



Stakeholders Policy

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1. INTRODUCTION

ENAIRe, a state-owned company of the [Ministry of Transport and Sustainable Mobility](#), 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. These services are provided to all users of the airspace managed by ENAIRe, such as civil aviation, drone operators, etc.

ENAIRe's values include its commitment [to meet and respond to the needs and expectations of its stakeholders](#), that is, of all those interested parties that are affected by its decisions and activities, either directly, such as customers, aviation sector users and its own personnel, or indirectly due to potential economic, social and environmental impacts.

As part of the [Integrated Management System](#) implemented in the organisation, ENAIRe has set up mechanisms to identify its stakeholders¹. It has also established two-way communications with them, as well as specific tools to facilitate participation and engagement with key stakeholders.

2. PURPOSE AND SCOPE

The purpose of this Policy is to establish the general framework for ENAIRe's relations with its [Stakeholders](#), especially those considered [key](#)², so as to consider their needs and expectations both in terms of the organisation's purpose and in the generation of long-term value, in order to create solid relationships, beyond legal and contractual requirements.

This Policy applies to ENAIRe and all its personnel, the members of the Management Committee and member of the Governing Board, 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.

3. OPERATING PRINCIPLES AND COMMITMENTS

3.1. General framework

This general framework for the Entity's relations with its stakeholders is defined in order to ensure that:

- ⇒ [Stakeholders are involved in defining the strategy and creating value](#) in order to achieve ENAIRe's purpose.

¹ ENAIRe's Stakeholders are identified on the Map of Stakeholders (DGL-17-DTC-001) and on the website: https://www.enaire.es/sobre_enaire/conoce_enaire/grupos_de_interes.

² Key stakeholders are those that directly impact ENAIRe's activities, either because they have a significant influence, or because they are significantly affected by these activities.

- ⇒ The business culture and ethical code of ENAIRe are in line with the expectations of its stakeholders.
- ⇒ The relationship of mutual trust and benefit with the Stakeholders is promoted in order to form long-term alliances and partnerships that share similar levels of ethics and integrity.
- ⇒ Open and transparent communication is maintained with stakeholders that is able to appropriately and fairly respond to their different expectations.
- ⇒ The stakeholders have the upmost confidence that ENAIRe's governing bodies are acting with integrity and making informed decisions based on a reliable analysis of risks, information and data, on the needs and expectations of stakeholders, on regulatory obligations, on ethical and social expectations, and on the impacts and dependence on the natural environment, taking into account current and future sustainability criteria and those of future generations.
- ⇒ Accountability is a priority of ENAIRe's governance bodies, providing relevant, comprehensive and transparent financial and non-financial information to stakeholders that covers material or relevant aspects involving sustainability.
- ⇒ ENAIRe is recognised by stakeholders and society as a prestigious and socially responsible corporate entity with a vocation and desire to serve the public, one that is recognised as a leader in the air navigation ecosystem internationally, both due to the quality of its professional services and to its engagement with stakeholders.

3.2. Guiding principles

ENAIRe's principles of action in terms of its relations with stakeholders, which all the people in our organisation must respect and enforce, are as follows:

- ⇒ Ensure the safety of air navigation in national responsibility airspace.
- ⇒ Act in the spirit of public service towards stakeholders, especially with the public, maintaining critical services of general interest.
- ⇒ Actively involve stakeholders in defining the strategy by creating relationships of mutual trust and benefit, so as to make it possible to comply with the purpose and create shared value.
- ⇒ Build relationships based on ethics, integrity, sustainable development and respect for human rights across the value chain of ENAIRe's services and activities, beyond its legal and contractual compliance, and contribute to the Sustainable Development Goals set out in the United Nations 2030 Agenda.
- ⇒ Take the impact on stakeholders into account in decision-making, including aspects associated with the environment and society, especially with regard to the communities affected by ENAIRe's activity.
- ⇒ Ensure that rights are protected and that all stakeholders are treated fairly, and that their needs and expectations are considered.
- ⇒ Provide new services to meet the needs of all airspace users.
- ⇒ Apply the principles of cooperation and transparency to relations with competent authorities, regulatory bodies and government agencies.

- ⇒ **Constantly optimise and improve the mechanisms for engaging and communicating** with stakeholders to ensure that their needs are satisfied, and do so through active listening and attention to their expectations, and through a direct, fluid, constructive, diverse, inclusive and intercultural dialogue.

3.3. Specific commitments

To ensure the proper application of this Policy, ENAIRe undertakes to:

- ⇒ **Identify each type and category of stakeholder**, and establish communication channels, committees and working groups to meet their needs and expectations and take them into account in decision-making.
- ⇒ **Promote socially responsible ties and commitments**, beyond any legal, contractual and professional responsibilities, to bolster and further the air navigation sector while protecting the environment and the interests of society and local communities.
- ⇒ **Work with stakeholders** to understand the current ecosystem and to anticipate future scenarios that ensure the viability and performance of the aviation sector and of ENAIRe over time.
- ⇒ **Use its knowledge of the needs and expectations** of its stakeholders to engage in constant interaction with them and to identify opportunities for business development, innovation and technology alliances that lead to an improved service, to progress and to the sustainable development of the sector and society.
- ⇒ **Involve stakeholders** in defining and deploying its strategy and in creating value by drawing on and contributing to the United Nations Sustainable Development Goals, recognising their contributions and including within the strategy the drivers they need to meet the objectives of their organisations.
- ⇒ **Build, maintain and develop a long-term value relationship** with stakeholders based on joint responsibility, ethical behaviour, trust and mutually beneficial results.
- ⇒ **Report to stakeholders** by publishing adequate, comprehensive, relevant and clear financial and non-financial information that covers material or relevant aspects involving sustainability, and audited by certified entities.
- ⇒ **Provide stakeholders with continuous, adequate and truthful information**, and let them access it in a transparent and cooperative manner.
- ⇒ **Actively gather the impressions of stakeholders** to continuously assess and improve the response to their needs and expectations, taking into account this information in decision-making.

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, the Policy will be appropriately communicated and [disseminated](#) internally using existing tools, to aid everyone acting on behalf of ENAIRE to understand and apply it.

6. APPROVAL AND VALIDITY

Following its presentation to the Management Committee on 14 February 2024, this Policy was approved by ENAIRE's Governing Board at its meeting of 08 April 2024, going into effect 10 calendar days after its approval, and will remain in force as long as no modifications occur, which will be properly communicated.

This Policy will be subject to review and update when necessary to adapt it to any regulatory, social, economic, or organizational changes.

ANNEX. Infographic on Stakeholders

This image summarises ENAIRe's main stakeholders: Customers; People (as Employees); Society (including passengers, and environmental protection groups, etc.); Regulators and public administrations; and Partners and suppliers.



The updated infographic on ENAIRe's Stakeholders is available internally on the Map of Stakeholders (DGL-17-DTC-001) and externally on the ENAIRe website:

https://www.enaire.es/about_enaire/know_enaire/stakeholders