

Code of Ethics



Message from the President of ENAIRE

At ENAIRE we take care of your flight to ensure it is safe, fast, efficient, and sustainable. This is our purpose, and it sets the course for our roadmap and business strategy. It serves as a guide for our professional performance.

We are a benchmark in the provision of air navigation services at both the European and global levels. This is because we demonstrate, day after day—with humility and dedication—the rigour with which we deliver our services, focusing on safety, quality, and sustainability.

Public service is at the core of ENAIRE's identity, and our professionals show their commitment to society and to air navigation safety every day.

We are fully aware that the mission entrusted to us carries great responsibility.

We cannot conceive of a public service that is not aligned with the principles of ethics and integrity—two concepts that are inseparable and meaningless without one another.

That is why our Code of Ethics adheres to the highest standards of ethical behaviour and integrity.

It reflects the values, ethical principles, and conduct commitments that must guide our actions and decision-making, all of which are aimed at meeting the expectations of our stakeholders. Good governance, ethics, and regulatory compliance are among our top priorities, as they form the foundation of the trust placed in us.

This special responsibility extends to all ENAIRE professionals. Our conduct and performance must help to enhance the prestige and reputation of our organisation.

Each of us is part of ENAIRE and our behaviour must be exemplary making us proud of our integrity and professionalism, which reflect the values and principles of this Code, shaping the personality and culture of the organisation.

We rely on the commitment of all ENAIRE personnel to uphold and enforce the provisions of this Code. In doing so, we strengthen ethical practices within the organisation and contribute to maintaining the prestige and public service mission that we are honoured to serve.

José Antonio Santano Clavero
President of ENAIRE



OUR CODE OF ETHICS

ENAIRE, Spain's air navigation service provider and state-owned company of the Ministry of Transport and Sustainable Mobility, through the Secretary of State of Transport and Sustainable Mobility, was designated by the State as an Operator of Critical Infrastructure in 2015 and as an Operator of Essential Services in 2019.

ENAIRE, as a state-owned company providing air navigation services in Spain, performs an essential task for Spanish society, acting as a driving force for the development of the economy, society and tourism and for the nation's technological innovation.

Throughout its history, ENAIRE has maintained a corporate commitment with its different stakeholders based on ethical principles that are part of the corporate culture and that go beyond the strict observance of the law.

The aim of this Code of Ethics is to establish a reference for professional conduct that guarantees ethical and responsible behaviour by all ENAIRE personnel, and that introduces general ethical principles that must be observed, including in relationships with third parties.

SCOPE OF APPLICATION OF THE CODE

This Code of Ethics applies to ENAIRE and is mandatory for members of the Governing Board and Management Committee, as well as the rest of the company's governing and management bodies and for each and every one of the people working at ENAIRE, both in the performance of their duties and in their interactions with third parties, regardless of their association or position within the company.

This Code of Ethics shall also apply to the ENAIRE Foundation and to entities in which ENAIRE holds a majority interest, unless they have their own Code of Ethics.

Likewise, individuals acting on behalf of and representing ENAIRE, without being part of its organization, shall commit to acting in accordance with this Code when, in the performance of their duties, they act on behalf of or represent the Entity or act on ENAIRE's behalf.

All of them, hereinafter, "regulated individuals".

OUR AIM

In accordance with ENAIRE's Charter, our Purpose, as embodied by all the people of the Company in a collaborative manner and reflected as an essential element in the strategy, is our *raison d'être*.

Through its good governance, ENAIRE provides the basis for the organisation to achieve its Purpose ethically, effectively, efficiently and responsibly, in keeping with the expectations of key stakeholders and ensuring long-term value generation.

OUR VALUES

ENAIRE's Values are the basic principles that underpin our organisational personality and culture.

They have been drawn up jointly by all ENAIRE personnel and are an essential part of our strategy, meaning they identify us and provide a benchmark for all the people in the organisation.

Aim



"We take care of your flight to make it safe, fast, efficient and sustainable"



Safety First



Committed to customers and society



We are big team



"Hunger" for improvement in our organisation

OUR ETHICAL PRINCIPLES

Respect for human rights

At ENAIRE we express our commitment to and respect for human rights as contained in national and international laws, as well as to international recommendations and the principles of the Global Compact, enforcing them in all our areas of activity.

