	W	M	W	M	W	M	W		
Maternity	0	30	0	22	0	0	0	0	0	0	0	0	0	15	-	23	0	0	-	4	45	49
Paternity	111	0	110	0	0	0	2	0	0	0	0	0	11	0	14	-	10	0	8	-	132	134
Adoption/Foster care	0	0	0	1	0	0	0	0	0	0	0	0	0	0	-	-	0	0	-	-	0	1
Parental Leave	5	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-	0	0	-	-	5	0
Total	116	30	110	23	0	0	2	0	0	0	0	0	11	15	14	23	10	0	8	4	182	184

Rate of return to work of employees who took parental leave by gender in 2021 (GRI 401-2)

	No. of employees returned to work			No. of employees who should return to work			Rate of return to work*		
	M	W	Total	M	W	Total	M	W	Total (%)
Maternity	0	49	49	0	58	58	-	84.5%	84%
Paternity	134	0	134	164	0	164	81.7%	-	82
Adoption/Foster care	0	1	1	0	2	2	-	50.0%	50%
Parental Leave	0	0	0	0	0	0	-	-	-
Total	134	50	184	164	60	224	81.7%	83.3%	82

(*) Rate of return to work: (Total number of employees who returned to work after parental leave/Total number of employees who must return to work after parental leave) x 100.

Risk management and control

Aena has established a 'risk assessment and control' procedure, agreed by the State Health and Safety Committee and available on the intranet for all personnel to consult. It describes the methodology to be used when risk assessments and controls are carried out, the

communications to be followed and the monitoring and verification of the effectiveness of the measures adopted.

In 2021, the occupational medical specialism within the Prevention Service did not detect any new occupational illness, according to RD 1299/2006, of 10 November, which approves the list of occupational illnesses in the

Social Security system and establishes criteria for their notification and registration.

All occupational illnesses follow the same investigation procedure as occupational accidents.

Aena's Occupational Risk Prevention Service monitors all proposed risk preventive measures to eliminate hazards and minimise risks for the health of workers.

No. of occupational illnesses by region/During the fiscal year 2021, the following occupational diseases declared by the mutual insurance company were recorded (GRI 403-10)

	Aena S.M.E., S.A.			SCAIRM			ADI			LLA			Aena Brasil			Total		
	2019	2020	2021	2019	2020	2021	2019	2020	2021	2019	2020	2021	2019	2020	2021	2019	2020	2021
No. of deaths due to occupational disease or illness	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Men	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Women	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
No. of cases of occupational diseases or illnesses	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Men	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Women	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Commitment to companies (external/concurrent)

As a public corporation, Aena takes on the commitment to promoting the coordination of business activities pertaining to occupational risk prevention in all areas and in all activities carried out in its work centres.

To this end, it has a system for the Coordination of Business Activities with third parties²⁰ in operation in all its work centres, where the risks of the companies (external/concurrent companies) that work in Aena's facilities are communicated, and coordination among all of them is strengthened.

In compliance with the current regulations, the procedure PPRL 03-03 Coordination of Business Activities, which establishes the coordination requirements and mechanisms pertaining to Occupational Risk Prevention between Aena S.M.E., S.A. and all the companies that carry out some type of activity in the facilities managed by Aena S.M.E., S.A. The purpose is to improve actions in the area of occupational risk prevention and to promptly comply with the obligations established in Article 24 of Act 31 of 1995, on Occupational Risk Prevention, and its

subsequent development through Royal Decree 171 of 2004, and other concordant legislation.

This commitment is articulated through the exchange of information related to the generation of risks to third parties produced by the activity carried out by the companies that work together in Aena's centre.

Through the Company's website²¹, the companies proceed to download the 'Centre's risk map' document in which the risk statements generated by the companies that are currently carrying out any activity at Aena's centre are collected in real time, as well as the possible risks to third parties generated by their activity. All companies have a duty to update this information in real time and to disseminate it to their workers.

During 2021, the website has been updated to facilitate the coordination process of external companies as much as possible.

Regular meetings have also been held with concurrent companies by virtue of the type of activity carried out by the company or the areas where the work is carried out.

In order to continue encouraging coordination with all the companies that work on the airport premises,

creating increasingly safer environments, work is being done to be able to record accidents that the workers of all the external companies may have suffered at Aena's facilities. This will result in greater efficiency when designing and maintaining spaces where the safety of everyone who accesses Aena's facilities comes first. All the coordination of business activities thus becomes the mechanism that Aena uses comprehensively, both at the airport and in society, to care for the health of all workers, taking into account the large number of people who carry out their work activity at Aena's centres.

London Luton Airport works in collaboration with suppliers to ensure that the risks to which third parties and employees are exposed are reduced as much as possible. Any communication that is relevant to suppliers (including guidance or recommendations related to COVID-19) is shared through the online channels to which they have access.

Periodically, meetings are held with stakeholders to review risks so that, if they have an impact on the business, they can be reported internally to the governing bodies.

At Aena Brasil, all third-party work accidents must be reported and duly investigated.

²⁰ The relationship between Aena and the external companies may be the result of a direct link, resulting from a contractual relationship between the parties (contracts of employment, lease, assignment of facilities, etc.) or an indirect link (when the external company carries out its business activity in whole or in part at Aena's facilities).

²¹ Access the link to the website for Business Activities Coordination with third parties – Occupational risk prevention. See section 'About this report – Links of interest'.

6

Safe, high-quality services

Operational Safety

- Programmes and management systems certified and approved at the highest level of the Company
- Specific objectives
- Periodic, internal and external reviews and audits
- Emergency plans
- Communication and training
- Corrective actions
- Commitment to operational safety extendable to third parties

105 internal supervision

47 External audits



+2,525 employees trained in operational safety in 2021

Cybersecurity or information security

- Information Security Management System certified according to ISO 27001:2013
- Strategic Information Security Plan 2022-2026, reviewed by the Board of Directors and senior management
- Training and awareness actions
- Procedure for incidents
- Contingency plans and incident response procedures



0 information security breaches or other cybersecurity incidents

Health safety



- 46 airports of its network accredited by the Airport Health Accreditation (AHA) programme
- Maximum score of 5 stars for 6 airports in the 'COVID-19 Safety Ratings' programme of the prestigious consultant Skytrax
- COVID-19 Airport Excellence Awards awarded by Skytrax to the Adolfo Suárez Madrid-Barajas Airport, Barcelona-El Prat Josep Tarradellas Airport and Alicante-Elche Airport
- Award for 'Best Hygiene Measures' in Europe, granted by ACI, to Alicante-Elche Airport, F.G.L. Granada-Jaén Airport, Menorca Airport, Seve Ballesteros-Santander Airport, Región de Murcia International Airport and Pamplona Airport
- Corporate strategy and solid recovery plan after the COVID-19 pandemic at London Luton Airport

Excellent management

- Company Strategic Plan
- Aena Strategic Airport Maintenance Plan
- Responsible Business Strategy 2020-2025
- Service Quality Plan (SQP)
- ANB Airport Exploration Plan (APE)
- Integrated quality and environmental management system

Airport security

Focused on:

- Communications and collaboration between all agencies and groups involved
- Surveillance of vulnerable areas of the airport.
- Control of the movement of persons and vehicles at the accesses to restricted security areas.
- Inspection of persons and property
- Creation and update of the measures of the Airport Security Programme

More than 1,715 employees trained in airport security



Commitment to SDGs



SDG 3
Health and well-being



SDG 9
Industry, innovation and infrastructure



SDG 11
Sustainable cities and communities



SDG 16
Peace, justice and solid institutions



SDG 17
Partnerships for the goals

Aena adopts a risk-prevention approach in the event of possible situations, contingencies and eventualities that may affect the normal development of activities and may pose a risk, with the aim of trying to reduce them as much as possible.

To do this, it continuously and permanently evaluates the procedures for action in the field of safety and adapts them according to the results obtained, providing them with the mechanisms, measures, and human and material resources necessary to ensure airport, operational, health and informational safety.

The effectiveness of this system has been highlighted in situations such as that caused by the COVID-19 pandemic due to the speed with which the Company has adapted and improved its facilities and services to respond to the needs of each moment.

By maintaining a high level of OPERATIONAL, AIRPORT, INFORMATION AND HEALTH SAFETY at airports, associated risks are progressively reduced, which, therefore, reduces the possibility of related accidents and incidents occurring.
GRI 103-2; 416-2



6.1. Operational Safety

6.1.1. Management framework

Aena integrates Operational Safety management into all of its processes and airport activities, complying with the highest standards and applicable regulations¹, and contributing optimally to guaranteeing the Operational Safety of aviation as a whole through a preventive approach.

6.1.2. Operational Safety Objectives

In Spain, each airport establishes its own operational safety objectives, guaranteeing the highest levels of safety. To this end, on the basis of the lessons learned, they incorporate the improvements that, as a result of the measures and actions carried out, are considered more effective. To this end, the main objectives are focused on the adaptation and improvement of infrastructures, implementation of more efficient processes for the proactive identification of risks, and improvement of the culture of operational safety by promoting notifications and implementing the principles of fair culture.

London Luton Airport has set five health and safety objectives, aligned with the principles of Operational Safety, focused on ensuring accident prevention, paying special attention to training, valuing lessons learned, organising meetings and workshops, and reinforcing the tour and visitors programme for employees. All of this is measured through objectives at the internal level.



¹ Operational Safety is a priority at airports around the world. There are national and international regulations on the subject, as well as sectoral guidelines:

- ICAO: in 'Annex 14 – Volume I 'Aerodrome Design and Operations'', in Doc. 9774 'Aerodrome Certification Manual' and in Doc. 9859 'Operational Safety Management Manual'; sets down the requirement for airports to establish an Operational Safety Management System (OSMS) that ensures that operations are carried out in a controlled manner and that there are continuous improvement procedures for safety levels.
- Spanish Aviation Safety and Security Agency (AESA): responsible for developing the Operational Safety regulation in relation to the requirements that must be met by the OSMS of Spanish airports and their own continuous improvement procedures.
- EU Regulation No. 139/2014 (applicable to both Spanish airports and London Luton Airport), which establishes the administrative requirements and procedures relating to aerodromes, in accordance with Regulation (EC) No. 1139/2018 of the European Parliament and the Council, which establishes in its part ADR.OR.D.005 the need to include, as part of the management system, a description of the operator's philosophy and principles with regard to operational safety, referred to as the Safety Policy, which must be signed by the manager.
- At Aeroportos do Nordeste do Brasil (ANB), the requirements of Annex 19 of the ICAO and the Regulations determined by ANAC (RBAC 153).

Commitment to guaranteeing the highest levels of Operational Safety from senior management, to reduce risks to a sufficiently and reasonably achievable level*

Set out in the

Operational Safety Policy
Approved by the Managing Director of Airports**
Supervised by the Director of Operations



Addresses **operational safety at airport facilities**, adopting a preventive attitude, with the commitment to comply with legal requirements and applicable regulations on the matter, take into account good practices, provide the necessary resources and make operational safety, including crisis situations, one of the main responsibilities of all directors and airport personnel in general.



Active application of a culture of fairness as a tool to improve safety notifications and influence the improvement of the system's performance as opposed to the search for individual responsibilities, except in cases of wilful misconduct or serious negligence.

It has led to the implementation of the **Operational Security Management Systems (OSMS)**, adapted to each airport of the network
Includes the organic structure, lines of responsibility, policies and procedures

- 
 Identifying the organization's weaknesses, classifying their risk level and taking measures to reduce it: identification of hazards, risk analysis and mitigation of risks.
- 
 Analysing and monitoring the operation of the airport globally.
- 
 Having indicators that allow for the monitoring of the security conditions of the airport activity to anticipate possible problems and their solutions.
- 
 Analysing accidents and incidents to define measures that minimize their consequences.
- 
 Creating a culture based on safety through the dissemination of its results and conclusions.
- 
 Improving the airport's overall safety through an operational safety programme with clear objectives.

Operational Security Programme,
to achieve the principle of continuous improvement of the System at each airport



With specific objectives and goals, measured through indexes and indicators (adapted to each airport), which are evaluated and analysed periodically.



These indicators are related to weather, maintenance, the environment, vehicles/drivers or incidents, among others.

* All airports in the Aena network (including AIRM), both Spanish airports as well as the London Luton Airport and those at ANB, have an operational security policy and the corresponding OSMS, procedures, programmes, etc. adapted to their case studies.

** At London Luton Airport, the policy is approved by the responsible manager. In the case of ANB, it is approved by the Board of Directors and CEO of ANB and supervised by the Director of each Airport.

6.1.3. Main actions focused on improving operational safety in 2021

To improve the training of personnel operating vehicles inside the airport complex, driving simulators are being implemented at 13 airports in Aena's network in Spain. In 2021, they were installed at Alicante-Elche Airport, Ibiza Airport, Palma de Mallorca Airport, Valencia Airport and Málaga-Costa del Sol Airport.

At all Aena airports, including London Luton and Aeroportos do Nordeste do Brasil, the new procedure for notifying the conditions of the runway (GRF) has been implemented when the tarmac is affected by water, ice or snow.

In 2021, London Luton Airport made progress in key aspects of operational safety, such as the introduction of shared learning; the creation of the partnerships with directors in the field; the programme for retaining skills for personnel on leave of absence has been continued; as well as the programme for reducing incidents. Aeroportos do Nordeste do Brasil has worked on improving the comprehensive management of operational safety through the formation of local teams, the promotion of training and promotion.

6.1.4. General aeronautical safety audits, checks and drills

In order to continuously evaluate and improve the Operational Safety Management System, the following are carried out:

- **Internal monitoring**, at all Aena network airports, including London Luton Airport and ANB, with the objective of verifying the correct implementation, suitability and effectiveness of the Operational Safety management systems and avoiding the detection of nonconformities arising from external monitoring.
- **External audits**, to ensure that Aena has properly implemented the Operational Safety Management System (OSMS) at each airport:
 - In Spain, conducted by AESA. Generally, the network's airports are visited by auditors an average of 50–100 times per year, visiting Group I airports more often.
 - The London Luton Airport is audited twice per year by the Civil Aviation Authority (CAA) and by the British Standards Institution.

- At ANB, the operational certification inspections are carried out by the Agência Nacional de Aviação Civil (ANAC). At the end of 2021, four airports were in the process of being certified². ANAC carried out a verification inspection of the airport infrastructure at all ANB's airports and sent a document called the 'Airport Characteristics List (LCA [Lista de Características Aeroportuarias])', which will be included in aeronautical publications (AIS).
- **Drills**. In 2021, 28 general aeronautical drills were carried out at Spanish airports in the Aena network³. For its part, London Luton Airport also carries out regular drills, following the scheme established by the CAA. At ANB, no drills have been carried out.

Operational safety
of all airports
EU Regulation
139/2014/national require-
ments Royal Decree
862/2019

² Airports of Recife, Maceió, Aracaju and João Pessoa.

³ Valencia Airport, Salamanca Airport, Adolfo Suárez Madrid-Barajas Airport, Gran Canaria Airport, León Airport, Son Bonet Airport, Ceuta Heliport, Vitoria Airport, Asturias Airport, Fuerteventura Airport, Alicante-Elche Airport, Huesca-Pirineos Airport, Seve Ballesteros-Santander Airport, Logroño-Agoncillo Airport, Tenerife Sur Airport, A Coruña Airport, Ibiza Airport, Palma de Mallorca Airport, Zaragoza Airport, Reus Airport, Sabadell Airport, Algeciras Heliport, Menorca Airport, Albacete Airport, F.G.L. Granada-Jaén Airport, Córdoba Airport, San Sebastián Airport and Melilla Airport

	2020				2021			
	Spanish airport network (*)	London Luton Airport	ANB	Total	Spanish airport network (*)	London Luton Airport	ANB	Total
Internal monitoring (no.)	55	19	-	74	66	36	6	105
External audits (no.)	22	2	-	24	28	7	12	47

(*) Includes AIRM

6.1.5. Other mechanisms to maintain excellent levels of Operational Safety

Emergency Plan

All Aena Airports and Heliports—including London Luton Airport and ANB⁴—have an Emergency Plan (self-protection)⁵ to deal with emergencies arising from the operation of aircraft, as well as those that occur in passenger terminals and other airport buildings and facilities. These plans establish the emergency equipment designated in the airport, as well as its coordination with the teams of the superior Civil Protection plans (local/autonomous) in which the airport plan is integrated⁶.

The plans identify the elements that can generate an emergency, the key dependencies for service continuity, or the coordination procedures for actions to respond to them, evaluating the possible risks (natural, technological or human hazards, etc.), and associating mitigating measures.

These are live documents, which are in continuous update to be able to incorporate any change or improvement that is convenient. In general, they are distributed to all bodies, both internal and external, that are involved or affected by the plan. However, in certain cases, they contain certain information related to safety procedures, the dissemination of which is restricted and separate from the Emergency Plan.

Emergency response is an integral part of the operational safety culture implemented at airports

The emergency plans include the emergency equipment alert mechanisms, as well as the information routes for passengers or other users of the airport facility.

In addition to the emergency plans, the Spanish airport network has an Emergency Drills Plan and Policy, applicable to buildings and facilities as well as to aeronautical emergencies, with which the safety level is reinforced.

⁴ Aena's Airports in Brazil have the Airport Emergency Response System (AERS), which is updated and structured in accordance with the regulations that apply to them. They include the user alert, and communication mechanism and system. In this regard, the airports have, for example, emergency telephones to guarantee immediate communication of possible incidents to agents, such as the fire service or the operations control centre, among others.

ANB also has Procedures for the Removal of Inoperative Aircraft and Unblocking of Runways, procedures for mitigating negative psychological effects derived from an aviation accident, firefighting plans and contingency plans for public health emergencies. All of them are reviewed in the event of a drill exercise, of an emergency that requires the activation of the Emergency Response System, of a significant change in the operational characteristics of the aerodrome or in the event of a transmissible disease at a regional, national and/or international level.

⁵ Updated and structured in accordance with European sectoral regulations (Regulation 139/2014), with Royal Decree 862/2009 in the case of Spanish airports-, the technical instructions of AESA, the standards and recommendations of the International Civil Aviation Organisation (ICAO) and the National Civil Protection regulations.

London Luton Airport has 'Emergency Orders' that define the types of emergency, general procedures, actions by area, etc. This document is available to all stakeholders through the specific communication platform.

⁶ The need to plan the response to emergencies derives from both the requirements established at the sectoral level (airport certification/verification) and Civil Protection regulations (Basic Self-Protection Standard). Taking this into account, Aena has an operating instruction that sets the minimum criteria that airports must meet in relation to emergency plans.

Investigation, handling of accidents and incidents, and corrective actions

The network airports have a procedure for the analysis and communication of accidents/incidents that occur on the airside of the airport or that affect Operational Safety that allows the necessary measures to be established to prevent them from repeating themselves and learning from the experience and lessons learned. When an accident/incident occurs, all the data related to the event must be communicated to the control department that has been established for this purpose⁷.

Airports adopt a best practice model for accident reporting and investigation, with the aim of learning from mistakes and seeking new learning opportunities

Taking into account the logic of each airport, each one identifies possible hazards that may condition operational safety, analyses possible risks and implements the corresponding mitigation measures. By using an Operational Safety Communication Procedure, a system is established that allows internal and external communications, queries and complaints in this area, and provides a specific internal communication channel.

At Aena Spain, the dissemination of lessons learned is carried out within the framework of the Operational Safety conferences, the dissemination of Operational

Safety Bulletins and the development or improvement of specific procedures, if applicable.

At London Luton Airport, employees have participated in the *Safety differently* (tours and visitors) training, which promotes a proactive methodology and is focused on learning based on opportunities (prevention).

Total airport incidents indicators			
	Aena	London Luton Airport	ANB
2020	631	141	20*
2021	718	96	16

*Runway incursions and excursions are considered.

Equipment accident indicators (ACI TYPE D)			
	Aena	London Luton Airport	ANB
2020	315	60	-
2021	372	26	14

Motion incident indicators (ACI TYPE B)			
	Aena	London Luton Airport	ANB
2020	116	0	2*
2021	134	0	4

*Both incidents were minor

Ensuring third-party operational safety

To ensure compliance with Operational Safety Regulations by all those operating at airports, through clauses included in contracts with external suppliers, the following are required, among others:

- have a person in charge of Operational Safety;
- ensure the knowledge and application of regulations in the matter, provide the airport with the necessary information regarding its activity; and
- maintain continuous collaboration with the Director of the file, as well as communicate accidents/incidents.

These relate to clauses that must be complied with and that must be included in contracts that may affect operational safety in some way (such as the provision of specific services, acquisition or installation of equipment or systems that intervene in the area of movement, may affect the aerodrome protection area, interfere with the operation of aeronautical services, cause any alteration in physical or operational characteristics, etc.). Furthermore, at London Luton Airport, these providers are given access to publications related to Operational Safety through the airport's own Management Portal,

⁷ In this regard, the Company has a 24-hour network management centre for operational incidents, CGRH24, which continuously monitors the operational status of the entire Airport Network, coordinated with SYSRED (ENAIRES) and the incidents affecting flight operations, in addition to generating the corresponding monitoring reports. In the case of London Luton Airport, all accidents, incidents and corrective actions are reported through their own system, following their specific accident and incident management procedure, similar to that followed in the case of occupational health and safety accidents. Aena's Airports in Brazil have the Airport Emergency Response System (AERS), which is updated and structured in accordance with the regulations that apply to them. They include the user alert, and communication mechanism and system. In this regard, the airports have, for example, emergency telephones to guarantee immediate communication of possible incidents to agents, such as the fire service or the operations control centre, among others.

and they must, in turn, provide information related to Operational Safety and cooperate with the airport in all of these aspects.

In the Spanish network, during 2021, the supplier monitoring mechanisms were improved by updating the control procedure for external suppliers, which establishes the mechanisms to ensure compliance with the Operational Safety objectives established in the airports' OSMS to external suppliers.

