

# **STAKEHOLDER RELATIONS POLICY OF AENA S.M.E., S.A.**

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

## I. PURPOSE

The Board of Directors of Aena S.M.E., S.A. (“**Aena**” or the “**Company**”) approves this Stakeholder Relations Policy (hereinafter, the “**Policy**”) to recognise the importance of stakeholder management as a key element for achieving social interest and developing a responsible and sustainable business model, and to establish the principles and guidelines for such management, understanding stakeholders to be those groups that have the ability to influence the achievement of the Company’s objectives or that may be impacted by its activity.

The Policy is developed and complemented by the different corporate policies that meet specific needs and expectations, such as the Policy on communication and contacts with shareholders, institutional investors and proxy advisers or the Policy on Reporting Economic-Financial, Non-Financial and Corporate Information. Notwithstanding the foregoing, the Board of Directors may approve other corporate policies aimed at specific Stakeholders.

## II. SCOPE

This Policy is applicable to Aena (parent company) and to any of the companies integrated in its group (hereinafter “**Subsidiaries**”), under the terms established in article 42 of the Code of Commerce (the “**Aena Group**”).

Notwithstanding the foregoing, Subsidiaries registered outside of Spain may make the necessary adaptations to this Policy in order to comply with the local law applicable to them.

However, when within the scope of local law applicable to Subsidiaries registered outside of Spain there is a regulation in force, compliance with which requires the alteration or suppression of essential terms or principles of this policy, its adaptation shall require that, once it is approved in the form of an addendum by the Board of Directors of the corresponding subsidiary, it be submitted, together with a legal report justifying the mandatory nature of the local regulation, to the Board of Directors of Aena SME SA for its final approval. Once the addendum has been definitively approved, it will be published on the website, along with the rest of the policies, and will be communicated to the Aena Directors whose area of responsibility is related to this policy.

The Board of Directors of Aena shall approve a procedure regulating the steps to be followed to adapt corporate policies to the local law applicable to subsidiaries domiciled outside Spain in the cases referred to in the preceding paragraph.

## Company Stakeholders

The number of Stakeholders (hereinafter, the “**Stakeholders**”, “**interested parties**” or “**SIGs**”) identified may be very large due to the Company’s own activity and the extent of its value chain. Stakeholders are grouped for the purposes of this Policy into different categories (which are further subdivided into other categories, made up of different groups and entities):

- Passengers.
- Employees.
- Airlines.
- Public Administrations.
- Regulatory bodies and other organisations.
- State Security Forces and Corps, Civil Protection and other emergency services.
- Shareholders, investors, markets, and other organisations and financial institutions.
- Air Transport Industry Associations.
- Trade Union and Business Organisations.
- Suppliers, service provider partners, lessees.
- Cargo companies, tour operators, general aviation.
- Tourism sector.
- Local communities and society.
- NGOs and associations.
- The media.

Aena has a set of tools to ensure the correct application of the Policy, designed to establish the necessary guidelines to segment, identify and prioritise the groups and SIGs, as well as the effective communication mechanisms -which facilitate correct communication and fluid dialogue with each group identified-, their needs, expectations and the relevant issues. All this is locally adapted and contextualised with the objectives set by the Company, facilitating the identification of future trends and good practices.

The Company recognises the need to frequently update and review the results obtained in each of the processes, pursuing continuous improvement in order to respond as efficiently as possible to the most current needs.

Training and awareness-raising activities will be carried out among employees - especially among the areas directly involved- in the area of communication and Stakeholder management in order to ensure its correct implementation.

The results obtained, including best practices and possible areas for improvement in the management of SIGs, among others, will be disseminated, mainly, and in those aspects that are not particularly confidential, through the Company’s different communication channels, as well as through the different reporting tools, especially facilitating the exchange of information among employees.

### III. PRINCIPLES

Aena considers **SIGs** to be those groups that have the capacity to influence the achievement of the Company's objectives or that may be impacted by its activity, and a framework of relations based on transparency, dialogue, the generation of trust and the creation of shared value must be promoted with them, based on the following principles:

- a) Act responsibly and build relationships based on ethics, integrity, sustainable development, respect for human rights and the communities affected by the different activities of the Company.
- b) Ensure compliance with current legislation in Aena's relations with third parties, respecting the principles of legality, efficiency, transparency and ethical behaviour with Stakeholders, with full submission to Aena's Anti-Bribery and Anti-Fraud Policy.
- c) Protect the rights of Stakeholders, through clear, direct and effective communication channels to receive appropriate information, guaranteeing equal treatment in terms of information, participation and the exercise of their rights.
- d) Apply the principles of cooperation and transparency in relations with the authorities, regulatory bodies and competent administrations.
- e) Work towards consensus with Stakeholders, especially with local communities and with the peoples of the territories where the Aena Group operates, taking into account their needs, points of view and expectations.
- f) Pursue continuous improvement, periodically reviewing the mechanisms for relations with Stakeholders to ensure that they respond as efficiently as possible to the needs of the moment.
- g) Promote the involvement of Stakeholders in the Company's business project, through a strategy of strong involvement with the communities in which it operates and the creation of shared sustainable value for all of them.
- h) Respond to the legitimate interests of all Stakeholders in line with those of the Company.
- i) Build lasting, stable and robust relationships based on co-responsibility, respect, ethics and integrity.
- j) Promote recognition of Aena's commitment to diversity in the broadest sense and, in particular, in all matters relating to the professional development of its members.
- k) Recognise the importance of managing relations with Stakeholders as a key element for achieving social interest and developing a responsible and sustainable business model.
- l) Contribute, with all this, to preserving the corporate reputation in the different countries and businesses in which the Company operates.

#### **IV. MONITORING AND CONTROL**

The Board of Directors is entrusted with the utmost oversight of relations with Stakeholders, safeguarding, protecting and facilitating the exercise of their rights and interests within the framework of the defence of the company's interests.

The Nomination, Remuneration and Corporate Governance Committee (CNRGC) is responsible for supervising and evaluating the processes of relations with the different Stakeholders, and the Sustainability and Climate Action Committee (CSAC) is responsible for knowing, promoting, guiding and supervising 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 channels of communication, participation and dialogue with the Stakeholders; all without detriment to the powers of the Audit Committee.

#### **V. VALIDITY**

This Policy was approved by the Board of Directors of Aena at its meeting of 28 September 2021 and last updated at its meeting of 19 December 2023. It will remain in force as long as no amendments are made to it.