



# Communication Policy

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## 1. INTRODUCTION

ENAIRe, a state-owned company of the [Ministry of Transport, Mobility and the Urban Agenda \(MITMA\)](#), 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.

After the publication of Royal Decree-Law 12/2018 of 7 September on the security of information networks and systems, implemented through Royal Decree 43/2021, dated 30 November 2018, ENAIRe was designated as [Operator of Critical and Essential Services](#), thus highlighting the importance of the services it provides to its customers and to society as a whole.

ENAIRe, in its desire to be a driving force within the Ministry of Transport, Mobility and the Urban Agenda and the aviation sector and its [Good Governance and Management](#) model, is aware of the need to build, approve and disseminate a [robust Communication Policy](#) that:

- is consistent with the [purpose, values, Code of Ethics and strategy](#) of ENAIRe and creates value in line with the expectations of our stakeholders;
- safeguards, protects and strengthens ENAIRe's [institutional brand, image and reputation](#), its activity, people and infrastructures as a [leader and benchmark for society](#);
- [complies with best Good Governance practices](#) in terms of transparency, accountability and [Corporate Social Responsibility](#);
- reflects the levels of safety and security required by its condition as a [Critical Infrastructure Operator](#) and an [Essential Services Operator](#), as defined in the [Information Security Policy](#).

## 2. PURPOSE AND SCOPE

The purpose of this [Communication Policy](#) is to:

- Lay out the [operational principles and commitments](#) governing internal and external communications in the organisation, and on which ENAIRe's general communication strategy is based.
- Identify the [communication channels](#) that are available to stakeholders and the information provided in each.

This Policy applies to ENAIRe and all employees, the members of ENAIRe's Management Committee and Governing Board, who are required to know, understand and comply with the provisions of this Policy. It will also apply to subsidiaries that do not have a Communication Policy, including the ENAIRe Foundation. 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

In terms of communication, this Policy relies on the following operational principles and commitments:

- **Ensure transparency, the confidentiality of information and data protection**
  - ⇒ Ensure transparent, truthful and immediate communications that provide adequate and comprehensive information in an open and non-discriminatory manner.
  - ⇒ Protect the confidentiality of the information of our services, activities, people and infrastructures, as well as the confidentiality required in our relationship with third parties, in compliance with the applicable legal requirements.
  - ⇒ Respect the right to privacy of people in all its manifestations, and in particular as regards the processing of personal data, in compliance with the applicable legal requirements.
- **Protect ENAIRe's information security**
  - ⇒ Avoid, as a Critical and Essential Services Operator, the dissemination and disclosure of any type of information that, due to its nature, may pose a risk in terms of safety and security of ENAIRe's people, goods, data and services, in accordance with ENAIRe's [Information Security Policy](#).
  - ⇒ Preserve the highest levels of confidentiality in the exchange of relevant information on Safety, in keeping with the [General Procedure for Communicating Safety Information of ENAIRe](#).
- **Boost ENAIRe's image and preserve its institutional reputation**
  - ⇒ Align communications with the strategy, values, Code of Ethics and culture of ENAIRe.
  - ⇒ Safeguard ENAIRe's image, reputation and prestige, and perform the corresponding reputational damage risk analysis.
  - ⇒ Convey a faithful image of ENAIRe as a State-Owned Business Entity serving the general interest, the relevance of its services and activities nationally and internationally, and its impact on safety, the Spanish economy, society and the progress of the aeronautical sector.
  - ⇒ Promote ENAIRe's involvement in associations, events, committees, and public channels that promote its public image as a public service and leading company in the aviation sector.
- **Have a plan for managing two-way communications with stakeholders**
  - ⇒ Inform stakeholders and society in general of ENAIRe's firm commitment to good governance, regulatory compliance, ethical, responsible, and sustainable behaviour, respect for human rights, environmental protection, and the fight against climate change.
  - ⇒ Special attention will be paid to communicating with ENAIRe's customers and the users of its services, such as airlines, non-commercial aviation, airport managers, drone operators, etc.
  - ⇒ Promote trust with stakeholders through effective, two-way communication channels that offer comprehensive, traceable and up-to-date information.
  - ⇒ Ensure that the economic and financial information, corporate and business sustainability information provided meets the most demanding criteria in terms of quality, reliability, clarity, and integrity, ensuring that the requirements set out in the applicable legislation, in internal standards and commitments made are met, showcasing best practices.
  - ⇒ Publish the conditions for accessing services and any changes made, as well as establish a formal consultation process with customers and users about the services, either periodically or as needed for specific changes to the services provided.

- ⇒ Apply the principles of cooperation and transparency to relations with competent authorities, regulators, supervisors, and government agencies.
- **Actively contribute to the transformation and consolidation of ENAIRe's culture**
  - ⇒ Support internal communication that contributes to the transformation, dissemination, and consolidation of ENAIRe's culture and that enhances the pride of belonging to the organisation based on its values to achieve a common project.
  - ⇒ Establish a trustworthy internal communication model that is both bidirectional and interactive, and encourages feedback from ENAIRe's employees, cohesion, and mutual recognition.
  - ⇒ As for internal information systems, ensure the confidentiality of the identity of whistleblowers and any third party mentioned, as well as of the processing of information and its investigation, the protection of whistleblowers, the presumption of innocence and the right to a defence.
- **Ensure the constant improvement of communication and its channels**
  - ⇒ Establish a communication model that can be constantly improved and whose efficacy can be evaluated.
  - ⇒ Take advantage of new technologies by promoting digitisation and other techniques and methodologies to address new communication challenges.

## 4. COMMUNICATION CHANNELS

### 4.1. Website

ENAIRe's website (<https://www.enaire.es>) is one of the main channels the Company uses to communicate with all its stakeholders and society.