Staff training

Operational Safety training is determined based on the identification of skills and detection of needs.

	Aena/AIRM	ANB	Total
Number of employees ⁸	2,372	155	2,527



⁸ At London Luton Airport, the training provided for external personnel has been postponed. However, teams' skills have been tracked in this regard to ensure their functions are properly executed.

6.2. Airport security

Maintaining the highest level of safety at airport facilities is one of the main objectives that guides the Company's actions in this area.

To this end, Aena implements surveillance systems and implements specific measures, preventing acts of illicit interference and encouraging continuous improvement.

Aena guarantees the safety and protection of passengers, the general public, crews, aircraft, ground personnel, and airports and facilities in general, beyond the minimum established by the corresponding authority

6.2.1. Airport Security Objectives in 2021

With regard to the general objectives, all airport security measures are aimed at guaranteeing operation with the highest levels of security for people and property:

- **Security Equipment:** supply of inspection equipment, as well as access control systems and CCTV in accordance with the regulations and needs of the airports⁹.
- **Analysis and monitoring of the Private Security service.** In addition, the private security companies at London Luton Airport are subject to audits, both by the CAA and internally.

- **Quality Control:** verifications and tests covering the application of security procedures, the preparation of reports and the monitoring of corrective action plans.
- **Training:** development of courses for airport security officers, at both Spanish airports and London Luton Airport.
- **Regulations:** participation with AESA, or with ANAC in the case of ANB, in different working parties and in the planning of tasks to be included in the permanent committees of the national security committee along with the other stakeholders involved. By way of example, as a result, ANB has collaborated in the preparation of the Manual of the civil aviation security management system against acts of illegal interference, which will serve as a guide for other airports in Brazil.

In addition, at London Luton Airport, the main security objectives in 2021 have been to achieve good scores with regard to the control of compliance by the CAA, the projection of images of threats and hidden tests, objectives that have been achieved.

6.2.2. Main actions focused on improving airport security in 2021

The main actions in the Spanish network include:

- Tests of new technology (EDS-CB and Remote Screening) in the Sevilla Airport and Adolfo Suárez Madrid-Barajas Airport.
- Tender for new private security files appropriate to the operational reality as a result of the COVID-19 pandemic.
- Collaboration with the new AESA VS certification programme.
- Implementation of the Drone Threat Protocol.
- Collaboration in the development of cybersecurity regulations in the AVSEC environment.
- Moreover, ANB has proceeded to:
 - Improve operating barrier facilities at the airports of Recife, Juazeiro do Norte and Aracaju.
 - Deploy weapons disassembly boxes.
 - Improve airport security signage and visual notices at ANB.
 - Accreditation 4.0 – Implementation of an online accreditation system modifying the flow of services in the airport accreditation sector starting to operate remotely.

⁹ At London Luton Airport, according to the Department for Transport (DfT), which certifies the equipment that can be installed at airports in the United Kingdom.

FACTORS ON WHICH AIRPORT SECURITY DEPENDS

Airports subject to national and international reference regulations (contains guidelines for the structural design of airport infrastructures with the aim of defending against and preventing acts of illicit interference)	AENA SME AIRM	ICAO: Annex 17 to the Chicago Convention of 1944: establishes the general rules and recommendations on security for air transport.	ECAC: European Civil Aviation Conference (ECAC): Document 30, which establishes safety recommendations for air transport at the European level.	COMMUNITY: Regulation (EC) No. 300/2008: Establishes common civil aviation security rules, which are mandatory in all States belonging to the European Union. Implementing Regulation (EU) 2015/1998: establishes detailed measures for the implementation of the common basic standards, thus developing Regulation 300/2008.	NATIONAL: Act 21/2003, of 7 July, on Aviation Security: establishes the legal regime for aeronautical inspections and obligations regarding aviation security, including the adoption of the National Security Programme (NSP) for Civil Aviation. Royal Decree 550/2006. Designates the Competent Authority, responsible for coordinating and monitoring the National Security Program for civil aviation. It also determines the organisation and functions of the National Security Committee.	National Civil Aviation Security Programme (PNS [Programa Nacional de Seguridad]) It establishes the organisation, methods and procedures necessary to ensure the protection and safeguarding of passengers, crews, the public, ground personnel, aircraft, airports and their facilities, against acts of illicit interference.
	LONDON LUTON AIRPORT		ANAC: Brazilian Civil Aviation Regulation No 107- Civil aviation security in the event of acts of illicit interference - Aerodrome operator. This regulation applies to the operator of the public civil aerodrome, shared or not, whose responsibilities related to the security of civil aviation against acts of illegal interference (AVSEC) are provided for in Article 8 of the National Civil Aviation Safety Program against Acts of Illicit Interference (PNAVSEC).	NATIONAL: Decree No. 7,168, of 5 May 2010 - National Civil Aviation Security Programme against Acts of Illicit Interference (PNAVSEC).		
	AEROPORTOS DO NORDESTE DO BRASIL					
Qualified staff	AENA SME AIRM	State Security Forces, Civil Guard and National Police Corps.	Autonomous and/or Local Security Forces.	Private Security Personnel, hired by Aena.	Security personnel of the airport itself.	Aena coordinates and collaborates with all groups involved in security to ensure its effectiveness and efficacy.
	LONDON LUTON AIRPORT	UK Security Services, Department of Transportation, CPNI.	Counter terrorism police.	Regional and Airport Police. Civil Aviation Authority (inspection).	Airport Security Department.	
	AEROPORTOS DO NORDESTE DO BRASIL	Federal Police, AVSEC Security Sector of ANB and its security subcontractors.		AVSEC Security Sector of ANB and its security subcontractors.	AVSEC Security Sector of ANB and its security subcontractors.	
Existence of technical resources	AENA SME AIRM	Perimeter security.	Integrated access control and CCTV systems.	Inspection equipment for people and screening machines for baggage, packages or bags.	Procedures (employee inspection, accreditation of individuals, vehicle authorisation, etc.).	
	LONDON LUTON AIRPORT	CCTV System.	Access Control System, vehicle access regime and ANPR.	Security systems to control access of people, transported objects, vehicles and cargo (screening).	Airport security plan, employee inspection, CAA-accredited training, general awareness, vehicle access control, security management systems (SeMS).	
	AEROPORTOS DO NORDESTE DO BRASIL	Perimeter security and protection infrastructure, including CCTV, security barriers, surveillance and ground personnel.		Civil Aviation Protection Agents, Gates and Security Guards, access control systems and systems for the inspection of persons and belongings including detection equipment.		

Airport Security at Aena focuses on the implementation of different measures:

- Communication and collaboration between all the agencies and groups involved.
- Surveillance of vulnerable areas of the airport.
- Control of the movement of persons and vehicles at the accesses to restricted security areas.
- Inspection of persons and property.
- Creation and update of the measures of the Airport Security Programme¹⁰.

In addition, in the event of an act of unlawful interference (AUI), the National Security Programme provides for specific measures to be applied. Thus, among the most representative AUIs, such as aircraft kidnappings or bomb threats, the airport is required to have the necessary resources for proper management, which will also be linked to the airport Emergency Plan.

For its part, ANB participates in the Brazilian Aviation Security Team (BAsE), as an active member, with the objectives of:

- Planning and guiding the civil aviation sector through the definition of an agenda of national actions and projects against Acts of Unlawful Interference under Civil Aviation Security (AVSEC), in accordance with the Global Aviation Security Plan (GAsEP), instituted by the International Civil Aviation Organization (ICAO);

- Promoting collaborative interaction, producing technical material and developing joint AVSEC projects between the Brazilian National Civil Aviation Agency (ANAC),¹¹ its regulators and other interested parties.
- To enable the collection and exchange of information, data and indicators by the agents of the sector, in order to provide a better analysis, diagnosis and definition of goals for the AVSEC system.

Airport Security RE 2017/458

100% of Aena's international airports with Schengen border (the border security force complies with this RE on behalf of London Luton Airport)

Airport Security RE 300/2018, 2015/1998 and the National Security Programme for Civil Aviation (PNS)

100% of Aena's airports in Spain (London Luton airport with RE 300/2008 and SCD 2/2019)

6.2.3. Excellent Airport Security Levels¹²

Airport Security Training

Aena carries out training and awareness activities in matters of Airport Security, aimed at employees who require access to airports:

	AENA	AIRM	LLA	ANB	Total
Number of employees	1,584		37	94	1,716

Airport Security Audits, Verifications and Drills

In accordance with the regulations, Aena is immersed, every year, in an airport security audit process conducted by the European Commission and AESA—in the case of Spanish airports—or by the CAA and external suppliers (in the case of London Luton Airport), and at Aeroportos do Nordeste do Brasil by the ANAC.

- Spain: in 2021, 37 external audits were carried out by AESA, and 35 internal verifications.
- London Luton Airport: conducts, on a daily or weekly basis, its own quality control audits, by checking the documentation and individual evaluations of security officers. All of this is supported by visits from the CAA auditor (not announced) who verifies compliance with the requirements of SCD 2/2021. In the event (not announced) in 2021, the Airport received 98% compliance.

¹⁰ Aena has at its disposal, in its Security Management System, specific procedures and measures—created in collaboration with the competent authorities—to facilitate compliance with the applicable regulations and maintain the highest levels of Airport Security. These procedures are not made public in order to safeguard the information.

¹¹ ANAC - National Civil Aviation Agency is a federal regulatory agency whose responsibility is to regulate and supervise the activity of civil aviation in Brazil.

¹² Regarding the management of detected risks and the handling of accidents and incidents in matters of Airport Safety, is restricted due to the participation of State Security Forces, as well as the Air Force.

- ANB: 11 internal verifications have been carried out in 2021, and 4 external audits by ANAC.

With regard to the carrying out of drills, the airports in the Spanish network comply with regulations to guarantee appropriate training in the event of an emergency¹³. London Luton Airport also carries out regular airport security drills, the next one scheduled for February 2022, in accordance with the CAA, as a compliance alternative. At Aena Airports in Brazil in 2021, 2 drills were carried out at Recife Airport in compliance with current regulations and with the objective of measuring all security processors with AVSEC security topics interface.

6.2.4. Ensuring third-party operational safety

To ensure compliance with airport security regulations by all those operating in airports, all the files of works and supplies, whether or not they have a direct impact on security, must include a specific clause by which the contractor undertakes to adopt a series of measures that ensure compliance with current regulations on the subject, how to ensure the knowledge and application of regulations, or have an Airport Security officer. The clauses also include the corresponding contractual penalties in case of infringement.

In addition, as part of the London Luton Airport Audit Programme, designated operators, suppliers and others can be audited to ensure standards are met.

For its part, ANB requires companies that perform activities that may affect airport security to prepare a Security Plan for the Auxiliary Services Company or Operators of the Airport Area (PSESCA [Plan de Seguridad para Empresa de Servicios Auxiliares u Operadores del Área Aeroportuaria]).



¹³ The drills for acts of illegal interference that are recorded in the National Security Program for Civil Aviation are regulated by security instruction SA-19, which records those aspects that do not depend on the airport manager and that need to be reported.

6.3. Cybersecurity or information security

Aena has an Information Security Management System certified according to ISO 27001:2013¹⁴ that allows effective protection of assets and information, capable of guaranteeing information security and avoiding the occurrence of possible related incidents and the potential threat of cyberattacks.

6.3.1. Management and commitment model

The Information Security Policy¹⁵, approved by the Board of Directors and available on the Organisation's website and intranet, aims to ensure the efficient and dynamic protection of information through a preventive, detective and reactive approach¹⁶.

Aena has implemented policies, rules and procedures for all employees, hired companies, collaborating companies and customers in order to ensure awareness of information security risks and threats.

Aena approved its first Cybersecurity Plan in 2018. In 2021, after conducting an analysis of the achievements achieved, the new Strategic Information Security Plan 2022–2026 was approved, which defines actions in the

following processes to achieve the objective level of security:

- Information Security Governance.
- Internal Safety Regulations.
- Information Security Awareness.
- Asset Management.
- Vulnerability Management.
- Security Incident Management.
- Monitoring Management.
- Management of Users.
- Security Operations.
- Communications Security Architecture.
- Information Systems Architecture.
- Security in Application Development.
- Security in Relations with Suppliers.
- Security in Cloud Environments.
- Safety Regulatory Compliance.
- Resilience.
- Safety in Industrial Environments.
- Cryptography Security.
- Physical Security.

Similarly, a governance cybersecurity structure has been created, consisting of the creation of the Cybersecurity Division, with the hiring of a Chief Information Security Officer (CISO), and the appointment of a person in charge of GRC (Government, Risk and Compliance) and Security Architecture, providing the function with more internal and external resources.

Bodies responsible for the implementation and operation of the Cybersecurity Plan:

- The Board of Directors and senior management actively participate in the review process of the Plan¹⁷.
- The Management Committee and the Information Technologies Division¹⁸ are responsible for promoting and supporting the establishment of technical, organisational and control measures that guarantee the integrity, availability, confidentiality, authenticity and traceability of computer assets. This is done in order to avoid their possible alteration, destruction, theft, copy, counterfeiting and other existing threats, whether or not these are accidental. They are also responsible for the training and awareness actions that are necessary to guarantee the success of the aforementioned measures.
- At the operational and management level, Aena has the role of the CISO and the Information Security Manager (ISM).

¹⁴ London Luton Airport is in the process of implementing the ISO 27001 planned for 2022, and moving forward to comply with the new NIS Information Security Directive.

¹⁵ Both London Luton Airport and Aeroportos do Nordeste do Brasil have their own Information Security Policy, which complies with the standards established by ISO 27001, supervised by the Director of the Financial Office and the Council respectively, and accessible to all employees through the intranet.

¹⁶ Employees are obliged to know, assume and comply with the Policy, regulations and safety procedures in force, as well as to maintain professional secrecy about the data they handle in the exercise of their work activity. Possible safety incidents must be communicated by them through the reporting channels established for this purpose.

¹⁷ At the Board level, the independent director Leticia Ortiz is responsible for these matters; she also has experience in the matter.

¹⁸ Specifically, the Head of the Cybersecurity Division.

6.3.2. Measures to ensure the effectiveness of the Cybersecurity Plan¹⁹

To ensure the achievement of the objectives of the Plan and of the transformation processes, operating models and ICT services by all those involved, measures of different natures are developed, based on:

Training

Focused on facilitating the development of new capabilities, both at the management and technological levels. To this end, an awareness plan has been designed that accompanies all the people involved (functional as technicians), in the transition to a new operating model and in the use of new technological tools. Likewise, periodic awareness activities are carried out, by sending emails or publishing information in the corporate Newsletter.

Provision of a procedure for employees to follow in the event of an incident

In accordance with the provisions of the Information Security Policy, Aena has a procedure for action to be used by employees (internal or external) and companies (hired or collaborating) in case of any event or incident in the area of cybersecurity, consisting of communicating it to the support centres or Computer Security Incident Response Team (CSIRT).

For their part, London Luton Airport employees can contact the IT Service to report this type of incident.

The manifest breach of the safety regulations may entail the corresponding disciplinary measures and, where appropriate, the legal responsibilities that may arise.

Contingency plans and incident response procedures

Aena has implemented an ICT Security Incident Response Centre (ICTSC) which provides information security incident management services, monitoring of corporate systems, review of the security rules and controls implemented in the systems that manage security and contact points with the entities of interest 24x7x365.

Likewise, the aforementioned Strategic Information Security Plan 2022-26, like the previous Plan, includes both continuous improvement measures in the area of contingency and/or incident response, as well as new necessary measures against the new risks detected.

For its part, London Luton Airport tests the *Disaster Recovery Plan* for critical systems annually. In 2022, the development of incident response plans for critical IT systems and services is planned.

External verification and vulnerability analysis

Periodically, ICT and Cybersecurity Management conduct compliance audits, hacking (IT and OT), applications, and penetration test (*Pentesting*), to verify the security of ICT infrastructure and information security management systems (ISMS), and to evaluate the level of security maturity at Aena.

At the same time, *Red Team* exercises are carried out, simulating targeted Hacking-Ethics attacks, where different hybrid methods are used to compromise the infrastructure in order to correct possible weaknesses.

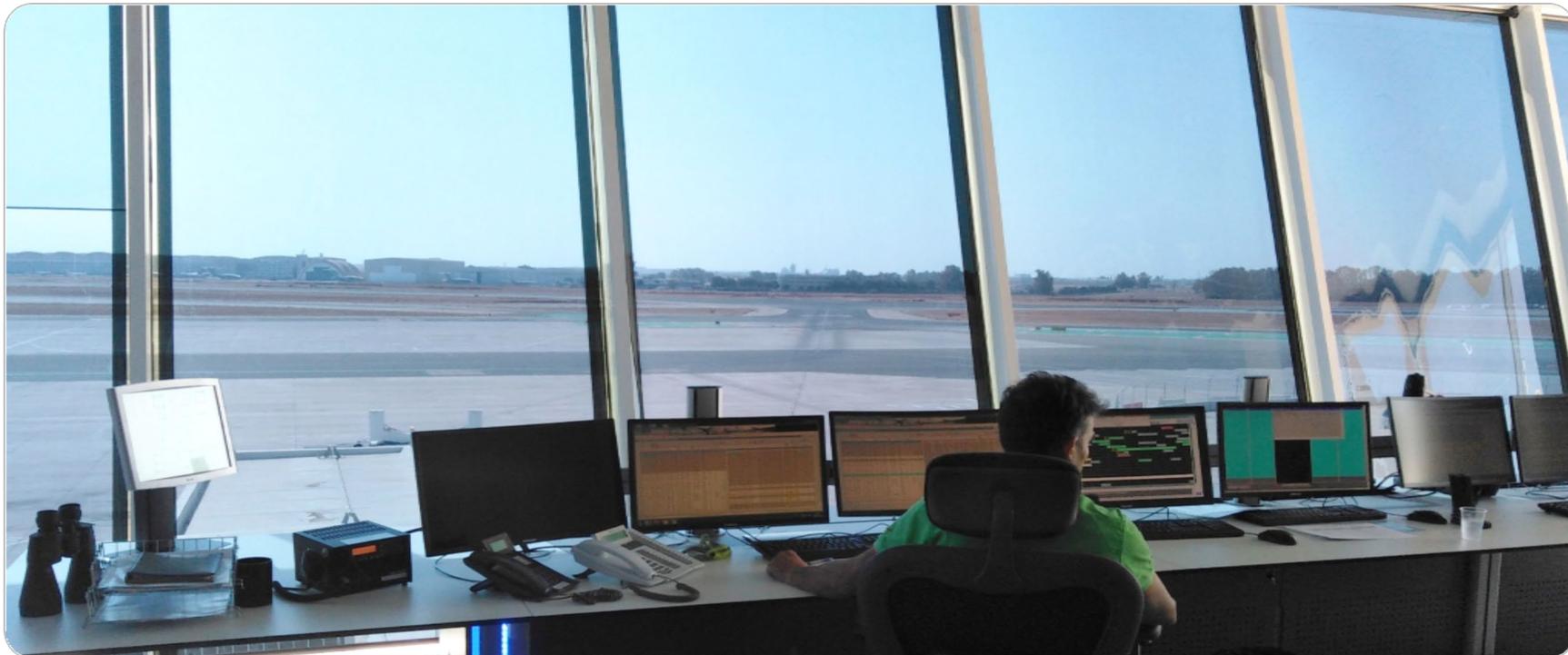
At London Luton Airport, the IT infrastructure is tested twice a year by an independent external company, proposing and carrying out the corresponding corrective actions.



¹⁹ Framed in the 2022 Security Plan, ANB is in the process of acquiring the SIEM tool, which allows for recovery and normalisation in case of events; applications (such as firewalls, proxies, intrusion prevention systems (IPS) and antivirus, etc.) that facilitate rapid identification and response to possible events; as well as the Identity Management tool, which will ensure that access is consolidated in a single location. During 2021, no external audits were performed, nor were cyberattacks simulated.

Cybersecurity Gaps

	Aena, ADI and AIRM	London Luton Airport	ANB	Total
Information security breaches or other cybersecurity incidents (no.)	0	0	0	0
Data breaches (no.)	0	0	0	0
Employees/customers affected by such violations (no.)	0	0	0	0
Cybersecurity breach/violation fines	0	0	0	0



6.4 Health safety

In 2021, the measures implemented to guarantee Health Safety during the first months of the pandemic have been adapted to the epidemiological situation of the moment and the requirements set by the health authority, maintaining the priority of minimising the possibility of contagion.

Thus, measures such as the installation of barriers in certain areas of the airport, the reinforcement of cleaning and disinfection services and the monitoring of social distance in areas where people may concentrate, etc., have been joined by others such as the delivery of certifying documentation or the incorporation of COVID-19 diagnostic testing clinics at airports.

To facilitate the familiarisation of all users of this new protocol, its implementation has been reinforced with signage and notices by public address system, authorisation of a specific website for each airport, etc.

This effort has been internationally recognised.

- Aena has achieved the secure airport accreditation from the *Airport Health Accreditation (AHA)* programme for the 46 airports in its network and has obtained the maximum score of five stars for six airports in the 'COVID-19 Safety Ratings' programme from the prestigious consultant *Skytrax*.
- Adolfo Suárez Madrid-Barajas Airport, Barcelona-El Prat Josep Tarradellas Airport and Alicante-Elche Airport have received the COVID-19 Airport Excellence Awards from Skytrax.

