

JULY 2024

# SUSTAINABILITY REPORT

FIRST SEMESTER 2024

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## The report at a glance

This report outlines the key milestones and advancements in sustainability achieved by ACCIONA Energía during the first half of 2024 and details the performance of the main ESG indicators, comparing them to the same period of the previous year. The report highlights innovative initiatives arising from environmental and social projects, linked to the 2025 Sustainability Master Plan.

# KEY MILESTONES

- **100% of CAPEX** is aligned with the **European Taxonomy of Sustainable Activities**.
- The production of more than **13 TWh of renewable energy** has avoided the emission of more than **7 million tons of CO2e** into the atmosphere.
- **Scope 1 and 2 emissions** have increased by **46%**, mostly due to the commissioning of new assets, with a higher consumption of electrical energy that has increased scope 2 emissions, which will be offset by the end of the year with the purchase of renewable attributes for the electricity consumed. **Scope 1 emissions** have increased slightly in the period, mainly due to startups in biomass plants.
- The **ratio of generated emissions to avoided emissions in tCO2e** is **1:388**.
- **98% of the waste** generated has been valorized through various circular economy programs for blades, biomass ashes and slags, and other recoverable waste.
- **94,385 trees** have been voluntarily planted in S1 2024, accumulating **411,204 trees** in the period 2021 – S1 2024 (achieving **70% of the planting target** defined in the PDS).
- The **frequency index** of employees and subcontractors has increased because, despite having fewer accidents in the period, there has been a significant reduction in the number of hours worked.
- **121 projects** are being developed to create positive impact in communities in **18 countries** with more than **87,000 direct beneficiaries**.
- **367 volunteers** from ACCIONA Energía have participated in various initiatives, dedicating **2,042 hours** to community work.
- The **Criminal Compliance and Anti-Bribery Management System** has renewed its **ISO 37001 and ISO 19601 certifications** in Spain, and has been certified for the first time in Mexico under **ISO 37001**.
- **100% of critical suppliers** (85 tier 1 and 16 tier 2) have been audited on-site during the period.
- The percentage of **sustainable financing** increased by **6 points**, with **5,129 million euros** of green or sustainability-linked corporate debt.
- **26 corporate instructions** have been approved, which will increase the assurance of non-financial information to the **"Reasonable" level**, equating it with the requirement for financial information.
- As of the end of the first half of 2024, **92% of ACCIONA Energía's gross corporate debt** is categorized as **Green (84%)** and **Sustainability-linked (8%)**.
- ACCIONA held the first **Sustainability Week** at its campus in Madrid, an event that brought together a hundred professionals to exchange experiences and knowledge in strategic sustainability.

# EVOLUTION OF THE MAIN KPIs

Environmental	1H 2024	1H 2023	Var.	Indicator development in the SMP pillar
CAPEX aligned with the European taxonomy of sustainable activities (%)	100%	100%	0pp	
Renewable energy production (GWh)	13,441	12,482	7.68%	Planet Positive -> <a href="#">Climate</a>
Avoided emissions (MM tCO <sub>2</sub> e)	7.2	6.9	4%	
GHG emissions scope 1+2 (tCO <sub>2</sub> e)	18,045	12,381	46%	
Weighted average carbon intensity (tCO <sub>2</sub> e/GWh)	1.34	0.99	35%	
Waste sent to landfill (KtM tonnes)	0.483	0.682	-29%	Planet Positive -> <a href="#">Circular Economy</a>
Waste recovery (%)	98%	96%	+1.4pp	
Water consumption (hm <sup>3</sup> )	0.49	0.66	-25%	Planet Positive -> <a href="#">Water</a>
Net positive emissions through nature-based solutions (number of trees planted)	94,385	54,264	74%	Planet Positive -> <a href="#">Biodiversity</a>
Social	1H 2024	1H 2023	Var.	
ACCIONA Energía workforce (FTE)	3,205	2,974	8%	People Centric -> <a href="#">Recognition of Merit</a>
Women in managerial and executive positions (%)	27.1%	27.3%	-0.2pp	People Centric -> <a href="#">Diversity</a>
People with disabilities in Spain (%)	1.8%	1.4%	+0.4pp	
Frequency index – employees and subcontractors	0.50	0.36	39%	People Centric -> <a href="#">Environments</a>
Fatalities (number)	0	0	0	
Projects with Social Impact Management (number)	121	117	3%	Integrating to transform -> <a href="#">Sustainable Difference</a>
Employee volunteer hours (number)	2,042	1,166	75%	Integrating to transform -> <a href="#">Local Ecosystems</a>
Governance	1H 2024	1H 2023	Var.	
Total suppliers (number)	2,634	2,579	2%	Exponential Leadership -> <a href="#">Supply Chain</a>
Audited suppliers (%) <sup>1</sup>	100%	100%	--	
No Go suppliers (number)	35	31	13%	
Communications through the ethical channel (number)	17	9	89%	
Third-party due diligence process (number)	73	37	97%	Exponential Leadership -> <a href="#">Governance</a>
Sustainable financing (%) <sup>2</sup>	92%	86%	+6pp	
Open controversies (number)	0	0	--	Integrating to transform -> <a href="#">Impact Funding</a>

<sup>1</sup>Audited suppliers / strategic suppliers.

<sup>2</sup>Sustainable financing / total debt in the period.

# PEOPLE CENTRIC

OUR ADVANTAGE COMES FROM PEOPLE. THEREFORE, WE NEED TO DEVELOP CHANGE AGENTS CAPABLE OF PROVIDING DIFFERENTIAL VALUE. WE SEEK TO FOSTER A DIVERSE AND INCLUSIVE ENVIRONMENT WHERE EVERYONE CAN MAXIMIZE THEIR POTENTIAL. A TRANSFORMATIVE ENVIRONMENT THAT REFLECTS OUR VALUES, ENSURING AT ALL TIMES THE RESPECT OF THE FUNDAMENTAL RIGHTS OF THE PEOPLE INVOLVED IN OUR VALUE SYSTEMS.

## LEADERSHIP

*For ACCIONA Energía, IT MEANS developing agents of change capable of providing differential value. It involves training leaders who not only manage, but also inspire and motivate, promoting innovation and excellence in each project.*

### **PEOPLE CENTRIC -> Leadership -> Madrid, Spain -> Sustainability Week**

ACCIONA held the Sustainability Week at its Madrid campus, an event that brought together a hundred professionals to exchange experiences and knowledge on strategic sustainability. Over three days, various key topics were explored, providing teams with practical tools to implement sustainable strategies in their areas of work.

The Sustainability Week included six training sessions that addressed key issues such as decarbonization, social impact, regenerative design, new developments in sustainability reporting and the creation of sustainable value propositions.

This event is a demonstration of ACCIONA's commitment to innovation and excellence, and its focus on preparing its teams to meet future challenges. The week not only strengthened the company's leadership in sustainability, but also fostered an environment of continuous learning and collaboration.

### **PEOPLE AT THE CENTER -> Leadership -> Madrid, Spain -> El Economista Award for the most sustainable company in the IBEX-35**

ACCIONA Energía was awarded in the 10th Edition of the Inversión a Fondo Awards by the newspaper el Economista in the category "Best ESG Ranking Value."