Commitment to sustainable development and corporate ethics

At ENAIRE we express our firm commitment to sustainable development and the achievement of the Sustainable Development Goals set out in the 2030 Agenda of the UN, as a cohesive framework for our programmes and actions, and for our relationships with our stakeholders, consistent with our corporate social responsibility.

We carry out our corporate activities by adopting a responsible business ethic, promoting sustainability in every area and endorsing value creation with respect to the environment in which we operate, by being aware of our impact on society and the natural environment.

Excellence, quality and innovation

At ENAIRE, we seek the highest quality in the services we provide. To this end, we promote the professionalism of our personnel and provide them with the resources needed to ensure that our actions in this constantly changing world are innovative, efficient and focused on excellence.



OUR COMMITMENTS

Good governance and regulatory compliance

- As a state-owned company, Critical Infrastructure Operator and Essential Services Operator in Spain, we act with a vocation to public service in keeping with the principles of efficacy, economy, efficiency and transparency in management, with the aim of satisfying the general interest.
- We provide services to our users openly, transparently and without discrimination, in accordance with the applicable laws.
- We are committed to promoting and communicating ENAIRE's purpose and values internally and externally, so that we may be identified as a great team that is devoted to public service to society.
- We take steps to learn about and strictly adhere to the applicable laws, as well as to the Code of Ethics and the policies and procedures of ENAIRE that affect our work.
- We do our jobs transparently and we are diligent and effective in our work, ensuring the achievement of the organisation's strategic objectives and the highest standards of safety and quality in the provision of services.
- We manage, protect and maintain public resources properly, which cannot be used for activities that are not permitted by the applicable laws.
- We comply with and enforce the obligations assumed in the Entity's contractual relations.
- Under no circumstances do we take advantage of our position in the Administration to obtain personal or material advantages.
- We are accountable for our actions, behaviours and results, and accept any responsibility that could arise from our decisions and actions.
- We inform the competent bodies of any irregular activity that we become aware of.



Safety

- "We have the highest commitment to ensuring the safe and effective provision of our Air Navigation Services, promoting a culture of prevention, proactivity and continuous improvement in the levels of operational, physical and cyber security."
- We encourage, at every level of activity and in all our services, a full awareness of the priority that safety has in all the actions we take as a company.
- We are committed to the safe management of the airspace and all our Air Navigation Services: Air Traffic Control, Communications, Navigation, Surveillance, Aeronautical Information, etc.
- We are responsible for the application of a Safety Management System that relies on the identification, prevention and application of corrective measures, based on continuous improvement.
- We promote management based on the responsibilities and skills of our staff, supported by ongoing training and awareness-raising as essential elements to ensure the safety of our operations and services.
- We enhance our safety culture by promoting a Just Culture that guarantees the open and free exchange of any information related to safety.

Professional and ethical conduct

- We behave professionally and ethically, taking responsibility for our actions and decisions at all times.
- We apply transparency across all our activities and in every area of the organisation.
- The decisions we take will abide by the applicable laws and will further the public interest and the purposes of the Company.

- We will not offer or accept hospitality and gifts that can influence business relationships by creating any advantage, preferential treatment, business expectations, a capacity to influence or an obligation (direct or indirect) to hire.
- We act impartially and objectively when taking decisions, and refrain from taking part in and taking decisions on matters where we are involved in a conflict of interest. Moreover, we always act in such a way that our private interests, those of our family members or other people connected to us, do not prevail over those of the Company.

Proper use of information

- We ensure the proper use of information by applying the relevant security measures, depending on the classification of the information.
- We ensure the secrecy of any non-public information we have access to as a result of our professional activity.
- Over the course of our activity, we only share with other professionals any information that is strictly necessary, as regulated by ENAIRE.
- We do not misuse the information or data we have access to as a result of our position or job, and use it only for legitimate business purposes.
- We do not use ENAIRE confidential information for our own or a third party's benefit.
- We commit ourselves to not disclose or publish ENAIRE information, whether images or content of any nature or format (digital or physical), that is the property of ENAIRE or related to ENAIRE, its employees, resources, systems, operations, facilities or infrastructures, or of organisations to which we provide services, without the explicit authorisation of the Company.