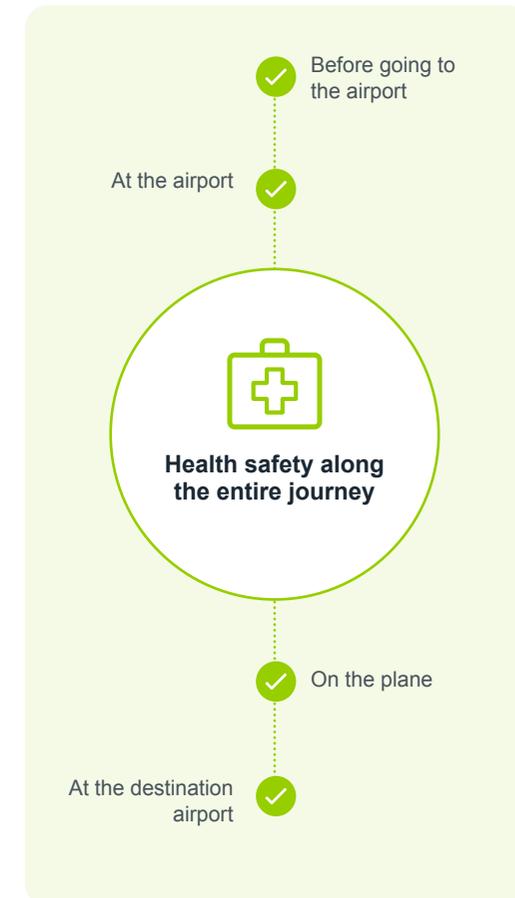
- Alicante-Elche Airport, F.G.L. Granada-Jaén Airport, Menorca Airport, Seve Ballesteros-Santander Airport, Región de Murcia International Airport and Pamplona Airport have received the award for the 'Best Hygiene Measures' in Europe, granted by the Airports Council International (ACI), for the sanitary measures implemented by Aena throughout the airport network against COVID-19.

The AHA programme of the airports has been part of the 'Aena Safe Airport Standard' project, the main objective of which has been to guarantee the suitability of the measures implemented in the Operational Recovery Plan and to seek their efficiency and effectiveness. This standard has been created based on the opinions and comments of passengers, the assessment of other international organisations such as Skytrax, etc.

At the same time, improvement plans have been proposed and new lines of work have been studied to ensure that passengers feel safe and adequately value the measures. There have also been visits to other European airports for the adoption of best practices.

On the other hand, a new corporate strategy has been developed at London Luton airport that provides a solid recovery plan after the COVID-19 pandemic. In addition, all areas have been reviewed to allow the COVID-19 restrictions to be applied with a minimal interruption of the passengers' experience; multilingual advertisements have been integrated into the COVID-19 restrictions in the automated system of public address system advertisements; and reorganisation of the seats to maximise space and maintain social distancing measures, etc.

Along the same lines, ANB has implemented actions and measures such as reducing capacity in communal areas.

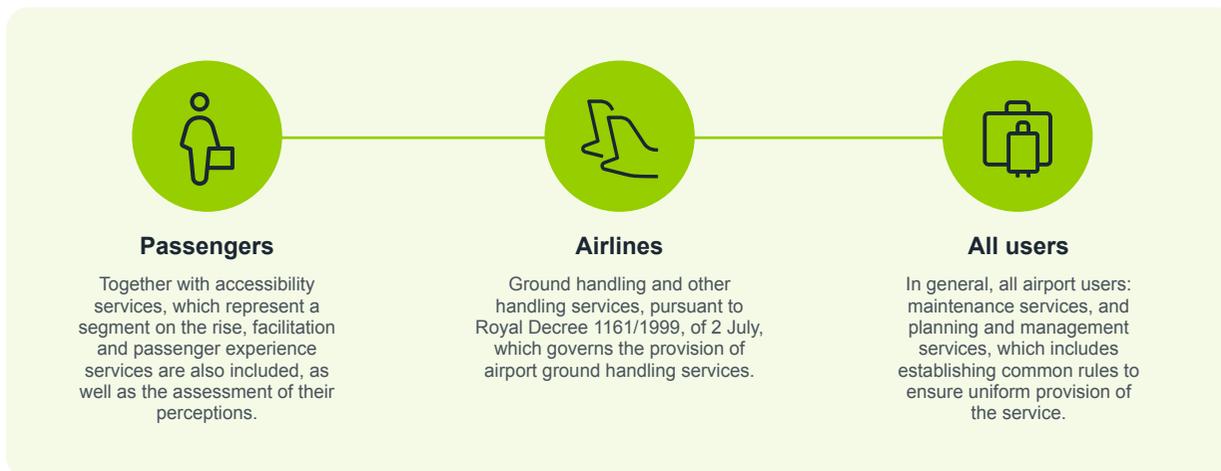


6.5. Dedication to service

With the aim of offering an experience of the highest quality Aena, mainly through the area of services,

maintenance and airport quality, it puts the focus on the customer (passengers, airlines, and any user of airports) and adapts, improves and continuously customises its services to their needs. In this continuous

commitment to excellence, sustainability, innovation and digital transformation play a fundamental role.



SERVICES, MAINTENANCE AND AIRPORT QUALITY RESPONSIBILITIES

- Maintenance of facilities with maximum efficiency, enhancing best practices.
- Service planning and management, with common rules for the different airports.
- Ground handling, with common rules for the different airports.
- Passenger facilitation and experience: measurement of perceptions and tracking of passenger expectations.
- Accessibility: coordination and guidelines to serve persons with reduced mobility uniformly in all airports.

6.6. Quality management

The organisation's primary objectives are to meet the highest levels of excellent service quality, and ensure the satisfaction and best service of all users, and this is what is proposed in the company's main planning instruments:

- The Strategic Plan 2018–2021, which is based on four axes:
 - Recovery plan
 - Sustainability
 - Future expansion
 - Capacity building
- London Luton Airport Responsible Business Strategy 2020–2025.
- ANB Service Quality Plan (PQS [Plan de Calidad de Servicios])²⁰ and Airport Exploration Plan (PEA [Plan de Exploración Aeroportuaria]).

The definition of these instruments takes into account current regulations and reference frameworks for decision-making, management systems, corporate policies and procedures, as well as mechanisms for communication with all users.

As a result, the different actions that the Company carries out each year are defined for the improvement of the facilities and their maintenance, as well as for the continuous optimisation of processes, all with a focus on customers and the services provided.

SECTIONS

→ Company Strategic Plan

Basic pillars: New DORA, environmental and social sustainability, development of new business lines, international expansion and new technological capabilities.

→ Aena Strategic Airport Maintenance Plan

Includes a specific line focused on the use of common tools that allow a preventive maintenance plan to be carried out and quality to be improved.

→ Responsible Business Strategy 2020 for London Luton Airport

Includes a strategic line aimed at 'Delivering an excellent customer experience' with seven specific objectives.

→ The Service Quality Plan (SQP) → ANB Airport Exploration Plan (AEP)

These plans inform all the actions, responsibilities, plans and procedures that define ANB's strategy to comply with the requirements of the Concession and Service Quality Contract.



- Current regulations (internal and external)
- Management systems
- Corporate procedures



Measures and situations for the improvement and maintenance of the facilities (training, services for people with functional diversity, technological improvements)



- Satisfaction surveys
- Complaints and claims
- Activity data

²⁰ In 2021, ANAC approved ANB's Service Quality Plans for the Airports in Recife, Maceió, João Pessoa and Aracaju.

6.6.1 Main applicable regulations and measures developed to improve the quality of the services

Airport Regulation Document (DORA)

At Spanish airports, since the approval of the first Airport Regulation Document (DORA [Documento de Regulación Aeroportuaria] 2017–2021) in 2017, efficiency and progress in managing the airport network have resulted in an improvement in the services provided to passengers and their companions, as well as to airlines.

In 2021, with the approval of DORA 2022–2026²¹, the conditions and the tariff path that must be met at the airports of the Aena network for the next 5 years in terms of quality and environment, capacity and investments are established. Among the strategic objectives that will guide Aena's performance in the 2022–2026 period, the following stands out:

- The recovery of traffic and the efficient management of the airport network in terms of safety and quality.
- Environmental sustainability as the backbone of the actions.

The new DORA updates the goals and objectives established (qualitative and quantitative) in terms of quality, demanding and competitive.

The objectives of a qualitative nature include:

- Efficient management of the airport network in terms of safety and quality.
- Environmental sustainability as the backbone of the actions.
- Innovation as an essential piece for efficiency and quality in the provision of the service.

At a quantitative level, for example, in the case of Aena airports in Spain, seventeen quality indicators are established that will allow us to measure aspects such as:

- Cleaning at the airport (restrooms and terminal).
- The correct orientation of the passenger.
- The collection of your baggage.
- The comfort in the boarding areas and the accessibility of persons with reduced mobility (PRM).
- Security at the airport.
- The availability of infrastructure.

For the first time, six environmental sustainability indicators aimed at reducing CO₂ emissions, efficiency in resource use, waste recycling, etc. are included.

The fulfilment of these objectives is verified through a report issued by AESA. Based on the level of compliance, bonuses or penalties are established in accordance with the rates that remunerate the services provided by Aena.

The budgets, approved annually by the Board of Directors, contain the planned actions in terms of quality. These actions include both those required by regulations (the DORA or the concession agreements) and those that

have been detected and contribute to improving the quality of services.

The ANB Service Quality Plans include Administrative Instructions to support and guide the teams directly and indirectly involved in the services provided, and to allow measurement and monitoring of quality indicators, as well as to evaluate the results achieved and plan and implement actions for the continuous improvement of the operation.

The Service Quality Indicators (SQIs) include the following aspects:

- Direct services;
- Availability of equipment;
- Installations on the airside;
- Passenger satisfaction survey.

Integrated Quality, Environmental and Energy Efficiency Management Policy

At an internal level, some of the principles of the Integrated Quality, Environment and Energy Efficiency Management Policy of Aena and ANB include offering interested parties excellent infrastructures and services, using and enhancing the knowledge existing within the Company, innovating and assimilating progress in new technologies. Through it, they ratify their firm commitment to excellence in the management of the services provided, with the aim of promoting the safe, effective and sustainable development of air transport, and maintaining excellent results for the organisation's stakeholders over time.

²¹ Second Airport Regulation Document (DORA 2021–2026), approved by the Council of Ministers. It stems from Act 18/2014, of 15 October, approving urgent measures for growth, competitiveness and efficiency.

Aena's integrated quality and environmental management system

Aena's Integrated Quality and Environmental Management System, implemented and certified in accordance with the ISO 9001 and ISO 14001²², international standards, constitutes the internal reference framework for the development and provision of the different services that are provided at the airports managed by Aena, both in Spain and Brazil.

For London Luton Airport, its quality standards are designed taking best practices into account, with the aim of going beyond what is established by the European Civil Aviation Conference, ECAC. Thus, the Airport has been accredited by the *Airport Service Quality* programme of the ACI, achieving Level 1.

Collaborations with third parties

The procurement specifications include certain specific contractual conditions to guarantee the quality of the contracted product or service²³. There are also collaboration agreements established with some suppliers, projects that take the form of alliances in which Aena and the collaborating companies explore and develop tools to satisfy the demands that have been detected, but for which a clear response has not been identified on the market.

Quality is also a key element in the selection criteria for bids made by the London Luton Airport. Only vendors ex-

ceeding minimum quality thresholds (determined by specific KPIs) can access the final tender round. During the process of implementing services, using key performance indicators, the suppliers' work is overseen and monitored, serving as the basis for improving efficiency and the service provided. At ANB, the operational efficiency project aims to establish a Service Level Agreement (SLA) in which the contracts define parameters and conditions that ensure operational efficiency, taking into account the demand, processing times and quality indicators of the services offered to passengers.

These mechanisms favour the future viability of the most innovative suppliers and, above all, guarantee a quick and effective response to the demands of customers and users.

With some suppliers, collaboration contracts are agreed to develop tools focused on improving satisfaction and detected demands.

Training

Aena provides specific quality training aimed at employees. During 2021, work was done on the creation of the course 'Introduction to the Passenger Experience', which is expected to be completed by all Aena personnel during 2023.

London Luton Airport also has a specific platform focused on promoting teamwork and proactive interrelation between the different areas. It is valued that the employees

who work in areas with direct customer service and treatment develop skills related to empathy, patience, etc.

At ANB, instructions have been drawn up to guide the teams in terms of service quality, and through virtual meetings and the transparency of Senior Management, the direct involvement of employees in defining strategies, objectives and results is promoted. During 2021, new actions focused on awareness were provided to promote better service, receive feedback from users, and guarantee quality and safety standards, as well as continuous improvement.

Training to improve the quality of services²⁴

	AENA, AIRM, ADI	ANB	Total
Customer experience training* (No. of employees)	164	160	324
Training in Environmental Awareness* (No. of employees)	782	60	842
Training in Quality and Environmental Management System* (No. of employees)	43	-	43

²² Certification under ISO standards is scheduled at Aeroportos do Nordeste de Brasil in 2022.

London Luton Airport is certified in accordance with ISO 14001, 45001 and 50001 regarding environmental management, occupational safety and energy.

²³ See Chapter 4.

²⁴ London Luton Airport took 12 courses in 2021.

6.6.2. Infrastructure accessible to everyone

Aena ensures universal accessibility to its facilities and offices, guaranteeing their use in terms of comfort, safety and equality for all people, and paying special attention to satisfying the requirements of people with special needs; integrating them into daily airport activity and eliminating any type of barrier to mobility, communication and understanding.

Mobility and passenger assistance

Airports offer high-quality, personalised and free services for persons with reduced mobility (PRM)²⁵. Assistance is provided throughout the entire journey through the airport's facilities, (departures, arrivals and connections) as well as in the different processing points to be followed (check-in, security checks, boarding and disembarkation, baggage collection, transfers to the terminal, placement in the assigned seat of the aircraft, etc.).

In 2021, as a consequence of COVID-19, high hygienic and sanitary requirements have been maintained. Also, the need for PRM passengers to request assistance sufficiently in advance has been maintained, thus guaranteeing the availability of resources necessary for the provision of the services and favour the organisation of the resources available for its execution. To ensure that the assistance is provided with adequate levels of quality and hygiene within the established times, it is

important that the passenger makes the service request sufficiently in advance of the flight and specifies their needs, as well as that they arrive at the airport on the day of the trip with the advance notice indicated by the assistance²⁶.

In 2021, the Service was tendered at twelve Spanish airports. In order to offer the highest quality in the provision thereof, the awarded companies must meet very precise requirements regarding the assistance offered, the necessary technical and human resources, the response times, the training of the staff or the attention and treatment so that the passenger with mobility problems is properly attended to. Aena will carry out a detailed monitoring of the care provided to ensure the continuous improvement of the service and the quality levels perceived by the user.

The PRM Service, also known as 'Without Barriers', is the best rated by passengers based on periodic surveys conducted at the Spanish airports of Aena, with a score of 4.9 out of a maximum of 5.

	2020				2021			
	Aena	AIRM	London Luton Airport	ANB	Aena	AIRM	London Luton Airport	ANB
PRM requests (no.)	517,115	3,704	35,685	5,105	716,076	3,165	25,232	5,470

²⁵ The Assistance Service for Persons with Reduced Mobility should be requested only when it is necessary, since requesting it when it is unnecessary may have an impact on the quality offered to people who really need it.

²⁶ In the case of Spanish airports, the most appropriate way to request assistance for PRM is through the airline or travel agent when making the reservation or purchasing the tickets. However, it is also possible to do so through Aena's website, through Aena's Information and Care Service (+34 91 321 10 00) or through Aena's mobile device App. To ensure that the assistance is provided at adequate quality levels, and within the established time frames, it is very important to specify the passenger's limitations, make the request at least 48 hours prior to the flight, and ensure that on the day of the trip the passenger arrives at the airport and notifies their arrival at least two and a half hours in advance. In relation to London Luton Airport, bookings can be made as explained on their website. At ANB, the service can be requested through the private link enabled for each of the six airports. See section 'About this report – Links of interest'.

Throughout 2021, work has continued to provide the best service to people with Autism Spectrum Disorder (ASD).

The consolidation of the proposal at the Málaga-Costa del Sol Airport, César Manrique-Lanzarote Airport and Tenerife Sur Airport²⁷, where operational and training measures of the different groups in contact with passengers have been designed and implemented, has served as the basis for starting work at the corporate level with the aim of trying to homogenise and optimise the programme at other airports. In support of this activity, the company maintains its line of collaboration with entities such as CERMI and the Spanish Confederation of Autism, to jointly analyse and evaluate the accessibility needs to public services, transport and tourism of this group.

Specifically, together with Spanish Confederation of Autism, we collaborate in the development of tools accessible to this group, such as social scripts, that offer sufficient information so that people with ASD can know in advance the main challenges they may face when travelling by plane. In this regard, awareness-raising activities have been carried out in order to provide the different groups working at the airport with simple recommendations when interacting with the passengers with ASD.

At the same time, actions are being carried out to improve the experience of passengers with disabilities while traveling to the airport. For example, in several of the Spanish airports, there are toilets adapted to the

needs of passengers carrying ostomy devices or low sensory stimulation rooms have been created for passengers with ASD.

London Luton Airport has created an accessibility forum, facilitating access to help and support for the local community and users who need special help²⁸

At London Luton Airport, the focus of the 'hidden disabilities' is, on the one hand, on employee training; and, on the other, on work developed from the Accessibility forum members, an accessibility work group in which representatives of social entities related to functional diversity (Alzheimer's, autism, auditory disability, etc.) are present. In 2021, a total of four Accessibility forum members meetings were held, focused on the new PRM service provider, Wilson James, which are used to update the progress of the DART (Direct Air to Rail Transport) project.

At ANB, training was carried out so that employees could recognise the main ways of providing assistance to Passengers with Special Needs for Assistance, and activity and assistance to passengers with reduced mobility, with a focus on the quality of the services.

Communication

Aena has a chat service and information line for passengers with hearing and/or speech disabilities, which allows them to contact the Telephone Service through chat, without the need for intermediaries, by accessing a chat from a computer, tablet or Smartphone. Some Spanish airports as well as the London Luton Airport also have magnetic induction loops to improve accessibility. This technology allows users with hearing aids, cochlear implants and other ear prosthetics with a micro coil to receive the specific information they require through a clean transmission of sound from the source to the hearing aid (London's airport has more than 100 points).

The Aena maps application offers the possibility of selecting the PRM configuration, which allows indoor guiding by accessible routes preferably using the elevator as a connector between floors and always avoiding conventional stairs. Despite this basic configuration, other connectors can be included as an alternative option.

Understanding

To facilitate the orientation of users and guide them in their journey through airports, Aena has signage, made using a guide of basic system symbols, which allows users to locate the areas, facilities and services of the airport. These symbols, which are universally recognised, have been designed and installed at all of the company's airports, in accordance with internationally established safety and accessibility

²⁷ London Luton Airport also donates to local organisations sunflower ribbons associated with people with hidden disabilities in order to contribute to the distribution and free assistance of service users.

²⁸ See section 'About this report – Links of interest'.

criteria. All of this is completed with the information that Aena provides to users, related to the correct use of the facilities, as well as with the different advertising media that promote their commercial and real estate activity.

On the other hand, the *Aena maps* application offers the possibility of selecting the PRM configuration, which allows indoor guiding by accessible routes, preferably using the elevator as a connector between floors and always avoiding conventional stairs. Despite this basic configuration, other connectors can be included as an alternative option.

During 2021, conferences were held on accessibility in order to jointly present good practices and relevant matters

Web accessibility

In 2021, new versions of both the Aena public website and the mobile application were launched, which have been audited by external entities to ensure their accessibility. The mobile app has been developed natively in mobile operating systems, to be fully compatible with the accessibility options of these and to provide a better experience of use.

The final objective of all the improvements made is that both the contents and the services offered, through Aena's different communication channels, be accessible (for more information, see 'Overview of this document').

6.6.3. Main actions in 2021 aimed at improving customer experience

- In 2021, in addition to the achievements achieved in health safety, Skytrax has been accredited for 6 airports in the network²⁹, obtaining the best possible rating in the ranking (5 stars).
- The Mystery Passenger project is underway to continue with the supervision and proposal of improvements in the quality perceived by our passengers.
- The 'Domestic Passenger' project has been developed to improve the experience for this type of passenger at Aena's network airports. Studying different types of segments/people to understand in detail the preferences and influences in the assessments and to be able to deploy concrete plans to improve their experience.

At London Luton Airport, among the main actions carried out, the availability of new public water sources, improvement of the Wi-Fi signal and the extension of the free use time for passengers, etc., can be mentioned.

For its part, at ANB, the Quality of Services and Passenger Experience Committee for Aena and stakeholders has been established during 2021, and action plans have been developed for each airport. In addition, the planning and studies of signage and passenger flows have been carried out and the airport reforms and expansions have been completed.



²⁹ Adolfo Suárez Madrid-Barajas Airport, Barcelona-El Prat Josep Tarradellas Airport, Palma de Mallorca Airport, Málaga-Costa del Sol Airport, Alicante-Elche Airport and Tenerife Norte-Ciudad de La Laguna Airport.

6.7 Communication and evaluation of customer satisfaction

6.7.1. Evaluation of customer satisfaction

To continuously monitor the opinions and expectations of its customers, both passengers and airlines and concession companies, and to evaluate the quality of the services it provides, Aena has the best tools available. These include Airport Service Quality (ASQ) surveys³⁰, Happy or Not devices, or work groups.

The results obtained are the basis for implementing proposals in line with its commitment to continuous improvement, maximum efficiency management, orientation towards continuous improvement, dialogue with stakeholders and the best customer experience.

During 2021, more than 41,000 passengers participated in the ASQ surveys. In relation to the quality indicators, the following conclusions can be drawn from the responses provided by users for 2021.

Quality assessment (out of 5)			
	Quality of service to passengers Reference value: 4.06	Quality of commercial premises	Quality of catering
Aena	4.12	3.5	3.43
London Luton Airport ³¹	4.17	3.81	3.71
ANB	n/a	3.49	3.51
% of participating passengers		0.047	
Objective 2022	4		

³⁰ ASQ is a programme of studies on passenger satisfaction directed by the ACI, in which 386 airports from 95 countries participate, through which each airport has the opportunity to study the satisfaction of its passengers throughout the current year, also comparing their results with those of other airports in their vicinity.

³¹ Results of ASQ surveys conducted in the third and fourth quarters. The Airport plans to set objectives in the next year.