The company achieved the highest position in the IBEX 35 in terms of environmental, social, and governance criteria, according to the ESG ranking prepared annually by el Economista and updated semiannually (in the review carried out in March 2024, the company still maintains the highest ESG score in this ranking).

This award is the result of over 30 years of commitment to developing solutions for the decarbonization of the economy, generating a positive impact on the planet and the communities in which we operate.

## MERIT RECOGNITION

*For ACCIONA Energía, IT MEANS is being able to attract, develop and retain the best talent through policies and procedures that enable employees to excel personally and professionally. ACCIONA encourages excellence and rewards outstanding performance and potential.*

### ACCIONA Energía team profile

ACCIONA Energía closed the first half of 2024 with a total of 3,205 employees, representing an 8% increase compared to the same period last year. Of the total workforce, 25.6% are women.

Overall, the company has employees from a total of 53 nationalities across 25 countries.

The increase in the workforce, evaluated over the interannual periods of 2023 and 2024, is due to organic growth from increased activity (new installations, technologies, and countries) and the integration of Solideo's workforce.

#### **PEOPLE CENTRIC -> Recognition -> Global -> Academy Program**

The ACCIONA Academy Program is a global initiative that has been implemented in 7 countries with 27 editions, including seven in Spain, and more than 700 participating students. The program aims to promote employability, attract young talent, and develop essential soft skills for the professional environment.

The hybrid edition of 2024 selected 42 students from 21 universities and 8 different locations in Spain, with 60% female participation and 5% of profiles with disabilities. During the program, students participated in online and in-person sessions, where they learned about the company and its businesses through the Learning by Doing method. Additionally, soft skills workshops and professional opportunity sessions were conducted.

One of the program's highlights was the Smart Cities challenge, where students worked in teams to develop regenerative sustainability solutions aligned with ACCIONA's businesses, presented at the end of the program.

The program concluded with an inspiring talk on diversity, delivered by an external speaker. This program serves as a gateway for many of these students to ACCIONA's scholarship program, facilitating their integration into the professional world.

## DIVERSITY

*For ACCIONA Energía, IT MEANS fostering an environment where everyone feels capable of participating and reaching their potential, which allows organizations to effectively increase employee engagement and achieve a rise in productivity and cohesion.*

This semester, the workforce has increased by approximately 7% compared to the beginning of the previous year, reaching 3,205 employees. The percentage of women in managerial and executive positions remains at 27%. The percentage of the workforce with disabilities stands at 1.82% of direct employment compared to the total workforce in Spain.

# ENVIRONMENTS

*For ACCIONA Energía, IT MEANS creating safe and flexible work environments that facilitate the well-being of professionals and contribute positively to our immediate surroundings.*

## | HEALTH AND SAFETY

The frequency index (number of lost-time accidents per 200,000 hours) of accidents involving ACCIONA Energía's employees and subcontractors has increased by 39% due to a decrease in the number of hours worked. The number of lost-time accidents has been 18 (compared to 19 in the same period last year), but the number of hours worked has been one million less. Due to the formula for calculating the FI: number of lost-time accidents / number of hours worked, despite having fewer accidents, the FI has increased.

It is worth noting the drastic reduction in lost-time accidents at Solideo, which had 18 lost-time accidents in 2023; following the implementation of a specially designed emergency plan after the integration into ACCIONA Energía, lost-time accidents have been reduced to 2 in this first semester.

### **PEOPLE AT THE CENTER -> Environments -> Actions against the risk of exposure to high temperatures**

Most of the company's activities are carried out in open environments, where workers are exposed to environmental conditions. A specific plan has been developed for the personnel in the Construction and O&M areas to improve information and control of this risk: updating action guidelines, specific training, meeting points with suppliers, awareness campaigns, production of an informative video, specific monitoring from the Health Surveillance area, and in some cases, adjusting work schedules to avoid peak exposure hours.

### **Health and Wellbeing Programme**

ACCIONA's Health and Wellness Programme has implemented two major global campaigns: one focused on healthy nutrition and the other on emotional balance.

Healthy Nutrition: This campaign promotes healthy eating with local and sustainably grown food, encouraging the consumption of zero-kilometre products. Seven meeting points have been held since the start of the programme in 2023, reaching 3,244 employees globally. In 2024, 2 additional sessions were held, impacting 911 employees. The campaigns are available in Spanish, English and Portuguese, in face-to-face and online formats.

Emotional Balance: The Emotional Balance campaign addresses issues such as stress at work, providing tools for proper emotional management. Since 2023, 6 meeting points have been held, reaching 2,674 employees through online and face-to-face sessions around the world. In the first half of 2024, the last two sessions were held, impacting 847 employees. This campaign is also available in Spanish, English and Portuguese, both in person and online.

## AWARD FOR THE BEST HEALTHY HABITS IN THE WORK ENVIRONMENT

ACCIONA has been awarded the [ASEPEYO Prize](#) for best practice in healthy habits in the workplace in Spain. This recognition highlights the importance the company attaches to information and awareness-raising on healthy lifestyle habits, fundamental pillars for comprehensive health and a state of individual and social well-being. ACCIONA's commitment to promoting healthy habits at work reinforces its dedication to the well-being of its employees and the creation of a healthy and sustainable working environment.

### PEOPLE CENTRIC -> Environments -> Medical specialists' outpatient clinics

ACCIONA has implemented a medical specialties programme at the ACCIONA Campus in Spain, with the aim of reducing employee travel for medical consultations and reducing the waiting list. General medicine, dermatology, internal medicine, radiology, cardiology, urology, traumatology, pneumology, psychology, nutrition and physiotherapy services have been made available to employees. This programme has facilitated access to medical care, with 5,418 consultations in 2023 and 4428 in the first half of 2024.

### PEOPLE CENTRIC -> Environments -> Heart-healthy spaces

ACCIONA has created heart-healthy workplaces in Spain through the provision of automatic defibrillators (AED) in work centres and voluntary training of employees to respond to cardiac emergencies. Since 2023, 441 employees have been trained in the use of AEDs and 19 defibrillators have been installed in different work centres. This effort reinforces ACCIONA's commitment to the health and safety of its employees, providing the necessary tools and knowledge to save lives in the event of cardiac emergencies.

## ACCESS TO RIGHTS

*For ACCIONA Energía, IT MEANS that the rights of the people who form part of the company's value systems are fulfilled. It implies non-complicity in any form of abuse or violation of these rights, among workers, suppliers, contractors, collaborators, partners, competitors, customers, local communities and society, in all activities and geographical areas where the company is present.*

## | SOCIAL SAFEGUARDS

The Business Principles and Principles of Ethical Conduct of the Code of Conduct establish ACCIONA Energía's commitment to respect internationally recognised human rights and civil liberties. The Human Rights Policy establishes the principles of responsible business conduct and the due diligence strategy, through which the Company undertakes to identify, assess, prevent, mitigate, minimise, address, eliminate, monitor, remedy and report actual or potential adverse effects of its activities and business relationships on human rights.

