



Human Rights Policy

Contents

1. INTRODUCTION 3

2. PURPOSE AND SCOPE 3

3. OPERATING PRINCIPLES AND COMMITMENTS 4

3.1. Guiding principles 4

3.2. Commitments 4

 ENAIRe's commitment to its people.....5

 Commitment to customers.....6

 Commitment to vendors and partner companies6

 Commitment to society6

4. MONITORING MECHANISMS 7

5. DISCLOSURE AND DISSEMINATION 7

6. APPROVAL AND VALIDITY 7

ANNEX. REFERENCE DOCUMENTATION 8

1. INTRODUCTION

ENAIRe, a state-owned company of the [Ministry of Transport, Mobility and the Urban Agenda](#), is responsible for the planning, management, coordination, operation, maintenance and administration of air traffic, telecommunications and aeronautical information services, as well as of the communications infrastructure, facilities and networks of the air navigation system, with the aim of ensuring that the service is provided safely, efficiently, continuously and sustainably.

ENAIRe, aware that [respect for human rights](#) in the performance of its corporate activity is a fundamental component on which the purpose and values of the organisation rests, and a necessary aspect to [contribute to sustainable development and comply with the United Nations 2030 Agenda](#), adopts this policy on respect for human rights in accordance with national and international legislation, treaties and standards.

This Policy is part of ENAIRe's commitment to ethical and socially responsible corporate behaviour, as set out in our [Code of Ethics](#) and other corporate policies that directly or indirectly protect fundamental human rights. This is all in accordance with national and international law and the best practices set out in Annex I.

2. PURPOSE AND SCOPE

The purpose of this Policy is to establish the principles that will be applicable to due diligence in the field of human rights in order to strengthen ENAIRe's commitment to respect said rights, as recognised in national and international law.

The responsibility to respect human rights requires:

- Preventing its own activities from causing or contributing to negative consequences on human rights, and addressing these consequences when they occur.
- Trying to avoid or mitigate the negative consequences on human rights that are directly related to operations, products or services resulting from its business relationships, even when it did not contribute to creating them.

This Policy applies to ENAIRe and all its personnel, the members of its Management Committee and Board of Directors, who are required to know, understand and comply with the provisions of this Policy.

Similarly, persons acting on behalf of and representing ENAIRe without being part of its organisation will undertake to act in accordance with this Policy when representing the Company or acting on its behalf in the performance of their duties.

ENAIRe also promotes respect for human rights in its relations with third parties, such as our stakeholders, business partners, vendors and customers.

3. OPERATING PRINCIPLES AND COMMITMENTS

3.1. Guiding principles

To achieve the objectives indicated, ENAIRE accepts and promotes the following **basic principles of action** that must govern its activity in all areas:

- ⇒ **Identify the potential impacts** that operations and activities carried out by ENAIRE and dependent companies, directly or through a third party, can have on human rights.
- ⇒ **Have a due diligence system** that identifies the activities with the highest risk of human rights violations in order to develop mechanisms to prevent and mitigate said risk, as well as to repair any impacts if they materialise.
- ⇒ **Promote a culture of respect for human rights**, and actions aimed at raising awareness among ENAIRE's staff and stakeholders in this area.
- ⇒ **Have reporting and whistleblowing mechanisms** with sufficient guarantees and adequate procedures to deal with potential cases of human rights violations.
- ⇒ **Adopt the measures** that may be applicable as soon as possible **if a human rights violation is identified** and report said violation to the competent public authorities so they can take the appropriate action when such infringement may constitute an administrative, criminal or other violation.

3.2. Commitments

Based on these principles of action, ENAIRE undertakes to identify, prevent, mitigate and respond to the negative consequences that its activities have on human rights, both internally and externally in its relations with its stakeholders, proceeding with due diligence in the field of human rights in its respective areas:

- ⇒ **ENAIRe's commitment to its people**
- ⇒ **Commitment to customers**
- ⇒ **Commitment to vendors and partner companies**
- ⇒ **Commitment to society**

ENAIRe's commitment to its people

The main commitments to the people who work at ENAIRe are as follows:

- ⇒ **Promote adequate working conditions and protect people's health:** ENAIRe is committed to ensuring that the best occupational health and safety conditions are maintained in the workplace. It thus promotes the dissemination and reinforcement of a safety culture by developing risk awareness and encouraging responsible behaviour by its staff, mainly through information, training and the implementation of the necessary preventive measures to achieve it. ENAIRe also informs all its professionals of the risks present in the workplace, as well as of the rules and procedures in place to mitigate them.
- ⇒ **Facilitate freedom of association and collective bargaining:** ENAIRe recognises, with no interference, the right of its employees to set up or participate in organisations to defend and uphold their interests through unions or other forms of representation chosen in accordance with the law and the practices in effect in the different countries where employment relationships are entered into. ENAIRe also recognises the value of collective bargaining as the preferred instrument for determining the contractual conditions of its employees, as well as for regulating the relations between management and trade unions.
- ⇒ **Reject forced labour:** ENAIRe promotes a culture of zero tolerance for forced labour, and is committed to the freedom of its professionals in the Organisation, as well as of its vendors. As a result, ENAIRe will never require any person, under threat or any other form of intimidation, to perform work or provide a service that he/she does not want to do voluntarily.
- ⇒ **Reject child labour:** ENAIRe commits to respecting the rights of children and therefore rejects the use of child labour.
- ⇒ **Respect the principles of equality, diversity and non-discrimination:** ENAIRe rejects all forms of discrimination on the grounds of age, race, sex, religion, disability, political ideology, sexual orientation or social origin, and remains committed to ensuring equal opportunity and that all of its employees are treated with respect for their diversity, at any stage of their employment relationship. ENAIRe will also promote gender equality in access to employment and career development, and respect wage parity in equal positions.
- ⇒ **Promote the development of people:** ENAIRe recognises the importance of professional training and guidance for the development of people and their skills. Because of this, ENAIRe supports the training of its employees, promoting their and their representatives' involvement and participation.
- ⇒ **Support a respectful and decent work environment:** In order to maintain a positive and respectful work environment, ENAIRe rejects any cruel, inhumane, humiliating or degrading treatment, as well as any form of harassment (whether verbal, physical, sexual or psychological), threat or intimidation in the workplace.

Commitment to customers

The commitments to customers and users of the services provided by ENAIRE are based on the following principles:

- ⇒ **Provide safe and reliable services and infrastructures** that do not compromise the safety or physical integrity of its customers to a reasonably predictable extent.
- ⇒ **Ensure equal access to the services offered** without any discrimination on the basis of gender, race, age, disability or any other personal condition.
- ⇒ **Ensure the proper processing of personal data**, in accordance with the applicable data protection laws. In this regard, ENAIRE will use the information and data of customers and users exclusively for the agreed purpose, safeguarding it with due diligence and security. It will also allow individuals to exercise their rights under the applicable law

Commitment to vendors and partner companies

- ⇒ **Disseminate its commitment to human rights** throughout its entire value chain, encouraging its vendors, contractors, business partners and other collaborating companies to formalise their commitment to human rights and, if they do not have their own policy, to endorse ENAIRE's policy.

Commitment to society

- ⇒ **Reject corruption** in all its forms, both direct and indirect, as it constitutes one of the factors that undermines the functioning and legitimacy of institutions and has serious repercussions on the violation of human rights, and on the well-being and development of society. Because of this, ENAIRE has implemented an anti-corruption control mechanism.
- ⇒ **Respect the rights of the local communities** in which it operates, and commit to providing the necessary means for its activities not to adversely affect the traditional ways of life and work of the people living in the areas where it operates.
- ⇒ **Take into account the environmental footprint, and respect economic, social and cultural rights**, in the design of airspace, operational manoeuvres and infrastructure construction in areas where these projects are to be carried out. For this reason, ENAIRE carries out awareness-raising actions among its professionals to respect human rights in all the areas where the company operates and, in particular, in those where the risk of violating these rights may be higher.

4. MONITORING MECHANISMS

The body responsible for supervising the operation of and compliance with this policy is the [regulatory compliance body](#).

5. DISCLOSURE AND DISSEMINATION

This Policy is supported by Senior Management and is kept as substantiated information.

In compliance with the requirements of international transparency standards and practices, this Policy will be made available to all stakeholders on ENAIRE's [website](#) for their information and consultation.

Similarly, it will be suitably communicated and [disseminated](#) internally using existing tools to ensure it is understood and applied within the organisation, thus confirming ENAIRE's [commitment](#) to our staff, to development and [progress](#) in order to guarantee the future of aviation and Spanish society, promoting its dissemination so it is understood by all the [people](#) who act on behalf of ENAIRE.

6. APPROVAL AND VALIDITY

Following its presentation to the [Management Committee](#) on 20 December 2022, this Policy was approved by ENAIRE's [Board of Directors](#) at its meeting of 25 January 2023, coming into force on that date. It shall remain in force until amendments are made to the Policy, which will be properly communicated.

This Policy is subject to review and updating as needed to adapt it to any regulatory, social, economic or organisational changes.

ANNEX. REFERENCE DOCUMENTATION

The most relevant documents on the protection of human rights are listed below.

- ⇒ The United Nations International Charter on Human Rights:
- ⇒ The United Nations Universal Declaration of Human Rights
- ⇒ The United Nations International Covenant on Economic, Social and Cultural Rights
- ⇒ The United Nations International Covenant on Civil and Political Rights
- ⇒ The Conventions of the International Labour Organization
- ⇒ The United Nations Guiding Principles on Business and Human Rights
- ⇒ The Ten Principles of the United Nations Global Compact on human rights, labour rights, the environment and anti-corruption.
- ⇒ The Sustainable Development Goals (SDGs) approved by the United Nations in its 2030 Agenda
- ⇒ The Spanish Constitution
- ⇒ ISO 26000. Guide to Corporate Social Responsibility

As well as those documents and texts that may replace or supplement the aforementioned documents.