- We verify that any information that is transmitted, whether internally or externally, is truthful and that in no case will information be intentionally provided that is incorrect, biased or inaccurate and that is contrary to ENAIRE's interests and reputation.
- In events that are disseminated publicly, we will be particularly careful in our actions so that our message and behaviour are consistent with ENAIRE's strategic plan and with this Code of Ethics.
- If we identify any reasonable indication of a leak of confidential information, we will inform the organisation.
- If the employment or professional relationship with the Company ends, all of ENAIRE's information will be returned by the professional to the organisation, and the professional will remain bound by the confidentiality clause.
- We honour our commitment to the transparency and access to public information, guaranteeing the right of citizens to have all the relevant public information.
- We are committed to providing complete, transparent and truthful accounting and financial information. We will always provide an accurate image of the assets, financial situation and profits of ENAIRE as required by law.
- We respect the right to privacy of people in all its manifestations, and in particular as regards the processing of personal data. ENAIRE's Central Data Protection Unit is at the service of all of us to provide advice on complying with the applicable regulations.
- We are committed to processing any personal data we obtain when providing a service in a lawful, fair and transparent manner.



Safe and healthy working environment. Emotional well-being

- We comply with legal provisions on occupational health and safety.
- We provide a safe and risk-free work environment in our facilities. We promote occupational health and safety programmes, and we offer information and training on occupational risk prevention.
- We respect applicable preventive measures in terms of workplace health and safety and we use the resources provided by ENAIRE.
- We promote emotional well-being based on fair, courteous and respectful treatment at all levels of the organisation and in the different 360° assessments and evaluations.

Personnel selection and development

- In the recruitment, selection and/or professional promotion processes, we commit to taking decisions with the utmost objectivity, impartiality and transparency, without bending to the influence of factors that could alter the objectivity of the decisions.
- We respect the principles of equality, merit and ability to select people who best meet the profile, qualifications and needs set by ENAIRE.

- We enforce the provisions of personal data protection rules.
- We advocate for the professional development of the people who are part of ENAIRE.
- We promote training through programmes that are consistent with our strategic objectives to encourage personnel training, leadership, equal opportunity and career development.
- We are committed to taking advantage of ENAIRE's training programmes.

Equality, work-life balance and diversity

- At ENAIRE, we support equal treatment and opportunities between men and women, and do not discriminate, directly or indirectly, due to gender.
- We do not tolerate discrimination or harassment for reasons of race, religion, nationality, sex, sexual orientation, gender identity, gender expression, disability, age, opinion, or for any other personal or social condition or circumstance.

■ We comply with the applicable laws on equality and diversity, and with the provisions of the Equality Plan and, where applicable, in ENAIRE's Inclusion and Diversity Policies.

■ We promote actions to fully integrate people with disabilities, and we go beyond strict compliance with the regulations on the rights of people with disabilities.

- We do not use discriminatory language in any type of corporate, internal or external communication and we will promote the use of inclusive language.
- We respect the personal life of our professionals and the balance of work and family life.
- We improve professional and personal conditions through remote working and digital disconnection policies.

Environmental protection, climate change and decarbonisation of the economy

- All our activities are carried out with a view to respect and protect the environment, minimising any impact we might have.
- We encourage projects that contribute to environmental protection, carrying out and sponsoring research and development projects that help to decarbonise air transport.
- We strive to minimise the acoustic impact of air operations on population centres around airports.
- We only use the energy resources needed to provide our services, and we are engaged in a real energy transition, expanding the generation of electricity from renewable sources and introducing more efficient technologies that are less dependent on carbon emissions.
- We reduce pollution, minimise waste generation, use systems to reduce, reuse and recycle, and respect protected natural spaces.
- We actively collaborate with regulatory bodies to develop and promote regulations that protect the environment, as well as public policies and strategies that address this problem in a coordinated and consistent way.