ACCIONA Energía has a procedure and an integrated system for risk assessment and management of compliance with social safeguards. The Social Safeguards Internal Control System (SCISS) is based on the internal control models developed by the *COSO Committee of Sponsoring Organizations of the Treadway Commission*, and on the Company's combined assurance methodology based on the three lines of defence



model. The Social Safeguards Internal Control System aims to promote and consolidate a true culture of compliance and respect for both current legislation and international human rights standards and principles.

During the first half of 2024, the internal monitoring procedure of the SCISS was completed. The results of this monitoring have been reported to the Audit and Sustainability Committee of the Board of Directors through the Corporate Internal Audit Department.

# PLANET POSITIVE

WE INVEST IN REGENERATING THE PLANET. OUR BUSINESS MODEL PROVIDES SOLUTIONS TO THE CLIMATE CRISIS AND CONTRIBUTES TO SUSTAINABLE DEVELOPMENT. THROUGH OUR PROJECTS, AND FROM A CIRCULAR APPROACH, WE PRIORITISE THE REDUCTION OF WASTE AND ITS RECOVERY, UNIVERSAL ACCESS TO WATER, ITS SUSTAINABLE MANAGEMENT, THE PROMOTION OF A DECARBONISED ECONOMY AND THE GENERATION OF A POSITIVE IMPACT ON NATURAL CAPITAL.

## CLIMATE

*For ACCIONA Energía, IT MEANS making a positive contribution to the climate through business and a public commitment to reduce emissions under the 1.5°C scenario, the most demanding scenario validated by science. The company turns this commitment into a business driver.*

### Renewable generation and avoided emissions

ACCIONA Energía's renewable energy production increased by 8% this semester compared to the previous semester, mainly driven by the commissioning of new assets in the United States and Peru.

This increase in production, entirely from renewable sources, has prevented the emission of 7,225,201 tons of CO<sub>2</sub>e into the atmosphere.

### Main taxonomic figures

In 2024, the alignment of ACCIONA Energía's investment (CapEx) with the European Taxonomy of Sustainable Activities reaches 100%, maintaining the figures from previous years.

Between the period S1 2023 and S1 2024, a decrease in the eligible percentages of CapEx, OpEx, and Sales is observed. This is due to an increase in renewable energy marketing activity along with development activities seeking and evaluating potential sites for new projects in Chile and Australia.

All new eligible investments maintain 100% aligned CapEx.

The increase in the alignment percentages of OpEx and sales figures compared to the same period of the previous year, both around 97%, is a clear indication of ACCIONA Energía's commitment to developing sustainable solutions for the decarbonization of the global economy.

## ALIGNMENT WITH THE EUROPEAN TAXONOMY OF SUSTAINABLE ACTIVITIES

### MITIGATION AND ADAPTATION

		1H 2023			1H 2024		
		TOTAL	ELEGIBLE (OUT OF TOTAL NUMBER)	ALIGNED (ON ELIGIBLE FIGURE)	TOTAL	ELEGIBLE (OUT OF TOTAL NUMBER)	ALIGNED (ON ELIGIBLE FIGURE)
CAPEX	%	N/A	96.9%	100%	N/A	95.5%	100%
OPEX	%	N/A	95.8%	95.7%	N/A	89.7%	96.8%
SALES	%	N/A	57.3%	96.6%	N/A	51.0%	97.4%

## OWN GREENHOUSE GAS EMISSIONS

		2024		
Generated Emissions (t CO <sub>2e</sub> )		Scope.1	Scope.2	ΔtCO <sub>2e</sub>
				1S 2024 vs 1S 2023
Energía		6,187	11,858	+46%

An increase in emissions has been recorded compared to the same period of the previous year, attributable to three main factors:

- **Incorporation of new generation assets in the United States:** In the first half of 2024, Cunningham, Fort Bend, High Point, and Red Tailed Hawk have started operations. This has resulted in an additional 3,588 tons of CO<sub>2</sub> in scope 2, which will be offset by the end of the year through the purchase of renewable attributes.
- **Higher auxiliary consumption** due to high temperatures in India and lower production in some assets in Australia, Canada, and Italy.

Overall, 94% of these increased scope 2 emissions will be offset by the end of the year through the purchase of renewable attributes related to electricity consumption. The forecast is that ACCIONA Energía will meet its SBTi (Science Based Targets initiative) target defined for 2024.

## | DECARBONISATION FUND

ACCIONA has a decarbonization fund whose budget comes from the impact of the internal carbon price on its activities. The fund is allocated to financing projects for carbon footprint reduction and the purchase of credits for climate neutrality.

The financing of decarbonization initiatives through the fund is awarded through an internal competitive mechanism. In the first phase, a selection committee decides which proposals are prioritized based on their impact and profitability, and finally, a committee composed of senior management members determines the allocation of funds to the projects with the greatest potential.

During this first semester, the fourth edition of the Decarbonization Fund was also launched by opening a call for proposals, which will be financed by the Decarbonization Fund in 2025.

### **POSITIVE PLANET -> CLIMATE -> Decarbonization Fund -> Spain -> Biogenic CO2 capture for methanol production**

The main objective of the project is to conduct a feasibility study for installing a CO<sub>2</sub> capture system and integrating it with the production of renewable hydrogen to generate e-MeOH, responding to market interest in renewable methanol for maritime and aviation transportation. The specific objectives are: to analyze the technical and economic alternatives for CO<sub>2</sub> capture and the logistical infrastructure; to develop internal knowledge for future large-scale e-MeOH projects; and to evaluate the application of the study's conclusions in a real ACCIONAPLUG project.

## Sustainability Report aligned with the TCFD framework

In February 2024, ACCIONA Energía published its new [Sustainability Report](#), in accordance with the thematic standards of the new Corporate Sustainability Reporting Directive (CSRD).

This year's Climate Change chapter has been prepared in accordance with the E1 standard of the delegated regulation (ESRS) of the directive, ensuring full interoperability under the criteria of the Task Force on Climate-related Financial Disclosures framework for managing climate change risks and opportunities, also applying the principle of double materiality to assess impact.

During the risk evaluation and management process carried out in 2023, 8 potential risk events related to climate change were analyzed, occurring both in own operations and in the value chain (upstream and downstream). From this evaluation, 8 risk situations were considered relevant at the company level. No significant financial impacts were observed from physical or transitional climate risks. The operating model is considered robust and resilient to climate change. The analyzed risks have a moderately low potential impact, and a high impact is observed in terms of opportunities.

ACCIONA Energía has established an ambitious roadmap to achieve the goal of being Net Zero, meeting the reduction of generated emissions, both own and in the supply chain, in the period 2017-2030. This plan is aligned with the Science Based Targets initiative (SBTi) to keep the global temperature increase below 1.5°C and achieve Net Zero Carbon status by 2040 (scopes 1 and 2) and by 2050 (scope 3).

The aforementioned Climate Change chapter specifically details information on governance, the results of the risk and opportunity analysis, and the strategy adopted by the company to achieve its climate goals.

## W A T E R

*For ACCIONA Energía, IT MEANS working to ensure sustainable water management.*

During this semester, water consumption has decreased by 25% compared to the first half of the previous year, due to lower water consumption in biomass plants, resulting from reduced production.

