



# Sustainability Policy

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## 1. INTRODUCTION

ENAIRe, a state-owned company of the [Ministry of Transport, Mobility and the Urban Agenda](#), is responsible for the planning, management, coordination, operation, maintenance and administration of air traffic, telecommunications and aeronautical information services, as well as for the communications infrastructure, facilities and networks of the air navigation system, and its task is to ensure that the service is provided safely, efficiently, continuously and sustainably.

ENAIRe, 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, and aware of the current and future challenges facing the air transport sector, includes [sustainability](#) in its purpose and strategic values, as a [key element to its business model and the performance of its activity](#). By viewing the provision of air navigation services as an engine of economic development and social cohesion in balance with the impact it has on its environment, it creates shared value to comply with the expectations of its stakeholders, while contributing value to society and committing to global sustainable development that guarantees a better world for future generations.

ENAIRe views its [contribution to sustainable development](#), in its [social, environmental and economic aspects, through the ethical, transparent and responsible management of its business](#) beyond its legal requirements. It is committed to the principles contained in the United Nations Global Compact and, as a state-owned agency and social actor involved in achieving the 17 Sustainable Development Goals (SDG) of the 2030 Agenda, it has adopted this policy on sustainability.

## 2. PURPOSE AND SCOPE

The purpose of this Policy is to establish ENAIRe's basic principles and commitments in terms of [sustainability](#) and to provide a reference framework for its decisions and actions, taking into account their impact on its environment, the creation of long-term value, the expectations of stakeholders and their contribution to sustainable development through ethical, transparent and responsible behaviour.

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.

Due to the all-encompassing nature of sustainability, this Policy provides the reference framework on which to establish the principles that guide the sustainable action of the company, especially in environmental, social and matters related to good governance of the organisation. It has thus been developed and complemented with the rest of ENAIRe's policies that address specific environmental issues, stakeholder management, respect for human rights, diversity, fiscal responsibility, the prevention of corruption, other illegal conduct, and other issues.

### 3. OPERATING PRINCIPLES AND COMMITMENTS

#### 3.1. General framework

This general framework for ENAIRe to take action in the area of sustainability is defined in order to ensure ethical and socially responsible behaviour in the organisation that:

- ⇒ Considers the **principles** set out in the **Global Compact** and the **Sustainable Development Goals (SDGs)** of the United Nations, the regulations applicable to the organisation's scope of action and the expectations of stakeholders in its strategy.
- ⇒ **Evaluates the balance between environmental, social and economic challenges** in the short, medium and long term, considering these three pillars in the company's decision-making and performance.
- ⇒ **Promotes the integration of sustainability requirements** into all its processes, at all levels of the organisation and throughout its value chain.
- ⇒ **Manages the company's impact on society and identifies the risks and opportunities of sustainable development** in order to create shared value with stakeholders.
- ⇒ **Render account of the corporate sustainability information** by providing relevant, comprehensive and transparent information that covers material aspects for stakeholders and society in general.

#### 3.2. Guiding principles

ENAIRe's guiding principles in the area of sustainability, which apply to the entire organisation as a basis for building a global commitment to sustainability and sustainable development, are as follows:

- ⇒ **Ensure the organisation's economic viability and sustainability**, as an efficient and competitive state-owned entity that ensures the creation of value, both for the company and the stakeholders with which it engages.
- ⇒ **Promote the search for sustainable businesses** by encouraging the creation of social value, establishing business development, innovation and technology alliances and partnerships with other stakeholders that lead to the improvement of the service, to progress and to the sustainable development of the sector and society.
- ⇒ **Respect and protect the economic, social and natural environment** in the performance of the organisation's activities, advocating for a socially responsible commitment, beyond its legal and contractual responsibilities, that promotes and projects the air navigation sector to bolster sustainable development and accomplish the goals of the United Nations 2030 Agenda.
- ⇒ **Integrate sustainability** into all business areas and at all levels of the organisation, ensuring the availability of the necessary resources, taking into account the stakeholder perspective, managing the risks and opportunities of social and environmental activity.
- ⇒ **Determine and periodically analyse the needs and expectations** of its various stakeholders, such as officials, regulators, employees, customers, suppliers, local communities and society in general.
- ⇒ **Ensure accountability** to stakeholders through information on corporate sustainability by transparently issuing reliable, rigorous, relevant and comprehensive information through economic, environmental and social performance indicators that cover relevant material or aspects for stakeholders, as well as information on the entity's compliance with its commitments in terms of sustainability

- ⇒ Support the company's commitment to projects or initiatives whose purpose is to promote responsible practices in business organisations and sustainable development, and adopt and disseminate the principles that emerge from these initiatives.
- ⇒ Convey a culture of sustainability to the staff and to the stakeholders that comprise the value chain by acknowledging best practices in the area of sustainability internally and externally, 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.