Combatting fraud and corruption

- We reject fraud and corruption in all its forms and we declare our firm commitment to avoiding and prosecuting practices or behaviours that may be considered irregular or contrary to the law, both within the Entity and in its dealings with third parties (customers, suppliers, competitors, authorities, and others).

Relationships with third parties

- Relationships with third parties must be based on legality, equality and non-discrimination, acting with impartiality, objectivity, transparency and respect for the Code of Ethics.

- We do not accept or offer favours or privileges, including hospitality or gifts, based on one's professional position or status, offered by individuals or legal entities, nor do we grant preferential treatment to persons or entities in the framework of the relationships we maintain with third parties or in any other type of relationship in which we participate as employees of the Company.
- We respect the principles of impartiality and objectivity in our dealings with third parties, avoiding conflicts of interest.
- We promote the dissemination and knowledge of the Code of Ethics in our dealings with third parties.



Safeguarding ENAIRE's reputation

ENAIRE's reputation is a strategic asset of the company, an intangible asset that relies on the ethical behaviour of all its professionals, as well as on the provision of services with the highest standards of safety, quality and sustainability.

As such:

- We must take maximum care to preserve ENAIRE's corporate image and reputation in a way that is respectful and appropriate, applying the brand's usage criteria.
 - We must always mind our conduct in our work environment to ensure it is fair, impartial, comprehensive and beyond reproach.
 - We must engage in behaviours that contribute to ENAIRE's interests and reputation by building the trust that stakeholders have in our organisation.
- We should not use ENAIRE's name in activities that are not part of our duties within the Company.
 - All interactions with the media will be channelled through ENAIRE's Communication Division.



ETHICAL CHANNEL

Anyone who has knowledge of a fact that is contrary to this Code of Ethics, ENAIRE's internal regulations or the applicable legislation must report it through our Ethical Channel, accessible from the Cloud (intranet) and from ENAIRE's website.

ENAIRE's Ethics Channel is a platform that forms part of ENAIRE's Internal Reporting System.

This platform includes measures to ensure the security and integrity of information and the processing of personal data, in accordance with Law 2/2023 on the protection of individuals who report regulatory violations and on the fight against corruption. It allows whistleblowers to submit anonymous and confidential reports, either in writing or verbally, thereby ensuring their protection.

The Governing Board of ENAIRE is responsible for the implementation of ENAIRE's Internal Reporting System. The Board appointed the Secretary General and Director of Regulatory Compliance of ENAIRE as the Responsible Officer for the Internal Reporting System, effective June 13, 2023. This person has direct access to the Governing Board, as well as the independence, authority, and competence necessary to manage reports diligently.

The Ethics and Compliance Committee (CECN), the Director General, and the Governing Board of ENAIRE are the guarantors of the Internal Reporting System and of the protection of whistleblowers against retaliation, in accordance with the provisions of Law 2/2023 on whistleblower protection.

ENFORCING THE CODE OF ETHICS

ENAIRE is firmly committed to this Code and will gradually adopt the measures needed to implement the set of values, principles and behaviours that comprise it, spreading its content.

The Ethics and Compliance Committee ensures that the Code of Ethics is aligned with ENAIRE's values and ethical principles.

In its role of promoting an ethical culture and regulatory compliance, the Ethics and Compliance Committee (CECN):

- promotes awareness and compliance with the Code of Ethics;
- interprets the Code and provides guidance for decision-making in cases of doubt;
- makes improvement proposals;
- promotes the proper use of the Ethics Channel.



CONSEQUENCES IN THE EVENT OF NON COMPLIANCE

Regulated individuals who violate this Code may be subject to disciplinary measures, which will be proportionate to the degree of noncompliance, in accordance with the provisions of the collective agreements and other relevant rules.

If applicable, the competent authority will be promptly notified.

VALIDITY AND UPDATE

This Code of Ethics will go into effect once approved by the Governing Board and will be enforceable from that moment on. Any amendment or revision to this Code shall be submitted to the Governing Board for approval, and once approved, it will be communicated to the regulated individuals.

ENAIRE's Governing Board
On 25 September 2024