## B I O D I V E R S I T Y

*For ACCIONA Energía, IT MEANS increasing natural capital through investment in the protection, conservation, and regeneration of natural ecosystems. Renewable energy and green infrastructure are part of the equation.*

In terms of biodiversity, ACCIONA Energía (through its parent company ACCIONA, a member company of the TNFD (Taskforce on Nature-related Financial Disclosures)), has worked during the first half of the year in several working groups dedicated to developing drafts of sectoral guidelines. Additionally, as an Adopter, ACCIONA has committed to publishing the first comprehensive analysis according to the LEAP methodology (Locate, Evaluate, Assess, Prepare) throughout 2024.

**PLANET POSITIVE -> Biodiversity -> España -> Programs for the reinforcement of bird populations around wind farms**

ACCIONA Energía is developing various initiatives for the protection and reinforcement of bird populations affected by the presence of wind farms:

- **Program to reinforce the population of lesser kestrel in the Campillos area (Málaga)**, promoting the establishment of a colony. Actions have been taken to adapt the existing area to accommodate chicks of the species (25 individuals) that will be raised and fed before their release to begin migration in August. It is expected that they will return to the breeding site the following year, gradually forming a stable colony in the area. The program will last for 5 years.
- **Program for the monitoring and tagging of red kite specimens.** Migrant specimens tagged in 2023 have been monitored to understand their movements and risk in the vicinity of the Celadas wind farm. A census has also been conducted to determine the resident population in the Cerrato region, around another of the company's wind farms.

## C I R C U L A R I T Y

*For ACCIONA Energía, IT MEANS prioritizing the reduction of generated waste to zero, using renewable and recycled materials, and giving new life to resources.*

The percentage of waste sent to landfill has decreased by 29%, mainly due to the completion of maintenance shutdowns in biomass plants and the return to normal operation. Similarly, the total waste recovery percentage this semester has increased by 1.4 percentage points, an 8% increase compared to the first half of 2023.

**PLANET POSITIVE -> Circular Economy -> Navarra y Galicia, España -> Reduction of hazardous waste in the O&M of wind farms**

Cleaning materials (rags/paper) have been replaced with reusable cloths. All waste generated in the process is repurposed, achieving a "Zero Waste" process.

During the first half of 2024, an initial pilot test was completed in wind farms in Galicia and Navarra (304 MW in operation), preventing the generation of 9.7 tons of hazardous waste annually.

Following this result, the scaling of the initiative to different wind farms in Spain is being analyzed.

# EXPONENTIAL LEADERSHIP

WE ARE NOT NEUTRAL; WE PURSUE A PURPOSE. EVERYONE AT ACCIONA ENERGÍA SHARES THE COMMITMENT TO GO BEYOND "BUSINESS AS USUAL" WITH THE GOAL OF DEVELOPING INNOVATIVE REGENERATIVE DIFFERENTIAL VALUE IN EVERYTHING WE DO. TO ACHIEVE THIS, WE FOSTER A CULTURE OF CONSTANT IMPROVEMENT AND EXCELLENCE, PRIORITIZING TRANSPARENCY AND ALIGNMENT OF THE GOVERNING BODIES AND THE ENTIRE COMPANY WITH OUR PURPOSE AND REASON FOR BEING.

## GOVERNANCE

*For ACCIONA ENERGÍA, IT MEANS that the company's governance and management systems evolve to incorporate mechanisms that authentically drive the purpose, assuming new responsibilities, evolving incentive systems, and leading by example.*

ACCIONA Energía has a Board Composition Policy that sets out the objective of achieving greater gender parity in its governing body. In this regard, as of the end of the first half of 2024, the percentage of female directors relative to the total number of Board members was 45%.

## SUSTAINABLE SUPPLY CHAIN

During the first half of the year, ACCIONA Energía experienced a 2% increase in the number of suppliers with active purchases, reaching a total of 2,634.

On-site audits were conducted for 101 suppliers, of which 85 are tier 1 and 16 are tier 2.

35 suppliers were classified as No Go suppliers (therefore with no associated purchase orders).

At the ACCIONA group level, and thus applicable to ACCIONA Energía, the following advancements have been achieved with a considerable impact on the sustainability of the supply chain:

- Completion of the tender and pre-agreement with Repsol for the supply of HVO in Spain, a synthetic fuel that allows a 90% reduction in emissions compared to fossil fuel.
- Signing of a new edition of the Corporate Procedure for Supplier Approval and Evaluation (PCCO01).
- Update of the ESG Risk Matrix in the Supply Chain, aligned with the Corporate Risk Matrix.

## ETHICS AND ANTI-CORRUPTION

ACCIONA Energía has successfully completed the renewal process for ISO 37001 and UNE 19601 certifications, thus validating its ongoing commitment to business ethics and criminal compliance. In March 2024, the company underwent a rigorous audit by AENOR, during which the management systems for bribery prevention (ISO 37001) and criminal compliance (UNE 19601) were evaluated, ensuring that ACCIONA Energía meets the most demanding international and national standards in these areas.

It is noteworthy that no non-conformities or observations were identified during this audit, reflecting the strong compliance with both standards.

The renewal process not only ensures that ACCIONA Energía maintains high standards in bribery prevention and criminal compliance management but also reaffirms the commitment to continuous improvement, operational excellence, and legal compliance in all its operations.

ACCIONA Energía Mexico has achieved a significant milestone by obtaining the ISO 37001 certification for the first time, thus validating its ongoing commitment to business ethics and criminal compliance. In May 2024, ACCIONA Energía's entities in Mexico underwent a rigorous audit by AENOR, during which the compliance of the bribery prevention management system with the requirements established in the ISO 37001 standard was evaluated, with no non-conformities detected.

This certification is particularly relevant in jurisdictions like Mexico, where it strengthens ACCIONA Energía Mexico's position as a leader in business ethics and sets an exemplary standard in the energy sector.

In relation to the third-party (non-supplier) due diligence process, ACCIONA Energía analyzed and approved 73 files in the first half of 2024, representing a 97% increase compared to the figures recorded in the first half of 2023. This increase is due to improved understanding of the due diligence processes required within the framework of commercial opportunity approvals and the company's commitment to its application.

## INNOVATION

*For ACCIONA Energía, IT MEANS evolving the innovation focus to connect the innovation strategy with its regenerative purpose. The company aims to be a reference in the development of new and improved operational business solutions, more digital and capable of increasing the sustainable productivity of its projects.*

According to the European Commission report "EU Industrial R&D Investment Scoreboard 2023," ACCIONA is the 7th Spanish company (134th in Europe) that invests the most in R&D and innovation.

### VEHICLE TO GRID (V2G) AWARD WINNER FOR ACHIEVING ODS 7

This semester, ACCIONA Energía's Vehicle to Grid (V2G) Islas Baleares project has been recognized as the winner of the IV Edition of the go!ODS Awards, organized by the UN Global Compact Spain in collaboration with the Rafael del Pino Foundation. The project was acknowledged for its contribution to achieving SDG 7: Affordable and Clean Energy, as it will launch Spain's first bidirectional electric vehicle charging network.

At ACCIONA Energía's Floating Photovoltaic Hub in Sierra Brava, a new membrane technology field is being constructed and put into operation this semester.

Additionally, the 7th edition of I'MNOVATION has been launched, an open innovation program aimed at attracting knowledge and capabilities to co-develop new solutions with the company's business areas. Seven



entities, selected from startups, scaleups, technology centers, and universities, have been chosen to address ACCIONA ENERGÍA's challenges.