Passenger satisfaction and perception



Satisfaction and perception of airlines: airport marketing



Relationship with concession companies: commercial marketing

<p>OF THE DETECTED EXPECTATIONS</p>	<ul style="list-style-type: none"> Competitive prices in restaurants. Staff efficiency. Minimum wait time (check-in, security control, etc.). Discounts on services. Comfortable facilities. Recharging points for electronic devices. 	<ul style="list-style-type: none"> Good Wi-Fi connectivity. Absence of supervening costs. Cleaning. Friendliness of the staff. Enough personal distance, fewer queues and crowds. 	<ul style="list-style-type: none"> Premium offer. Efficient and coordinated work procedures. Quality of service appropriate for the price. Active collaboration. Operational information and information on analysis of potential markets.. 	<ul style="list-style-type: none"> Incentives and discounts. Operational priorities (special services to customers). Help with passenger mobility (wayfinding). 	<ul style="list-style-type: none"> Clear, achievable and stable contractual requirements. Transparency. Equal treatment. Procedural agility. 	
<p style="writing-mode: vertical-rl; transform: rotate(180deg);">MAIN TOOLS USED TO GET TO KNOW USER EXPECTATIONS</p>	<p>SPANISH AIRPORT NETWORK</p>	<ul style="list-style-type: none"> ASQ surveys Instant Feedback devices (currently, Happy or Not), which conduct surveys on bathroom cleanliness, the courteousness of the security staff and baggage claim time in 33 airports of the network. These opinion collection devices are also available in the car parks and in 18 airports where the VIP Lounge Services are offered, managed on their own. 	<ul style="list-style-type: none"> Complaints, suggestions and compliments tracking and management. Monitoring and management of passenger queries. EMMA surveys. Monitoring of process indicators. DORA indicators. Monitoring and management of interactions in social media networks. 	<ul style="list-style-type: none"> Working groups/expert sessions. Analysis of the satisfaction and quality perception of airlines. Surveys to companies. Direct contact/meetings. 	<ul style="list-style-type: none"> Attendance at specialised forums and conferences. Indicators associated with company processes. User committee and joint follow-up committees. 	<ul style="list-style-type: none"> Regular follow-up meetings. Brand conferences (professional meetings where we explain the airport's overall offering). Exchange of periodic surveys and statistics. Mystery shopper and compilation of opinions in VIP lounges. Aena Business Portal. Advertising, promotion and revitalisation of Commercial Areas. Loyalty Club (more than one million customers in 2019). Workgroups for information exchange and service improvement. Analysis of the results of the service provided (commercial attributes of ASQ surveys, and complaints suggestions and compliments management monitoring). Business service surveys.
	<p>LONDON LUTON AIRPORT</p>	<ul style="list-style-type: none"> Customer experience transformation meeting. Accessibility Forum for inquiries from PRM users and charitable organisations. ASQ surveys during the last two quarters of 2021. 	<ul style="list-style-type: none"> Real-time collection of comments from customers (FeedbackNow) on different aspects (security, check-in, bathrooms, immigration and baggage claim). Mystery Shop Programme is back in the CX strategy, (to be implemented in the second quarter of 2022). Quality walkarounds. 	<ul style="list-style-type: none"> Airport operators' committee. 		
	<p>AEROPORTOS DO NORDESTE DO BRASIL</p>	<ul style="list-style-type: none"> PSP surveys (passenger satisfaction surveys). Passenger Quality Assurance and Satisfaction Survey, in addition to the communication channels described above. 	<ul style="list-style-type: none"> Controls and monitoring of service quality indicators. Additional surveys. 	<ul style="list-style-type: none"> Airport operators' committee. Establishment of consultations with airlines and definition - SLAs. 		<ul style="list-style-type: none"> Regular follow-up meetings. Exchange of periodic surveys and statistics. Workgroups for information exchange and service improvement. Analysis of results of the service provided in accordance with the commercial requirements of the ANAC surveys. Business service surveys. Daily inspections and follow-up of the levels of Service Level Agreement (SLA) and its Key Performance Indicators (KPIs) for contracts related to the management and quality control of third parties and subcontractors.

6.7.2. Customer rights and obligations

Aena uses different tools to share and comply at all times with the commitment to keep all of its customers and suppliers informed of their rights and obligations, both before signing the contract and during its execution.

- Aena uses, among others, the website³² to inform passengers of their rights, including their rights of information, complaints and compensation, non-discrimination, indemnification, etc.
- At London Luton Airport, there are different information points especially designed to inform customers about these aspects. The digital display of these rights is planned for 2022 at various points of contact with the customer.
- ANB has different communication channels to inform passengers about their rights and obligations. As an example, the websites of each airport can be used to consult information about the rights of users, including rights in the event of a delay or cancellation, where to submit a complaint, etc.

6.7.3. Complaint mechanisms (GRI 103-2)

Complaints and claims management

Users have various tools to report complaints or claims to the Company related to their services:

- The Telematic Services Portal, accessible from the Company's website, includes a specific section for complaints, suggestions and compliments³³.
- Complaint sheets, provided mainly at airport information points, as well as VIP lounges and car parks.
- London Luton Airport has a specific website (*London Luton Airport Feedback-form*), accessible to all users, to submit the claim through an online form.
- Aena's airports in Brazil have the *Canal de Ouvidoria* to receive proposals for improvements related to the offered airport services. They have also set up the email address ouvidoria@enabrazil.com.br³⁴.

In order to guarantee their correct processing, Spanish airports have a Procedure for the Management of Complaints and Claims, and a Department for Passenger Facilitation and Experience.

Aena's objective is to answer initial claims regarding its airport management in less than five days³⁵ and to make the corresponding financial compensation. As an

example, in 2021, financial compensation arising from property claims in Brazil, Spain and Luton amounted to a total of €12,693.5³⁶ ³⁷. In 2021, the total number of complaints and claims received amounted to 7,205.



³² Aena website: incidents during your trip. See section 'About this report – Links of interest'.

³³ In the case of environmental inquiries, the Company has the Environmental Assistance Office (Noise inquiries or complaints at London Luton Airport) and the *Canal de Ouvidoria* at ANB. See the links in the 'Appendix – references and links of interest' of this document.

³⁴ The Management System also addresses the relationship with Aena's Airport users in Brazil. Its objective is to provide information to citizens about the Ombudsman and their relationship with consumers, suppliers, employees, the community and ANB Airport users. ANB has to maintain a physical and electronic service system for users and an ombudsman to investigate complaints, claims, requests for information, suggestions and compliments in relation to the execution of the Concession Contract. And, in addition, the Airport Exploration Plan (PEA) establishes the obligation to implement a 'recording and processing system for claims related to the provision of the service'.

³⁵ London Luton Airport does not currently have a complaint and claim management procedure, although they try to respond to all requests and complaints in less than five business days, with this being managed through their insurance companies. They currently use Dynamics 365 to manage communications with their customers, allowing them to record and generate the corresponding reports for their monitoring.

³⁶ The amount includes possible expenses incurred from expert and/or legal counsel services. This includes both civil liability claims for personal injuries and for property damages greater than €9,000. The resolution of personal injuries does not occur until the claimant has been medically discharged. In cases that wind up in court, the resolution does not occur until a final ruling is issued.

³⁷ Aena's airports in Brazil have not provided any financial compensation to date arising from pecuniary claims.

The Company also receives claims and complaints through its social media profiles (Twitter and Facebook³⁸). A total of 2,155 complaints were received at Spanish airports in 2021³⁹ and 1,861 at London Luton Airport. These channels are not included in the Complaints and Claims Management Procedure, so the complaints that are received are generally answered by encouraging those affected to deal with them through the official channels.

Specifically, with regard to the offer of services to airlines, handling agents, commercial activity concessionary companies and real estate customers, Aena makes an opinion collection tool available in its VIP Lounges based on the Happy or Not Platform, where users' comments are analysed in order to implement improvement measures alongside the management companies of these Lounges⁴⁰.

In the case of ANB, through the Ombudsman Channel, the email address, website and physical forms available at the information desks can forward communications sent to airlines, handling agents and concessionary companies so that they can carry out the relevant procedures.



³⁸ ANB only has a Twitter account.

³⁹ Data relating to Spain, taking into account those received through Twitter. Data not available for ANB.

⁴⁰ In Brazil, they will begin in January 2021.

Main data on complaints and claims 2021

Indicator	Aena and SCAIRM		London Luton Airport		ANB		Total	
	2020	2021	2020	2021	2020	2021	2020	2021
Transport agreement	496	587	66	-	7	3	569	590
Handling	110	248	336	255	-	-	446	503
Information systems	183	251	-	-	14	1	197	252
Facilities	280	319	-	35	71	150	351	504
Security services	709	1,035	237	147	49	52	995	1,234
Supplementary services	427	587	-	1,984	-	-	427	2,571
Access	11	36	-	51	-	3	11	90
Damage and theft	102	138	66	28	3	-	171	166
Miscellaneous	90	163	-	48	171	198	261	409
Commercial and food & beverage services	62	123	347	90	5	12	414	225
Car parks	575	569	630	89	2	3	1,207	661
Total	3,045	4,056	1,682	2,727	322	422	5,409	7,205

Other specific indicators

In 2021, Aena had no record of breaches of regulations or voluntary codes related to:

- The information that is provided to users about the service, in none of the companies of the Group.
- Marketing communications, in none of the companies of the Group.
- Regulations or voluntary codes relating to the impacts on the health and safety of services.

7 Innovation

Main advances in innovation in 2021

- Approval of the Strategic Innovation Plan.
- Digital identity systems.
- Aena as operator of drones.
- Aena Ventures.
- Pilot Projects.
- 2020



Strategic Innovation Plan

3 programmes:

- From passenger to customer.
- Efficient use of resources.
- Beyond the airport.

Includes more than 80 projects for the 2021–2025 period

Innovation ecosystem

'Aena Ventures'

Work in alliance with partners.



254 proposals from 33 countries, of which 5 were accelerated

Training



528 employees with more than 8,965.5 specific hours of training in innovation

Investment



In R&D&I projects during fiscal year 2021, it was more than €14.8 million



Commitment to SDGs



SDG 3
Health and well-being



SDG 7
Affordable and non-polluting energy



SDG 9
Industry, innovation and infrastructure



SDG 11
Sustainable cities and communities



SDG 13
Climate action



SDG 16
Peace, justice and solid institutions



SDG 17
Partnerships for the goals

7.1. Innovation management at Aena

7.1.1. Strategic Innovation Plan

Aena has made a decisive commitment to innovation in 2021, approving a cross-divisional Strategic Innovation Plan across the entire Company. Aena's vision is to be a benchmark in the use of technology to optimise customer experience, increase operational efficiency and develop business around sustainable mobility.

Digitisation as a concept for the Organisation will mean digitising the relationship with our customers, installing sensory infrastructures in order to be a data-driven organisation on a global scale.

The Plan is underpinned with three programmes:

- From passenger to customer.
- Efficient use of resources.
- Beyond the airport.

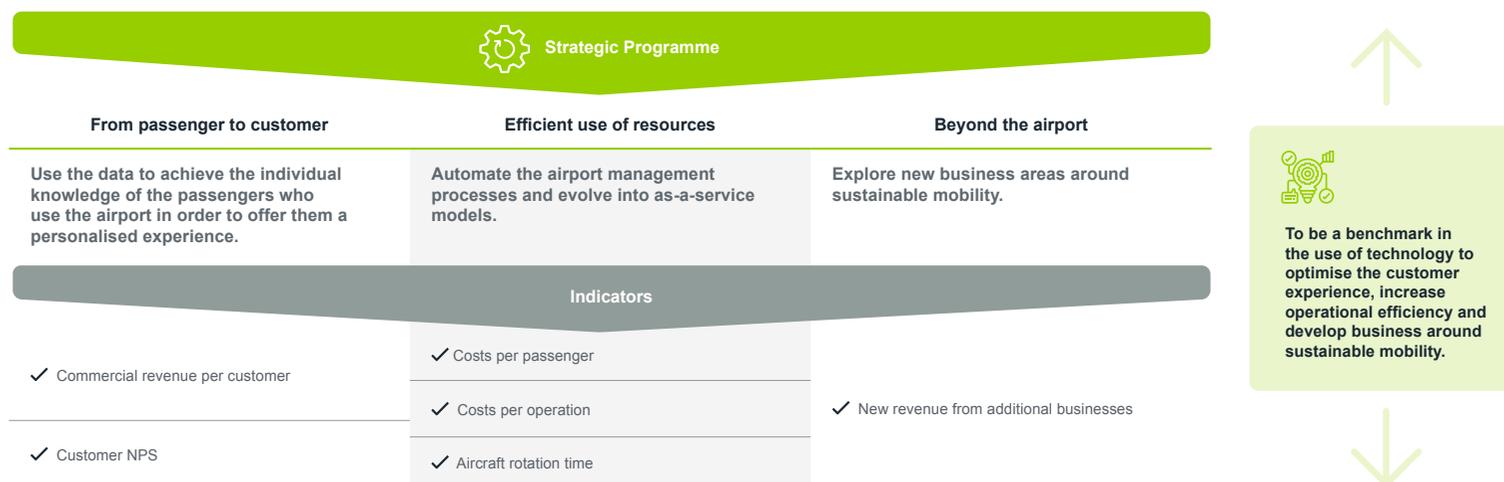
Each programme develops a series of lines of action that allow for validating technology, analysing results and estimating impacts on subsequent deployments.

The Strategic Innovation Plan materialises in technological and process validation projects that allow for the different technologies and their adaptation to the sector and to the company to be analysed in detail. And it sets the organisation's qualitative and quantitative objectives in this area, making innovation a fundamental pillar of airport management.

Innovation at Aena is open, dynamic and cross-divisional. It attempts to encourage the participation of all related stakeholders (users, customers, suppliers, partners, entrepreneurs, universities, research centres) and learn from them by working jointly to solve new challenges and existing problems by sharing risks in pilot projects and by using the best as inspiration.

To achieve this, Aena has different tools that help promote innovation. Internally, the Innova Awards for internal talent channelling, and collaboration agreements for pilot projects and the Aena Ventures programme for external collaboration.

Aena's Strategic Innovation Plan strengthens Aena's commitment to Innovation



7.1.2. Innovation ecosystem

To strengthen the development of advances and proposals, Aena works alongside different partners (employees, suppliers, startups, town councils, universities, etc.). As proof of this, the Company offers the possibility of testing new technologies and processes at its airports, in order to find innovative solutions and alternatives for the airport's business. In this regard, in 2020 the call for startups (SU) was launched with 'Aena Ventures'¹, which attracted, in this first edition, more than 254 proposals from 33 countries, of which 5 were accelerated in the programme to deploy a prototype.

For each challenge, the selected SUs adapted their proposals to a proof of concept suited to the sector and the customer, being able to deploy projects with real customers from August to October 2021 and presenting their results in the *DemoDay* of this first edition.

In the future, Aena is committed to continue this open innovation programme with the aim of attracting new ideas from agile and innovative companies.

Internally, the Innova Awards have made it possible to detect good practices within the network, share them and test new ideas for airport management. In this third edition of the awards, Aena employees from Spain, Luton and Brazil participated, and the call for proposals were the following: good practice, sustainable idea, innovative idea, idea to increase revenue and idea for passenger assistance.

Training

As one of the main levers of innovation and cultural change, in 2021, Aena launched training activities that allowed Aena employees to acquire the necessary know-how to integrate innovation as a driving force of the company. To this end, different levels of training have been implemented in regard to innovation, digitisation and 'agile' project management procedures. These include postgraduate master's degrees, seminars and internal technical training courses, among others.

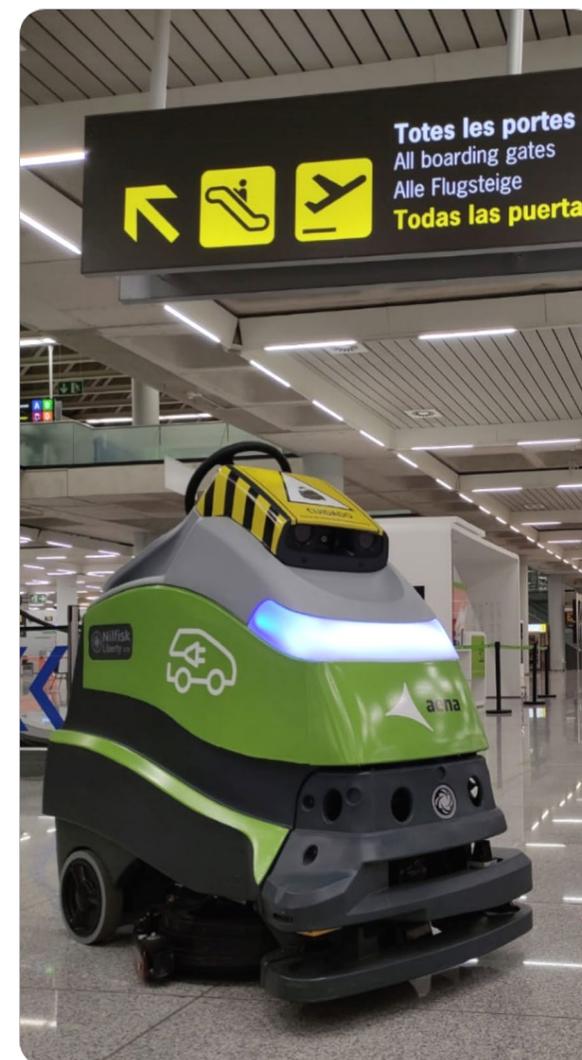
Training in new cross-divisional work methods and new technologies has been in areas where special attention has been paid to foster innovation in the company.

The training data in specific areas of innovation in 2021 shows 528 employees with more than 8,965.5 hours of training.

Work and collaboration with specialised companies

The investment made in R&D&I projects during the year 2021 exceeded €14,8 million, which represents 47.18% of turnover for 2021.

Aena has participated in 45 projects in collaboration with 50 companies in the area of innovation at the private level, while seven international R&D&I projects have been presented in different consortiums.



¹ See section 'On this report – Links of interest'

7.2. Developments in 2021

In 2021, the main objective in terms of innovation was to continue with the projects initiated in 2020 and to approve and develop the aforementioned Strategic Innovation Plan, whose scope encompasses the 2021–2025 period.

The main advances made in innovation during 2021 include the following:

- **Strategic Innovation Plan.** This is a cross-divisional plan for the organisation, which includes the main technologies to work on over the next five years with the focus placed on the digitalisation of passengers and infrastructures, seeking new opportunities in the airport business environment.

The Plan includes more than 80 projects for the 2021–2025 period.

- **Digital identity systems.** During 2021, proofs of concept were carried out on two modules of the biometric systems. On the one hand, there is access to biometric boarding with tablets, which allows extra mobility and fundamentally improves the ‘noncontact passenger’ experience. This project is part of a Research and Development Project (PDI [Proyectos de Desarrollo y Investigación]) conducted with the Centre of Industrial and Technological Development (CDTI [Centro para el Desarrollo Tecnológico Industrial]). In addition, in December 2021, the last biometrics pilot was launched, which encompasses all the steps of the airport process carried out with biometrics: registration (at home or at the airport), baggage check-in, access to the security checkpoint and boarding access.

- **Aena as operator of Drones.** In 2021, Aena became a drone operator with the objective of analysing the Remotely Piloted Aircraft System (RPAS) capacities within the management, operation and maintenance activities of the airports. This project will continue in 2022, looking for new use cases to test and validate the employability of this new work tool.
- **Aena Ventures.** In 2021, the startups acceleration programme was consolidated with the acceleration of five companies in the Barcelona-El Prat Josep Tarradellas Airport facilities. Accelerated companies carried out proofs of concept for the challenges that had won them the award:
 - **AIRBOT:** Chatbot for communicating with passengers in three languages that allows for the use of AI to improve passenger assistance.
 - **MEEP:** Mobility platform, with door-to-gate usability for different modes of transport.
 - **ChinaSpain:** Initiative to improve the Chinese passengers’ experience at the airports in the Aena network.
 - **Carwatt:** Retrofit handling equipment from combustion to electric.
 - **DUBZ:** Baggage management services and check-in outside the airport.
- **Pilot Projects.** Demonstrative projects that are measurable and produce tangible short-term results are carried out through collaboration agreements with different technological partners. This allows us to attract external innovation and provides mutual benefits, for example:
 - **Autonomous mobility for PRM:** This project has enabled the use of self-driving seats for persons with reduced mobility to be tested, which allows for a more comfortable experience for passengers.
 - **Video analysis on the apron:** video analysis techniques detect the events that occur around the aircraft during rotation with the aim of improving planning and safety around the aircraft.
- **Horizon 2020:** In 2021, Aena continued participating as a partner in the following projects:
 - **TRANSIT (Travel Information Management for Seamless Intermodal Transport):** is a research project funded by SESAR 2020.
 - **IMHOTEP:** its goal is to develop a concept of operations and a set of data analysis methods, predictive models and decision support tools that allow for information sharing.
 - **ASPRID:** aims to address the problem of protecting airport operations against (careless or malicious) drone intrusion from an operational point of view.
 - **SESAR WAVE 2:** continued participation in the SESAR (Single European Sky ATM Research) programme.
 - **SESAR 3:** Aena has become a founding member of SESAR 3 within the framework of the new European Union R&D&I project (Horizon Europe).

- EUROCONTROL Innovation Hub: Aena has participated in EUROCONTROL Innovation Hub projects with objectives to improve the punctuality of operations.

