



January 2020

# **HUMAN RIGHTS POLICY OF AENA, S.M.E., S.A.**



## 1. PURPOSE

For Aena S.M.E., S.A. (hereinafter, “**Aena**” or the “**Company**”), protecting Human Rights is an essential part of its values and the minimum framework of action to guarantee that it carries out its business activities lawfully.

Through this Policy, the Company undertakes to deliver upon its responsibility to respect Human Rights, and especially the ones implicit in its activity and the operations carried out by its employees, to ensure it is not complicit in any form of abuse or violation.

This commitment goes beyond the people who are part of Aena and includes those who collaborate along the value chain, as well as all the communities that live in the environment where its operations take place, including indigenous peoples.

Likewise, in all its relations with suppliers and business partners, Aena promotes respect for the same principles, paying particular attention to situations of conflict where there is a high risk of human rights being violated.

## 2. SCOPE AND APPLICATION

This Policy is binding and applicable to the Aena Group, and through it, Aena commits itself to defending the fulfilment and protection of these rights in all its activities and geographical areas in which it operates by means of a majority shareholding. Aena will also endeavour to adopt these principles and values in the other companies with which it collaborates.

## 3. PRINCIPLES AND COMMITMENTS OF AENA TOWARDS HUMAN RIGHTS

Aena's Human Rights Policy is based, *inter alia*, on the principles set forth 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; and the United Nations Sustainable Development Goals.

On this basis, Aena is committed towards:

- The abolition of child labour

Aena respects the rights of children, rejecting the use of child labour, as defined by the prevailing laws in all countries in which it operates.

- Avoiding discriminatory practices

Aena rejects all forms of discrimination on the grounds of age, race, sex, religion, disability, political ideology, sexual orientation or social origin, and is committed to ensuring equal opportunities and that all its employees are treated with respect for their diversity, at any stage of their employment relationship.



- Promoting people's development

Aena acknowledges the importance of training and professional guidance in people's development and for their skills, encouraging employees and their representatives to become involved and take part in such activities.

- Helping to ensure freedom of association and collective negotiation

Aena recognises, without interference, the right of its employees to arrange or take in organisations to defend and promote their interests, through trade union representation or in the forms of representation chosen in accordance with the prevailing laws and practices in the various countries where the employment relationship takes place.

Likewise, Aena recognises the value of collective bargaining as a preferential instrument for determining the contractual conditions of its employees, and also for regulating relations between management and the unions.

- Promoting adequate working conditions and protecting people's health

Aena is committed to ensuring that the best health and safety conditions are maintained in the workplace. Therefore, it promotes the dissemination and reinforcement of a safety culture, developing risk awareness and encouraging its employees to act responsibly, mainly through information, training and the implementation of preventive measures that may be necessary to achieve this purpose.

- Promoting a respectful and dignified working environment

Aena is committed to ensuring there is a positive and respectful work environment and thus rejects any form of harassment, threat or intimidation in the workplace.

- Commitment towards its customers

Aena is committed to ensuring that its products and services do not harm the safety and physical integrity of its customers, to the extent that this can reasonably be foreseen.

- Commitment towards people linked to suppliers, contractors, partner companies and business partners

Aena will disseminate its commitment to Human Rights throughout its entire value chain, encouraging its suppliers, contractors, business partners and other partner companies to formally arrange their commitment to Human Rights and, if they do not have their own policy, to sign up to Aena's.

- Respect for the rights of communities

Aena is committed to safeguarding the rights of the local communities in which it operates, and to providing the necessary means so that its activities do not negatively impact the traditional ways of life and work of the people living in the areas where it operates.

Aena pays special attention to the most vulnerable communities, such as indigenous populations, mainly through the promotion of local development projects from which these communities stand to benefit.



When designing and building infrastructure projects, Aena is committed to taking into account its environmental footprint and to respecting Human Rights in the areas where such projects are to be developed, using appropriate environmental and social impact studies.

- Promotion and awareness of Human Rights

Aena is committed to promoting a culture of respect for Human Rights and to raising awareness of these rights among its professionals in all the areas in which it operates and, in particular, in those areas where there may be higher risk of such rights being violated.

#### **4. DEVELOPMENT OF THE POLICY**

For the effective development of this Policy and the promotion of the values of the Universal Declaration of Human Rights, Aena undertakes to collaborate with non-governmental organisations and other social institutions, and also to help to carry out social projects and to deploy environmental policies focused on keeping the environmental impact of its activity to a minimum.

#### **5. MONITORING AND CONTROL MECHANISMS**

Aena implements control and monitoring mechanisms to fulfil its commitments in the field of Human Rights, which allow it to permanently assess the level of risk, and also to pinpoint new potential impacts or social concerns.

To this end, Aena carries out continuous due diligence in its own activities and others related to third parties, focused on identifying, preventing, mitigating and responding to potential negative consequences on Human Rights.

Aena is committed to establishing effective complaint mechanisms in its operations through its Appointments, Remuneration and Corporate Governance Committee, from the time the economic activity begins, so that individuals whose Human Rights may be violated are able to bring such circumstances to the Company's notice.

Aena's employees must also inform the Company of any possible breach of the commitments set out in this Policy, as well as in the other conduct-related directives and guidelines it has established.

#### **6. APPROVAL AND REVIEW**

This Policy was approved by the Board of Directors at its meeting held on 28 January 2020. It will be updated and revised as necessary, to adapt to any new contingencies that may arise in the specific environment addressed here, so as to ensure it is implemented as best as possible.