Moreover, 100% of the innovation projects underway at ACCIONA Energía during the first semester of 2024 (a total of 9 projects) include some regenerative component.

## **T R A N S P A R E N C Y**

*For ACCIONA Energía, **it means** creating spaces to discuss the complex challenges and decisions faced by companies and society, as well as the credibility challenges of the company's promise in the market, offering a push for truth and trust.*

### | P E R M A N E N T D I A L O G

This semester, ACCIONA has been selected as a case study at the 5th European Peer Learning Meeting on Climate of the Global Compact for its advanced application of the Corporate Sustainability Reporting Directive (CSRD), a year ahead of its mandatory implementation.

Thanks to the Global Compact platform, ACCIONA has shared its experience and helped several companies in the complex transition and compliance with the new directive. ACCIONA's sustainability report, structured under the ESRS, has served as a reference, allowing the company to lead the way towards greater transparency and accountability in ESG reporting.

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# INTEGRATE TO TRANSFORM

WE WORK TO CREATE A SUSTAINABLE DIFFERENCE IN EVERY PROJECT. OUR REGENERATIVE WAY OF DOING BUSINESS REPRESENTS US AS A COMPANY. TO THIS END, WHEN DESIGNING A PROJECT, WE SEEK TO CREATE ADDITIONAL VALUE THAT CONTRIBUTES TO MEETING THE SUSTAINABLE DEVELOPMENT GOALS. TO THIS END, WE EXTEND OUR COMMITMENT TO SUSTAINABILITY TO OUR VALUE CHAIN AND CHANNEL IT THROUGH SUSTAINABLE FINANCE AND ITS ABILITY TO GENERATE A POSITIVE IMPACT.

## SUSTAINABLE DIFFERENCE IN EACH PROJECT

*For ACCIONA Energía, IT MEANS that the lines of business and especially the projects develop differentiating signs of identity of a regenerative/sustainable nature in execution and that they are recognizable by third parties.*

### REGENERATIVE BY DESIGN

ACCIONA Energía continues to incorporate tools to maximize the regenerative vectors of its projects. A notable example is the implementation of Carto, a data visualization tool in map format. This tool enhances the social and environmental analysis that ACCIONA Energía conducts during the development phases of its projects. Carto relies on public and private information maps, providing detailed data at a granular level and enriching the initial social and environmental studies conducted.

### SOCIAL IMPACT MANAGEMENT

ACCIONA Energía has had a Social Impact Management methodology for over ten years, which allows for the identification, analysis, and management of both intended and unintended social consequences—whether negative or positive—resulting from project development within a community. It also includes managing relationships with local communities and other stakeholders.

During the first six months of the year, this methodology has been implemented in 121 projects globally, marking a 3% increase compared to the first semester of 2023.

**INTEGRATE TO TRANSFORM -> Sustainable Difference -> Palencia, Spain -> Eolo Prize 2024 for Rural Integration of Wind Energy**

The municipality of Hornillos de Cerrato in Palencia has been awarded the EOLO Prize by the Spanish Wind Energy Association (AEE) for being a "model municipality" where the development and integration of wind energy "is being carried out with the utmost harmony and compatibility with other economic, cultural, and environmental activities in the area."

The municipality hosts 40 wind turbines across seven wind farms operated by ACCIONA Energía. These renewable installations have consistently received community support and have had a significant economic and social impact on both the municipality and the surrounding region. Evidence of this impact is seen in the population of Hornillos de Cerrato increasing from 110 residents in 2015 to 175 in 2023, demonstrating how renewable energy can help revitalize Spain's depopulated areas.

The 'Celada Fusión' wind farm, the most recent and modern of the seven in Hornillos de Cerrato, was completed in 2022 and generates enough renewable electricity annually to supply 40,000 homes. Its construction involved an investment of over 45 million euros and created approximately 280 direct, indirect, and induced jobs, with five positions retained for the operation and maintenance of the park.

Traditionally, Hornillos de Cerrato's economy relied on agriculture, but the revenue generated from wind energy has led to the development of new services and employment opportunities. Notable additions include a taxi service for transporting elderly residents to medical appointments, a restaurant catering to wind farm employees, and municipal subsidies for fiber optic internet and electricity. Additionally, new facilities such as a swimming pool, a paddle court, and a mini-golf have been constructed.

The Hornillos de Cerrato town council also allocates part of the wind energy revenue to promote local tourism, including the restoration of old gypsum mines for visits and the 'Descubre El Cerrato Palentino' project. Launched on May 31, this project aims to boost tourism in Herrera de Valdecañas, Hornillos de Cerrato, and Valdecañas de Cerrato (Palencia) through a themed hiking route that traverses the area around the Celada Fusión wind farm and connects the three municipalities.

For ACCIONA Energía, it is essential that the development of its renewable projects is carried out in an orderly and sustainable manner, ensuring that the benefits reach the local communities where they are implemented. The company advocates for a fair and sustainable energy transition based on dialogue, consensus, and contributions to local development.

**INTEGRATE TO TRANSFORM -> Sustainable Difference -> Cuenca, Spain -> "Desarrolla Villalba del Rey" Program**

This initiative, which is part of ACCIONA Energía's Social Impact Management, emerged from a process of dialogue and community participation to identify measures that foster socioeconomic development in the areas surrounding several of the company's renewable energy installations.

When ACCIONA Energía enters a new region, its priority is to listen to the community—farmers, ranchers, the local council, and associations—to understand their challenges and determine how the company can help address them. In the case of Villalba del Rey (Cuenca, Spain), the local residents focused on enhancing the performance of the olive cooperative, a key economic driver for the municipality. The cooperative comprises 74 members managing approximately 450 hectares of olive groves with around 67,000 olive trees.

As part of the program, ACCIONA Energía, in collaboration with AgroVidar, conducted a comprehensive analysis to identify areas for improving productivity and boosting the cooperative's profitability. Based on the resulting diagnosis, a series of proposals were developed, which ACCIONA Energía is financing by reinvesting a portion of its annual revenue to enhance the well-being of the local community.

The implementation of renewable energy in this municipality has been recognized as a model of best practices by external organizations such as the Spanish Network for Sustainable Development (REDS-SDSN Spain) and Greenpeace. It reflects ACCIONA Energía's commitment to generating a positive impact in the communities where it operates.

The "Desarrolla Villalba del Rey" program has been awarded "Best Environmental Integration Initiative" at the III El Periódico de la Energía Awards.

## LOCAL ECOSYSTEMS

*For ACCIONA Energía, IT MEANS developing conversations with the agents of the company's value system by setting up work programmes, initiatives and collaborative projects that enable multiplying the capacity to develop or improve regenerative solutions with the aim of accelerating the achievement of the Sustainable Development Goals.*

The Volunteer Program promotes the participation of employees, as well as collaborators and their families, in initiatives either led by the company or independently organized by them. The goal is to foster local volunteerism and support the communities where ACCIONA Energía operates its projects, aiming to enhance the positive impact on society and its environment. The ultimate purpose is to gain a deeper understanding of local realities and strengthen the objective of being recognized as valuable contributors to society.