7.3. Future outlook

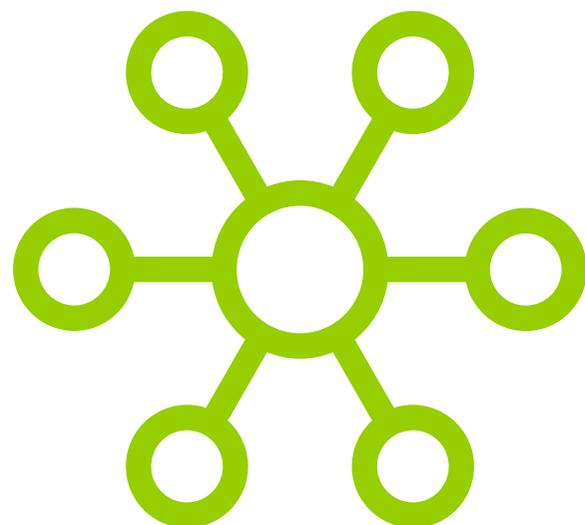
Aena seeks to strengthen innovation and digital transformation as a lever of change and competitive advantage that enables the Company to achieve its objectives.

Digitising the relationship with the passenger and infrastructure management will improve the service provided to our customers and allow us to be more efficient in the use of resources.

Continuing to validate technologies with short- and medium-term implementation perspectives and participating in the large transnational innovation projects will allow the organisation to be prepared for the new changes in the sector and to deploy R&D&I projects, giving them a practical and real application in the organisation's production.



About this report





Commitment to SDGs



 <p>SDG 2 Zero hunger</p>	 <p>SDG 7 Affordable and non-polluting energy</p>	 <p>SDG 12 Responsible production and consumption</p>
 <p>SDG 3 Health and well-being</p>	 <p>SDG 8 Decent work and economic growth</p>	 <p>SDG 13 Climate action</p>
 <p>SDG 4 Quality education</p>	 <p>SDG 9 Industry, innovation and infrastructure</p>	 <p>SDG 15 Life on land</p>
 <p>SDG 5 Gender equality</p>	 <p>SDG 10 Reduction of inequalities</p>	 <p>SDG 16 Peace, justice and solid institutions</p>
 <p>SDG 6 Clean water and sanitation</p>	 <p>SDG 11 Sustainable cities and communities</p>	 <p>SDG 17 Alliances to achieve objectives</p>

This 2021 Consolidated Management Report meets the reporting requirements of Act 11/2018, of 28 December, on Non-Financial Information and Diversity. It presents the information necessary to understand the risks, business model, policies, strategy, evolution, results and situation of Aena, as well as the impact of its activity on environmental and social issues related to staff, the respect for Human Rights and combating corruption and bribery

The Non-Financial Information Statement (NFIS) is part of Aena's consolidated management report for the fiscal year 2021. It is subject to the same approval, deposit and publication criteria as these reports and to verification by an independent provider of verification services.

The scope of the information included in the document covers the companies in which Aena has a holding of more than 50%, as included in the Annual Accounts by virtue of the control criterion. This includes the data available for Aena Desarrollo Internacional S.M.E., S.A.; Aena's concession company of the Región de Murcia International Airport.; and the subsidiaries in the United Kingdom and Brazil on a consolidated basis, while the remaining holdings, which are not fully consolidated, are not included in the non-financial performance indicators included in this document.

When the reported indicators refer not to the Group, but to a part thereof, it is explicitly specified.

With the issuance of this report, Aena complies with the provisions of Articles 262 of the Corporate Enterprises Act and 49 of the Code of Commerce in its wording given by Act 11/2018, of 28 December, on non-financial information and diversity, which transposes EU Directive 2014/95 to the Spanish legal system.

The reference framework used in the NFIS to respond to the information requirements of Act 11/2018 has been the GRI in its selected GRI option, in accordance with that mentioned for each subject in the "Table of contents of Act 11/2018". This information has been verified by an independent external party and both the scope and the description of the work and the conclusions of this verification are found in the verification report, attached to this document.

Additional information submitted by Aena to stakeholders

Following the non-financial reporting model used by Aena last fiscal year, the 2021 Consolidated Management Report goes beyond the information actually required by Act 11/2018, in order to satisfy the demand for information from its stakeholders. In this way, Aena integrates, in a single document, the Non-Financial Information Statement (NFIS) and the traditional Corporate Responsibility Report (Sustainability Report).

The GRI standards, in their essential option, have been used to prepare and submit this information. This information with the GRI contents is attached to this document in Table: Table of Contents: GRI

Moreover, other reporting frameworks have been taken as a reference, such as the international integrated reporting framework of the IIRC (International Integrated Reporting Council); SASB (Sustainability Accounting Standards Board), relating to the industries of Professional and Commercial Services, Logistics and Air Freight Transportation Services, Airlines and Real Estate Services –see "Table of contents of the Sustainability Accounting Standards Board"–; others such as the principles of the United Nations Global Compact, the United Nations Guiding Principles on Business and Human Rights, the United Nations Sustainable Development Goals, the TCFD recommendations, the Carbon Disclosure Project (CDP), the 2017/EU Guidelines, as well as the recommendations of the CNMV and ESG Rating agencies.

In order to reflect the Company's sustainability performance over the last few years and to enable its assessment, the report provides data from previous years or has external references to help its readability. In addition, in the event that a value or

indicator has been updated, the corresponding change is specified.

For more information, further details on the Company's performance in matters related to ESG

aspects are available in different sections on the corporate website. Furthermore, if you have any questions or concerns about this report, please contact the Corporate Responsibility department: rc@aena.es

REPORTING PRINCIPLES USED

Quality of the report

- Accuracy
- Balance
- Clarity
- Comparability
- Reliability
- Timeliness

Definition of contents

- Inclusion of stakeholders
- Sustainability context
- Materiality
- Completeness

Reporting principles included in GRI Standard 101 "Foundations 2016"

PHASES FOR PREPARING THE REPORT AND GROUPS INVOLVED

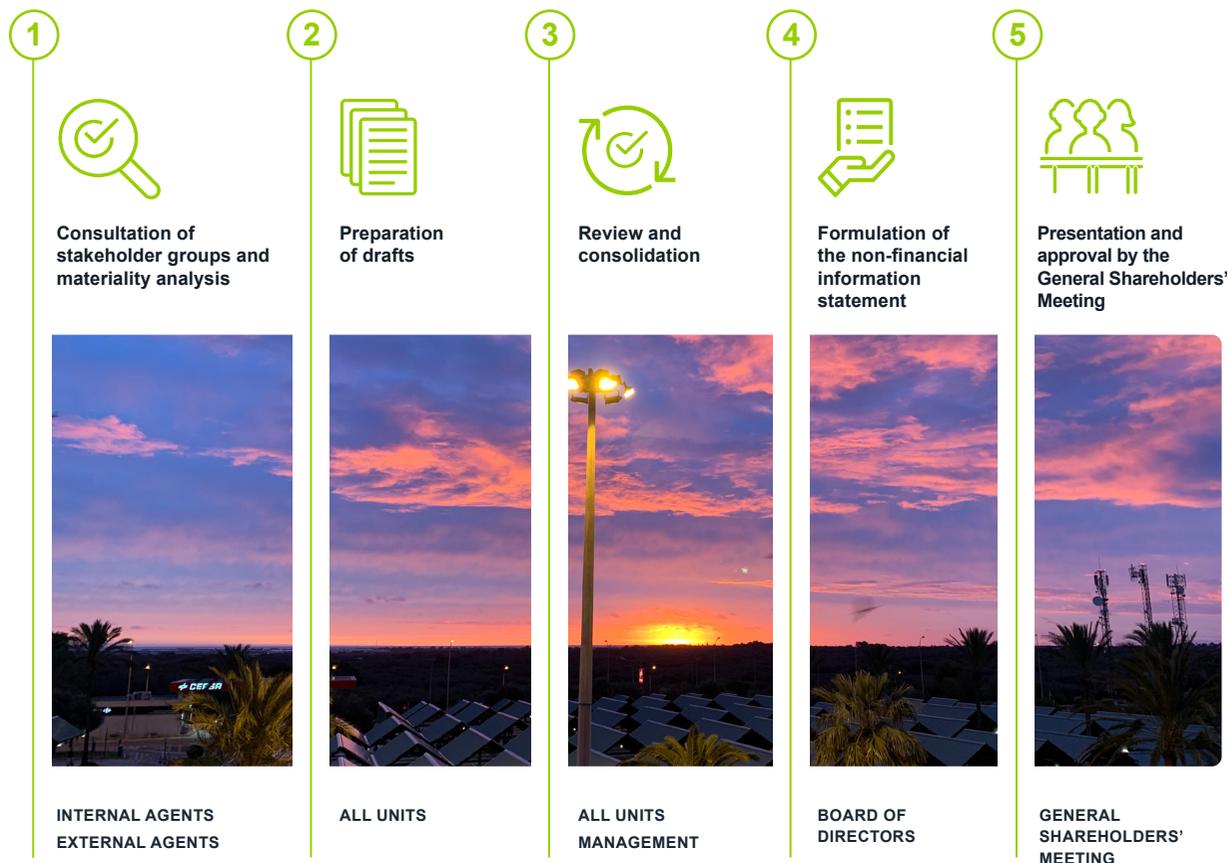


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The Aena 2021 Consolidated Management Report includes Aena’s most relevant financial and non-financial information in a single document. This facilitates its understanding, avoids possible repetitions and, at the same time, improves and extends the level of disclosure and transparency.

In accordance with the structure of the Aena 2021 Consolidated Management Report, presented below are the contents required by Act 11/2018, of 28 December, which modifies the Code of Commerce, the consolidated text of the Corporate Enterprises Act approved by the Royal Legislative Decree 1/2010, of 2 July, and Act 22/2015, of 20 July, on Auditing, regarding non-financial and diversity information. To facilitate its location, the sections of the Aena 2021 Consolidated Management Report are specified, in which these contents are located:

Subjects Act 11/2018	Answers with references to the Introduction of the document and 2021: “A year for recovery” sections, with these contents forming part of the Aena 2021 non-financial information statement	GRI Framework	Omissions
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Business model description		GRI Framework	Omissions
Business environment.	<p>The Group’s activity has been drastically affected in 2021 by the extraordinary, unexpected, external and unpredictable circumstances entailed by the COVID-19 pandemic and the appearance of new variants worldwide. Especially in Europe, they have led to a very significant reduction in operations and passenger traffic in the aeronautical sector, with a very negative impact on the companies in the Aena Group.</p> <p>Although the uncertainty inherent in the current circumstances does not allow us to foresee when the recovery will begin, the management mechanisms and measures that were adopted by the Company’s management at the time to mitigate the most significant risks that the Group had to face, have ensured the capacity, strength and sustainability of the Company.</p> <p>Another relevant event worth highlighting has been the approval by the Council of Ministers of the second Airport Regulation Document - DORA II 2022-2026. This emanates from Act 18/2014, of 15 October, on the approval of urgent measures for growth, competitiveness and efficiency, which becomes even more important, as it is an essential piece for the recovery of this sector, an objective that will be key during the next five-year period.</p> <p>In addition to the essential objective of recovery, the second DORA II considers the following aspects to be strategic aims: excellence in the service to passengers and their companions, as well as to airlines; and sustainability; innovation and an efficient management of the network.</p> <p>The section “2021: A year for recovery” can be consulted for more information, pp. 16-20.</p>	GRI 102-2	
Markets where it operates.	<p>The Company manages 46 airports and two heliports in Spain and participates directly and indirectly in the management of another 23 airports: one in Europe (London Luton Airport, of which it owns 51% of the capital) and 22 in America (six in Brazil, 12 in Mexico, two in Colombia and two in Jamaica).</p> <p>In March 2019, Aena Internacional acquired 100% of the management of six airports in the Northeast of Brazil (Aeroporto de Juazeiro do Norte-Orlando Bezerra de Menezes, Aeroporto Internacional Recife/Guararapes-Gilberto Freyre, Aeroporto de Joao Pessoa-Presidente Castro Pinto, Aeroporto de Campina Grande-Presidente Joao Suassuna, Aeroporto de Aracaju-Santa Maria, Aeroporto de Maceió-Zumbi dos Palmares).</p> <p>In addition, Aena Desarrollo Internacional provides consultancy services to the Cuban airports company, Cuba-Ecasa.</p> <p>As detailed in “Note 5. Financial information by segments” of the Consolidated Annual Accounts, the Group conducts its business activities centred on the following segments: Airports, Real Estate Services, International and SCAIRM.</p> <p>For further information on this matter, please see the section “Aena Airport Network” in the introduction to the Management Report, p.2.</p>	GRI 102-3 GRI 102-4 GRI 102-6	

**Subjects
Act 11/2018**

Answers with references to the Introduction of the document and 2021: “A year for recovery” sections, with these contents forming part of the Aena 2021 non-financial information statement

Business model description		GRI Framework	Omissions
Objectives and strategies.	<p>In 2021, two very important tools have been approved that will guide the Organisation’s activity in the coming years, to respond to the new challenges associated with the aviation sector:</p> <ul style="list-style-type: none"> • The DORA II 2022–2026 includes these strategic pillars, on the basis of which Aena will perform its activity during the next five-year period: <ul style="list-style-type: none"> • The recovery of air traffic. • Excellence in service and commitment to safety. • Environmental sustainability. • Enhancing competitiveness through innovation and digitisation. • Efficiency in management. <p>Due to its importance as a matter of general interest, the Aena airport network will continue to ensure the accessibility and mobility of citizens, workers and goods and services, as well as territorial cohesion.</p> <ul style="list-style-type: none"> • The Sustainability Strategy 2021-2030 lays the groundwork to meet the big challenges and mega trends of ESG. In line with the Sustainable Development Goals of the United Nations 2030 Agenda, it is based on 5 strategic programmes, which in turn are developed into 16 lines of action, and are deployed in projects and actions. The five strategic programmes are: <ul style="list-style-type: none"> • Zero carbon • Sustainable aviation • Responsible use of resources • Community and sustainable value chain • Social commitment <p>In the short and medium-term, the effects that COVID-19 and the progress of the epidemiological situation have on the company’s strategy and objectives cannot be ignored. Aena acts quickly to adapt to the current situation, and collaborates with other agencies, airlines and companies that carry out activities at the network’s airports to implement common actions.</p> <p>For further information on this matter, consult “2021: A year for recovery”, sections “1.2 The Airport Regulation Document (DORA)”, pp. 19-20 and “Strategic lines for the period 2022-2026”, page 20 and section “1.4. Sustainability: Aena’s management pillar” in Chapter 1 (pp. 35-38).</p>	GRI 102-14	
Factors and trends that may affect its future evolution.	<p>Aena’s activity has been subject to risks and impacts of COVID-19 on business and operations; macroeconomic and political context; concentration and competition; sustainability and climate change; public-private organisation and regulation; digital innovation and transformation; cybersecurity; third-party dependence; operational and physical security; regulatory framework; fiscal compliance and transparency; stakeholder involvement; planning and execution of investments.</p> <p>For further information on this matter, consult “2021: A year for recovery”, sections “Sector context” and “Risks and their management” (pp. 24-26).</p>	GRI 102-15 GRI 102-29	
Description of the policies the Group applies		GRI	Omissions
Due diligence procedures applied to the identification, evaluation, prevention and mitigation of risks.	Aena has a risk management and control model based on the integrated corporate risk management framework of COSO III (Committee of Sponsoring Organisations of the Treadway Commission), aimed at guaranteeing the achievement of the Company’s objectives in a predictable way in a globalised competitive environment and a complex context. For more information, consult “2021: A year for recovery”, section “Structure, control and management of risks” page 24.	GRI 103-2 GRI 102-31	

**Subjects
Act 11/2018**

Answers with references to the Introduction of the document and 2021: “A year for recovery” sections, with these contents forming part of the Aena 2021 non-financial information statement

Business model description		GRI Framework	Omissions
<p>Significant impacts, and verification and control. Measures taken.</p>	<p>The update to the risk map made for 2021 adapts to the situation of the environment in which the Company has developed its activity both as regards those aspects that have kept their relevance (such as the impact of the health emergency), as well as those others whose impact has been diluted with respect to previous years (as has been the case of Brexit), which has led to an update of the controls, indicators and action plans of the existing risk dossiers.</p> <p>With the review of the Risk Map in 2021, a total of 16 risks have been identified that are classified as strategic; operational; financial; technological; legal and compliance; information; and social, environmental and good governance.</p> <p>In 2021, the Company also updated the process to be followed when conducting the materiality analysis. As the main novelty, this new methodology incorporates the concept of double materiality.</p> <p>For further information on this matter, consult “Overview of the document”, subsection “Materiality” (pp. 4-7) and “2021: A year for recovery,” subsection “2.2 Risks in 2021” pp. 27-29.</p>	<p>GRI 103-1</p>	
Main related risks linked to the activities of the group		GRI	Omissions
<p>Commercial relationships, products or services that may have negative effects.</p>	<p>Aena’s activity has been subject to different types of risks, which are classified as strategic, operational, financial, technological, legal and compliance, information and social, environmental and good governance.</p> <p>For further information on this matter, consult “2021: A year for recovery”, section “Risks and their management” (pp. 24-26).</p>	<p>GRI 102-30</p>	
<p>How the group manages these risks.</p>	<p>Aena has a risk management and control model based on the integrated corporate risk management framework of COSO III (Committee of Sponsoring Organisations of the Treadway Commission), aimed at guaranteeing the achievement of the Company’s objectives in a predictable way in a globalised competitive environment and a complex context. For more information, consult “2021: A year for recovery”, section “Risks and their management”, pp. 24-26.</p>	<p>GRI 103-2 GRI 102-30</p>	
<p>Procedures used to detect and evaluate them.</p>	<p>Aena’s risk management system develops the principles defined in the risk management and control policy, and incorporates the responsibilities and procedures to identify and evaluate risks according to an evaluation methodology so as to prioritise them according to their criticality, based on their impact and probability of occurrence.</p> <p>For further information on this matter, consult “2021: A year for recovery”, section Structure, control and management of risks”, page 24.</p>	<p>GRI 103-3 GRI 102-30</p>	
<p>Information on the impacts that have been detected and their breakdown, particularly the main short-, medium- and long-term risks.</p>	<p>The update to the risk map made for 2021 adapts to the situation of the environment in which the Company has developed its activity both as regards those aspects that have kept their relevance (such as the impact of the health emergency), as well as those others whose impact has been diluted with respect to previous years (as has been the case of Brexit), which has led to an update of the controls, indicators and action plans of the existing risk dossiers.</p> <p>With the review of the Risk Map in 2021, a total of 16 risks have been identified that are classified as strategic; operational; financial; technological; legal and compliance; information; and social, environmental and good governance.</p> <p>For further information on this matter, consult “2021: A year for recovery”, sections “Sector context” page 21 and “Risks and their management” pp. 24-26.</p>	<p>GRI 102-15 (risks)</p>	
Information about the company		GRI	Omissions
<p>Commitments from the company on sustainable development.</p>	<p>In 2021, Aena presents the new Sustainability Strategy 2021-2030, a cross-divisional strategy that encompasses all areas of the Company, especially designed to meet the big challenges and mega trends of ESG, and aligned with the SDGs. It is formed around five strategic programmes, which in turn are developed into 16 lines of action, and are deployed in projects and actions. The five strategic programmes are:</p> <ul style="list-style-type: none"> • Zero carbon 	<p>GRI 102-43</p>	

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Answers with references to the Introduction of the document and 2021: “A year for recovery” sections, with these contents forming part of the Aena 2021 non-financial information statement

Business model description		GRI Framework	Omissions
	<ul style="list-style-type: none"> Sustainable aviation Responsible use of resources Community and sustainable value chain Social commitment <p>Moreover, the new Sustainability Policy, approved in 2021, becomes the internal reference framework, with which Aena reaffirms that its activity is directed towards the creation of long-term value for all its stakeholders. This ensures that its activity is developed in accordance with a set of values, principles, criteria and attitudes that promote sustainable social and environmental development, and promote the implementation and development of its ethical principles based on integrity and transparency. For further information, consult Chap. Governance Model, section “Sustainability: Aena’s management pillar,” pp. 35-38.</p>		

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Information collected in Block B: Non-Financial Information Statement

Business model description	Location (page, section)	Framework used (*)	Omissions
Business environment.	Chap. “2021: A year for recovery”. Section “Evolution and impact of the pandemic caused by COVID-19 at Aena”, pp. 18-19. Section “About this report”, p. 204.	GRI 102-2 GRI 102-45	
Organisation and structure.	Chap. 1. “Sustainable Governance Model”. Sections: “Governing bodies” and “Executive Management Committee”, pp. 3, 12. Chap. 1. “Sustainability: pillar of Aena’s management”, pp. 35-38	GRI 102-18 GRI 102-19 GRI 102-23 GRI 102-24 GRI 102-32	
Markets where it operates.	Chap. “Overview of the Document”. “Aena airport network” infographic, page 2. Chap. 1. “Aena: Sustainable governance model”. Section: “Structure of the property”, page 2.	GRI 102-6	
Objectives and strategies.	Chap. “2021: A year for recovery”. Section “The Airport Regulation Document (DORA)”, pp. 19-20. Table: “The main short, medium and long-term trends and risks that could result from the context in which Aena operates”, pp. 22-23 Chap. 1. “Sustainable Governance Model”. Infographic: “ESG issues on the Board’s agenda”, page 10; Sustainability: pillar of Aena’s management, pp. 35-38. Chap. 2 “Commitment to the environment”, page 50. Chap. 3 “Commitment to society and human rights”, page 96. Chap. 4 “Social management in the value chain”, page 107. Chap. 5 “Staff and social issues”, page 124. Chap. 6 “Safe, high-quality services”, page 171. Chap. 7 Innovation, page 199.	GRI 102-14 GRI 102-20 GRI 102-26	
Factors and trends that may affect its future evolution.	Chap. “2021: A year for recovery”. Table: “The main short, medium and long-term trends and risks that could result from the context in which Aena operates”, pp. 22-23	GRI 102-15	
Description of the policies the Group applies	Location (page, section)	Framework used (*)	Omissions
Due diligence procedures applied to the identification, evaluation, prevention and mitigation of risks.	Chap. “2021: A year for recovery”. Infographic “Structure, control and management of risks” (infographic), page 24. Chap. 1. “Aena: Sustainable governance model”. Infographic “Regulatory Compliance System”, page 16; Sections “Prevention of fraud, corruption and bribery”, pp. 21-22; “Governance of Sustainability,” page 35.	GRI 103-2 GRI 102-31	

