

# Diversity, fairness and inclusion Policy



# **Diversity, fairness and inclusion Policy**

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#### 1. INTRODUCTION

The state-owned company ENAIRE is responsible for providing air navigation services in Spain and for managing air navigation networks and aids. It is part of the Ministry of Transport, Mobility and the Urban Agenda and carries out its activity within the framework of the Government's general transport policy.

In recent years, various equality regulations have been approved that supplement the provisions of Organic Law 3/2007 of 22 March, on the Effective Equality of Women and Men, as well as on the elimination of discrimination and on sexual freedom, that lay out the obligation for companies to take measures in these areas that ensure their effectiveness, and that also establish severe consequences in cases of noncompliance or if all the tools needed to prevent violence or harassment are not available.

As a result of the above, in addition to the applicable regulations and binding agreements, ENAIRE's activity is planned and forecast as per its strategic plan, the 2025 Flight Plan, which includes action plans to guide the company forward to ensure its viability, and whose Vision is to turn ENAIRE into a global operator, a leader in the air navigation sector, by relying on people, innovation and digitisation. ENAIRE's workforce is therefore one of its strategic priorities.

#### 2. PURPOSE AND SCOPE

This Policy aims to lay down ENAIRE's principles of action to achieve a working environment based on harmony and respect for all people who make up its diverse and inclusive workforce, principles that are binding upon management and administrative bodies and based on equal opportunity and the corresponding eradication of any form of discrimination. To achieve this, the leadership style must be inclusive and respond to the principles of social justice.

It lays out the commitments and lines of action to establish the management of diversity, equity and inclusion as key elements in ENAIRE's management, promoting a culture that guarantees a diverse and inclusive environment and encourages a work environment where trust and mutual respect prevail, as well as the recognition of the merit and capacity of its workforce as fundamental elements in the employment relationship and the professional development of its employees.

Through this policy, ENAIRE expresses its firm commitment to equal opportunity and to the recognition of diversity, to the equity and inclusion of all individuals, as well as its rejection of discrimination in any of its manifestations.

As a result, ENAIRE, in its management model and respecting the commitments made by our organisation in terms of sustainability and corporate social responsibility, is committed to professional excellence and quality of life for its employees, stakeholders and society in general, with a view to contributing to their progress and well-being.

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 during their daily work, as well as to draw inspiration from it in their relations with co-workers.

People in senior and middle management posts are responsible for implementing inclusion based on equity.

Similarly, people acting on behalf of ENAIRE who are not part of the organisation will undertake to act in accordance with the principles contained in this Policy.

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#### 3. OPERATING PRINCIPLES AND COMMITMENTS

ENAIRE is committed to equal opportunity and rejects any kind of discrimination, taking the necessary measures to identify, prevent and combat it.

It also makes the following specific commitments:

#### 3.1. Commitments to equal opportunity

In compliance with the applicable legal and contractual regulations, as well as with the ENAIRE Equality Plan, it undertakes to continue to apply the following principles:

- With regard to hiring: access to employment must be based on the principles of equality, merit, capacity and openness, without making any distinction for reasons of birth, racial or ethnic origin, gender, age, sexual orientation or gender, illness or health status; serological status, language, financial situation, opinion, religion or any other reason for discrimination.
- With regard to promotion: promotions at ENAIRE must necessarily be based on merit and capacity.

Women's access to positions of responsibility should be encouraged and supported through training actions and talent support programmes, with the aim of advancing toward a balanced gender distribution in these types of positions.

To the extent possible, ENAIRE's Board of Directors will have equal representation in terms of gender.

With regard to training: ENAIRE must continue to provide training to enhance professional
development and improve skills for all its staff depending on their specific characteristics, on the
basis of previously identified training needs and in coordination with the respective managers.

The training of the workforce must neutralise the risk of a hypothetical digital divide in older staff, as it is oriented, where necessary, to adapt workstations to new technologies.

Flexible training should be promoted through CAMPUS ENAIRE and other platforms.

Similarly, and as laid out in the Equality Plan, training and information on gender equality and the inclusion of all types of diversity should be provided that makes a significant effort in the area of sexual harassment or gender-based harassment prevention, as well as in the prevention of workplace harassment and any form of discrimination in the company.

- With regard to work-life balance: the work-life balance and shared responsibility measures in place at ENAIRE must make it easier to combine family and work life, with an emphasis on their shared importance. These measures must be disseminated and the necessary information must be constantly available to the workforce, in order to ensure that they are known by the staff so that they are in a position to use them in the way that is most appropriate to their personal needs.
  - The goal is to promote the balance between work and family life, making it easier for our workforce to continue pursuing responsibilities and interests that allow them to achieve full personal satisfaction in a diverse and changing society, thus promoting their attachment to the company.
- With regard to the fight against gender violence: Gender violence is a serious problem that
  constitutes the most serious expression of inequality between women and men, and must thus be
  addressed through the effort and commitment of all areas of society.

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ENAIRE must contribute to making the workforce more aware in this area and must have measures in place to protect, support and, if necessary, guide potential victims.

#### 3.2. Commitments to diversity, equity and inclusion

• Inclusive leadership: management at ENAIRE must be committed to diversity, fairness and inclusion, and must ground the conduct of its activity on these principles, which must be disseminated among the workforce, mainly by maintaining and engaging in exemplary conduct that consists of accepting, respecting and promoting the uniformity of its teams, accepting and assessing their uniqueness, diversity of opinions and ideas, as well as by preventing, identifying and eliminating any type of inequality, unfavourable treatment or abuse.

This process will enable collaborative, flexible, efficient and competitive structures to be created, such that each person feels unique and at the same time part of a team to which they belong and to which they contribute value, thus helping to achieve and internalise ENAIRE's common purpose and mission.

- Social dialogue and collective bargaining: ENAIRE must recognise and respect freedom of
  association, the right to collective bargaining; fair treatment of workers' representatives, as well as
  dialogue based on a spirit of cooperation and agreement, considering their work as representatives
  of its employees and their contribution to the defence of their rights.
- **Zero tolerance for unconscious biases**: ENAIRE must prevent and combat unconscious biases through information and awareness of the entire workforce.
- **Inclusive corporate communication**: ENAIRE must ensure that the language used in its internal and external communications is respectful of all personal diversities and circumstances.
  - This same pattern of behaviour applies to all communication media.
- Zero tolerance for any kind of harassment: ENAIRE is clearly and decidedly against any type of discrimination for any reason, and adopts preventive measures, and others to identify any harassment, applying the appropriate actions to combat it if necessary.
- Recognition and support for all types of diversity: ENAIRE recognises the value of all the people who make up its workforce, as unique and one-of-a-kind individuals, as well as their ability to contribute their genuine talent to the company, regardless of gender, sexual orientation, sexual identity or gender expression, type and degree of disability, age, convictions, ideology, religion or racial origin.

#### 4. MONITORING MECHANISMS

The body responsible for supervising the operation of and compliance with this policy is the regulatory compliance body. Until this organisation is created, the current internal or external regulations will apply.



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#### 5. DISCLOSURE AND DISSEMINATION

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

Given ENAIRE's commitment to the strict application of the operational principles contained in this Policy, and 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 17 February 2023, this Policy was approved by ENAIRE's Board of Directors at its meeting of 23 February 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.