In 2022, the new Volunteer Program was launched, structured into the following types:

**ACCIONA.ORG FOUNDATION:** Volunteering initiatives driven by the Foundation in rural areas, focusing on projects related to energy access, water, and sanitation in regions where acciona.org operates: Mexico, Chile, Panama, Peru, the Philippines, Ethiopia, and Spain.

**RECOGNITION PROGRAM:** Led by Human Resources, this program integrates initiatives aimed at employees with exceptional performance.

**INSTITUTIONAL VOLUNTEERING:** Development of activities with third-sector organizations (foundations and NGOs) with which ACCIONA Energía maintains an institutional collaboration relationship.

**PROJECT VOLUNTEERING:** Conducted in areas where the company's projects are developed, aiming to address local social and environmental needs and maximize the positive impact of the projects on the community.

The Volunteer Office coordinates ACCIONA's Volunteer Program across the different areas of the company.

In the first semester, **367 volunteers** from ACCIONA Energía participated in various initiatives, dedicating **2,042 hours** to community work with a range of objectives. These included developing projects for energy access, water, and sanitation led by the Foundation acciona.org; supporting the career development of university students; facilitating the employment integration of women with disabilities, survivors of gender violence, those with family responsibilities, or unemployed individuals in vulnerable situations; and teaching children about the Sustainable Development Goals (SDGs).

### **INTEGRATE TO TRANSFORM – Local Ecosystems -> Global -> ACCIONA Volunteer Day 2024**

Around 600 ACCIONA volunteers participated this year in the Volunteer Day event, which consists of a training session conducted by ACCIONA employees for children aged 6 to 10 years old, aiming to raise awareness about the importance of sustainable development and, in particular, the Sustainable Development Goals. This year, ACCIONA volunteers have trained more than 9,800 students in over 100 schools across 13 countries: Brazil, Mexico, Peru, Chile, Panama, Ecuador, Dominican Republic, Italy, Poland, Portugal, United Kingdom, Australia, and Spain.

As part of this day, various initiatives were also developed in countries such as the United States (people from different teams at the ACCIONA Energía office in Chicago collaborated for a day with the Chicago Food Bank to help the underprivileged), Poland (ACCIONA Energía and Mostostal volunteers participated in the 8th Family Festival, an initiative implemented as part of the "Family, Educational, and Artistic 2" project).

### **Voluntariado en acciona.org**





The acciona.org Foundation offers ACCIONA employees the opportunity to collaborate, both in person and remotely, in its development cooperation projects. These projects consist of bringing, improving and making affordable access to basic energy, water and sanitation services for vulnerable populations in different countries around the world.

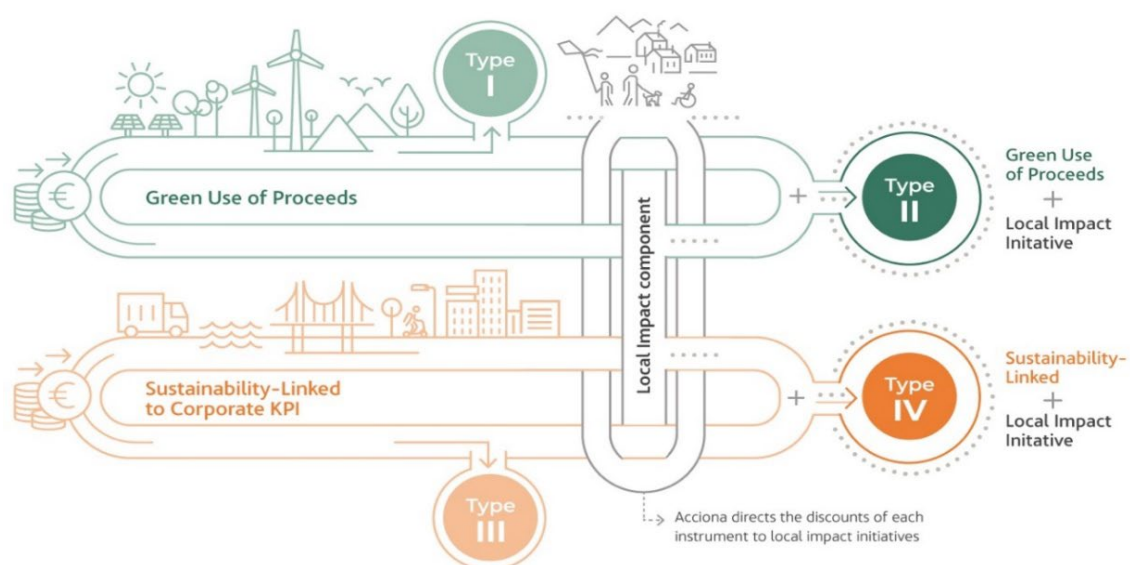
During this first half of the year, 16 volunteers from different ACCIONA businesses and countries participated on the ground in the communities where acciona.org is present, collaborating in the different phases of development, whether implementation or operation of the service, where the Luz en Casa initiative is being developed, such as Palawan (Philippines), Oaxaca (Mexico), Cajamarca-selva and Cuzco (Peru) and, for the first time, acciona.org had ACCIONA volunteers collaborating in its projects in Chile to help carry out different activities of the Luz en Casa rural electrification initiative in the Coquimbo region.

# S U S T A I N A B L E F I N A N C E

For ACCIONA Energía, it means promoting innovative financing solutions that contribute to increasing the sustainable impact of their renewable energy infrastructure development activities and decarbonization solutions in an environment of opportunities, where capital markets are focused on financing the existing compliance gaps in the Sustainable Development Goals.

The [sustainable financing strategy](#) of ACCIONA and ACCIONA Energía is designed to contribute to the commitment of leading the transition towards a low-carbon economy. The **Sustainable Impact Financing Framework** of ACCIONA and ACCIONA Energía covers both green financing and sustainability-linked financing instruments, and introduces a new Local Impact feature which, when combined with either type of instrument, results in a "Double Impact" structure. Thus, under this Framework, ACCIONA Energía can issue four types of sustainable financing instruments:

- 
**Type I (Green UoP).** In line with a traditional green structure, this type of financing supports economic activities aligned with the EU Taxonomy through the support of projects that contribute to environmental goals.
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**Type II (Green UoP+Local Impact).** This financing structure incorporates a Green UoP structure and thus, channels investments into EU Taxonomy-aligned activities, and additionally supports initiatives that generate positive environmental and/or social outcomes at local level.
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**Type III (SL).** In line with a traditional Sustainability-Linked structure, these instruments are tied to the achievement of meaningful sustainability targets set at corporate level.
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**Type IV (SL + Local Impact).** This type of instrument builds upon the Sustainability-Linked structure tied to one of ACCIONA’s strategic corporate objectives and additionally supports initiatives that generate positive environmental and/or social outcomes at local level.



Lastly, to increase transparency, the Group has included a series of clear standards in the Sustainable Financing Framework to provide greater comfort to investors and financial entities.

## | GREEN AND SUSTAINABLE FINANCING






The following table reflects the new instruments issued in the first half of 2024 as well as the total outstanding instruments.