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Information collected in Block B: Non-Financial Information Statement

Significant impacts, and verification and control. Measures taken.	Chap. "2021: A year for recovery". Sections "Risks and their management", "Risks in 2021", pp. 27-29.	GRI 103-1	
Results of the policies	Location (page, section)	Framework used (Unless expressly indicated, GRI Standard 2016)	Omissions
Key indicators of relevant non-financial results that allow the monitoring and evaluation of progress and favour comparability between companies and sectors.	Chap. 1. "Sustainable Governance Model". Page 1. Chap. 2 "Commitment to the environment", page 50. Chap. 3 "Commitment to society and human rights", page 96. Chap. 4 "Responsible value chain management", page 107. Chap. 5 "Staff and social issues", page 124 Chap. 6 "Safe, high-quality services", page 171. Chap. 7 "Innovation", page 199. Section "About this Report", page 204.	GRI 103-3 GRI 102-50 GRI 102-32	
Main related risks linked to the activities of the group	Location (page, section)	Framework used (Unless expressly indicated, GRI Standard 2016)	Omissions
Commercial relationships, products or services that may have negative effects.	Chap. "A year for recovery: "Risks in 2021", pp. 27-29. The different chapters of this non-financial information statement contain the possible negative impacts associated with each area (Chap 2. "Commitment to the environment"; Chap. 4 "Social management of our value chain"; Chap. 5 "Staff and social issues"; Chap. 6 "Safe, high-quality services"; Chap. 7 "Innovation"). Chap. 1. "Sustainable Governance Model". Infographic "Committees supporting board", page 11.	GRI 102-2 GRI 102-30	
How the group manages these risks.	Chapter "2021: A year for recovery". Infographic "Structure, control and management of risks", page 24.	GRI 103-2 GRI 102-30	
Procedures used to detect and evaluate them.	Chapter "2021: A year for recovery". Infographic "Structure, control and management of risks", page 24.	GRI 103-3	
Information on the impacts that have been detected and their breakdown, particularly the main short-, medium- and long-term risks.	Overview of the Document, page 4. Chapter "2021: "A year for recovery". Table "The main short, medium and long-term trends and risks that could result from the context in which Aena operates", pp. 22-23; Section "Risks in 2021", pp. 27-29	GRI 102-15 (risks) GRI 102-46 GRI 102-47	
Information on environmental issues			
Current and foreseeable effects of the company's activities on the environment.	Chap. 2. "Commitment to the environment". Section: "Management of environmental risks and impacts", page 55.	GRI 103-2	
Current and foreseeable effects of the company's activities on health and safety.	Chap. 6 "Safe, high-quality services". Introduction infographic, page 172.	GRI 103-2	
Environmental evaluation or certification procedures.	Chap. 2. "Commitment to the environment". Section "Environmental certifications", page 54.	GRI 102-11	
Resources dedicated to the prevention of environmental risks.	Chap. 2. "Commitment to the environment". Table "Some indicators related to environmental management and the resources dedicated to the improvement of environmental management and the prevention of environmental risks", page 56.	GRI 103-2	
Principle of precaution.	Chap. 2. "Commitment to the environment". Sections: "Environmental objectives", page 51; "Sustainable environmental management model", pp. 51 and 52.	GRI 102-11	
Environmental risk provisions and guarantees.	Chap. 2. "Commitment to the environment". Table "Some indicators related to environmental management and the resources dedicated to the improvement of environmental management and the prevention of environmental risks", page 56.	GRI 103-2	
Pollution	Measures to prevent, reduce or remedy carbon emissions that seriously affect the environment.	Chap. 2. "Commitment to the environment". Sections "Climate Action Plan", page 60; "Effective mitigation and adaptation actions and measures to achieve the decarbonisation objectives", page 63; "Metrics. Carbon Footprint", pp. 67-69; "Efficiency in the use of energy and the use of renewable energies", pp. 70-71; "Reduction of emissions thanks to renewable energy facilities", pp. 72-73.	GRI 103-2

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Information collected in Block B: Non-Financial Information Statement

	Any form of air pollution specific to an activity, including noise and light pollution.	Chap. 2. "Commitment to the environment". Section "Pollution", pp. 77-78, 81-82.	GRI 103-2 GRI 305-7 GRI- A07	
Circular economy, and prevention and waste management	Prevention, recycling, reuse, recovery and elimination of waste.	Chap. 2. "Commitment to the environment". Section "Waste management and circular economy model", page 92.	GRI 103-2 GRI 306-1 (2020) GRI 306-2 (2020)	
	Actions to combat food waste.	Chap. 2. "Commitment to the environment". Table "Waste management indicators", page 95.	GRI 306-4 (2020) GRI 306-3 (2020)	
Sustainable use of resources	Water consumption and water supply in accordance with local limitations.	Chap. 2. "Commitment to the environment". Table: "Water consumption indicators," pp. 88-89.	GRI 303-5	
	Consumption of raw materials and measures adopted to improve the efficiency of their use.			Not applicable. Material No. As a company providing airport services, the consumption of raw materials is not relevant in the Aena value chain
Climate change	Direct and indirect energy consumption.	Chap. 2. "Commitment to the environment". Section "Main energy consumption indicators", pp. 74-75.	GRI 302-1 GRI 302-3	
	Measures taken to improve energy efficiency.	Chap. 2. "Commitment to the environment". Infographic "Energy efficiency in 2021. Some relevant related actions", page 71. Section "Reduction of emissions thanks to renewable energy facilities and efficiency", pp. 72-73.	GRI 103-2 GRI 302-4	
	Use of renewable energies.	Chap. 2. "Commitment to the environment". Table "Renewable energies", page 76.	GRI 302-1	
	Important elements of greenhouse gas emissions generated as a result of the company's activities and the use of the goods and services it produces.	Chap. 2. "Commitment to the environment". Table "Metrics. Carbon footprint (table)", pp. 67-69.	GRI 305-1 GRI 305-2 GRI 305-4 GRI 305-5	
	Measures taken to adapt to the consequences of climate change.	Chap. 2. "Commitment to the environment". Sections "Climate Action Plan", page 60; "Risks and opportunities related to climate change", pp. 65-66.	GRI 201-2	
	Voluntary reduction targets in the medium and long term to reduce greenhouse gas emissions and the means implemented to this end.	Chap. 2. "Commitment to the environment". Sections "Climate Action Plan", page 60; "Specific decarbonisation objectives", page 61; "Carbon footprint metrics", page 67; "Reduction of emissions thanks to renewable energy facilities and efficiency", pp. 72-73.	GRI 103-2 GRI 305-5 GRI 302-3	
	Taxonomy of sustainable finances – EU Regulation 2020/852 of the European Parliament – Delegated Taxonomy Acts of the EU	Chap. 1 Sustainable Governance Model. Section "1.5. Sustainable financing. Taxonomy", pp. 42-49	Company criteria	

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Information collected in Block B: Non-Financial Information Statement

Protecting biodiversity	Measures to preserve or restore biodiversity.	Chap. 2. "Commitment to the environment". Section "Biodiversity management and protection model", page 90; "Protected spaces", page 90.	GRI 103-2 GRI 304-1
	Impacts caused by activities or operations in protected areas.	Chap. 2. "Commitment to the environment". Section "Studies on the fauna of the environment and control services", pp. 90-91.	GRI 304-2
Information on staff and social issues			
Employment	Total number and distribution of employees by gender, age, country and professional classification.	Chap. 5. "Staff and social issues". Table "Total number and distribution of employment contract types (as of 31 December)", page 127.	GRI 102-8
	Total number and distribution of employment contract types.	Chap. 5. "Staff and social issues". Table "Total number and distribution of employment contract types (as of 31 December)", page 127.	GRI 102-8
	Annual average of open-ended contracts, temporary contracts and part-time contracts by sex, age and professional category.	Chap. 5. "Staff and social issues". Table "Annual average of contracts according to their type* by gender, age and professional category in 2021 (consolidated)", page 129.	GRI 102-8
	Number of dismissals by sex, professional category and age.	Chap. 5. "Staff and social issues". Section "Dismissals", page 131; "Turnover rate", page 132.	GRI 103-2 GRI 401-1
	Average remuneration and its evolution broken down by gender, age and professional categories or equal value.	Chap. 5. "Staff and social issues". Section "Remuneration model", Table "Average remuneration and its evolution broken down by gender, age and professional categories or equal value". pp. 133, 135. Section "Comparison with the inter-professional minimum wage", page 136.	GRI 102-38 GRI 405-2
	Wage gap.	Chap. 5. "Staff and social issues". Table "Average remuneration and its evolution broken down by gender, age and professional categories or equal value", page 135.	GRI 405-2
	The remuneration of equal or average jobs in the company.	Chap. 5. "Staff and social issues". Table "Average remuneration and its evolution broken down by gender, age and professional categories or equal value", page 135.	GRI 405-2
	The average remuneration of directors and executives, including variable remuneration, allowances, compensation, payment to long-term savings systems and any other compensation broken down by sex.	Chap. 1. "Sustainable Governance Model". Section: "Remuneration of the Board", pp. 13-14. Chap. 5. "Staff and social issues". Section Table "Average remuneration and its evolution broken down by gender, age and professional categories or equal value", page 135.	GRI 405-2 GRI 102-35 GRI 102-36
	Implementation of right to disconnect policies for employees.	Chap. 5. "Staff and social issues". Section, "Organisation of working time and disconnecting from work", pp. 137, 138; "Balance and promotion of the health and well-being of workers", pgs. 166-169.	GRI 401-2 GRI 103-2
	Employees with disabilities.	Chap. 5. "Staff and social issues". Section "Table of Employees with Disabilities", page 143.	GRI 405-1
Organisation of work.	Organisation of working time.	Chap. 5. "Staff and social issues". Section, "Organisation of working time and disconnecting from work", pp. 137, 138; "Balance and promotion of the health and well-being of workers", pgs. 166-169.	GRI 103-2 (industrial rights) GRI 401-2
	Number of absentee hours.	Chap. 5. "Staff and social issues". Table "Absenteeism (own personnel)", row: "No. of hours lost due to absenteeism", page 164.	GRI 403-9 (GRI 403:2018)

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Information collected in Block B: Non-Financial Information Statement

	Measures designed to facilitate the enjoyment of work-life balance and encourage joint responsibility of these measures by both parents.	Chap. 5. "Staff and social issues". Section "Balance and promotion of the health and well-being of workers", pp. 166-169.	GRI 401-2 GRI 401-3
Health and safety.	Health and safety conditions in the workplace.	Chap. 5. "Staff and social issues". Section "Occupational health and safety", pp. 156-161.	GRI 403-1 (GRI 403:2018) GRI 403-8 GRI 403-3 (GRI 403:2018) GRI 403-4 (GRI 403:2018) GRI 403-2 GRI 403-5 GRI 403-6 GRI 403-7
	Work accidents, in particular their frequency and severity,	Chap. 5. "Staff and social issues". Section "Notification, recording and investigation of accidents", pp. 160, 161. Table "Accident rate (own personnel)", pp. 162-163.	GRI 403-3 (GRI 403:2018) GRI 403-9 (GRI 403:2018)
	Occupational diseases; broken down by gender.	Chap. 5. "Staff and social issues". Table "No. occupational diseases by region", page 169.	GRI 403-10 (GRI 403:2018)
Industrial relations	Organisation of social dialogue, including procedures for informing and consulting with staff, and negotiating with them.	Chap. 5. "Staff and social issues". Section "Industrial relations", page 153. "Occupational health and safety", pp. 156-158; "Communication, dialogue and participation of employees in occupational safety", pp. 159-160.	GRI 103-2 GRI 403-1 (GRI 403:2018) GRI 403-4 (GRI 403:2018)
	Percentage of employees covered by collective agreements by country.	Chap. 5. "Staff and social issues". Section "Industrial relations", page 153.	GRI 102-41
	The balance of collective agreements, particularly in the field of health and safety at work.	Chap. 5. "Staff and social issues". Section "Communication, dialogue and participation of employees in occupational safety", page 159.	GRI 403-4 (GRI 403:2018)
Training	The policies implemented in the field of training.	Chap. 5. "Staff and social issues". Sections "Training" and "Sustainability Strategy: training, development and professional career", page 148.	GRI 404-2 GRI 103-2
	Total amount of training hours by professional categories.	Chap. 5. "Staff and social issues". Table "Training hours by gender, professional category and region", page 150.	GRI 404-1
Universal accessibility for people with disabilities		Chap. 5. "Staff and social issues". Section "Universal accessibility to employment for people with disabilities", page 143.	GRI 103-2 GRI 405-1
Equality	Measures taken to promote equal treatment and opportunities between women and men.	Chap. 5. "Staff and social issues". Sections: "Diversity and inclusion", pp. 138-139; table "Percentage of women/men in the workforce (as of 31 December)", page 141.	GRI 103-2 GRI 405-1 i (gender)
	Equality plans (Chapter III of Organic Act 3/2007, of 22 March, for the effective equality of women and men).	Chap. 5. Staff and social issues. Section "Diversity and inclusion", pp. 138, 139.	GRI 103-2

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Measures taken to promote employment.	Chap. 5. "Staff and social issues". Sections "Gender diversity", pp. 138, 139; "Generational diversity, age management and the promotion of the integration of young people", page 145.	GRI 103-2 GRI 413-1	
Protocols against sexual and gender-based harassment, integration and universal accessibility for people with disabilities.	Chap. 5. "Staff and social issues". Section "Diversity and inclusion", pgs. 138, 139. Section "Accessibility of services", page 143.	GRI 103-2	
The policy against all types of discrimination and, where applicable, management of diversity.	Chap. 5. "Staff and social issues". "Diversity and inclusion", pp. 138, 139.	GRI 103-2	
Information on the respect for Human Rights			
Application of due diligence procedures in the field of Human Rights.	Chap. 1. "Sustainable Governance Model". Section "Culture and corporate ethics", pp. 15-18. Section "Code of Conduct", page 19. Chap. 3. "Commitment to society and human rights". Section "Implementation of the human rights due diligence process", pp. 104-106.	GRI 103-2 GRI 102-16 GRI 102-17	
Prevention of risks related to human rights violations and, where appropriate, measures to mitigate, manage and redress possible abuses committed.	Chap. 3. "Commitment to society and human rights". Sections "Prevention of risks that violate Human Rights" page 106	GRI 102-17 GRI 102-16	
Human rights violations complaints.	Chap. 3. "Commitment to society and human rights". Section "Complaints on violation of Human Rights", page 106.	GRI 103-2 GRI 406-1	
Promotion of and compliance with the provisions of the fundamental conventions of the International Labour Organization related to respect for freedom of association and the right to collective bargaining.	Chap. 3. "Commitment to society and human rights". Section "Human Rights", pp. 103, 104.	GRI 102-12 GRI 102-16	
The elimination of discrimination in employment.	Chap. 5. "Staff and social issues". Section "Diversity and inclusion", pp. 138, 139.	GRI 102-12 GRI 407-1	
The elimination of forced labour.	Chap. 3. "Commitment to society and human rights". Section "Against child labour and forced labour", page 106.	GRI 102-12 GRI 102-17 GRI 409-1	
The effective abolition of child labour.	Chap. 3. "Commitment to society and human rights". Section "Against child labour and forced labour", page 106.	GRI 102-12 GRI 102-17 GRI 408-1	
Information on combatting corruption and bribery			
Measures taken to prevent corruption and bribery.	Chap. 1. "Sustainable Governance Model". Sections "Culture and corporate ethics", pp. 15-18; "Prevention of fraud, corruption and bribery", pp. 21, 22; "Conflicts of interest", pp. 23-24; "Procedure for related transactions", page 23.	GRI 102-16 GRI 102-17 GRI 102-25 GRI 205-2	
Measures to combat money laundering.	Chap. 1. "Sustainable Governance Model". Sections "Prevention of fraud, corruption and bribery", pp. 21, 22; "Specific measures against money laundering", page 24.	GRI 102-16 GRI 102-17	
Contributions to foundations and non-profit entities.	Chap. 3. "Commitment to society and human rights". Subsection "Social action: Contributions to foundations and non-profit entities", page 98.	GRI 201-1 GRI 413-1	
Information about the company			
Commitments from the company on sustainable development.	The impact of the company's activity on employment and local development, local populations and on the territory.	Chap. 3. "Commitment to society and human rights". Section "Impact of the business on society and the environment". Section "Creating social value"; table "Generation of resources in the community (Social cash flow)", page 100.	GRI 201-1 GRI 413-1 GRI 413-2
	The relationships maintained with local communities actors	Chap. 3. "Commitment to society and human rights". Section "Commitments to sustainable development and to society" (footnote. Stakeholders), page 97.	GRI 102-43 GRI 413-1

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	and modalities of dialogue with them.	Chap. "Overview of the Document". Infographic "Relationship and dialogue with stakeholders", pp. 11-12.	GRI 413-2	
	Association or sponsorship actions.	Chap. 3. "Commitment to society and human rights". Sections "Impact of the business on society and the environment". Section "Creating social value"; table "Generation of resources in the community (Social cash flow)", page 100; "Impact on local populations and on the territory" pp. 101, 102.	GRI 201-1 GRI 102-13 GRI 413-1	
Subcontracting and suppliers.	The inclusion of social issues, gender equality and environmental issues in the purchasing policy.	Chap. 4 "Social management of our value chain". Sections: "The acquisition and purchasing process", "Inclusion of social and environmental issues in tendering processes"; pp. 117-120; "Contract execution processes", pp. 121-122.	GRI 103-2 GRI 308-2 GRI 414-2	
	Consideration in relations with suppliers and subcontractors of their social and environmental responsibility.	Chap. 4 "Social management of our value chain". Sections: "The acquisition and purchasing process", "Inclusion of social and environmental issues in tendering processes"; pp. 117-120; "Contract execution processes", pp. 121-122.	GRI 102-9 GRI 308-2 GRI 414-2	
	Supervision and audit systems, and their results.	Chap. 4 "Social management of our value chain". Section "Monitoring and evaluation of suppliers", page 123.	GRI 102-9 GRI 308-2 GRI 414-2	
Consumers.	Measures for the health and safety of consumers.	Chap. 6 "Safe, high-quality services". Introduction infographic, page 172.	GRI 103-2 GRI 416-2	
	Systems for claims and complaints received, and their resolution.	Chap. 6 "Safe, high-quality services". Section "Complaint mechanisms", pp. 196-197.	GRI 103-2	
Tax information.	Profits obtained, country by country.	Chap. 1. "Sustainable Governance Model". Section: "Fiscal transparency", pgs. 32-33.	GRI 207-1 GRI 207-2 GRI 207-3 GRI 207-4 (GRI 207:2019)	
	Taxes paid on profits.	Chap. 1. "Sustainable Governance Model". Section: "Fiscal transparency", pgs. 32-33.	GRI 207-1 GRI 207-2 GRI 207-3 GRI 207-4 (GRI 207:2019)	
	Public grants received.	Chap. 1. "Sustainable Governance Model". Table "Taxation", page 34.	GRI 201-4	This information is available in the Annual Accounts

GRI Table of Contents¹

GRI Contents	Description	Global Compact	SDGs	Location/Content	Page ²	Comments/Omissions
GRI 101: Foundation 2016						
GRI 102: General disclosures 2016						
1. Organizational Profile						
102-1	Name of the organization			Aena		
102-2	Activities, brands, products and services			Chap. "2021: A year for recovery", Sections "1.1. Evolution and impact of the pandemic caused by COVID-19 on Aena"; "Risks in 2021". Section "About this report", "Table of contents Act 11/2018 – Business environment"	18-19, 27-29 204	
102-3	Location of headquarters			C/ Peonias, 12. 28042 Madrid, Spain		
102-4	Location of operations			"Introduction" Chap. "Aena airport network" infographic	2	
102-5	Ownership and legal form			Chap. 1. "Structure of the property" section	2	
102-6	Markets served			Introduction. "Aena airport network" infographic Chap. 1, Section: "Structure of the property" Section "About this report", "Table of contents Act 11/2018 – Markets in which it operates"	2 2, 204	
102-7	Scale of the organization			Chap. 1. Section "1.1.1. Capital and organisational structure" Chap. 5. Section "5.1. Stable, quality employment, Table "Total number and distribution of employment contract types (31 December)"	2 127	Information on the total number of transactions, net sales, total capitalisation and quantity of products served can be found in "Block A. Economic and financial information" of this Management Report
102-8	Information on employees and other workers	3, 4, 5, 6	5, 8, 10	Chap. 5. Section "5.1.1. Main details of the workforce". Tables "Annual average of contracts according to their type" by gender, age and professional classification in 2021 (consolidated); "Total number and distribution of employment contract types (31 December)"	127-129	
102-9	Supply chain	7	8	Chap. 4. Section "4.2.2. The acquisition and purchasing process"; Chap. 4.2. Sustainable management of our value chain; "Inclusion of social and environmental issues in tendering procedures"; "4.2.3. Contract execution processes"; "Monitoring and evaluation of suppliers"	117-123	
102-10	Significant changes to the organization and its supply chain		8	Chap. 4 Section "4.1.2. Description of the supply chain"	112	In 2021, there have been no significant changes in the organisation or its supply chain.
102-11	Precautionary principle or approach	7		Chap. 2. Sections: "Environmental objectives" and "2.1.1. Natural capital management model", "2.1.2. Environmental certifications"	51, 52, 54	

¹As indicated in the "About this Report" section, this "GRI Table of Contents" has been elaborated in accordance with the GRI Standards, essential option and has not been verified by an independent third party. The verification of the GRI indicators has been carried out within the framework of Act 11/2018, in accordance with the GRI Standards, selection option and are included in the Table of Contents Act 11/2018.