### 3.3. Specific commitments

To ensure the correct application of this Policy, ENAIRe endorses the specific commitments described below in terms of environmental, social and economic sustainability, as well as of transparency and good governance:

#### 3.3.1. Involving environmental sustainability

- ⇒ Maintain a firm and preventive commitment to environmental management, the preservation and improvement of the natural environment, minimising unwanted effects or negative impacts from air transport and ENAIRe's activity, with particular attention on the fight against climate change and energy efficiency, as stated in ENAIRe's Environmental Sustainability Policy.
- ⇒ Undertake the fight against climate change as a strategic priority so as to reduce greenhouse gas emissions and help mitigate its effects in order to achieve carbon neutrality by 2030.
- ⇒ Integrate the climate change variable into internal decision-making processes, as well as into the analysis and management of the organisation's risks and opportunities in the short, medium and long term.
- ⇒ Minimise the environmental impact of the activity by reducing the environmental and noise impact that aircraft have during take-off, en route and on approach, while preserving biodiversity in operational areas.
- ⇒ Increase the energy efficiency of ENAIRe's facilities by investing in the use of renewable energies.
- ⇒ Promote the transition to a circular economy and reduce the use of resources in all its processes and in its value chain, by properly managing waste
- ⇒ Collaborate with institutions and agents involved in the environmental impact of air transport
- ⇒ Increase the environmental awareness and training of the staff, and inform local communities of ENAIRe's activity

#### 3.3.2. Involving social sustainability

- ⇒ Maintain a firm and proactive commitment to improving the social aspects associated with both the staff and social causes associated with disadvantaged or vulnerable groups, with the aim of contributing to a more egalitarian, fair and equitable society
- ⇒ Respect and promote human rights, freedom of association, the right to unionise and collective bargaining, the absence of child labour, the elimination of forced or compulsory

labour, declaring the organisation's absolute opposition to practices that may result in a violation of individual or collective dignity.

- ⇒ Provide a safe and healthy working environment characterised by equal opportunity and non-discrimination (in particular for reasons of race, nationality, social background, marital status, sexual orientation or identity, age, religion, political ideology, disability or any other personal, physical or social condition of people), promote diversity, manage, attract and retain talent and establish a work-life balance.
- ⇒ Champion and encourage sustainable development by promoting responsible public procurement and introducing social clauses in procurement, as well as responsible practices in the value chain
- ⇒ Contribute value in the geographic areas where the company operates by fostering involvement in communities, encouraging integration into the territory and contributing to social welfare and improving people's quality of life, in order to bolster actions aimed at education, training, promotion of culture, inclusion and employability, with a special commitment to children, people with disabilities and people at risk of social exclusion.

### 3.3.3. Involving economic sustainability, transparency and good governance

- ⇒ Maintain and promote a management model based on good governance that upholds sustainable, ethical and comprehensive growth based on its corporate values, with the necessary systems and guarantees, in a way that is responsible and transparent to its stakeholders.
- ⇒ Ensure the company's economic sustainability in the medium and long term by guaranteeing the generation of sustainable economic value for both the organisation and its stakeholders, adopting responsible investment practices and corporate governance management based on ethics, transparency and integrity, and handling risks through effective and responsible business management.
- ⇒ Ensure ethical behaviour recognised by all stakeholders and society in general, condemning any illegal or fraudulent practice, corruption, bribery or extortion in its activity and in its value chain.
- ⇒ Promote transparency, reliability and rigour in the information on its activities and relationships with stakeholders, and accountability at the highest levels of quality and excellence.
- ⇒ Maintain a regulatory compliance system that properly adheres to the legal and regulatory requirements applicable to the entity, or to which it submits voluntarily.

## 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

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.

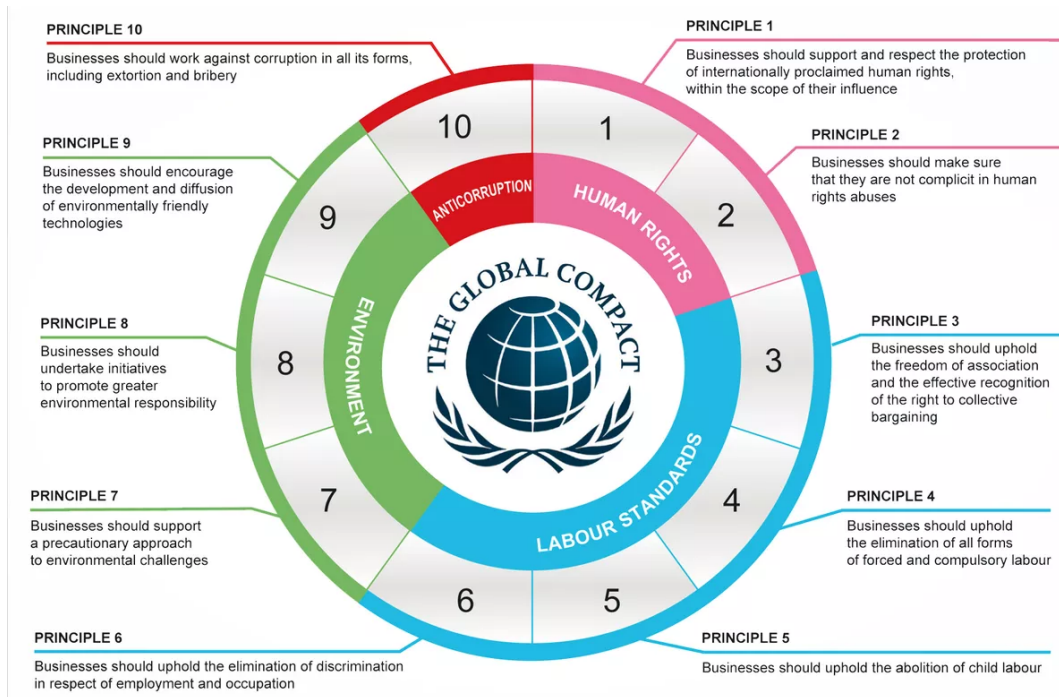
Similarly, the Policy will be appropriately communicated and **disseminated** internally using existing tools, to aid everyone acting on behalf of ENAIRE to understand and apply it.

## **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.

**ANNEX. Principles of the Global Compact and Sustainable Development Goals of the 2030 Agenda**



**SUSTAINABLE DEVELOPMENT GOALS**  
17 GOALS TO TRANSFORM OUR WORLD