Type of Financing		Instruments 2024 (#)	Total Instruments (#)	Amount 2024 (€M)	Total amount (€M)
Green Financing	Type I	0	7	0	2,472
	Type II	1	4	25	1,707
Sustainability- linked Financing	Type III	0	0	0	0
	Type IV	0	2	0	950
<b>Total</b>		<b>1</b>	<b>13</b>	<b>25</b>	<b>5,129</b>

The innovative structure of the Sustainable Financing Framework has generated significant interest in the market. As of the end of the first half of 2024, 92% of ACCIONA Energía's gross corporate debt is categorized as Green (84%) or Sustainability-linked (8%).





## | ESG EXTERNAL RATINGS

ACCIONA Energía is periodically evaluated on sustainability, consistently standing out as a leader in its sector. The ratings at the end of the first half from the main rating agencies are as follows:

Rating agency	Rating Scale	Score	Industry Average	Industry
 S&P Global	0 a 100	<b>87</b>	34	Utilities
 CDP	D- a A	<b>A -</b>	C	Utilities
 SUSTAINALYTICS	100 a 0	<b>9,3</b> Low Risk	25 Med Risk	Utilities
 MSCI	CCC a AAA	<b>AAA</b>	A	Utilities
 ISS ESG	D- a A+	<b>A - Prime</b>	B	Renewable electricity

## | S U S T A I N A B I L I T Y I N D E X P R E S E N C E

ACCIONA Energía is included in several sustainability stock market indexes that include leading companies in this field.

Supplier	Index Name
<b>Bloomberg</b>	<ul style="list-style-type: none"> <li>Bloomberg ESG Data Index</li> <li>Bloomberg ESG Score Total Coverage Index</li> <li>Bloomberg Europe 500 Energy Index</li> <li>Bloomberg World Energy Alternative Source Index</li> </ul>
 SOLACTIVE German Index Engineering	<ul style="list-style-type: none"> <li>Solactive Longspur Global Clean Energy Index NTR</li> <li>Solactive ISS ESG Developed Markets Europe Net Zero Pathway Index NTR</li> <li>Solactive Power Up Europe Select Index</li> <li>Solactive Wind Energy Index</li> </ul>
 Euronext	<ul style="list-style-type: none"> <li>Euronext Low Carbon 300 World PAB NR</li> <li>Euronext Low Carbon 100 Eurozone PAB NR</li> <li>Euronext Low Carbon 100 Europe PAB Index</li> </ul>
 NASDAQ OMX	<ul style="list-style-type: none"> <li>NASDAQ OMX Green Economy Index</li> <li>NASDAQ OMX Green Economy Europe USD</li> </ul>
<b>J.P.Morgan</b>	<ul style="list-style-type: none"> <li>J.P. Morgan QUEST Renewable Energy Index</li> </ul>
 WilderHill Clean Energy Index®	<ul style="list-style-type: none"> <li>WilderHill Hydrogen Economy Index (USD NTR)</li> <li>WilderHill Wind Energy Index (USD NTR)</li> <li>WilderHill New Energy Global Innovation Index USD Net TR</li> </ul>



## | OTHER SUSTAINABILITY AWARDS

Award	Organization	Position	Details
<b>Europe's Climate Leaders 2023</b>	Financial Times	Among the 300 most decarbonized companies	Ranking of companies with the greatest reduction in emissions intensity between 2015-2021, combined with a score of company transparency in Scope 3 reporting and corporate commitments
<b>New Energy Top 100 Green Utilities</b>	Energy Intelligence	1 <sup>st</sup> utility in the world	ACCIONA Energía has reaffirmed its position as the world's "greenest" electricity generation company for the ninth year in a row.
<b>2023 Sustainability Rating</b>	EcoVadis	Platinum medal (Top 1%)	ACCIONA Energía has been awarded the Platinum medal with a score of 82/100 in the EcoVadis Sustainability Rating, demonstrating a solid management system that addresses sustainability efficiently.
<b>CDP Suppliers Engagement</b>	CDP	A	ACCIONA Energía was included in the CDP A List for Supplier Engagement, being one of the leading organizations in managing their suppliers regarding climate issues. The rating is based on the general CDP questionnaire, considering whether the organization has Scope 3 targets, measures and publishes these emissions, and has initiatives to reduce its suppliers' emissions.

# ANNEX

## | LEVEL OF ASSURANCE OF INDICATORS

GRI STANDARD	CONTENT	PAGES	TYPE OF INSURANCE
<b>SOCIAL</b>			
GRI 2-7	Total workforce (FTE)	3,5	Limited
GRI 405-1	Women in the workforce (no.)	3,5	Assured annually
GRI 405-1	Women in managerial and executive positions (%)	3,6	Limited
GRI 405-1	Workforce with disabilities in Spain (%)	3,6	Limited
GRI 405-1	Nationalities in the workforce (no.)	5	Assured annually
GRI 403-9	Accident frequency rate for own employees and subcontractors	3,6	Assured annually
GRI 403-9	Fatalities	3	Assured annually
GRI 413-1	Projects with Social Impact Management - GIS (no.)	3,17	Limited
GRI 413-1	Volunteers (no.)	2,20	Assured annually
GRI 413-1	Volunteer hours	2-3,20	Assured annually
<b>ENVIRONMENTAL</b>			
GRI 302-1	Renewable energy production (GWh)	2-3	Reasonable
GRI 305-5	Avoided emissions (tCO <sub>2</sub> e)	2-3,9	Reasonable
GRI 305-1, 305-2	GHG emissions scope 1+2 (tCO <sub>2</sub> e)	2-3,10	Reasonable
GRI 305-4	Weighted average carbon intensity (tCO <sub>2</sub> /GWh)	3	N/A
GRI 303-5	Water consumption (hm <sup>3</sup> )	3	Reasonable
GRI 306-5	Waste destined for landfill (kts)	2-3,13	Reasonable
GRI 306-4	Waste recovery rate (%)	2-3,13	Reasonable
GRI 304-3	Voluntary plantings Total (no. trees)	2,3	Assured annually
<b>GOVERNANCE</b>			
GRI 405-1	Female Directors on the Board of Directors (%)	14	N/A
GRI 204-1	Total suppliers with active purchases (no.)	2-3,14	Assured annually
GRI 308-1, 414-1	Audited strategic suppliers (%)	3,14	Assured annually
GRI 308-2, 414-2	No Go Suppliers (nº)	3,14	Assured annually
GRI 2-16	Communications in the ethical channel (no.)	3	Assured annually
GRI 308-2, 414-2	Third party due diligence process (no.)	3,15	Assured annually
GRI 201-2	Green Finance	2-3,22	Limited
GRI 201-2	Corporate Finance with sustainable commitments	2-3,22	Limited
GRI 419-1	Open disputes (no.)	3	Assured annually
<b>TAXONOMICS</b>			
Reglamento (UE) 2020/852	CapEx aligned with the European taxonomy of sustainable activities (%)	3,9,10	Limited
Reglamento (UE) 2020/852	Opex aligned to European taxonomy of sustainable activities (%)	3,9,10	Limited
Reglamento (UE) 2020/852	Sales aligned with the European taxonomy of sustainable activities (%)	3,9,10	Limited

# CONTACT INFORMATION

## GLOBAL SUSTAINABILITY

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# Corporación Acciona Energías Renovables, S.A. and subsidiaries

Independent Limited Assurance and Reasonable  
Assurance Report on the First Half 2024  
Sustainability Report.