The website includes:

- general information on ENAIRe, including financial information and information on corporate sustainability;
- Information on services and fees;
- access to online services;
- a specific Communication section that provides access to press releases, publications, a video library, blog, *Vuela* magazine and the *Safety Clip*;
- access to the Customer Portal;
- job offers;
- information on contracting;
- access to the e-Office;
- and access to the Transparency Portal of the Spanish Administration.

### 4.2. e-Office

ENAIRe has an e-Office that is accessible through its website (<https://enaire.sede.gob.es/>). The e-Office allows citizens to interact with the Company to carry out various administrative procedures such as requesting grants, information on public sector job vacancies, submitting complaints or suggestions, filing appeals or claims, environmental procedures, etc.

### 4.3. Transparency Site

Through the Transparency Site of the Spanish Administration, ENAIRe processes information requests submitted under Transparency Act 19/2013 of 9 December.

The Site is accessible directly through its specific website, or by clicking on the link on ENAIRe's website.

### 4.4. Contractor Profile

The ENAIRe website contains the Contractor Profile, located in the Public Sector Contracting Platform, where all information related to the Company's contracting procedures is published.

### 4.5. Ethics Channel

ENAIRe, as part of its commitment to corporate transparency and ethics, operates an Ethics Channel as a permanent means to report any behaviour that is irregular or potentially contrary to the law, to the policies and procedures of our organisation or to the performance standards set forth in the Code of Ethics.

### 4.6. Information mailbox and contact number

Any citizen, legal entity or stakeholder can send its enquiries and communications by email to ENAIRe at the address [informacion@enaire.es](mailto:informacion@enaire.es) or by calling the following number: +34 900 929 220.

### 4.7. Social and communication media

Through our social media channels ([Twitter](#), [Facebook](#), [LinkedIn](#), [Instagram](#) and [YouTube](#)), ENAIRe offers real-time and relevant information to the public, our digital followers and stakeholders, as well as photos and infographics, videos and more, along with information for professionals.

It also issues press releases, interviews, videos, etc. for written, digital or audiovisual media.

### 4.8. Participation in forums, fairs and events

ENAIRe is a company with a strong national and international presence, and is therefore an active participant in forums, congresses, fairs, events and institutional visits.

Highlights include ENAIRe's participation in fairs such as Fitur, Airspace Integration, Expodrónica, etc.

### 4.9. Channels for communicating specifically with the staff

- **"Nube" Intranet:** A 24/7 platform for internal use updated with ENAIRe's routine activity through special pages, news and events.
- **"Mi ENAIRe" app for mobile devices:** ENAIRe offers this application as a dynamic and interactive way to communicate with and inform employees.
- **ENAIRe informa.** Publications that provide the latest company information to employees and are disseminated via email and the "Cloud" Intranet.
- **Seminars and events:** ENAIRe organises events to communicate and disseminate its strategy, share notable achievements and promote the values and culture of the organisation.
- **ENAIRe Conecta:** Internal Teams channel through which ENAIRe shares important news about its activity in a fast, brief, convenient and simple format.

### 4.10. Channels for communicating specifically with customers

- ⇒ **Committees and meetings with customers:** ENAIRE has created committees and working groups with customers and other agents in the aeronautical sector to jointly deal with their needs and expectations.
- ⇒ **Email inbox** ([clientes@enaire.es](mailto:clientes@enaire.es)): This inbox responds to customer questions, complaints, suggestions and compliments.
- ⇒ **Customer Site** (<https://clientes.enaire.es>): Site where ENAIRE makes news and developments, upcoming events, reports on the quality of services, and more, available to customers. It also lets them participate in satisfaction surveys and user polls involving proposals for new flight procedure manoeuvres, airspace changes, etc.

## 5. COORDINATION WITH THE MEDIA

ENAIRE has a **Communication Directorate** that is tasked with promoting the organisation's reputation, directing the communication strategy, coordinating, analysing and managing the **relationship and contacts with the media**, advising and supporting ENAIRE's Management and ensuring proper coordination with the MITMA in this area.

The press and media can contact ENAIRE's Communication Department via telephone (+34 913 214 895) and email ([dircom@enaire.es](mailto:dircom@enaire.es)).

The Communication Directorate is assisted round-the-clock by Management and all ENAIRE employees to process information requests.

All requests made by the media to ENAIRE employees, or communications that employees may issue, must be coordinated beforehand with the Communication Directorate, which will proceed in accordance with the operational principles and commitments set out in this Policy. They must also adhere to any other guidelines and recommendations made by the Communication Directorate for this purpose.

## 6. VISITS TO FACILITIES WHERE ENAIRE PROVIDES ITS SERVICE

In order to disseminate and bolster its reputation and its vocation for public service, to show and demonstrate the high standards of safety and quality in the services it provides, and to reinforce ties with its stakeholders, ENAIRE receives and handles **visits to its operating facilities**, in an orderly and planned manner.

Due to the different ways they are arranged and managed, ENAIRE differentiates between the following types of visits, as described in the **Procedure for visits to facilities where ENAIRE provides its service**:

- Institutional visits
- Commercial visits (customers and users, vendors, etc.)
- Media visits
- Technical visits
- School visits
- Private visits

## 7. MONITORING MECHANISMS

The body responsible for supervising the operation of and compliance with this policy is the **regulatory compliance body**.

## **8. DISCLOSURE AND DISSEMINATION**

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.

## **9. APPROVAL AND VALIDITY**

Following its presentation to the Management Committee on 19 April 2023, this Policy was approved by ENAIRE's Governing Board at its meeting of 26 April 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.