²In blue, pagination relating to the "Overview of the document" and "2021: A year towards recovery" chapters.

GRI Con- tents	Description	Global Compact	SDGs	Location/Content	Page ²	Comments/Omissions
102-12	External initiatives		17	Chap. 3. Sections "3.3.1. Aena's Human Rights Policy", "Against child labour and forced labour". Chap. 5. Section "5.2. Diversity and inclusion",	103-104, 106, 139	
102-13	Membership of associations		17	Chap. 3. Section "3.2. Impact of the business on society and the environment"; "3.2.1. Creating social value". Table "Generation of resources in the community (Social cash flow);" "Impact on local populations and on the territory".	100-102	A more detailed list of associations and organisations can be found on the Aena website. See: <a href="https://www.aena.es/en/corporative/transpar-
ency/agreements.html">https://www.aena.es/en/corporative/transpar- ency/agreements.html
2. Strategy						
102-14	Statement from senior decision-maker			Chapter "2021: A year for recovery"; Sections "The Airport Regulation Document (DORA)"; "Strategic Airport Regulation Document lines for the 2022-2026 period"; table: The main short, medium and long-term trends and risks that could result from the context in which Aena operates Chap. 1. "Sustainable Governance Model". Infographic: ESG issues on the Board's agenda, Sustainability: Aena's management pillar, Chap. 2 Commitment to the environment, Chap. 3 Commitment to society and human rights. Chap. 4 Responsible value chain management, Chap. 5 Staff and social issues, Chap. 6 Safe, high-quality services. Chap. 7 Innovation Section "About this report", "Table of contents Act 11/2018 - Ob- jectives and strategies"	19-20, 22, 23 10, 35-38, 50, 96, 107, 124, 171, 199, 204	
102-15	Key impacts, risks, and opportunities	1, 2, 6, 7, 10	8, 9, 11	Overview of the Document Chap. "A year for recovery". Section: "3.2. Risks in 2021"; Ta- ble: "The main short, medium and long-term trends and risks that could result from the context in which Aena operates". Section "About this report", "Table of contents Act 11/2018 - Factors and trends that may affect its future evolution; Infor- mation on the impacts that have been detected and a break- down thereof, in particular on the main short, medium and long- term risks"	4, 22-23, 27- 29	
3. Ethics and integrity						
102-16	Values, principles, standards, and norms of behaviour	1-10	16	Chap. 1. Sections "1.2. Culture and corporate ethics"; "1.2.2. Code of Conduct"; "1.2.3. Prevention of fraud, corruption and bribery"; "1.2.4. Procedure for related transactions"; "1.2.5. Con- flicts of interest"; "1.2.6. Specific measures to combat money laundering" Chap. 3. "Infographic – Aena's Commitments"; "Implementation of the human rights due diligence process"; "Prevention of risks that violate Human Rights"; "Complaints on violation of Human Rights" sections	15-18, 21- 24, 103-106	
102-17	Mechanisms for advice and concerns about ethics	1, 2, 10	16	Chap. 1. Sections "1.2. Culture and corporate ethics"; "1.2.2. Code of Conduct"; "1.2.3. Prevention of fraud, corruption and bribery"; "1.2.4. Procedure for related transactions"; "1.2.5. Con- flicts of interest"; "1.2.6. Specific measures to combat money laundering" Chap. 3. "Implementation of the human rights due diligence pro- cess"; "Prevention of risks that violate Human Rights" sections	15-18, 21- 24, 104-106	
4. Governance						

GRI Contents	Description	Global Compact	SDGs	Location/Content	Page ²	Comments/Omissions
102-18	Governance structure		16	Chap. 1, Sections "1.1.2. "Governing bodies"; "Executive Management Committee"; "1.4. Sustainability: Aena's management pillar"	3, 12, 35-38	
102-19	Delegating authority			Chap. 1, Sections "1.1.2. "Governing bodies"; "Executive Management Committee"; "1.4. Sustainability: Aena's management pillar"	3, 12, 35-38	
102-20	Executive-level responsibility on economic, environmental, and social topics			Chap. "2021: A year for recovery"; "1.2. The Airport Regulation Document (DORA)"; table "The main short, medium and long-term trends and risks that could result from the context in which Aena operates" Chap. 1. Infographic "ESG issues on the Board's agenda"; Section "1.4. Sustainability: Aena's management pillar" Chap. 2. "Title Page" Infographic Chap. 3 "Title Page" Infographic Chap. 4 "Title Page" Infographic Chap. 5 "Title Page" Infographic Chap. 6 "Title Page" Infographic Chap. 7 "Title Page" Infographic	19-20, 22-23 10, 35-38, 50, 96, 107, 124, 171, 199	
102-23	Chair of the highest governance body			Chap. 1, Sections "1.1.2. "Governing bodies"; "Executive Management Committee"; "1.4. Sustainability: Aena's management pillar"	3, 12, 35-38	
102-24	Nominating and selecting the highest governance body		5, 16	Chap. 1, Sections "1.1.2. "Governing bodies"; "Executive Management Committee"; "1.4. Sustainability: Aena's management pillar"	3, 12, 35-38	
102-25	Conflicts of Interest	10	16	Chap. 1, Sections "1.2. Culture and corporate ethics"; "1.2.3. Prevention of fraud, corruption and bribery"; "1.2.4. Procedure for related transactions"; "1.2.5. Conflicts of interest"	15-18, 21-24	
102-26	Role of highest governance body in setting purpose, values, and strategy			Chap. "2021: A year for recovery"; "1.2. The Airport Regulation Document (DORA)"; table "The main short, medium and long-term trends and risks that could result from the context in which Aena operates" Chap. 1. Infographic "ESG issues on the Board's agenda"; Section "1.4. Sustainability: Aena's management pillar" Chap. 2. "Title Page" Infographic Chap. 3 "Title Page" Infographic Chap. 4 "Title Page" Infographic Chap. 5 "Title Page" Infographic Chap. 6 "Title Page" Infographic Chap. 7 "Title Page" Infographic	19-20, 22-23 10, 35-38, 50, 96, 107, 124, 171, 199	
102-29	Identifying and managing economic, environmental, and social impacts	1, 7, 10	16	Section "About this report", "Table of contents Act 11/2018 - Factors and trends that may affect its future evolution"	204	
102-30	Effectiveness of risk management processes	1, 2, 7, 10	16	Chap. "2021: A year for recovery", Sections "3.1. Structure, management and control of risks" (infographic), "3.2. Risks in 2021". Chap. 1. Section "Committees supporting board" (infographic) "About this report" section, "Table of contents Act 11/2018 - Commercial relations, products or services that may have negative effects; How the group manages these risks; Procedures used to detect and assess them" The different chapters of this non-financial information statement contain the possible negative impacts associated with each area (Chap 2. Commitment to the environment; Chap. 4 Social management of our value chain; Chap. 5 Staff and social	24, 27-29 11, 204	

GRI Contents	Description	Global Compact	SDGs	Location/Content	Page ²	Comments/Omissions
				issues; Chap. 6 Safe, high-quality services; Chap. 7 Innovation).		
102-31	Review of economic, environmental, and social topics			Chap. "A year for recovery", section "3.1. Structure, control and management of risks" Chap. 1, Sections "1.2.1. Regulatory compliance system" (infographic); "1.2.3. Prevention of fraud, corruption and bribery"; C "1.4.2. Governance of sustainability" Section "About this report", "Table of contents Act 11/2018 - Due diligence procedures applied for the identification, assessment, prevention and mitigation of risks"	24 16, 21-22, 35, 204	
102-32	Highest governance body's role in sustainability reporting			Chap. 1, Sections: "Governing bodies" and "Management Committee" Chap. 1, Sustainability: Aena's management pillar Chap. 2 Commitment to the environment, Chap. 3 Commitment to society and human rights, Chap. 4 Responsible value chain management, Chap. 5 Staff and social issues, Chap. 6 Safe, high-quality services, Chap. 7 Innovation Section About this Report.	1, 3, 12, 35, 39, 50, 96, 107, 124, 171, 199, 204.	
102-35	Remuneration policies	1.6	5	Chap. 1, Section "Remuneration of the Board and Senior Management" Chap. 5, Section "5.1.2. Remuneration model", Table "Average remuneration and its evolution broken down by gender, age and professional categories or equal value (fixed + variable salary)"	13, 14, 133, 134, 135	
102-36	Process for determining remuneration	1.6	5, 16	Chap. 1, Section "Remuneration of the Board and Senior Management" Chap. 5, Section "5.1.2. Remuneration model", Average remuneration and its evolution broken down by gender, age and professional categories or equal value (fixed + variable salary)"	13, 14, 133, 134, 135	
102-38	Annual total compensation ratio			Chap. 5, Section "5.1.2. Remuneration model", Table "Average remuneration and its evolution broken down by gender, age and professional categories or equal value (fixed + variable salary)"; Section "Comparison with the inter-professional minimum wage"	13, 14, 133, 134, 135	
5. Stakeholder engagement						
102-40	List of stakeholder groups			Chap. "Overview of the document", Section "Relationship and dialogue with stakeholders"	11, 12	
102-41	Collective bargaining agreements	1, 3, 4, 6	8	Chap. 5, Section "5.4. Industrial relations"	153	
102-42	Identifying and selecting stakeholders			Chap. "Overview of the document", Section "Relationship and dialogue with stakeholders"	8, 9, 10	
102-43	Approach to stakeholder engagement			Chap. "Overview of the document", Section "Relationship and dialogue with stakeholders" Chap. 3, Commitments to sustainable development and to society (footnote "Stakeholders"). Section "About this report", "Table of contents Act 11/2018 - Commitments of the company to sustainable development"	11-12 97, 204	
102-44	Key topics and concerns raised			Chap. "About this report". Infographic "Phases for preparing the report and groups involved"	204	
6. Reporting practices						

GRI Contents	Description	Global Compact	SDGs	Location/Content	Page ²	Comments/Omissions
102-45	Entities included in the consolidated financial statements			Chap. 2021: A year for recovery. Section 1.1 "Evolution and impact of the pandemic caused by COVID-19 in Aena" Chap. "About this report"	18-19 204	
102-46	Defining report content and topic boundaries			Chap. "2021: A year for recovery", table "The main short, medium and long-term trends and risks that could result from the context in which Aena operates". Section "3.2. Risks in 2021"	4, 22, 27-29	
102-47	List of material topics			Overview of the Document Chapter "2021: A year for recovery", table "The main short, medium and long-term trends and risks that could result from the context in which Aena operates". Section "3.2. Risks in 2021"	4, 22, 27-29	
102-48	Restatements of information					Any re-expression of information given in previous reports is explained in each case.
102-49	Changes in reporting			Chap. "About this report"	204	
102-50	Reporting period			Chap. 1. Sustainable governance model. "Title Page" Infographic Chap. 2 Commitment to the environment, "Title Page" Infographic Chap. 3 Commitment to society and human rights, "Title Page" Infographic Chap. 4 Responsible value chain management, "Title Page" Infographic. Chap. 5 Staff and social issues, "Title Page" Infographic Chap. 6 Safe, high-quality services, "Title Page" Infographic Chap. 7 Innovation, "Title Page" Infographic. Section About this Report.	1, 50, 96, 107, 124, 171, 199, 204	Fiscal year 2021 (from 1 January to 31 December 2021)
102-51	Date of most recent report					23 February 2021
102-52	Reporting cycle			Fiscal year 2020 (from 1 January to 31 December 2020)		Annual
102-53	Contact point for questions regarding the report					rc@aena.es
102-54	Claims of reporting in accordance with the GRI Standards			Chap. "About this report". This report has been developed in accordance with the GRI Standards, essential option		
102-55	GRI content index			Chap. "About this report". Section "GRI Table of Contents".		
102-56	External assurance			Chap. Introduction, section "Level of review by external auditors"	3	Independent audit report of the consolidated non-financial information statement of Aena S.M.E, S.A. and subsidiaries for the fiscal year 2021
GRI 103: Management approach 2016						
103-1	Explanation of the material topic and its boundary			Chap. "2021: A year for recovery", Section 3 "Risks and their management", "3.1. Risks in 2021" Section "About this report", "Table of contents Act 11/2018 - Significant impacts and their verification and control. Measures taken"	5-9, 24-29 204	
103-2	The management approach and its components	1-10		Chap. "2021: A year for recovery", Section: "3.1. Structure, management and control of risks" (infographic) Chap 1. Infographic "Regulatory compliance system"; Sections Culture and corporate ethics", "Code of conduct", "Prevention of fraud, corruption and bribery"; "Governance of sustainability", Chap. 2. Section: "2.1.3. Management of environmental risks and impacts"; table: "Some indicators related to environmental	24-29 15-19, 21- 22, 35, 55, 56, 60, 61, 63, 67-69, 10-71, 72- 73, 77-78,	

GRI Con- tents	Description	Global Compact	SDGs	Location/Content	Page ²	Comments/Omissions
				management and the resources dedicated to the improvement of environmental management and the prevention of environmental risks"; "2.2.1. Climate Action Plan", "Effective mitigation and adaptation actions and measures to achieve the decarbonisation objectives (infographic)"; Specific decarbonisation objectives "2.2.4. Metrics: Carbon footprint", "2.2.5. Efficiency in the use of energy and renewable energy"; "Energy efficiency in 2021. Some relevant actions (infographic)"; "Reduction of emissions thanks to renewable energy facilities"; "2.3. Pollution"; 2.5.1. Biodiversity management and protection model; 2.5.2. Protected spaces "2.6.1. Waste management and circular economy model". Chap. 3. "Implementation of the human rights due diligence process"; "Complaints on violation of Human Rights" Chap. 4. Sections "4.2.2. The acquisition and purchasing process", "Inclusion of social and environmental issues in tendering procedures"; "4.2.3. Contract execution processes" Chap. 5. Section "Dismissals"; "Turnover rate"; "5.1.3. Registering the workday and disconnecting from work"; "5.2. Diversity and inclusion"; "5.2.1. Gender diversity"; "5.2.2. Universal accessibility to employment for people with disabilities"; "5.2.3. Accessibility of services"; "Generational diversity, age management and the promotion of integrating young people in the workplace"; "5.3.2. Training"; "Sustainability Strategy: training, development and professional career"; "5.4. Industrial relations"; "5.5. Occupational health and safety", "Communication, dialogue and participation of employees in occupational safety"; "Balance and promotion of the health and well-being of workers", Chap. 6 Introduction Section (infographic); "6.7.3. Complaint mechanisms" Section "About this report", table "Table of contents Act 11/2018 - Due diligence procedures applied for the identification, assessment, prevention and mitigation of risks; How the group manages these risks"	81-82, 90, 92, 104-106, 117-122, 131-132, 137-138, 139, 143, 145, 148, 166-169, 172, 196-197, 204	
103-3	Evaluation of the management approach	1-10		Chapter "2021: A year for recovery", Section: "3.1. Structure, control and management of risks" Chap. 1. Sustainable governance model. "Title Page" Infographic Chap. 2 Commitment to the environment, "Title Page" Infographic Chap. 3 Commitment to society and human rights, "Title Page" Infographic Chap. 4 Responsible value chain management, "Title Page" Infographic. Chap. 5 Staff and social issues, "Title Page" Infographic Chap. 6 Safe, high-quality services, "Title Page" Infographic Chap. 7 Innovation, "Title Page" Infographic Section "About this report", "Table of contents Act 11/2018 - Procedures used to detect and assess them"	24 1, 50, 96, 107, 124, 171, 199, 204	
<p>GRI 201: Economic performance 2016 Material topics: Sustainability and Economic Profitability; Research, Innovation, Digital Design and Transformation; Impact and Contribution in the Community; Decarbonisation and Combating Climate Change; Quality of Services and Responsible Services; Restrictions derived from the Regulatory Framework; Internationalisation</p>						
201-1	Direct economic value generated and distributed		5, 8, 9	Section "About this report", "Table of contents Act 11/2018 - Commitments of the company to sustainable development"	98, 100-102	

GRI Contents	Description	Global Compact	SDGs	Location/Content	Page ²	Comments/Omissions
				Chap. 3, Section "3.1.1. Social action: Contributions to foundations and non-profit entities"; "3.2.1. Creating social value". Table "Generation of resources in the community (Social cash flow);" "Impact on local populations and on the territory"		
201-2	Financial implications and other risks and opportunities due to climate change	7, 8, 9	13	Chap. 2, Section "2.2.1. Climate Action Plan", "2.2.3. Risks and opportunities related to climate change"	60, 65-66	
201-4	Financial assistance received from the government	10	16	Chap. 1, Section "1.3.1. Tax paid", table	33	Consult the Annual Accounts
GRI 205: Anti-corruption 2016						
Material topics: Good governance and ethical culture; Transparency, reporting and communication with stakeholders; Cybersecurity and data protection						
205-2	Communication and training about anti-corruption policies and procedures	10	16	Chap. 1, Section ". "Culture and corporate ethics"; "1.2.3. Prevention of fraud, corruption and bribery"; "Conflicts of interest"; "Procedure for related transactions"	15-18, 21-24	
GRI 207: Tax 2019						
Material topics: Good governance and ethical culture; Transparency, reporting and communication with stakeholders						
207-1	Approach to tax		16	Chap. 1, Section "1.3. Fiscal transparency"	32-33	
207-2	Tax governance, control, and risk management	10	16	Chap. 1, Section "1.3. Fiscal transparency"	32-33	
207-3	Stakeholder engagement and management of concerns related to tax		16	Chap. 1, Section "1.3. Fiscal transparency".	32-33	
207-4	Country-by-country reporting		16	Chap. 1, Section "1.3.1. Tax paid"	34	
GRI 302: Energy 2016						
Material topics: Decarbonisation and combating climate change; Environmental footprint and use of resources (circular economy)						
302-1	Energy consumption within the organisation	7, 8, 9	7, 8, 12, 13	Chap. 2, Sections "Main energy consumption indicators" (graph and table) and "2.2.6. Renewable energies" (table)	74, 75, 76	
302-3	Energy intensity	7, 8, 9	7, 8, 12, 13	Chap. 2, Sections: "2.2.1. Climate Action Plan"; "Specific decarbonisation objectives"; "2.2.4. Metrics. Carbon footprint"; "Reduction of emissions thanks to renewable energy facilities and energy efficiency"; "Main energy consumption indicators" (graph and table)	60, 61, 67, 72-73, 74, 75	
302-4	Reduction of energy consumption	7, 8, 9	7, 8, 12, 13	Chap. 2, Sections "Energy efficiency in 2021. Some related relevant actions (infographic)"; "Reduction of emissions thanks to renewable energy facilities and energy efficiency"	71, 72, 73	
GRI 303: Water and effluents 2018						
Material topics: Environmental footprint and use of resources (circular economy)						
303-5	Water consumption	7, 8, 9	6, 14	Chap. 2, Section "Water consumption indicators"	88, 89	
GRI 304: Biodiversity (2016)						
Topics: Environmental footprint and use of resources (circular economy)						
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305-2	Energy indirect (Scope 2) GHG emissions	7, 8, 9	3, 12, 13, 14, 15	Chap. 2, Section "2.2.4. Metrics. Carbon footprint"	67-69	
305-4	GHG emissions intensity	7, 8, 9	13, 14, 15	Chap. 2, Section "2.2.4. Metrics. Carbon footprint"	67-69	
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GRI 306: Waste 2020						
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GRI 308: Supplier environmental assessment 2016						
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403-4	Worker participation, consultation, and communication on occupational health and safety	3	3, 8	Chap. 5, Section "5.4. Industrial relations"; "5.5. Occupational health and safety"; "Communication, dialogue and participation of employees in occupational safety"	153, 156-161	
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The Sustainability Accounting Standard Board (SASB) is a US-based non-profit organisation whose mission is to help companies around the world identify, manage and report on the sustainability issues most relevant to investors.

In order to further its commitment to transparency towards all stakeholders, Aena has extended its sustainability reporting framework by adopting the

SASB reporting standard, in an attempt to quantify its creation of value and its impact on the environment.

Due to the heterogeneity of the activities framed in its business model, Aena has considered, in addition to the indicators of the sector to which it belongs (Professional and commercial services), those of the Air Freight & Logistics and Real Estate sectors, which complement the set of activities carried out by the

company. As a result of the analysis of the indicators associated with the three industries and their relationship with Aena's business, only the indicators of the SASB framework that are substantive and/or apply to Aena have been selected, taking into account its ordinary business.