June 30, 2024



KPMG Asesores, S.L.  
Paseo de la Castellana,  
259C 28046 Madrid

## **Independent Limited Assurance and Reasonable Assurance Report on the Sustainability Report of Corporación ACCIONA Energías Renovables, S.A. and Subsidiaries**

*(Translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails)*

To the shareholders of Corporación ACCIONA Energías Renovables, S.A.:

Pursuant to our engagement letter dated July 5, 2024, we have reviewed, on a limited independent assurance basis, the attached First Half 2024 Sustainability Report (hereinafter, "the Report") of Acciona, S.A. (hereinafter, the Parent Company) and subsidiaries (hereinafter, the Group), as of June 30, 2024.

For the indicators and scopes detailed in the attached Appendix I "Indicators subject to reasonable assurance", prepared in accordance with the criteria indicated in said Appendix I, the scope of our verification has been reasonable assurance.

The content of the Group's First Half 2024 Sustainability Report includes additional information to that required by the GRI standards and by current commercial regulations on non-financial information, which has not been the subject of our verification work. In this sense, our work has been limited exclusively to the verification of the information identified in the table in the Annex "Assurance level of the indicators", included in the attached Report.

### **Responsibilities of Corporación ACCIONA Energías Renovables, S.A.**

The Parent Company's management is responsible for preparing the First Half 2024 Sustainability Report with reference to GRI standards.

This responsibility also includes the design, implementation and maintenance of internal control relevant to enable the First Half 2024 Sustainability Report to be free from material misstatement, whether due to fraud or error.

The Parent Company's management is also responsible for defining, implementing, adapting and maintaining the management systems from which it obtains the information necessary for the preparation of the First Half 2024 Sustainability Report.

### **Our Responsibilities**

Our responsibility is to examine the Sustainability Report First Half 2024 prepared by Corporación Acciona Energías Renovables, S.A. and report thereon in the form of an independent limited assurance conclusion of reasonable assurance regarding the indicators and scopes detailed in Appendix I "Indicators subject to reasonable assurance" attached hereto, based on the evidence obtained. We conducted our engagement in accordance

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with ISAE 3000 *Assurance Engagements other than Audits or Reviews of Historical Financial Information*, issued by the International Auditing and Assurance Standards.

This standard requires that we plan and perform our procedures to obtain limited assurance about whether the First Half 2024 Sustainability Report has been prepared, in all material respects, with reference to the GRI standards. In the case of the indicators and scopes detailed in Annex I “Indicators subject to reasonable verification” the assurance to be obtained will be reasonable.

Our firm applies International Quality Management Standard 1 (IQMS 1) which requires the design, implementation and operation of a quality management system that includes policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

We have complied with the independence and other ethical requirements of the International Code of Ethics for Professional Accountants (including international standards on independence) issued by the International Ethics Standards Board for Accountants, which is based on the fundamental principles of integrity, objectivity, professional competence and diligence, confidentiality and professional behavior.

## **Procedures applied**

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The procedures selected depend on our knowledge of the Group's First Half 2024 Sustainability Report and other circumstances of the engagement, and our consideration of areas where material misstatements are likely to occur.

In the case of the indicators and scopes detailed in Appendix I, tested to the extent of reasonable assurance, this assurance is less than absolute assurance. We obtained an understanding of internal control relevant to the preparation and presentation of these indicators in order to design procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the entity's internal control.

Our work consisted of making inquiries of management, as well as of the various responsible units and areas of the Group involved in the preparation of the First Half 2024 Sustainability Report, reviewing the processes for compiling and validating the information presented in the First Half 2024 Sustainability Report, and applying certain analytical procedures and sample review tests described below:

- Meetings with the Group's personnel to learn about the business model, policies and management approaches applied, the main risks related to these issues and to obtain the necessary information for the external review.
- Analysis of the scope and completeness of the contents included in the Report for the 6-month period ending June 30, 2024.
- Analysis of the processes for compiling and validating the data presented in the Report for the 6-month period ended June 30, 2024.
- Review of the information relating to the risks, policies and management approaches applied in relation to the material aspects presented in the Report.
- Verification, by means of tests, based on the selection of a sample, of the information related to the contents included in the Report and its adequate compilation from the data provided by the information sources.



- Obtaining a letter of representation from the Directors and Management.

The procedures applied in a limited assurance engagement are different in nature and timeframe from those used in a reasonable assurance engagement, and are less in scope. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than that which would have been obtained if a reasonable assurance engagement had been performed.

The work team has been formed by professionals with expertise in Non-Financial Information reviews and, specifically, in economic, social and environmental performance information.

### **Conclusion on indicators with limited assurance scope** \_\_\_\_\_

Our conclusion has been formed on the basis of, and is subject to, the matters described in this report.

We believe that the evidence we have obtained provides a sufficient and appropriate basis for our conclusion.

Based on the procedures applied and the evidence obtained, we are not aware of any facts that would lead us to believe that the Group's First Half 2024 Sustainability Report has not been prepared, in all material respects, in accordance with the Global Reporting Initiative's Sustainability Reporting Standards (GRI Standards), as detailed in the table in the Appendix "Assurance level of indicators".

### **Conclusion on indicators with reasonable assurance scope** \_\_\_\_\_

In our opinion, the Group's indicators detailed in Annex I "Indicators subject to reasonable assurance" and detailed in the table in the Annex "Assurance level of indicators" of the attached Report, have been prepared, in all material respects, in accordance with GRI standards.

### **Restriction of use and distribution of our report** \_\_\_\_\_

In accordance with the terms of our engagement, this report has been prepared for Corporación ACCIONA Energías Renovables, S.A. solely in connection with its Sustainability Report First Half 2024 and for no other purpose..

KPMG Asesores, S.L.

Patricia Reverter Guillot

Partner

26 July 2024

**Annex I INDICATORS SUBJECT TO REASONABLE VERIFICATION**

N°	Indicator name	Definition	Reference standard	Scope of verification
1	Renewable energy production	Total amount of renewable energy produced, broken down by type of origin (wind, solar, hydroelectric, etc.) and by country	GRI 302-1	Corporación ACCIONA Energías Renovables
2	Avoided emissions	Total amount of greenhouse gas (GHG) emissions avoided through the implementation of sustainable projects or initiatives.	GRI 305-5	Corporación ACCIONA Energías Renovables
3	Scope 1 + 2 Greenhouse Gas Emissions	Total direct (Scope 1) and indirect (Scope 2) greenhouse gas emissions by business unit.	GRI 305-1 GRI 305-2	Corporación ACCIONA Energías Renovables
4	Water consumption	Sum of water consumed (own consumption) from subway, surface, rain and recycled sources.	GRI 303-5	Corporación ACCIONA Energías Renovables
5	Waste for landfill	Total amount of waste sent to landfills.	GRI 306-5	Corporación ACCIONA Energías Renovables
6	Percentage of waste recovery	Proportion of waste generated that is recovered through recycling, energy recovery or other recovery methods, compared to total waste generated.	GRI 306-4	Corporación ACCIONA Energías Renovables