



Safety and Security Policy

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1. INTRODUCTION

Safety and Security are core elements of ENAIRe's strategy. As the national air navigation service provider, it ensures the safety and security of people when they travel through our airspace and in the airports where it provides its services.

ENAIRe is not immune to today's changing risks and the new threats to safety and security, which is why one of its main objectives is to achieve and maintain the maximum possible levels of safety and security in all its facets - operational, cybersecurity, protection, and occupational risk prevention - by enhancing all the necessary safety and security actions.

2. PURPOSE AND SCOPE

The Safety and Security Policy aims to define and establish the principles of action and commitments that ENAIRe will abide by to maintain the highest levels of safety and security in all areas.

Implementing Regulation (EU) No 2017/373, *laying down common requirements for air navigation service providers*, sets requirements in terms of safety, cybersecurity, and the protection of property, people, welfare and health.

In addition, in the field of the Single European Sky, Implementing Regulation (EU) 2019/317, *laying down a performance and charging scheme in the single European sky*, sets other requirements for ENAIRe in the field of Safety.

It is also very important to note that ENAIRe was declared by the Ministry of the Interior as a Critical Operator in 2015 through Act 08/2011, *establishing measures to protect critical infrastructure*, and as an Essential Services Operator in 2019 through RD-Act 12/2018 *on the security of information networks and systems*. The Certification of Conformity with the National Security Framework (NSF) in the High Category for its air navigation operations systems is a clear example of ENAIRe's determination to achieve the highest levels of security.

ENAIRe, in the interests of being a leader in safety and security, is not limited to complying with regulatory requirements, but has placed the protection of all its personnel, facilities, assets, information and data as its highest priority. As a result, this Policy applies to safety and security in their broadest meanings, including safety, cybersecurity, the protection of goods and people and the health and welfare of ENAIRe's staff.

This Policy applies to [all ENAIRe 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](#), even if they are not 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, and they agree to extend these principles to the value chain.

3. OPERATING PRINCIPLES AND COMMITMENTS

3.1. Guiding principles

ENAIRe has established the following operating principles for safety:

- ⇒ [Safety is the top priority for ENAIRe](#), and it is the pillar on which our service and the welfare of people rest.

- ⇒ ENAIRe's Safety Management System is part of the Integrated Management System (IMS) and is **integrated into the organisation's processes** (Government, Services and Support) and with the **global management structure**; therefore, safety is taken into account in the design of processes and systems throughout their life cycle.
- ⇒ ENAIRe regards **safety as a comprehensive process** consisting of all the technical, human, material, strategic and organisational elements related to the system and its interconnections, aimed at guaranteeing **prevention, detection, reaction and recovery in the event of threats and incidents**.

3.2. Commitments

- ⇒ C1 - **Prioritise safety** and security as central elements of ENAIRe's strategy, taking care of people when they travel through our airspace.
- ⇒ C2 - Senior management will ensure that all personnel are **aware of and committed to the safety** of operations as ENAIRe's top priority, that they are cognizant of their individual responsibility and understand the consequences of their actions on safety.
- ⇒ C3 - **Comply with the legal** and regulatory requirements applicable to safety and with any other requirements that the organisation endorses.
- ⇒ C4 - **Improve performance standards** to support the achievement of the highest levels of safety through proactive and systematic innovative management, adapting best practices in the sector in an increasingly demanding scenario of new and emergent risks.
- ⇒ C5 - Work jointly with customers, experts, industry associations and trade union organisations to define the priorities for **enhancing safety** and guaranteeing the **continuous improvement** of performance and the Management System.
- ⇒ C6 - **Promote a positive Safety Culture** that encourages reporting any event that may or did affect air safety in order to learn about and improve safety, while guaranteeing the confidentiality and protection of the persons making the reports, in accordance with the Just Culture in place at ENAIRe.
- ⇒ C7 - **Only take disciplinary action** in those situations where the findings of the safety investigation show that **deliberate and intentional misconduct or gross negligence** was involved, and that the actions, omissions or decisions of the worker in question were not consistent with their training, responsibility and experience, or are proven to be the result of working under the influence of not allowed psychoactive substances.
- ⇒ C8 - **Develop the procedures needed to prevent and detect** the problematic use of psychoactive substances and their harmful effects on aviation safety and the health of its staff, as well as to ensure that all staff understand the individual liabilities resulting from their use.
- ⇒ C9 - Proactively and systematically monitor and manage the risks to operations arising from **fatigue and stress**.
- ⇒ C10 - Maintain up-to-date technical knowledge related to **human factors** and apply it to manage the risks to operations associated with human actions, and promote systemic analysis methodologies.
- ⇒ C11 - **Ensure that the facilities** from which ENAIRe provides its services are kept secure, and **reinforce the protection of goods, data, services and people** by augmenting ties with law enforcement.

- ⇒ C12 - Evolve **protection mechanisms** against new cybersecurity attacks and threats to ensure the continued availability of ENAIRe's services and guarantee access, **integrity, availability, authenticity, confidentiality, traceability** and storage of the data, information and services provided in electronic media.
- ⇒ C13 - Support actions for a **healthy company** by implementing support programmes that guarantee the emotional well-being of workers.
- ⇒ C14 - Continue to coordinate and collaborate in **occupational health** and **safety** measures, both with sector organisations and government agencies, and with affected personnel and their representatives.
- ⇒ C15 - **Protect our staff** against harm and deterioration of their health by providing safe and healthy working environments and conditions, eliminating hazards and assessing, reducing, preventing and controlling occupational risks, improving occupational health and safety management, establishing improvement goals, all in consultation and cooperation with the staff and their representatives.
- ⇒ C16 - Address relevant safety issues with **workers' representatives and professional associations**, so that improvements can be proposed for safety, cybersecurity, protection and occupational risk prevention, **and implement strategic areas of work to reinforce them**.

4. MONITORING MECHANISMS

Management has established the strategic lines to ensure these commitments materialise into actions and results, and it undertakes to provide the resources needed to carry them out. ENAIRe's Management has also set up the COSEGO (Safety Committee) and the SECCIBE (Security and Cybersecurity Committee) as the governing bodies entrusted with the task of establishing and approving the guidelines and directives to be followed in the different areas of security assigned to them.

The **Management Committee** will oversee the promotion and implementation of this Policy, and inform the **Board of Directors** of its progress through the CEO, where relevant, in accordance with the processes established for its review as part of the Integrated Management System.

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 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.