These indicators are detailed below:

Topics					
Professional and commercial services sector	Indicator No.	Description	Location	Page	Omissions or comments
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	SV-PS-230a.3	Number of data breaches Percentage involving customers' confidential business information (CBI) or personally identifiable information (PII) Number of customers affected	Chap. 1, Section "Data protection" Chap. 6, Section "6.3.2. Measures to ensure the effectiveness of the Cybersecurity Plan"	28-30 184	
Workforce Diversity & Engagement	SV-PS-330a.1	Percentage of gender and racial/ethnic group representation for (1) executive management and (2) all other employees	Chap. 5, Section "5.2.1. Gender diversity"	140-141	
	SV-PS-330a.2	Voluntary and involuntary turnover rate for employees	Chap. 5, Section "Turnover rate"	132	
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	TR-AF-110a.2	Discussion of long-term and short-term strategy or plan to manage Scope 1 emissions, emissions reduction targets, and an analysis of performance against those targets.	Chap. 2, Sections "2.2.1. Climate Action Plan"; "Specific decarbonisation objectives"; "Evolution and progress of the set decarbonisation objectives"	60-62	
Air quality	TR-AF-120a.1	Air emissions of the following pollutants: (1) NOx (excluding N2O), (2) SOx, and (3) particulate matter (PM10)	Chap. 2, Section "2.3.1. Air pollution"	78	
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	IF-RE-130a.5	Description of how the considerations related to energy management in buildings are integrated into the analysis of real estate investments and in the operational strategy	Chap. 2, Section "2.2.5. Efficiency in the use of energy and use of renewable energy";	70, 71	
Water management	IF-RE-140a.2	(1) Total water withdrawn by portfolio area with data coverage and (2) percentage in regions with High or Extremely High Baseline Water Stress, by property subsector	Chap. 2, Section "Water"	88, 89	
	IF-RE-140a.4	Description of water management risks and discussion of strategies and practices to mitigate those risks	Chap. 2, Section 2.4. Sustainable use of resources: water,	86	See also the Strategic Plan for water management, available at https://www.aena.es/en/corporative/environment-sustainability/sustainability/water.html
Management of Tenant Sustainability Impacts	IF-RS-410a.3	Discussion of approach to measuring, incentivizing, and improving sustainability impacts of tenants	Chap. 2, Section "2.1.5. Sustainability and value chain" Chap. 4, Section "Inclusion of social and environmental issues in tendering procedures"	58, 59 118-122	
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Links of interest

Overview of the Document

Aena's website	https://www.aena.es/en/passengers/passengers.html
Aena's 2021 Consolidated Annual Accounts	https://www.aena.es/en/shareholders-and-investors/financial-and-economical-information/financial-and-operational-publications.html
Shareholders and investors portal	https://www.aena.es/en/shareholders-and-investors.html
CR section of the Aena website	https://www.aena.es/en/corporative/cr/responsible-business/responsible-business-aena.html
Environmental section of the Aena website	https://www.aena.es/en/corporative/environment-sustainability/environment-office.html
Contracting and companies	https://www.aena.es/en/commercialbusinesses/commercial-businesses.html
General information for users and airlines in general	https://www.aena.es/en/passengers/passengers.html
Job portal	https://empleo.aena.es/empleo/SessSrv?accion=seleccionar&leng=EN&SEDE=0
Telematic services portal	https://serviciostelematicos.aena.es/en/online-services/online-services.html
Aena Twitter	https://twitter.com/aena
Aena Facebook	https://www.facebook.com/aena.es/
Aena Instagram	https://www.instagram.com/accounts/login/?next=/aena.es/
Aena LinkedIn	https://www.linkedin.com/company/aena/mycompany/
Aena YouTube Channel	https://www.youtube.com/c/AenaTV/playlists
Enjoy Aena Facebook	https://es-es.facebook.com/EnjoyAena/
Enjoy Aena Instagram	https://www.instagram.com/accounts/login/?next=/enjoyaena/

1. Sustainable governance model

Significant Shares and Treasury Stock of the website of the National Securities Market Commission – CNMV Portal	http://www.cnmv.es/Portal/Consultas/DerechosVoto/Notificaciones-Participaciones.aspx?qS=%7b1cfac28d-93c5-4b8f-88d6-b46d6c0fae17%7d&lang=en
Company Bylaws	https://www.aena.es/sites/Satellite?blobcol=urldata&blobkey=id&blobtable=MungoBlobs&blobwhere=1576857202804&ssbinary=true
General Shareholders' Meeting Regulations	https://www.aena.es/sites/Satellite?blobcol=urldata&blobkey=id&blobtable=MungoBlobs&blobwhere=1576857202824&ssbinary=true
Board of Directors Regulations	https://www.aena.es/en/shareholders-and-investors/corporate-governance/regulations-governing-board-directors.html
Corporate Policies	https://www.aena.es/en/shareholders-and-investors/corporate-governance/corporate-policies.html
Information on the call of the Aena 2021 General Shareholders' Meeting	https://www.aena.es/en/shareholders-and-investors/corporate-governance/general-shareholders-meeting.html
Resolutions adopted by the 2021 GSM	https://www.aena.es/sites/Satellite?blobcol=urldata&blobkey=id&blobtable=MungoBlobs&blobwhere=1576857164521&ssbinary=true
Results of the voting on the resolutions included in the agenda of the 2021 GSM	https://www.aena.es/sites/Satellite?blobcol=urldata&blobkey=id&blobtable=MungoBlobs&blobwhere=1576857164565&ssbinary=true
Code of Conduct	https://www.aena.es/sites/Satellite?blobcol=urldata&blobkey=id&blobtable=MungoBlobs&blobwhere=1576857144424&ssbinary=true
Code of Conduct of Aeroportos do Nordeste do Brasil	https://www.aenabrasil.com.br/pt/corporativo/Compliance.html
Anti-Corruption and Fraud Policy of Aeroportos do Nordeste do Brasil	https://www.aena.es/sites/Satellite?blobcol=urldata&blobkey=id&blobtable=MungoBlobs&blobwhere=1576857968030&ssbinary=true
Regulatory Compliance Policy	https://www.aena.es/sites/Satellite?blobcol=urldata&blobkey=id&blobtable=MungoBlobs&blobwhere=1576857144150&ssbinary=true
Director candidate selection policy	https://www.aena.es/sites/Satellite?blobcol=urldata&blobkey=id&blobtable=MungoBlobs&blobwhere=1576857967990&ssbinary=true
Policy on communications and contacts with shareholders, institutional investors and proxy advisers	https://www.aena.es/sites/Satellite?blobcol=urldata&blobkey=id&blobtable=MungoBlobs&blobwhere=1576858310843&ssbinary=true
Sustainability Policy	https://www.aena.es/sites/Satellite?blobcol=urldata&blobkey=id&blobtable=MungoBlobs&blobwhere=1576857968132&ssbinary=true
Risk control and management policy	https://www.aena.es/sites/Satellite?blobcol=urldata&blobkey=id&blobtable=MungoBlobs&blobwhere=1576858310881&ssbinary=true
Integrated Quality, Environmental and Energy Efficiency Management Policy	https://www.aena.es/sites/Satellite?blobcol=urldata&blobkey=id&blobtable=MungoBlobs&blobwhere=1576857144515&ssbinary=true
General reporting policy for economic-financial, non-financial and corporate information of Aena	https://www.aena.es/sites/Satellite?blobcol=urldata&blobkey=id&blobtable=MungoBlobs&blobwhere=1576857144549&ssbinary=true
Corporate tax policy	https://www.aena.es/sites/Satellite?blobcol=urldata&blobkey=id&blobtable=MungoBlobs&blobwhere=1576857968064&ssbinary=true
Corporate governance policy	https://www.aena.es/sites/Satellite?blobcol=urldata&blobkey=id&blobtable=MungoBlobs&blobwhere=1576858438204&ssbinary=true
Policy against corruption and fraud	https://www.aena.es/sites/Satellite?blobcol=urldata&blobkey=id&blobtable=MungoBlobs&blobwhere=1576857968166&ssbinary=true
Information Security Policy	https://www.aena.es/sites/Satellite?blobcol=urldata&blobkey=id&blobtable=MungoBlobs&blobwhere=1576857968200&ssbinary=true
Information Security Policy	https://www.aena.es/sites/Satellite?blobcol=urldata&blobkey=id&blobtable=MungoBlobs&blobwhere=1576857968200&ssbinary=true

Human Rights Policy	https://www.aena.es/sites/Satellite?blobcol=urldata&blobkey=id&blobtable=MungoBlobs&blobwhere=1576857968200&ssbinary=true
Stakeholders relations policy	https://www.aena.es/sites/Satellite?blobcol=urldata&blobkey=id&blobtable=MungoBlobs&blobwhere=1576857152833&ssbinary=true
Data Policy	https://www.aena.es/sites/Satellite?blobcol=urldata&blobkey=id&blobtable=MungoBlobs&blobwhere=1576857968247&ssbinary=true
Information on Board Committees	https://www.aena.es/en/shareholders-and-investors/corporate-governance/board-committees.html
Activities reports of Board Committees	https://www.aena.es/en/shareholders-and-investors/corporate-governance/reports/other-reports.html
Arrangement of the Board of Directors and CVs	https://www.aena.es/en/shareholders-and-investors/corporate-governance/board-of-directors.html
Arrangement of the Executive Management Committee and CVs at 31/12/2021	https://www.aena.es/en/corporative/about-aena/executive-management-committee.html
Board Committees	https://www.aena.es/en/shareholders-and-investors/corporate-governance/board-committees.html
Annual Report on Remuneration	https://www.aena.es/en/shareholders-and-investors/corporate-governance/reports/directors-remuneration.html
Corporate Governance Report	https://www.aena.es/en/shareholders-and-investors/corporate-governance/reports/corporate-governance-reports.html
Airport Regulation Document (DORA) 2022-2026	https://www.aena.es/sites/Satellite?blobcol=urldata&blobkey=id&blobtable=MungoBlobs&blobwhere=1576857313584&ssbinary=true
Aena's complaints channel	https://serviciostelematicos.aena.es/en/online-services/available-services/citizens/complaints-channel.html
Aeropertos do Nordeste do Brasil complaints channel	https://denuncia.aenabrasil.com.br/
Aena's web privacy policy	https://portal.aena.es/en/privacy-policy.html
Privacy policy for Aena Shareholders and Investors	https://www.aena.es/en/privacy-policy-for-aena-shareholders-and-investors.html
Data privacy information policy for users of the facilities, customers, suppliers and the Aeropertos do Nordeste do Brasil website. Privacy information policy for personnel of collaborating companies of Aeropertos do Nordeste do Brasil	https://anbbrasil-my.sharepoint.com/personal/acarboni_aenabrasil_com_br/_layouts/15/onedrive.aspx?id=%2Fpersonal%2Facar-boni%5Faenabrasil%5Fcom%5Fbr%2FDocuments%2FPolicas
Privacy Policy for customers of London Luton Airport	https://travel.london-luton.co.uk/terms-conditions/privacy-policy/
Cookies policy	https://www.london-luton.co.uk/cookies-policy
Policy for disclosure to third parties of London Luton Airport	https://www.london-luton.co.uk/terms-conditions
Information on related transactions	https://www.aena.es/en/shareholders-and-investors/general-information/related-party-transactions.html
Aena Tax Strategy	https://www.aena.es/en/shareholders-and-investors/financial-and-economical-information/tax-transparency/fiscal-strategy.html
Sustainability Strategy 2021-2030	https://www.aena.es/en/corporative/environment-sustainability/sustainability/sustainability-strategy.html
Responsible Business Strategy for London Luton Airport	https://www.london-luton.co.uk/corporate/sustainability/responsible-business-strategy#:~:text=Responsible%20Business%20Strategy%202020%20%2D%202025,has%20never%20been%20more%20important.

2. Commitment to the environment

Environmental Care Office	https://www.aena.es/en/corporative/environment-sustainability/environment-office.html
Noise complaints and claims at London Luton Airport	https://www.london-luton.co.uk/corporate/community/noise/making-a-noise-complaint
London Luton Airport feedback form	https://www.london-luton.co.uk/contact-us
Aeropertos do Nordeste do Brasil's <i>Canal de Ouvidoria</i>	https://ouvidoria.aenabrasil.com.br/
Noise consultation and complaint policy	https://www.london-luton.co.uk/LondonLuton/files/4e/4e34d520-025e-464d-af5f-f48f37778e8b.pdf
Aena Climate Action Plan 2021-2030: path to zero emissions	https://www.aena.es/en/corporative/environment-sustainability/climate-change/climate-action-plan.html
Carbon Reduction Plan for London Luton Airport	https://www.london-luton.co.uk/CMSPages/GetFile.aspx?guid=af6067e9-0fd6-438d-ac28-8a1c1423d8e6
Reports from the surveillance network at Adolfo Suárez Madrid-Barajas Airport	https://www.aena.es/en/adolfo-suarez-madrid-barajas.html
Data from the stations around Barcelona-El Prat Josep Tarradellas Airport (atmospheric pollution)	https://www.aena.es/en/josep-tarradellas-barcelona-el-prat.html
Environmental Impact Assessment (EIA) projects	https://www.aena.es/en/corporative/environment-sustainability/environmental-assessment/environmental-impact-assessment-eia-of-projects.html

3. Commitment to society and human rights	
Collaboration agreements signed by Aena	https://www.aena.es/en/corporative/transparency/agreements.html
ATAG Report. COVID-19 analysis fact sheet, ed. Sept. 2021	https://www.atag.org/our-publications/latest-publications.html
Barcelona cycling network	https://www.amb.cat/s/en/web/mobilitat/mitjans-transport/bicicleta.html
Airport surface access strategy for 2018-22	https://www.london-luton.co.uk/corporate/lla-and-the-environment/promoting-public-transport
Environmental Master Plans	https://www.aena.es/en/corporative/environment-sustainability/environmental-assessment/strategic-environmental-assessment-sea-of-plans.html
Local community projects at London Luton Airport	https://www.london-luton.co.uk/corporate/community/community-trust-fund
Information about the Adolfo Suárez Madrid-Barajas Airport City	https://desarrollo-logistico.aena.es/en/logistic-development.html
Modern Slavery Act at London Luton Airport	https://www.london-luton.co.uk/corporate/modern-slavery-statement
4. Social management in the value chain	
Aena Recruitment Portal	https://empleo.aena.es/empleo/SessSrv?accion=seleccionar&leng=EN&SEDE=0
Landing page for Aena Suppliers and Aena Companies	https://contratacion.aena.es/contratacion/principal?portal=inicio
Landing page for Aena Companies	http://empresas.aena.es/sap(bD1cyZjPTAxMA==)/bc/bsp/sap/zexpwai/home.do?_ga=2.127558861.1303479140.1609751344-996859737.1585825955
Information about procurement on the Aena website	https://empresas.aena.es/empresas-contratacion/
Murcia International Airport procurement portal	http://www.aeropuerto-de-murcia.es/Contratacion/index
London Luton Airport "In tend" electronic procurement portal	https://in-tendhost.co.uk/llaol/asp/Home
Public Sector Procurement Platform	https://contrataciondeestado.es
5. Staff and social issues	
Aena Collective Agreement	https://www.boe.es/boe/dias/2011/12/20/pdfs/BOE-A-2011-19846.pdf
Average remuneration and pay gap at London Luton Airport	https://gender-pay-gap.service.gov.uk/Employer/MZGnz73O https://www.london-luton.co.uk/corporate/lla-publications/gender-pay-gap-report
Madrid Community Business Premises Agreement (ADI)	https://documentacion.eu/convenios-colectivos/20191026-convenio-colectivo-2020-oficinas-despachos-comunidad-de-madrid.pdf
Aena's 2020 Non-financial Information Statement	https://www.aena.es/en/corporative/cr/sustainability-assessment/non-financial-information-statement.html
Coordination of Business Activities with third parties – Occupational risk prevention	https://www.aena.es/en/corporative/about-aena/businesses/occupational-risk-prevention.html
Royal Decree-Law 8/2019, of 8 March, on urgent measures of social protection and the fight against precarious work during the working day	https://www.boe.es/buscar/doc.php?id=BOE-A-2019-3481
London Luton Airport Health and Safety Policy	https://www.london-luton.co.uk/corporate/health-safety-matters
6. Safe, high-quality services	
London Luton Airport Accessibility Forum	https://www.london-luton.co.uk/special-assistance-landing/llaaf-organisations
PRM Service Spain	https://www.aena.es/en/passengers/travellers/persons-reduced-mobility.html
Special assistance for persons with reduced mobility - London Luton Airport	https://www.london-luton.co.uk/special-assistance-landing/getting-the-special-assistance-you-need
Special assistance for persons with reduced mobility - Recife Guararapes - Gilberto Freyre International Airport	https://www.aenabrasil.com.br/pt/aeroportos/aeroporto-internacional-do-recife-guararapes-gilberto-freyre/Assistencia-especial--.html
Special assistance for persons with reduced mobility - Maceió - Zumbi dos Palmares International Airport	https://www.aenabrasil.com.br/pt/aeroportos/aeroporto-internacional-de-maceio-zumbi-dos-palmares/Assistencia-especial.html

Special assistance for persons with reduced mobility - Joao Pessoa - Presidente Castro Pinto International Airport	https://www.aenabrasil.com.br/pt/aeroportos/aeroporto-internacional-de-joao-pessoa-presidente-castro-pinto/Assistencia-especial-.html
Special assistance for persons with reduced mobility - Aracaju - Santa María Airport	https://www.aenabrasil.com.br/pt/aeroportos/aeroporto-internacional-santa-maria-aracaju/Assistencia-especial-.html
Special assistance for persons with reduced mobility - Juazeiro do Norte – Orlando Bezerra de Menezes Airport	https://www.aenabrasil.com.br/pt/aeroportos/aeroporto-de-juazeiro-do-norte-orlando-bezerra-de-menezes/index.html
Special assistance for persons with reduced mobility - Campina Grande – Presidente Joao Suassuna Airport	https://www.aenabrasil.com.br/pt/aeroportos/aeroporto-de-campina-grande-presidente-joao-suassuna/Direitos-do-passageiro.html
Passenger rights	https://www.aena.es/en/passengers/travellers/incidents-on-your-trip.html
7. Innovation	
Aena Ventures	http://www.aenaventures.com/

AENA S.M.E., S.A. and its subsidiaries

Independent assurance report on the
consolidated Non-Financial Information
Statement for the year ended
31 December 2021

Translation of a report originally issued in Spanish. In the event of a discrepancy, the Spanish language version prevails

INDEPENDENT ASSURANCE REPORT ON THE CONSOLIDATED NON-FINANCIAL INFORMATION STATEMENT FOR THE YEAR ENDED 31 DECEMBER 2021 OF AENA S.M.E., S.A. AND ITS SUBSIDIARIES

To the Shareholders of AENA S.M.E., S.A.:

Pursuant to article 49 of the Spanish Code of Commerce, we have performed the verification, with a scope of limited assurance, on the consolidated Non-Financial Information Statement (hereinafter “NFIS”), for the year ended 31 December 2021 of AENA S.M.E., S.A. and its subsidiaries (hereinafter “the Group”), which forms part of the Group’s Consolidated Management Report.

The contents of the NFIS includes additional information to that required by prevailing Spanish mercantile legislation on non-financial information, which has not been the subject of our verification work. In this regard, our work was limited solely to verification on the information identified in the chapter “Table of contents Act 11/2018” included in the NFIS.

Responsibilities of the Directors

The preparation and content of the NFIS included in the Consolidated Management Report are the responsibility of the Directors of AENA S.M.E., S.A. The NFIS has been prepared in accordance with the contents specified in the prevailing Spanish mercantile legislation and following the criteria of the selected Sustainability Reporting Standards of the Global Reporting Initiative (GRI standards), as well as those other criteria described as indicated for each subject in the NFIS " Table of contents Act 11/2018".

These responsibilities also include the design, implementation and maintenance of internal control deemed necessary to enable the NFIS to be free from material misstatement, whether due to fraud or error.

The Directors of AENA S.M.E., S.A. are also responsible for defining, implementing, adapting and maintaining the management systems from which the necessary information for preparing the NFIS was obtained.

Our independence and quality control

We have complied with the independence and other ethical requirements of the Code of Ethics for Professional Accountants issued by the International Ethics Standards Board for Accountants (IESBA), based on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

Our firm applies International Quality Control Standard 1 (IQCS 1) and accordingly maintains a comprehensive quality control system that includes documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

The engagement team was comprised of professionals who are experts in reviews of non-financial Information and, specifically, in information about economic, social and environmental performance.

Our responsibility

Our responsibility is to express our conclusions in an independent limited assurance report based on the work performed. We have carried out our review in accordance with the requirements established in International Standard on Assurance Engagements 3000 Revised, currently in force, "Assurance Engagements other than Audits or Reviews of Historical Financial Information" (ISAE 3000 Revised), issued by the International Auditing and Assurance Standards Board (IAASB) of the International Federation of Accountants (IFAC), and with the Performance Guide on assurance engagements on non-financial information statements issued by the Spanish Institute of Certified Public Accountants.

The procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement and, consequently, the level of assurance provided is also substantially lower.

Our work has consisted of making inquiries to Management, as well as of the different units of the Group that were involved in the preparation of the NFIS, in the review of the processes for compiling and validating the information presented in the NFIS, and in the application of certain analytical procedures and sample-based review testing described below:

- Meetings with the Group's personnel to gain an understanding of the business model, policies and management approaches applied, the main risks related to these matters and to obtain the information required for the external review.
- Analysis of the scope, relevance and completeness of the contents included in the NFIS for 2021 based on the materiality analysis performed by the Group and described in the NFIS, considering the contents required in prevailing Spanish mercantile legislation.
- Analysis of the processes used to compile and validate the data presented in the NFIS for 2021.
- Review of the information concerning risks, policies and management approaches applied in relation to the material matters described in the NFIS for 2021.
- Verification, through sample-based testing, of the information relating to the contents included in the NFIS for 2021 and its adequate compilation from the data provided by information sources.
- Obtainment of a representation letter from the Directors and Management.

Emphasis of matter

Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment stipulates the obligation to disclose information on how and to what extent the undertaking's activities are associated with economic activities that qualify as environmentally sustainable in relation to climate change mitigation and climate change adaptation. This obligation applies for the first time for the 2021 fiscal year, provided that the Non-Financial Information Statement is published from 1 January 2022 onwards. Consequently, the attached NFIS does not contain comparative information on this matter. Additionally, certain information has been included in respect of which the Directors of AENA have opted to apply the criteria that, in their opinion, best allow them to comply with the new obligation, and which are those defined in the "1.5 Sustainable financing. Taxonomy" in the accompanying NFIS. Our conclusion is not modified in respect of this matter.

Conclusion

Based on the procedures performed in our verification and the evidence obtained, nothing has come to our attention that causes us to believe that the consolidated Non-Financial Information Statement of AENA S.M.E., S.A. and its subsidiaries for the year ended 31 December 2021 has not been prepared, in all material respects, in accordance with prevailing Spanish mercantile legislation and the criteria of the selected GRI standards, as well as other criteria, described as indicated for each matter in the "Table of contents Act 11/2018" of the consolidated Non-Financial Information Statement.

Use and distribution

This report has been prepared in response to the requirement established in corporate legislation in force in Spain and, therefore, it might not be appropriate for other purposes and jurisdictions

DELOITTE, S.L.

(Signed on original in Spanish)

Ana Sánchez Palacios
February 22, 2022